

PRELIMINARY PLANNING ISSUES AND MANAGEMENT CONCERNS

The process for developing an RMP begins with identification of planning issues (40 CFR 1502.7 and 43 CFR 1610.4-1). *Planning issues* express opportunities, conflicts and problems associated with the management of public lands. Issues also reflect new data, new or revised policies, and changes in resource uses that affect an RMP - issues are considered generally external to the BLM. *Management concerns* are topics or points of dispute that involve a resource management activity or land use and often they are internal to the agency. While some of these concerns may overlap issues, a management concern is generally more important to BLM staff, an individual or group, whereas a planning issue has the potential to be a more widespread source of external conflict or opportunity.

The issues and management concerns presented below are preliminary, based on the best available information. For each issue, planning questions are identified. The questions and information for each issue or concern will be refined during public scoping and throughout the planning process. The CFO will prepare a Scoping Report summarizing issues and concerns identified by the public. Addressing management concerns in the RMP helps to ensure a comprehensive examination of BLM's land use management. After public scoping, known issues, along with any additional issues raised by the public, will be placed into one of three categories.

- Issues to be resolved in the plan;
- Issues to be resolved through policy or administrative action; or
- Issues beyond the scope of the plan.

Preliminary Planning Issues

Issue 1: Air Resources (Air Quality and Climate Change)

Approximately 78% of the CFO planning area is leased for oil and gas development, which generates air resource impacts, including air quality associated criteria pollutants, as well as greenhouse gases (GHGs) which may impact climate. New air resource data need to be incorporated into the plan revision.

Question to address:

- What management actions are necessary to maintain and/or enhance air resources, including maintaining and/or improving air quality within State and Federal air quality standards?
- How may related actions affect Class I airsheds, including adjoining Federal public lands such as Carlsbad Caverns and Guadalupe Mountains National Parks.

For this plan, it is likely that greenhouse gas emissions and potential effects on climate from the RMP's proposed actions will become an issue.

Question to address:

- What management actions and mitigation may be necessary to help address greenhouse gas emissions from proposed alternatives?

Issue 2: Groundwater and Karst Aquifers

Groundwater and interrelated karst aquifers must be considered in light of continued oil and gas development, potash mining, and other activities. Additional information is needed on groundwater and air resources.

Questions to address:

- What are the potential impacts of proposed activities such as oil and gas development on groundwater and related karst aquifers?
- How can groundwater resources and karst aquifers be identified and protected and meet State and Federal standards, while allowing other resource uses?
- What groundwater baseline data are needed to help make management decisions and monitor changes to groundwater quality?
- What BMPs/mitigation measures should be implemented to protect groundwater/karst resources? What existing BMPs should be carried forward?
- How should water sales for oil field development, road construction, etc., from wells on public land be managed? Should temporary use be handled differently than commercial water sale sites?

Issue 3: Fluid and Solid Minerals Development

Special attention is needed to address decisions for fluid and solid mineral (leasable, locatable, and saleable) development. Considerations for these uses include their potential impacts on for example: 1) wildlife and special species habitat; 2) existing and future recreation opportunities; 3) cultural resources; 4) special designations; 5) ground and surface water; 6) cave/karst; 7) visual resources; and 8) travel management.

New stipulations, BMPs, and open, limited, and closed designations for fluid minerals development need to be considered in the planning area. Existing stipulations need to be reexamined to determine if they need to be revised and/or carried forward into the new RMP.

Questions to address (Fluid Minerals):

- What areas are suitable, not suitable, or should be restricted from fluid minerals development in the unleased portions of the planning area?
- Are current decisions regarding fluid minerals development valid? What types of new decisions can be made for these areas, where appropriate?
- How will conflicts between fluid minerals development and other resource issues such as wildlife habitat be addressed?
- What updated/new BMPs/mitigation measures are needed for fluid mineral decisions?
- How should the plan allocate where geophysical exploration should be restricted or excluded?
- How should salt water disposal from fluid minerals development be addressed? What is the relationship between the salt water disposal system and rock mechanics?

Questions to address (Solid Minerals):

- What areas are suitable, not suitable, or should be restricted from solid leasable minerals development activity in the planning area?
- How should new technologies in the RMP be addressed such as solution mining?
- How will conflicts between solid minerals development and other resource issues such as wildlife habitat be addressed?
- What updated/new BMPs/mitigation measures are needed for solid mineral decisions?
- What inventory, BMPs, and mitigation measures are needed for abandoned mines?
- How will existing mineral materials sites be managed and how will they be reclaimed?

Issue 4: Renewable Energy (e.g. solar, wind)

With renewable energy development now considered a priority by the President and the BLM, special attention is needed through planning to adequately address this type of development and its associated impacts on resources and compatibility with existing and potential land uses.

Current policy requires that new or updated plans consider NREL maps showing areas having commercial solar or wind energy development potential. New stipulations, mitigation measures, and BMPs need to be considered in addition to those that have already been developed through the BLM's National programmatic efforts. Management prescriptions need to address areas in the planning area that will be excluded, avoided, or open to renewable development, and infrastructure associated with these actions. (Refer to the Lands and Realty section below for a discussion on related issues.)

Questions to address:

- How will other on-going local/regional/national renewable energy planning efforts be addressed in the RMP through effects analysis?
- What areas should be restricted or excluded from renewable energy development in the planning area to mitigate resource conflicts and/or impacts?
- Will buffers be established (e.g. resource protection or site safety)?
- What updated/new BMPs/mitigation measures are needed for renewable energy decisions?
- What utility corridors need to be identified in the area to deliver power to the grid? (i.e. transmission corridors)
- Will competitive renewable leasing be addressed in the plan?

Issue 5: Lands and Realty

There are scattered BLM parcels in the planning area that are difficult to manage. An updated list for lands identified for disposal will help assist with the effective management of the BLM's surface estate by consolidating holdings. An updated acquisition parcel list will also help to consolidate BLM's surface estate, as well as address proposed areas for special designations.

New realty decisions for designating avoidance/exclusion areas are directly related to the need for addressing renewable and nonrenewable energy development in the RMP revision. Updated exclusion and avoidance areas in the planning area will facilitate renewable/nonrenewable energy development and other right-of-way (ROW) proposals (e.g. utility corridors, communication sites), while balancing the need to protect sensitive resources.

Questions to address:

- What public lands should be identified for retention, disposal (e.g. parcels, historic landfill sites) or acquisition?
- What types of new withdrawals will be initiated through the plan?
- What existing ROW avoidance and exclusion areas need to be updated? What areas are suitable for wind and solar development and what areas should be avoided or excluded?
- How will right-of-way/energy corridors be established and addressed in the new RMP?
- What areas are designated for communication sites? Will those locations be maximized to the fullest extent before a new communication site is authorized?
- What land adjustments are necessary to improve access and management of BLM public lands?
- What updated/new BMPs/mitigation measures (e.g. surface pipeline thresholds, adequate ROW widths for construction) are needed for realty decisions?
- What updated/new BMPs/mitigation measures (e.g. road maintenance agreements) are needed for other management decisions?

Issue 6: Recreation

Most of the recreational activities in the planning area are dispersed. Activities include hunting, fishing, off-highway vehicle (OHV) use, camping, caving, hiking, mountain biking, climbing, horseback riding, recreational shooting, and geocaching. There are numerous opportunities for new recreation planning

decisions in the RMP, principally to capitalize on community interests and surrounding tourism destinations including Carlsbad Caverns and adjacent forest lands managed by the Forest Service.

Questions to address:

- What are the new opportunities and areas suitable for recreation (planned acquisition)?
- What types of recreation should the planning area emphasize, discourage, or limit?
- What new recreation designations should be proposed, such as Special Recreation Management Areas? How should some existing recreation areas that are not formally designated (e.g. Black River, La Cueva, developed OHV areas) be addressed?
- To what extent, if any, should the CFO develop facilities and improve recreation access opportunities to meet public demand?
- What are the current recreation interests of the community and adjoining residents, as well as tourists?
- Do opportunities exist to expand recreational activities in partnership with adjoining local, State and Federal agencies?

Issue 7: Transportation Management

A travel management plan was not completed for the former RMP. The majority of the planning area is designated as “open,” leaving parts of the planning area open to cultural and natural resource impacts. (A current road inventory is also not available and will be developed during the RMP process.)

Questions to address:

- What major roads and ways should be identified for closure? Are there alternative routes, and opportunities for reclamation?
- What areas should be identified as open, limited, or closed, while still meeting the resource and recreational demands of the area?
- What public access areas should be identified and acquired?

Issue 8: Special Designations

There are currently five ACECs in the CFO area totaling approximately 13,000 acres. The 1988 RMP contains 23 Special Management Area (SMA) designations that are no longer valid under BLM policy. Some of the SMAs were designated to protect springs, caves, and other resource values. Current and potential areas for ACEC designations need to be reinventoried and incorporated into the plan revision. In addition, federal land management agencies are directed by Congress to consider additions to the national Wild and Scenic Rivers system during land use planning. Rivers that are found suitable for inclusion in the National Wild and Scenic River System may be recommended to Congress for designation.

Questions to address:

- What existing ACECs should be carried forward (expanded/maintained) or revised in the new RMP? What are the potential new ACECs?
- Should any of the existing SMAs be incorporated into ACECs, Research Natural Areas, Outstanding Natural Areas, or other designations and/or dropped?
- Are there any other designations (e.g. National Natural Landmarks through NPS) that should be considered? How should the other existing special designations (e.g. Guadalupe Backcountry Byway) be managed?
- What cultural resources should be considered for nomination for listing on the National Register of Historic Places (non-BLM designation-Advisory Council on Historic Preservation)?
- What BMPs or mitigation measures are needed for special designations such as ACEC?

- What river segments are eligible for inclusion in the National Wild and Scenic River System (Black River, Delaware River, or parts of the Pecos River)?
- What river segments are suitable for inclusion in the National Wild and Scenic River System?
- What are their respective outstandingly remarkable values?
- What are their respective classifications?
- What protective management practices are necessary to protect and enhance the outstandingly remarkable values on eligible and suitable river segments?

Issue 9: Land Health

Land Health Standards are applicable to all ecosystems and management actions such as OHV use, wildlife, grazing, and vegetation treatments. The standards are derived from BLM policy and guidance, as well as the Strategic Plan, and are expressions of the fundamentals of rangeland health found in regulation (Title 43 CFR 4180).

Questions to address:

- What types of restoration methods should be used to improve/maintain rangeland health?
- What criteria should be used to develop Desired Plant Community Descriptions?
- What criteria should be considered to determine the type and amount of rangeland vegetation that will be deemed forage for use by livestock, wildlife, and/or watershed protection?
- What criteria should be used to apportion the forage allocated among wildlife and livestock? What criteria should be used to decide when, if, and to what degree the forage allocations should be modified in the future?
- How should some of the reclaimed/restored public lands be managed?
- What BMPs or mitigation measures are needed for reclaimed/restored public lands?

Issue 10: Riparian Areas/Watersheds

Riparian/watershed habitat management is a priority for the CFO because of the scarcity and importance of habitat. Riparian areas, including wetlands, often have unique plant communities, help reduce erosion and maintain perennial stream flow, filter pollutants, recharge ground water, and provide critical habitat for birds, wildlife, fish and other aquatic organisms.

A properly functioning riparian area is contingent on effective management prescriptions that reduce impacts associated with existing and future development such as oil, gas, and mineral extraction. Erosion, sediment loading, and accidental spills of contaminants can contribute to the decline of a properly functioning riparian area.

Questions to address:

- What management considerations are necessary to ensure watershed health, properly functioning aquatic ecosystems, or to provide for other public uses?
- What BMPs/mitigation measures are needed to improve water quality by reducing soil erosion?
- How will proposed actions on CFO public lands maintain, improve, or restore stream morphology and provide beneficial uses of riparian vegetative areas for aquatic and wildlife communities?

Issue 11: Visual Resources

The RMP will address visual resource values in accordance with visual resource management objectives (management classes). A new VRM inventory and management class designation(s) are needed for the

Decision Area. The intent is to balance development and uses with protecting scenic values. In assigning management classes, fragmented ownership will be an important consideration to avoid managing scenic values on small land parcels where BLM ownership is too limited to affect the overall landscape. The potential effects of renewable energy projects (e.g. wind) on the area's visual resources may become an issue, especially due to adjoining Federal lands managed by other agencies.

Questions to address:

- What are the critical viewshed areas (based on the pending inventory) and how should they be managed?
- How will current visual intrusions that do not meet existing VRM guidelines be mitigated and/or restored?
- How should the CFO and other adjoining Federal agency (e.g. NPS, USFS) visual resource management decisions be coordinated?

Management Concerns

Management concerns will involve most of the other resources in the planning area, including but not limited to wildlife and special status species, fire and fuels management, cultural and paleontological resources, and socio-economic considerations. It should be noted that several of the management concerns discussed below such as wildlife and special status species, may become elevated as issues during RMP development, especially due to the area's potential for renewable/nonrenewable energy development. Below is a summary of some management concerns by program area and how they will be addressed following current BLM policies and guidance.

Air Resources

Air resources will be addressed by using the Land Use Planning Handbook and other BLM guidance. The RMP will identify desired outcomes and area wide criteria or restrictions as required by the Environmental Protection Agency (EPA)/State of New Mexico, which directs and authorizes emission-generating activities, including the Clean Air Act's requirements for compliance with: 1. Applicable National Ambient Air Quality Standards (Section 109); 2. State Implementation Plans (Section 110); 3. Control of Pollution from Federal Facilities (Section 118); 4. Prevention of Significant Deterioration, including visibility impacts to mandatory Federal Class I Areas (Section 160 et seq.); and 5. Conformity Analyses and Determinations (Section 176(c)). (Refer to Air Resource/Climate under the issue section.)

Fluid and Solid Minerals

The RMP revision will follow the guidance for fluid and solid (locatable, leasable, and saleable) minerals in Appendix C, as well as related BLM policy and other Instruction Memoranda. For fluid minerals decisions, for example, the RMP will identify areas that have not been leased as either open to leasing, open to leasing subject to restrictions, and areas that are administratively closed, along with applicable seasonal and controlled stipulations to mitigate impacts to other land uses or resource values.

Wilderness

There are four existing Wilderness Study Areas (WSAs) that will continue to be managed according to the Interim Management Policy. The CFO's existing wilderness inventory will be reviewed and updated, if warranted according to BLM guidance, including the identification of any possible areas that may have wilderness characteristics (WCs) that should be considered during the planning process.

Cultural Resources and Traditional Cultural Values

Management concerns for cultural resources will be addressed by describing the cultural resource values located within the Planning Area and establishing goals for management and addressing the allocation of recorded sites to use categories as identified in BLM Manual 8110.

In addition to assigning use categories to known cultural resources, the CFO will also develop a strategy for how those cultural resources assigned to use categories may realize their use potential; categorize geographic areas as high/medium/low priority for future proactive inventory of cultural properties; and specify that all authorizations for land and resource use will comply with Section 106 of the National Historic Preservation Act.

During the RMP process, use of these cultural resources will be considered for scientific, educational, recreational, traditional, or experimental purposes. Management prescriptions will be identified in the RMP for protecting, stabilizing, and/or interpreting cultural resources. The RMP will also be used as an additional tool in the future to consult with tribal groups regarding traditional cultural values in the Planning Area and appropriate management strategies to protect, preserve, and enhance those values. The existing SMAs containing cultural values will be evaluated for potential incorporation into the RMP's proposed ACECs.

Socio-Economics and Environmental Justice

Concerns among residents from the RMP's proposed decisions will vary in the Planning Area, and they will be considered during the planning process. Land allocation decisions for minerals and realty actions for example, could potentially impact communities, and therefore will be analyzed. An Economic Strategy Workshop (e.g. Sonoran Institute) will be held to help rural communities develop a better understanding of regional economic changes and give participants an opportunity to discuss future challenges and opportunities.

The RMP will follow Appendix D of the BLM's Land Use Planning Handbook (2005) to guide the social and economic analysis for the Planning Area, as well as related IMs. This analysis will identify, describe and analyze social and economic conditions and trends including (but not limited to) demographics, social organization, attitudes, employment, income and environmental justice. The Economic Profile System (county-level data and Economic Profile System Community (EPSC)-level data) will be updated and available from the Sonoran Institute. The IMPLAN input-output database and model will be used to describe the affected economic environment and predict economic impacts.

The CFO will determine if actions proposed in the RMP would adversely and disproportionately impact minority populations, low-income communities, and local American Indian tribes (Executive Order No. 12898, Environmental Justice). The planning process will also consider aggregate, cumulative, and synergistic effects, including the results of actions taken by other parties. While the analysis of environmental justice is specifically concerned with disproportionate effects on these three populations, the social and economic analysis produced under NEPA will consider all potential social and economic effects, positive and negative, on any distinct group. The agency will also avoid disproportionate distribution of adverse impacts, especially those related to the environmental and health issues of these groups and communities.

Lands and Realty

The RMP will identify land use authorizations under 43 CFR 2800, 2880, and 2920, including but not limited to: transportation, renewable energy development (see related issue Renewable Energy Development). It will also consider establishing bond amounts for salt water disposal sites under right-of-way, fair market value rates for commercial disposal SWD, and pipeline safety (e.g. widths necessary for construction).

Paleontological Resources

Paleontological resources will be addressed in accordance with the management classes established in the 8270 Handbook and current policy guidance issued in various Washington Office Instruction Memoranda. The BLM's objectives for these resources are to manage them for scientific, educational and recreational values, and to mitigate adverse impact. Because fossils are associated with geological units, a classification based on geologic formations (e.g. Dark Canyon) will allow land use decisions to be made that balance various uses with significant fossil resources.

Cave and Karst Resources Management

The RMP's cave and karst resources management will be consistent with the existing BLM 8380 Manual and Handbook (being developed). In developing the RMP, staff will determine where updates in the management program need to be made to be in compliance with both the 8380 Cave and Karst Resources Management Manual and the 1610 Planning Manual. The CFO will address the four basic but broad types of cave and karst resource management actions for all Significant Caves:

1. Management (resources, visitors and facilities);
2. Marketing (outreach, information and education, promotion, interpretation, and environmental education);
3. Monitoring (social, environmental and administrative indicators and standards); and
4. Administration (regulatory, permit/fee/fiscal, data management, and customer liaison).

All BLM implementing actions are subject to the specific management objectives and accompanying setting prescriptions incorporated within the land use plan decisions. The CFO's existing cave/karst potential map will be further defined and delineated.

Recreation and Visitor Services

The RMP's Recreation and Visitor Services sections will be consistent with IM 2006-060, "Incorporating Benefits-Based Management within Recreation and Visitor Services Program Policy Changes" and guidance in Appendix C of the Land Use Planning Handbook. In developing the RMP, staff will identify proposed SRMAs in the Planning Area. For each SRMA, the following aspects of recreation management will be addressed: management of resources, visitors, and facilities; marketing (outreach, interpretation, environmental education and other visitor services; monitoring (social and environmental); and administration (regulatory; permits and fees, concessions). Public lands not identified as a SRMA will be designated as an Extensive Recreation Management Area (ERMA) and managed in a custodial manner.

Soil Resources

CFO will use available soil data to make required decisions for the resources and resource uses analyzed in the RMP. State Soil Geographical Data (STATSGO) and Soil Survey Geographical Data (SSURGO) are available for all counties in the Planning Area.

Soils will be managed to maintain or improve soil health and productivity and minimize impacts to soil resources through the actions of management activities. BMPs and mitigation measures will be implemented at the site-specific activity/project level to prevent or reduce soil erosion and compaction, especially, for soils with severe erosion susceptibility. If soil impacts cannot be mitigated or effectively controlled then the activity/project could be relocated or denied.

Vegetative Communities

The RMP will use ecoregional assessment and local vegetative community data to develop proposed decisions at landscape and more localized scales. BMPs and mitigation measures will be implemented at the site-specific activity/project level to address invasive species and noxious weeds. Brush management will be employed in communities where species such as mesquite, catclaw, creosote, tarbush, white thorn, salt cedar and juniper are invasive.

Noxious weeds are a mandatory item in the BLM's NEPA Handbook (H-1790-1) and addressed in applicable all EA/EIS's developed in the Field Office. Specifically, all activities authorized or conducted on CFO's public lands are reviewed for their potential to spread weeds, and are modified if needed. The CFO will carry out the Invasive and Noxious Weed Program through the RMP under the following laws: the Federal Noxious Weed Act of 1974, as amended by the Food, Agriculture, Conservation and Trade Act of 1990, Section 1453 ("Management of Undesirable Plants on Federal Lands"); the Carlson-Foley Act; the Omnibus Consolidated Appropriations Act of 1997 (Section 124); and the Plant Protection Act of 2000. In addition, Executive Order 13112 (1999) directs all federal agencies to control the spread of noxious weeds.

Locally, IM NM-010-99-01 ("Noxious Weed Prevention Schedule") directs CFO weed control efforts, which include determination of the best management options for preventing the introduction or spread of noxious weeds by using a combination of the four general categories of weed management—cultural control, physical control, biological control, and herbicides. The goals and strategies identified in Partners Against Weeds (PAWS, 1996) also will be implemented for noxious weed management in the CFO. These preventive measures will be applied to proposed actions in the RMP dealing with range improvements, fire rehabilitation, and road maintenance, as well as BLM authorized actions for rights-of-way, oil and gas activities, grazing permits, and recreation permits.

The CFO will continue and expand its cooperation with other federal agencies, state and county governments, organizations, and private landowners in the fight against weeds. The CFO is working with nine Soil and Water Conservation Districts to manage noxious weeds where populations have been identified, and to prevent their spread across administrative boundaries.

Planned/Unplanned Fire

The RMP will be updated to be consistent with current wildland fire policies including the Federal Wildland Fire Management Policy (1995) and the National Fire Plan; and the BLM's *Resource Management Plan Amendment for Fire and Fuels Management on Public Land in New Mexico and Texas* (2004).

In addition to incorporating these plans, the CFO has the opportunity to identify broad treatment levels within the CFO's Fire Management Units (FMUs). Treatment types and levels will be developed using an interdisciplinary approach and will be based on resource and fire objectives. The RMP revision will utilize the Fire Regime Condition Class (FRCC) in determining resource and fire management objectives, identifying priority treatment areas, and establishing the Appropriate Management Response (AMR). The RMP revision will also consider the number of acres treated by decade; general restrictions on fire management practices; fire exclusion areas (e.g. no burning 100 meters from bat nurseries, LPC leks); buffer areas for fire retardant around water source; sand dune lizard corridors; and special status species habitat.

The Carlsbad Fire Management Plan (FMP) will provide the specific implementation strategies, evaluation criteria and accomplishment reporting details as referenced in the fire management portion of the RMP." Additionally, the BLM will work with communities affected by wildland fire through the use of Community Wildfire Protection Plans. The RMP revision will be consistent and in compliance with applicable Federal and State smoke management requirements.

Fire management planning concepts and the relationship between the various planning levels can be found in the Interim Fire Planning Manual (M-9211) and the Interim Fire Planning Handbook (H-9211-1). These documents were transmitted via FA IM-2008-026. In addition, Appendix C of the Land Use Planning Handbook (H-1601-1) discusses fire management.

Special Status Species

The lesser prairie-chicken and the sand dune lizard are listed as species of concern and both are addressed in the Special Status Species RMPA. The related special status species decisions in the RMPA will need to be reevaluated, and where appropriate, carried forward in the Carlsbad RMP revision.