

These are my comments concerning the Lincoln National Forest's evaluation of certain portions of the Sacramento Ranger District for possible later designation by Congress as Wilderness under the Wilderness Act.

I own property along the lower part of Wills Canyon, within the boundaries of the Sacramento Ranger District ("SRD") of the Lincoln National Forest ("LNF"). My property is bounded by LNF land which is being evaluated for possible inclusion in the inventory of those lands which meet the criteria for possible later designation as Wilderness under the Wilderness Act.

I also serve as Vice Chair of the Board of Supervisors of the Otero Soil & Water Conservation District ("OSWCD"). The SRD lies entirely within the boundaries of the OSWCD.

I am submitting these comments on my own behalf as a private citizen and interested land-owner, and not on behalf of the OSWCD Board. Because of the Covid-19 restrictions on public meetings, the Board has not had the opportunity as of yet to consider the adoption of these or any other comments as its own. I do believe, however, that my comments here are entirely consistent with the views of my fellow Board members as expressed in public meetings held prior to the imposition of the Covid-19 restrictions.

As a general proposition, I do not support the designation of large portions of the SRD as Wilderness. I find it difficult to believe that any substantial portion of the SRD--and certainly, any portion thereof as large 5,000 contiguous acres--can even be fairly considered to meet the criteria. Evidence of "man, and his works" is simply too ubiquitous throughout the SRD to allow for such a designation.

The SRD includes many, widely-scattered inholdings of private land, as well an extensive network of roads, trails, utility lines and other infrastructure. All manner of structures, including full- and part-time residences, barns, sheds, fences, etc., dot the landscape. Both public and private lands receive heavy year-round use for a broad range of domestic, commercial and recreational activities both by local residents and by non-resident visitors. The SRD has been described (accurately, I believe) as among the most urbanized units of the entire National Forest System west of the Mississippi River. I also understand that there is not a single square foot of the SRD that does not meet the definition of "Wildland-Urban Interface."

I also object to the possible classification of SRD land as Wilderness on the very specific ground that such classification is wholly inappropriate given the threat which catastrophic wildfire poses not only to human life and property, but also to natural systems and features within the SRD. The recent example of the horrendous damage wrought by the Little Bear Fire in the LNF's Smokey Bear Ranger District offers an obvious warning.

The Little Bear Fire was started by a lightning strike in a remote and rugged portion of the White Mountain Wilderness. Under the special rules that apply to naturally-occurring fires in Wilderness areas, it was left to burn unchecked, until unexpectedly, it blew up and escaped into adjacent, highly-developed areas of Lincoln County, where burned hundreds of structures, caused hundreds of millions of dollars of property damage, and ravaged a watershed which won't fully recover in our lifetimes.

In 2001, portions of my own property burned in the Penasco Fire. That fire, too, originated on public land before escaping into adjacent private holdings. I lost many acres of timber, a barn, a storage shed and much fencing, and for a time, I thought I lost my house. I believe my house only survived because of the extensive thinning I had previously done to protect it from just such a threat.

Before it was finally brought under control, the Penasco Fire burned upwards 13,000 acres of public and private land, and destroyed 70-odd structures. Some 11,000 acres were burned down to mineral soil, which created the real possibility that even normal rains later in that year would have caused severe down-stream flooding. My recollection is that at least two lives--those of two occupants of a spotter plane--were lost in the effort to bring the fire under control, and I vividly remember several other close calls among firefighters.

One other consequence of the Penasco Fire is pertinent here: For years prior to the fire, a snag on the ridge a few hundred feet below my house had provided a nesting site for successive pairs of Mexican Spotted Owls, an endangered species. I frequently heard their distinct calls in the evening while sitting on my porch. The snag was consumed in the fire, however, and in the nearly 20 years since, I have never once heard another Spotted Owl's call on that ridge. As a consequence of that experience, I was not surprised when the US Fish & Wildlife Service revised its recovery plan for the Mexican Spotted Owl to recognize that the greatest threat to the recovery of the species is catastrophic wildfire.

The continuing threat posed by catastrophic wildfire in the SRD should come as no surprise to Forest Service personnel. The intentional suppression over a century or more of the frequent ground fires that once served to limit the accumulation of fuels on the forest floor has led to a situation where any spark can quickly explode into the canopy and become an uncontrollable inferno. Increased tree mortality from overcrowding, insect and mistletoe infestations, and a warming climate only exacerbate this risk.

To its credit, the current LNF leadership team has taken the initiative to finally start to address the wildfire risk in the SRD in a sustained and comprehensive way. I was privileged to have been invited in 2016 to participate as a representative of the OSWCD in the planning initiative that developed what is now called the South Sacramento Restoration Project ("SSRP"), the purpose of which is to begin restoring some 140,000 acres of the most densely-overgrown forest lands in the SRD to a safe and healthy condition. The OSWCD was, and remains, a strong supporter of the SSRP, as do I.

However, the Wilderness evaluation map for the SRD now raises a fundamental question, as those areas being evaluated for possible Wilderness designation substantially overlap with the areas slated for restoration in the SSRP. Indeed, virtually all of the 140,000 acres which are proposed to be restored in the SSRP are now being evaluated for their Wilderness potential.

Given the obvious inconsistency, it must be asked, which is it: Restoration, and the long-overdue mitigation of the catastrophic fire risk, or Wilderness, and the necessary, consequent surrender to the continuing risk of catastrophic wildfire? Restoration, on the one hand, means the landscape-scale cutting and removal of excess trees from the forest by mechanical means, while Wilderness absolutely precludes those activities. The SRD can have one or the other, but not both.

For the reasons stated above, I urge the LNF to choose Restoration.

However, if it should choose Wilderness, I respectfully ask that it first fully explain its choice to abandon Restoration. Further, I respectfully submit that should it choose Wilderness, it must explain how it reconciles that choice with its' responsibilities under the recovery plan for the Mexican Spotted Owl.

I appreciate the opportunity provided to offer these comments.

Richard Baish

Approved by the Otero Soil and Water Conservation District May 27, 2020