

**Amigos Bravos \* Backcountry Horsemen of New Mexico \* New Mexico Backcountry  
Hunters and Anglers \* New Mexico Sportsmen \* Rivers & Birds  
Trout Unlimited \* The Wilderness Society**

James Duran  
Forest Supervisor  
Carson National Forest  
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Via email: [jdduran@fs.fed.us](mailto:jdduran@fs.fed.us)

February 14, 2017

Re: Proposal to the Carson National Forest regarding the Valle Vidal for Consideration in the Land Management Plan Revision

Dear Supervisor Duran:

The undersigned organizations are pleased to submit to the Forest Service a management proposal for the Valle Vidal for consideration in one or more alternatives in the Environmental Impact Statement (EIS) for the Carson National Forest Land Management Plan revision. The amazing scenic, aquatic, and wildlife resources of the Valle Vidal combined with the legacy impacts and the current and ongoing focus on restoration efforts make the Valle Vidal a prime candidate for focused management directives.

Education and outreach for this management proposal is ongoing. We have shared this proposal with many key stakeholders and adjacent landowners including – Vermejo Park Ranch, Bobcat Ranch, Philmont Scout Ranch, Quivira Coalition, the Town of Red River, and the Valle Vidal Grazing Association and we have not received any objections. We have incorporated feedback for strengthening the proposal from some of these key stakeholders.

The Valle Vidal is wonderfully unique, beautiful landscape famous for its aquatic resources, scenic mountain-grassland vistas, extensive rolling grass-covered meadows, and abundant wildlife. The Valle Vidal cradles myriad aquatic resource values. Wetlands exist throughout the area. Indeed, two of the Wetland Jewels as proposed by Amigos Bravos during the scoping phase of forest plan revision process are located here. These wetland complexes found in the Valle Vidal serve as important headwaters for many streams. The streams in the Valle Vidal are crucial habitat for a rare pure strain of Rio Grande cutthroat trout. All surface waters in the Valle Vidal were designated as Outstanding National Resource Waters (ONRWs).<sup>1</sup> These are

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<sup>1</sup> ONRWs, which area designated by the NM Water Quality Control Commission, receive the highest level of protection under the New Mexico's Water Quality Standards, which establish designated uses for water bodies, set criteria to protect those uses, and establish provisions to preserve water quality. ONRWs are subject to the same water quality criteria as other waters with

specially designated waters within the state that have exceptional recreational or ecological significance that are given the highest level of protection against degradation. There are several eligible wild and scenic rivers in the area.

The Valle Vidal is beloved by many diverse stakeholders. The hunting, fishing, hiking and camping opportunities that the area provides are critical for supporting a regional recreational economy. The rich grassland resources of the Valle Vidal provide forage for the cattle of the members of the Valle Vidal Grazing Association. Every summer thousands of young people learn outdoor skills and land stewardship ethics in the Valle Vidal through programs run by the Boys Scouts of America. Many individuals and wildlife and conservation organizations have devoted tens of thousands of hours of labor towards restoration efforts in the Valle Vidal.

The Valle Vidal is important habitat for many species, including 60 species of mammals, 200 speices of birds, 33 species of reptiles and amphibians, and 15 kinds of fish,” including Rio Grande cutthroat trout.<sup>2</sup> The New Mexico Department of Game and Fish’s 2016 Fisheries Management Plan identifies several native fish that are of conservation concern that are a priority for restortion actions.<sup>3</sup> The Valle Vidal Unit is home to twenty species that are Federally listed, proposed for listing, and potential species of conservation concern.<sup>4</sup> Bison occasionally wander into the area from Vermejo Park Ranch to the east.

While the Valle Vidal is a beautiful, ecologically diverse place, it has also been abused by a history of intensive management from mining, logging, and road building. For example, even though all of the streams in the Valle Vidal Unit are ONRWs, many don’t meet existing water quality standards.<sup>5</sup> A history of logging and mining has left behind a network of closed roads that are no longer needed, many of which are impairing water quality. Wildlife and cattle grazing has adversely impacted watershed condition and wetland function. Fortunately, there is significant interest and investment in restoring the Valle Vidal’s important aquatic resources. Several non-profits, private corporations, and government agencies have been partnering with the Forest Service to restore streams and wetlands across the Valle Vidal to improve watershed condition.

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the same designated uses; however, ONRWs receive additional protection aimed at preserving water quality. Degradation of water quality is not allowed in ONRWs except under very limited circumstances. Where water quality meets or exceeds standards, that higher water quality must be protected. Nonpoint sources of pollution in these areas must be minimized and controlled through the use of best management practices (BMPs).

<sup>2</sup> Julyan, R. 1998. *New Mexico’s Wilderness Areas: the Complete Guide*. Westcliffe Publishers, Inc. p. 69.

<sup>3</sup> New Mexico Department of Game and Fish. Fisheries Management Plan. 2016. Available at: <http://www.wildlife.state.nm.us/download/commission/public-comment/NM-Fisheries-Management-Plan-2016-SCG-Approved.pdf>.

<sup>4</sup> Carson National Forest Final Assessment Report. (Sept. 2015). Table 40, p. 224.

<sup>5</sup> *Ibid* at 460.

The 1986 Carson National Forest Land and Resource Management Plan does not include management direction that is customized for the Valle Vidal. Rather, the 1986 Forest Plan asserts that a separate environmental analysis would be needed for Valle Vidal to establish a management framework. Subsequent efforts to amend the Carson Forest Plan and incorporate specific management direction for the Valle Vidal were attempted in 1986 and 1992, but the Southwestern Regional Forester directed the Carson National Forest to discontinue the effort in 1993.<sup>6</sup> The Valle Vidal has since been managed under a Multiple Use Area Guide, which governs its management until further direction can take place. The current forest plan revision process finally offers an opportunity to establish management direction for the Valle Vidal.

Our attached proposal establishes a special Geographic Area for the Valle Vidal that recognizes and maintains its unique character and resources. The proposal attempts to create a cohesive vision for the Valle Vidal that encompasses the restoration work that is underway, the area's wild, roadless lands, its unique biological and recreation values, and the fact that it is a working landscape. The proposal reflects the core values that were endorsed by the Coalition for the Valle Vidal that came together to pass the Valle Vidal Protection Act. The proposal also largely reflects many of the concepts included in the multiple use area guide that currently directs management in the area.

We request that the CNF recognize the unique biological and social values of the Valle Vidal by adopting our proposed plan direction in the forest plan.

Please consider this a scoping letter. Use it to help design your alternatives, and include it in your project record. Please do not hesitate to contact us if you have any questions.

Regards,



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<sup>6</sup> Carson National Forest proposed land management plan amendment for the Valle Vidal. Online at: [http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fsbdev7\\_011098.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fsbdev7_011098.pdf).

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