SCOPING REPORT

TriCounty
Resource Management Plans and Environmental Impact Statement

U.S. Department of the Interior

Bureau of Land Management
Las Cruces Field Office

URS

June 2005

TRICOUNTY

RESOURCE MANAGEMENT PLANS AND ENVIRONMENTAL IMPACT STATEMENT

SCOPING REPORT

Prepared for:
United States Department of the Interior
Bureau of Land Management
Las Cruces Field Office

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TABLE OF CONTENTS

SECTION 1.0 INTRODUCTION 1-1
1.1 Overview 1-1
1.1.1 Background 1-1
1.1.2 Purpose and Need 1-1
1.2 Planning Area 1-2
1.2.1 Location 1-2
1.2.2 Description 1-2
1.3 Collaborative Planning 1-4
1.3.1 Cooperating Agencies 1-5
1.3.2 Agency Coordination 1-5
1.3.3 Tribal Consultation 1-7
1.3.4 Public Interaction 1-7
1.4 Scoping Process 1-8
1.4.1 Description of Process 1-8
1.4.2 Announcements 1-8
1.4.3 Public Meetings 1-9

SECTION 2.0 PLANNING CRITERIA 2-1
2.1 Introduction 2-1
2.2 General Planning Criteria 2-1

SECTION 3.0 COMMENT SUMMARY 3-1
3.1 Comment Compilation 3-1
3.2 Comments Received through the Comment Form 3-2
3.3 Comments Received in Letters 3-6
3.3.1 Air Quality 3-8
3.3.2 Soils 3-9
3.3.3 Water Resources 3-10
3.3.4 Biological Resources 3-13
3.3.5 Cultural Resources and Tribal Concerns 3-19
3.3.6 Paleontology and Geology 3-21
3.3.7 Visual Resources 3-22
3.3.8 Fire Management 3-24
3.3.9 Special Management Designations 3-25
3.3.10 Proposed Special Designations (including nominations) and Recommended Management 3-28
3.3.11 Livestock Grazing 3-33
3.3.12 Recreation 3-34
3.3.13 Lands and Realty 3-40
3.3.14 Energy and Minerals 3-47
3.3.15 Education and Scientific Research 3-49
3.3.16 Hazardous Materials 3-50
3.3.17 Public Safety, Law Enforcement, and Illegal Activities 3-50
3.3.18 RMPs/EIS Process 3-51
3.3.19 Social and Economic Conditions 3-53
3.3.20 Transportation 3-55
3.4 Types of Decisions Anticipated To Be Made 3-56
3.5 Analysis of Existing Management 3-57

SECTION 4.0 DATA 4-1
4.1 Data Summary 4-1
4.2 Data Gaps 4-1

SECTION 5.0 SUMMARY OF FUTURE STEPS 5-1
5.1 Introduction 5-1
5.2 Identification of Issues 5-1
5.3 Development of Planning Criteria 5-1
5.4 Data and Information Collection 5-1
5.5 Analysis of the Management Situation 5-2
5.6 Formulation of Alternatives 5-2
5.7 Estimation of Effects of the Alternatives 5-3
5.8 Selection of the Preferred Alternative 5-3
5.9 Selection of the Plan 5-3
5.10 Monitoring and Evaluation 5-3

SECTION 6.0 REFERENCES 6-1

LIST OF TABLES

Table 1-1 Public Scoping Meeting Dates, Locations, and Attendance 1-9
Table 3-1 Geographic Distribution of All Comments (forms and letters) 3-1
Table 3-2 Familiarity with BLM Programs 3-4
Table 3-3 Resource Program Values[1] 3-4
Table 3-4 Percent of Comment Letters Relaying Various Issues 3-7
Table 4-1 GIS Data Inventory 4-2

LIST OF MAPS

Map 1-1 TriCounty Planning Area 1-3

LIST OF ACRONYMS

ACEC	Area of Critical Environmental Concern
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
DoD	U.S. Department of Defense
EIS	Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act of 1969
FWS	U.S. Fish and Wildlife Service
GPS	Global positioning system
LCFO	Las Cruces Field Office
MOU	Memorandum (or Memoranda) of Understanding
NASA	National Aeronautic Space Administration
NEPA	National Environmental Policy Act
NMGFD	New Mexico Game and Fish Department
NMSU	New Mexico State University
NOI	Notice of Intent
OHV	Off-highway vehicle
ONA	Outstanding Natural Area
RMP	Resource Management Plan
RMPs	RMPA and RMPR
RMPA	Resource Management Plan Amendment
RMPR	Resource Management Plan Revision
RNA	Research Natural Area
ROS	Recreation Opportunity Spectrum
SAR	Sodium absorption ratio
SRMA	Special Recreation Management Area
USDI	U.S. Department of the Interior
VRM	Visual Resource Management
WSA	Wilderness Study Area

SECTION 1.0 INTRODUCTION

1.1 OVERVIEW

The Bureau of Land Management (BLM) Las Cruces Field Office (LCFO) in New Mexico is preparing a resource management plan revision (RMPR) to address management of public land in Sierra and Otero Counties and a resource management plan amendment (RMPA) to address management of public land in Doña Ana County. The BLM is also preparing an associated environmental impact statement (EIS) to identify the potential effects of implementing the RMPR and RMPA (collectively referred to as the RMPs/EIS).

The BLM understands that a resource management plan for public lands is more effectively implemented if the management decisions made by the BLM reflect the values and sentiment of the public. The first in a series of nine basic steps in the BLM's planning process is to identify issues from agency and public comments. These issues were identified during scoping, a process intentionally conducted early in the planning process to solicit comments and translate the information gathered into meaningful input into the planning process and to guide the BLM's actions.

The results of scoping are summarized in this report. In addition, this report provides background information about the purpose and need for the RMPs/EIS, Planning Area, and BLM's collaborative planning process; description of the scoping process; explanation of the planning criteria developed to guide and direct the planning effort; a brief description of the data available for the studies and data needs; and summary of the future steps in the planning process.

1.1.1 Background

The BLM is responsible for management of public land—its resources and uses—based on the principles of multiple use and sustained health, diversity, and productivity of public lands for present and future generations. Management direction is provided by land use plans, which are used to determine appropriate multiple uses and allocate resources, develop strategy and manage and protect resources, and establish systems to monitor and evaluate the status of resources and effectiveness of management practices over time.

The LCFO administers public land in Hidalgo, Grant, Luna, Doña Ana, Sierra, and Otero Counties in southwestern New Mexico. The public land in Sierra and Otero Counties is currently managed under the 1986 White Sands Resource Management Plan (RMP), and public land in the other four counties is managed under the 1993 Mimbres RMP. These documents set forth land use decisions and terms and conditions for guiding the management of activities on the public land in these counties.

1.1.2 Purpose and Need

The purpose of an RMP is to provide a framework for managing public land and for allocating resources over a period of 15 to 20 years. RMPs are periodically evaluated to determine if they continue to meet legislative and policy requirements, and land use and resource needs. If an RMP is found to be inadequate in these respects, one of three document preparations can be implemented as a remedy: (1) preparation of a new plan, (2) revision of the existing RMP, or (3) amendment of the existing RMP.

The LCFO has determined that the 1986 White Sands RMP needs to be revised and updated to provide a more comprehensive framework for management guidance. The 1993 Mimbres RMP needs to be amended to address the pertinent issues associated with the significant growth in Doña Ana County (and nearby El Paso, Texas) that have affected changes in demographic characteristics as well as increased use

and consequent pressure on public land. Some elements of the current management documents provide appropriate management direction; however, many elements of the current management documents for the area, particularly Sierra and Otero Counties, have become outdated because of changing circumstances, demographics, resource conditions, and/or policies, and need revising.

The EIS will comply with the National Environmental Policy Act of 1969 (NEPA), Council on Environmental Quality regulations implementing NEPA, the Federal Land Policy and Management Act of 1976 (FLPMA), and other associated regulations.

The combined efforts of the RMPR and RMPA, along with the EIS, is referred to as the TriCounty RMPs/EIS.

1.2 PLANNING AREA

1.2.1 Location

The area defined for this planning effort includes Doña Ana, Sierra, and Otero Counties in south-central New Mexico (see map 1-1). The three counties are surrounded by Luna and Grant Counties to the west; Catron, Socorro, and Lincoln Counties to the north; Chaves and Eddy Counties to the east; and the State of Texas and the Republic of Mexico to the south.

The three-county area includes approximately 9.4 million acres. Approximately 3.4 million surface acres (about 36 percent of the total acres) and 6.9 million acres of Federal mineral estate (subsurface) are administered by the BLM.

McGregor Range, an area of 697,472 acres of Federal land, is located within the Planning Area. Although much of McGregor Range is BLM-administered public land, it is withdrawn from the public domain for military use. Management of McGregor Range is currently being addressed in the McGregor Range RMPA/EIS, the draft of which was published in January 2005. Therefore, McGregor Range will not be subject to land use planning decisions resulting from the TriCounty RMPs/EIS.

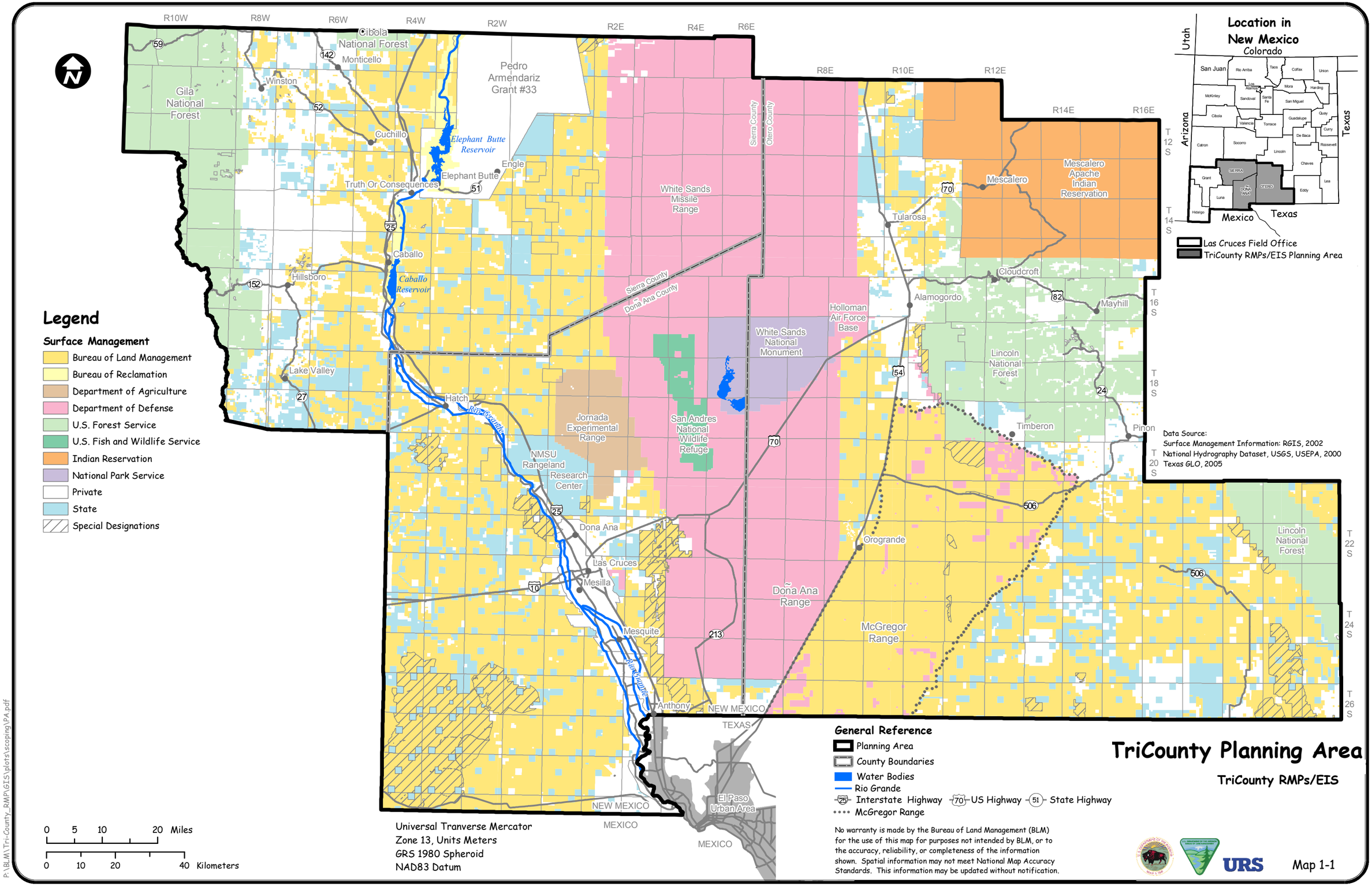
The three-county area is referred to as the Planning Area, within which BLM must consider potential impacts of its actions on all resources and land uses regardless of surface ownership or management. However, BLM's authority to make decisions applies only to BLM-administered public lands (surface and subsurface [mineral] estates) within those counties.

1.2.2 Description

The TriCounty Planning Area varies greatly in resource diversity, production, and potential due to differences in elevation, climate, soils, and topography—it exhibits influences from the Chihuahuan and Sonoran Deserts, Mexican Highlands, southern Rocky Mountains, and Mogollon Plateau. The Planning Area, with elevations of 3,800 to 5,000 feet and mountainous areas of up to 8,000 feet, is characterized by abruptly rising desert mountains and gently sloping plains. Approximately 490 species of vertebrate wildlife are known to inhabit the region.

Archaeological and historical studies indicate that a succession of different cultural groups have inhabited the region for approximately the past 12,000 years.

The Planning Area includes 27 specially designated areas (i.e., 13 areas of critical environmental concern [ACECs], 13 wilderness study areas [WSAs], and one backcountry byway) that have been designated to protect one or more resources.



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Several other agencies have jurisdiction within the Planning Area. For example, a large portion of the Planning Area is managed by the U.S. Department of Defense (DoD) (e.g., White Sands Missile Range, Doña Ana Range, Holloman Air Force Base, and other parcels). DoD and BLM jointly manage McGregor Range. The Bureau of Reclamation and New Mexico State Parks, manage lands along the Rio Grande and around two associated reservoirs (Elephant Butte and Caballo Reservoirs), which are prominent features in the Planning Area. The U.S. Forest Service (Forest Service) manages the Lincoln, Gila, and Cibola National Forests. The U.S. Fish and Wildlife Service (FWS) manages the San Andres National Wildlife Refuge, and the National Park Service manages the White Sands National Monument. In addition, the Mescalero Apache Indian Reservation is located in northeastern Otero County.

BLM-administered public lands in the Planning Area offer dispersed recreational opportunities to county residents and surrounding areas including the rapidly growing cities of Las Cruces and El Paso. These lands also present those cities that are landlocked by public land with opportunities to accommodate urban growth through disposals of public land by exchange or under the Recreation and Public Purposes Act. Two interstates (I-10 and I-25), three U.S. highways (U.S. 54, U.S. 70, and U.S. 82), and multiple state and county routes provide access within the Planning Area.

1.3 COLLABORATIVE PLANNING

The term collaboration may be used to describe a wide range of external and internal working relationships. According to BLM Handbook H-1601-1, Appendix A, collaboration implies that other Federal agencies; tribal, State and local governments; and the public will be involved before the planning process is officially initiated, rather than only at specific points stipulated by regulation and policy (USDI, BLM 2005). The collaborative process essentially allows the affected community to communicate to the BLM how public lands should be managed from the public's perspective. The goal of the collaborative planning process is that communities and agencies work together to seek solutions with broad support regarding the future management of the public lands.

Agency coordination is important in a successful collaborative process for several reasons. First, early involvement with other Federal, tribal, State, and local governments establishes solid working relationships with each agency. Next, it builds trust and credibility among agencies that can then be transferred to the public. Finally, it helps ensure that the land use decisions developed by BLM are supported by and conform to other jurisdictions in any given area to the maximum extent possible.

Similarly, active participation by the public early in the process helps to ensure that alternatives are developed that consider the following:

- Addresses the diversity of public interests
- Builds trust between BLM and the public
- Creates public understanding and acceptance of the eventual management decisions
- Develops a working relationship that will carry into the shared implementation of those management decisions

The LCFO has demonstrated, in earlier planning efforts, both their willingness and their capability to conduct equitable, effective collaborative processes—this has built the foundation of community trust and respect that will help this process move forward. Various agencies and individuals have developed working relationships with the LCFO that will foster continued community support and participation in the current planning effort.

1.3.1 Cooperating Agencies

A cooperating agency is defined as any Federal agency, other than a lead agency, that has jurisdiction by law or that has special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment (Title 40, Code of Federal Regulations, Part 1508.5 [40 CFR 1508.5]). A State or local agency of similar qualifications or, when the effects are on a reservation, a Native American tribe, may by agreement with the lead agency become a cooperating agency. As outlined in 40 CFR 1501.6, each cooperating agency shall

- Participate in the NEPA process at the earliest possible time
- Participate in the scoping process
- Assume, on request of the lead agency, responsibility for developing information and preparing environmental analyses – this includes portions of the environmental impact statement where the cooperating agency has special expertise
- Make available staff support, at the lead agency's request, to enhance the lead agency's interdisciplinary capability
- Normally use its own funds for efforts associated with participating in the RMPs/EIS process – that is, the lead agency shall, to the extent available funds permit, fund those major activities or analyses it requests from cooperating agencies (potential lead agencies shall include such funding requirements in their budget requests)

A cooperating agency may, in response to a lead agency's request for assistance in preparing the EIS, reply that other program commitments preclude any involvement or the degree of involvement requested.

The following agencies have taken action seeking cooperating agency status:

- New Mexico Department of Agriculture
- Sierra County
- Otero County
- Doña Ana County
- City of Las Cruces

Memoranda of Understanding (MOUs) are being developed or have been signed to formalize the participation of these agencies.

1.3.2 Agency Coordination

Though no scoping meetings were held specifically for agencies, BLM has contacted key Federal, State, and county agencies to initiate coordination and collaborative efforts that will continue throughout the RMPs/EIS process. As of the date of this report, contact has been made with the following agencies:

Federal

- Department of Agriculture
  - Forest Service
    - Gila National Forest
    - Lincoln National Forests
  - Natural Resources Conservation Service

    - Rural Development, New Mexico
- Department of Defense
    - Fort Bliss
    - Holloman Air Force Base
    - White Sands Missile Range
- Department of Homeland Security, Border Patrol
- Department of the Interior
    - Bureau of Indian Affairs
    - Bureau of Reclamation, Albuquerque Area Office
    - Fish and Wildlife Service, Albuquerque
    - Geological Survey
    - National Park Service
- Department of Transportation
    - Federal Highway Administration
- Environmental Protection Agency
- Southwest Strategy Coordination Office

State of New Mexico

- Department of Agriculture
- Soil and Water Conservation Commission
- Environmental Department: Air Quality Bureau, Ground Water Quality Bureau, and Surface Water Quality Bureau
- Governor of New Mexico
- Health Department
- Department of Game and Fish
- Energy, Minerals and Natural Resources Department
    - Oil Conservation Division
    - State Parks Division (Elephant Butte Lake and Caballo Lake State Parks)
    - Mining and Minerals Division
    - Forestry Division
- State Engineer
- State Land Office
- State University
- State Historic Preservation Office

County

- Doña Ana County
- El Paso County
- Otero County
- Sierra County

Local

- City of Alamogordo
- City of Las Cruces
- City of Truth or Consequences
- Town of Mesilla
- Village of Anthony
- Village of Cloudcroft
- Village of Hatch
- Village of Tularosa
- Village of Williamsburg

1.3.3 Tribal Consultation

Multiple governmental organizations have management responsibilities for land or resources within the TriCounty RMPs/EIS study area. The Mescalero Apache Tribe is the only tribe that manages land within the Planning Area; however, additional tribes were contacted due to their potential interest in the Planning Area. As part of the scoping effort, BLM contacted tribes to initiate consultations in accordance with the National Historic Preservation Act and to extend the opportunity to participate as a cooperating agency in the planning process. BLM's contacts included the following tribes:

- Fort Sill Apache
- Isleta
- Mescalero Apache
- San Carlos Apache
- White Mountain Apache
- Ysleta del Sur Pueblo
- Zuni

BLM intends to continue to consult with the Native American tribes to learn more about the values they have with regard to the resources within the TriCounty Planning Area. Through this government-to-government relationship, BLM may obtain data from interviews with tribal elders, tribal records on cultural resources, and relevant research.

1.3.4 Public Interaction

BLM continually works with the public, other resource management agencies, and jurisdictions. The relationships established with these entities have developed from previous planning efforts as well as the day-to-day management activities conducted by BLM. However, before beginning the planning process for the TriCounty RMPs/EIS, BLM conducted some specific efforts to gather preliminary community input.

In June 2003, James Kent Associates assisted the LCFO in developing a community profile, which is documented in the "Preliminary Assessment of Community Interests and Communication Strategies by Geographic Area: The Las Cruces Field Office Planning Area." This document summaries the results of citizen and BLM dialogue and proposes a communication strategy for the planning process. BLM began conducting informal public information meetings in 2003. The purpose of these meetings was to help BLM understand community interests related to public land, gather information to help frame a comprehensive set of issues regarding management of public land in the Planning Area, and identify opportunities to improve public land management. The meetings also enabled the LCFO staff to initiate, first hand, positive interactions and collaboration with the community. This process also served to educate the public about the importance of sustaining natural and cultural resource values, and about the relationship of these resources to economic activities within the community.

Additional and extensive public interaction occurred during scoping, which is described in the following Section 1.4, Scoping Process.

BLM will continue to encourage public involvement throughout the planning process by hosting or participating in informal community meetings, conducting communications through electronic mail, and providing information by means of the telephone information line and the TriCounty RMPs/EIS designated Web site.

1.4 SCOPING PROCESS

This section provides a description of the scoping process, the techniques that were used to notify the public about their opportunity to be involved in scoping, and a brief summary of the public scoping meetings.

1.4.1 Description of Process

The planning and environmental process, as well as scoping, commenced on January 28, 2005 with the publication in the *Federal Register* of a Notice of Intent (NOI) to prepare the RMPs/EIS and conduct public scoping meetings. Similar announcements were submitted to local and regional media and posted on BLM's Web site.

The LCFO hosted four public scoping meetings. Agencies and the public were encouraged to submit oral and/or written comments relaying their sentiment regarding management of public lands in the Planning Area. The period established for scoping, required to be a minimum of 30 days, was 60 days to ensure adequate time was allowed for comments to be submitted. Although the LCFO will welcome comments at any time during the planning process, comments received during the scoping period are particularly helpful in guiding the direction of the studies and analyses. The scoping period ended on March 28, 2005.

All of the comments received from scoping were compiled, reviewed, organized, and analyzed. Issues were derived from the comments and documented in this report.

1.4.2 Announcements

The RMPs/EIS and scoping meetings were announced through the *Federal Register*, paid advertisements, the New Mexico BLM Web site and the LCFO Web site, and media releases.

Federal Register

The TriCounty RMPs/EIS public scoping process began with the publication in the *Federal Register* of BLM's NOI to revise the 1986 White Sands Resource Management Plan, amend the 1993 Mimbres Resource Management Plan, prepare an EIS, and conduct public scoping meetings. The NOI to initiate planning for the TriCounty area was published on January 28, 2005 (Vol. 70, No. 18, Page 4146, [NM 030-1610-DO]).

Media Releases and Public Service Announcements

BLM prepared a media release to introduce the project and announce the scoping meetings and their respective locations. The announcement was issued in January 2005 to local and regional newspapers, television stations, and radio stations. The following entities received the media release:

Newspapers

- Sierra County Sentinel
- Las Cruces Sun-News
- Las Cruces Bulletin
- Alamogordo Daily News
- Truth or Consequences Herald
- El Paso Times
- Albuquerque Journal

Television Stations

- KVIA Channel 7 (ABC)
- KTSM Channel 9 (NBC)
- KDBC Channel 4 (CBS)
- KFOX Channel 14 (Fox)
- Univision

Radio

- KRWG – Local NPR
- KOBE – talk radio

Paid Newspaper Advertisements

A short time before the meetings, the LCFO determined that, because of the amount of public interest in the Las Cruces area, the venue had to be changed to accommodate the number of people anticipated to attend. BLM paid for the publication of a Public Notice of the Public Meeting Location Change in the Las Cruces Bulletin on March 11, 2005 and in the Las Cruces Sun News on March 11, 13, and 14, 2005.

Web site

BLM posted the news release regarding the planning effort on the LCFO Web site, and meetings were noted on the Web site's calendar of events. The BLM also posted Newsletter 1, a printable version of the comment form included with the newsletter, and a map of the Planning Area.

1.4.3 Public Meetings

BLM hosted four public scoping meetings during March 2005 that were attended by approximately 187 people, as summarized in Table 1-1. Las Cruces, Alamogordo, Truth or Consequences, and Anthony, New Mexico, were selected as the four most appropriate meeting locations because of their locations within the Planning Area.

Table 1-1
Public Scoping Meeting Dates, Locations, and Attendance

Meeting Date	Meeting Location	Attendance
March 15, 2005	Columbus Conference Center at the Best Western Mesilla Valley Inn Hotel, Las Cruces	133
March 16, 2005	Otero County Courthouse, Alamogordo	18
March 22, 2005	Civic Center, Truth or Consequences	26
March 23, 2005	Women's Intercultural Center, Anthony	10

Each meeting began with a brief presentation by the BLM team leader to provide an overview of the planning and EIS process. Following the presentation, the community members were encouraged to review maps and informational display boards arranged in stations around the meeting room and ask questions of and/or discuss with BLM staff about their interests in the RMPs/EIS. Members of the planning team were available at the stations to discuss interests related to the Planning Area and to record oral comments from the public.

Comment forms, newsletters, and maps of the Planning Area were available for the community members as handouts at each scoping meeting. A Spanish-speaking BLM staff member was available to translate at

each of the scoping meetings, if needed. The comment form, which was also distributed with the newsletter and posted on the LCFO Web site, prompted questions about the respondents' activities on or uses of the public lands in the Planning Area, and requested comments to help BLM gain a perspective of people's attitudes about public land—it asked what the respondent value about public land and how he or she would prefer to see the resources and uses managed. BLM also invited community members to submit comments in written formats other than the comment forms, including letters and electronic mail (e-mail) messages.

The LCFO will continue to engage community participation throughout the RMPs/EIS process.

SECTION 2.0 PLANNING CRITERIA

2.1 INTRODUCTION

Planning criteria are established early in the process to provide direction for the RMP process—they provide focus for data collection efforts, ensure compliance with legal mandates, and facilitate decision-making on the decisions that must be made and accomplished during the process:

2.2 GENERAL PLANNING CRITERIA

The planning criteria to guide the development of the RMPs/EIS require that the plan accomplish the following:

- Actions must comply with all relevant laws, regulations, executive orders, and BLM manuals.
- Actions must be reasonable and achievable and must allow for flexibility where appropriate (i.e., adaptive management).
- A social and economic analysis and an environmental justice assessment will be conducted to determine the effect that each alternative will have on users and on the diverse social and economic communities of the Planning Area.
- Actions will be considered using an interdisciplinary approach.
- The planning team will work cooperatively with county and municipal governments; other Federal, State, and local agencies; and interested groups and individuals. A process of collaborative public involvement and participation will continue throughout this process.
- The revision and the amendment will cause the protection and enhancement of the biodiversity in the Planning Area while allowing the public the opportunity for access to public land in a productive and meaningful way.
- The revision and the amendment will recognize valid existing rights related to the use of the public land.
- The process will involve Native American tribal governments and will provide strategies for protection of cultural resources on public land.
- Every effort will be made to ensure that decisions are compatible with existing plans and policies of adjacent local, State, and Federal governments and agencies [while recognizing that decisions must be made in conformance with relevant laws, regulations, and BLM management policies].

SECTION 3.0 COMMENT SUMMARY

3.1 COMMENT COMPILATION

The public submitted comments by completing the comment form (a brief questionnaire) provided by the BLM (described further in section 3.3), or by composing a letter or an e-mail message describing the interests that are most important to them. During scoping, BLM received a total of 323 submittals from various agencies, businesses, individuals, and/or special interest groups. Of the 323 comment submittals, 182 were comment forms and 141 were letters. All of the 323 submittals received were organized and reviewed, and the comments were analyzed to identify the preliminary issues to be addressed during the preparation of the RMPs and EIS. Comments from each comment form and letter were entered into an electronic database system that facilitates organization, sorting, and management of the comments in several different ways. Each submittal was coded to identify the submitter (e.g., agency, organization, group, or individual), geographic location of submitter, and type of issue.[1]

A majority of the comments received (from both the comment forms and the letters) were from New Mexico: 70 percent of all comments received were from residents of Doña Ana County, 4 percent were from Otero County, and 8 percent were from Sierra County (Table 3-1). El Paso County in Texas submitted the third largest amount (6 percent). The remaining 12 percent of the comments were from surrounding states.

Table 3-1
Geographic Distribution of All Comments (forms and letters)

State	County	Percent
New Mexico	Doña Ana	70
	Otero	4
	Sierra	8
Texas	El Paso	6
Other	Other Counties	12

Of the 141 letters received, 118 were from individuals. Twenty-three letters were received from the following agencies, businesses, and organizations:

Federal

- Department of the Army
- Department of the Interior
  - Fish and Wildlife Service
    - Regional Office
    - San Andres National Wildlife Refuge

State of New Mexico

- Game and Fish Department (NMGFD)
- New Mexico State University (NMSU), Department of Agronomy and Horticulture

Businesses

- Butterfield Trail Ranch, LLC

[1] Comments received on the comment form were summarized by question, comments received in letters were categorized by type of issue(s).

- Gary Sandler, Inc., Realtors

Organizations and Interest Groups

- New Mexico Wilderness Alliance/The Wilderness Society
- Citizens' Task Force for Open Space Preservation
- League of Women Voters of Greater Las Cruces
- Chihuahuan Desert Nature Park
- Southwest Environmental Center
- World Wildlife Fund
- Sierra Club
- High Range Neighborhood Association
- Native Plant Society of New Mexico
- Precious Desert Cooperative
- The Frontera Land Alliance
- Chihuahuan Desert Wildlife Rescue, Inc.
- The Nature Conservancy
- Las Cruces 4-Wheelers
- Southwestern New Mexico Quail Unlimited, Inc.

3.2 COMMENTS RECEIVED THROUGH THE COMMENT FORM

The BLM distributed a comment form (questionnaire) with general questions to help further ascertain and understand the issues of importance to the public, learn more about the types of activities that currently take place on public lands, and determine which locations are most important to the public. The comment forms were mailed with the newsletter that announced the scoping meetings and also was available during each of the scoping meetings and on the New Mexico BLM Web site. The following paragraphs include the questions on the comment form, with a summary of the responses from the public.

What do you value about the public land in Sierra, Otero, and/or Doña Ana Counties and why?

A majority of the comments received indicated appreciation for the large amounts of open space with relatively good access for recreation (e.g., hunting, hiking, biking, rock hounding). Respondents valued the opportunities to experience solitude, remoteness, and naturalness, and also valued the views within the natural landscapes, the provision for wildlife, and the wilderness character of the public lands. Preservation of the natural desert was identified as a concern, as was the ability to access public lands for OHV use. Comments indicated that public lands were valued because they contribute to a superior quality of life resulting from (1) reduced traffic, (2) undisturbed views, (3) opportunities for recreation, (4) clean air, and (5) water conservation.

Do you participate in outdoor recreation activities on public land in Sierra, Otero, and/or Doña Ana Counties? If yes, what types of recreational activities do you participate in or value? If yes, where do you participate in outdoor recreation activities? If no, please let us know why not.

A majority of the public who submitted comment forms, approximately 92 percent, indicated that they participate in outdoor recreation activities. Recreational activities mentioned include those that use motorized vehicles, those that use nonmotorized vehicles (e.g. horseback and trail riding, mountain biking, and boating), and pedestrian activities (using no vehicles) such as the following:

- Backpacking and camping
- Sightseeing, bird watching, wildlife watching, photography, and video/radio production

- Hunting and target shooting
- Hiking, exploring, historical research, cultural tourism
- Rock climbing, rock hounding, spelunking, rock and mineral collection
- Horseback and trail riding
- Botanical investigations and study
- Mountain biking
- Boating, fishing, and water recreation

Many of the comments from those that use motorized vehicles indicated that they "tread lightly," or stay on existing roads and trails.

Areas most noted for providing recreational activities within the Planning Area were the Organ, Robledo, and Doña Ana Mountains. Many comments indicated knowledge about the recreational opportunities offered within the Planning Area without specifying locations. Other specific areas that were noted include the following:

- Elephant Butte Lake State Park and Big Lake
- Butterfield Trail Range
- West Mesa
- Rio Grande Valley
- Red Sands
- Dripping Springs, Radium Springs, Whispering Springs, and Aguire Springs
- Orogrande
- Picacho
- White Sands
- Three Rivers Petroglyph Area

Community members who stated that they do not participate in recreational activities cited safety on public lands as an issue. For example, hunters firing weapons out of their vehicles, including OHVs, present issues for the casual hiker. Other community members who commented were ranchers committed to livestock management who indicated that they had little time for recreational activities.

What activities on or uses of the public land in Sierra, Otero, and/or Doña Ana Counties, other than outdoor recreation, are important to you and why?

A majority of the comments received indicated that grazing (i.e., ranching) was an important activity on public lands because of the economic base it brings to the community and the cultural heritage of the livestock industry within the region. Other comments requested a restriction on grazing to protect sensitive (e.g., riparian) areas. Additional uses of public land cited as important included the preservation of wildlife species, habitat, and movement corridors, cultural and natural history exploration and research, and conservation of water and restoration of watersheds and riparian areas. Air quality was identified as an important resource that should be protected, in regard to potential activities on public land. Other activities deemed important by respondents include mining, oil and gas, forestry, archaeological and natural history research and education, and additional law enforcement.

We want to know the types of information BLM should provide to educate the public about BLM and its programs. How familiar are you with BLM management policies and programs?

As shown in Table 3-2, a majority of the respondents, approximately 53 percent, indicated that they were somewhat familiar with the BLM's programs; approximately 23 percent responded that they were somewhat unfamiliar with BLM's programs.

Table 3-2
Familiarity with BLM Programs

Familiarity	Percent
Very familiar	14
Somewhat familiar	53
Unfamiliar	23
Very unfamiliar	10

Major BLM programs that currently are active in the Las Cruces Field Office are listed below. On a scale of 1 to 5, with 1 representing the least and 5 the most, how much do you value each of these programs for future management of public land in Sierra, Otero, and Doña Ana Counties?

- **Grazing Management**
- **Forestry**
- **Riparian, Wetlands**
- **Cultural Resources**
- **Wild Horse and Burro**
- **Wildlife (Habitat)**
- **Fisheries**
- **Endangered Species**
- **Recreation**
- **Fluid Minerals**
- **Other Minerals**
- **Lands and Realty**
- **Land Planning**
- **Hazardous Materials**
- **Other**

Table 3-3
Resource Program Values[1]

Resource Program	1 (least valued)	2	3	4	5 (most valued)	Total Number of Comments by Resource Program
Grazing Management	32	17	33	17	67	166
Forestry	27	11	24	37	58	157
Riparian, Wetlands	8	24	15	28	83	158
Cultural Resources	13	25	25	42	60	165
Wild Horse and Burro	46	28	30	21	35	160
Wildlife (Habitat)	4	8	17	29	102	160
Fisheries	17	21	37	22	54	142
Endangered Species	18	25	20	20	75	158
Recreation	10	4	14	41	93	162
Fluid Minerals	51	26	26	26	34	163
Other Minerals	53	35	28	23	24	163
Lands and Realty	34	26	36	26	38	160
Land Planning	6	10	26	39	78	159
Hazardous Materials	32	20	31	18	55	156
Other[2]					28	28

NOTES: [1] All respondents did not select a value for all resources.
[2] Generally, these could have been categorized within the resources listed above (e.g., off-highway vehicle use is included under recreation).

Table 3-3 above is a count of the respondents' choices regarding their opinion of the value of each resource. (All respondents did not select a value for all resources.) Responses indicate that wildlife habitat, recreation, and riparian/wetlands programs are most valued, while programs for fluid minerals, other minerals, and wild horses and burros are least valued.

Twenty-eight people selected the "other" category. Of these, 12 indicated that recreation program managing off-highway vehicle (OHV) use, rock collecting, or hunting would be of most value. Eight people indicated preservation programs as most valuable. Four felt that water deserved attention as the most valuable resource, two mentioned public education, one expressed concern about noise pollution, and one person advocated banning OHVs from public lands.

How would you like to see the natural (e.g., water, soil, wildlife, vegetation) and cultural (prehistoric, historic, traditional cultural places), recreational, scientific resource on public land managed in Sierra, Otero, and/or Doña Ana Counties?

Some members of the community indicated the BLM should continue managing the lands as they are currently. Other comments received expressed a desire to control public access, limit OHV use, and eliminate grazing. Many comments advocated the preservation and protection of natural, cultural, and scenic areas by reducing grazing, limiting OHV use, and eliminating mineral exploration in special areas such as ACECs. Also, commenters suggested that the BLM work with local communities and jurisdictions to coordinate consistency with local land use plans. Water was also identified as an important resource requiring management consideration. Some comments suggested that the BLM manage nonnative vegetation species to reduce consumptive use and to avoid negative impacts on the aquifer.

Some respondents had specific management concerns related to particular areas, as illustrated by the following suggestions:

- Preserve and protect the scenic values and traditional uses on Tortugas Mountain.
- Consider a geologic park in the Robledo Mountains to preserve dinosaur tracks.
- Petrified forest, near Truth or Consequences should be a special management area.
- Designate a larger area in Otero Mesa as a special management area for wilderness.
- Increase law enforcement in the Three Rivers petroglyph site area to reduce vandalism.

How would you like to see the uses (e.g., grazing, recreation, etc.) of public land and its resources managed in Sierra, Otero, and/or Doña Ana Counties?

The majority of the comments received were concerning OHV use and grazing. Some community members advocated limiting OHV use on public lands as a measure of protection against erosion and to prevent adverse impacts on wildlife: there was concern that a lack of "tread lightly" principles results in higher environmental impacts. Some requested that additional areas be designated for OHV use, and included specific areas in their recommendation (e.g., Red Sands); others were in favor of allowing open access for the use. Other comments mentioned the importance of more passive types of use, and some commenters expressed the desire that backpacking and camping activities would find support in the future plans for the public lands. More specifically, there were requests for looping trails marked by signage.

Many of the comments regarding grazing requested that leaseholders be granted the authority to manage the lands and limit OHV use, while others requested that BLM reduce or eliminate grazing on public lands. Other suggestions regarding grazing management included the following:

- Require a higher return on grazing monetarily by raising the animal unit months cost to reflect actual value and management costs.
- Manage grazing to provide a balance between ranching and wildlife.
- Enforce rotation or herd reduction in overgrazed areas.

- Identify a stable height system instead of a percent growth.
- Retire grazing leases gradually to help restore the health of the system.

Some comments supported the accommodation of multiple uses on public lands. Others felt that mineral development should be limited, and that reclamation of lands after mineral extraction should restore the lands to their original conditions. Some community members specifically opposed expanding community pit #1 (a mineral material extraction area near Las Cruces). Others requested overall protection of public lands from all users. A few comments expressed concern regarding the management of active watersheds—there were suggestions to reduce mining, fluid mineral development, and illegal dumping as protection measures. There was a recommendation to include an implementation decision that would require users to pay for permits (that would include written standards for exercise of the permit), which also would serve to raise public awareness regarding public land management. Law enforcement on public lands was another related issue of concern (e.g., protection of the Three Rivers petroglyph site). One commenter requested that BLM advertise contact information so that offenders on public lands could be reported.

Do you have any other comments about management of public land in Sierra, Otero, and/or Doña Ana Counties you would like to tell us?

There was general concern about the preservation of public lands for future generations, including concern that urban sprawl from Las Cruces to the Organ Mountains would lead to the disposal of public lands to accommodate future development. Access through private lands to public lands was cited as an issue, as was lack of access to public lands that are currently leased for grazing. It was suggested that the BLM exercise its authority to remind the leaseholder through the renewal process of the grazing lease that public lands should remain accessible . Other general comments supported controlling invasive species with spraying rather than a prescribed burn due to the potential long-term economic impacts of a burn on ranching operation.

Comments included recommendations to acquire specific parcels of land to help preserve the areas around the Organ Mountains. The following parcels were identified:

- Township 21 South, Range 3 East, Section 16
- Township 22 South, Range 3 East, Section 11, 14, and 23
- Township 22 South, Range 4 East, Section 5
- Township 23 South, Range 3 East, Sections 16 and 32

3.3 COMMENTS RECEIVED IN LETTERS

Comments from each of the 141 letters were entered into an electronic database and coded as belonging to one of 19 issue categories. Table 3-4 is a list of the 19 categories and the percent of letters that relayed the issue.

Table 3-4
Percent of Comment Letters Relaying Various Issues

Issue Category	Percent of Comment Letters Relaying the Issue[1]
Air quality	2.1
Soils	1.4
Water resources	17.0
Biological resources (vegetation and noxious weeds, special status species, wildlife and wildlife habitat)	36.2
Cultural resources and tribal concerns	12.8
Paleontology and geology	1.4
Visual resources	19.2
Fire management	2.1
Special management areas (ACECs, WSAs, Wilderness)	31.9
Livestock grazing	14.9
Recreation (off-highway vehicle use, trails and access)	61.0
Lands and realty (land tenure, urban expansion, rights-of-way, utilities, corridors, easements, open space)	88.6
Energy and minerals	10.6
Education and scientific research	7.8
Hazardous materials	2.8
Public safety, law enforcement, and illegal activities	4.3
RMPs/EIS process	7.1
Social and economic conditions	11.4
Transportation	21.3

NOTE: [1] Percentages do not include data from comment forms. Section 3.3 is a summary of the results from the comment forms.

The comments are summarized by issue category in the remainder of this section 3.4. For each issue category, information is organized and presented under the following subheadings: (1) Issues Overview, (2) Representative Comments, (3) BLM Management Concerns, (4) Issues To Be Used in the Development and Analysis of EIS Alternatives, (5) Issues That Can be Addressed Administratively, (6) Issues To Be Considered in Another Part of the EIS, and (7) Issues Not To Be Addressed in the EIS.

Though most of the issue categories include information under each subheading, subheadings were omitted if there were no relevant comments received. For example, an issue category that has no subheading for "Issues That Can Be Addressed Administratively" indicates an absence of scoping comments requesting BLM administrative action on that issue. Therefore, for each issue category, subheadings are listed only where applicable.

The subheadings are defined as follows:

> The "**Issues Overview**" is a summary of the public comments from which the issue was derived. Analysts reviewed all of the comments submitted and summarized them into a short paragraph.
>
> The "**Representative Comments**" are quotations from the written comments that exemplify similar comments. When specified, the agency or organization that submitted the comment was noted. If the comment was from an individual, the city and state of the commenter's address were

noted along with the comment; however, the commenter's name was omitted Some representative comments apply to more than one resource category and may therefore appear more than once within this report. The number of representative comments presented does not necessarily represent the relative number of comments received on the issue; rather, it is more indicative of the variety of viewpoints and the methods by which they were received (e.g., letters, etc.). In some cases, minor spelling or typographical errors were corrected within the quoted statements. However, no other changes were made to these statements; they are as they appear in the original submittals.

The "**BLM Management Concerns**" are concerns that are identified by BLM staff and managers based on their knowledge of the Planning Area and its users. Management concerns are generally associated with BLM programs and, while they may not be externally generated or controversial, they deserve the appropriate level of consideration in the planning process.

The "**Issues To Be Used in the Development and Analysis of the EIS Alternatives**" are issues that may help to guide the focus of the analysis. For example, there were requests to expand the boundaries of existing ACECs. This immediately suggests several potential alternatives: (a) expansion of all ACEC boundaries, as requested; (b) expansion of only two ACEC boundaries; and (c) expansion of certain areas of the boundary of a particular ACEC to protect a particular resource. The issue statements are included as they were written by the public; these statements do not necessarily describe how BLM intends to consider and address the issue within the draft RMPs/EIS.

The "**Issues That Can Be Addressed Administratively**" are those that can be resolved through policy or administrative action. These issues do not require a decision in the RMPs, but can be addressed immediately through administrative action by BLM. Examples would be the completion of ongoing cultural resources inventory within the Planning Area or development of a memorandum of understanding.

The "**Issues To Be Considered in Another Part of the EIS**" includes issues or information that can be presented in sections of the RMPs/EIS other than those mentioned previously (e.g., alternatives). This could include baseline data available (e.g., information pertaining to the affected environment) or consultation and/or collaboration with agencies and the community.

The "**Issues Not To Be Addressed in the EIS**" are issues that are beyond the scope of the RMPs/EIS process; for example, those that may refer to actions requested outside of the Planning Area or outside of the BLM's planning jurisdiction. Explanations as to why these issues will not be addressed are provided in italics.

3.3.1 Air Quality

Issues Overview

Comments regarding air quality were limited. However, there was concern about the impacts on air quality from uses on public lands—impacts that would occur from such things as flaring, oil and gas development, and operation of two-stroke engines. One commenter recommended the development of an air quality baseline and analysis report to establish the baseline air quality for the EIS, and which could be used in setting regional or Planning Area air quality goals and objectives.

Representative Comments

"We support the preservation of all the natural resources we enjoy: air quality, scenic views, night skies, green areas and natural habitats ranging from river valley to desert mesas, arroyos and the surrounding mountains." – Individual, Las Cruces, New Mexico

"The EIS should address the issue of regional haze and the destruction of viewsheds caused by haze (which may be caused by activities both within and outside the lands governed by the TriCounty RMPs, but is a necessary part of cumulative impact analysis)." – New Mexico Wilderness Alliance/The Wilderness Society, New Mexico

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Address air quality as required by FLPMA.
- Preserve air quality as a natural resource when allowing other uses on public lands.
- Set aggressive standards and require any actions on public lands to meet those standards.
- Address the question of how prevention-of-significant-deterioration requirements can be met. The following Class I airsheds are located in the TriCounty Planning Area:
    - Bosque del Apache National Wildlife Refuge
    - Carlsbad Caverns National Park
    - Gila Wilderness
    - Guadalupe Mountains National Park
    - Salt Creek Wilderness
    - White Mountain Wilderness
- Analyze cumulative impacts for proposed actions with other past, present, and reasonably foreseeable actions.
- Address oil and gas development activities directly related to air pollution.

Issues That Can Be Addressed Administratively

- Development of an air quality baseline and analysis report to document baseline conditions.
- Meet the requirements of applicable State Implementation Plans and ambient air quality standards and improve air quality in non-attainment areas.
- Establish an effective air quality-monitoring program that could halt any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded.

Issues To Be Considered in Another Part of the EIS

- Include the requirements in the Clean Air Act for the prevention of significant deterioration of air quality and protection of air quality in various airshed categories, particularly in Class I airsheds applicable to national parks and wilderness areas.

3.3.2 Soils

Issue Overview

Two comments received pertained to soils and soil erosion. One comment suggested that the BLM should analyze the costs associated with the loss of soil productivity that would result from increased oil and gas drilling and should include these in the impact analysis for socioeconomic conditions. The other comment warned against development of areas near the Jornada Experimental Range, which could threaten the integrity of long-term erosion studies.

Representative Comments

"Water with a high SAR [sodium absorption ratio] can permanently change chemical composition of soils, reducing soil, air and water permeability and thereby decreasing native plant and irrigated crop productivity. We recommend that the BLM analyze the costs due to the loss of productivity and include these in the socioeconomic impacts of alternatives that call for increased oil and gas drilling." – New Mexico Wilderness Association/The Wilderness Society, New Mexico

"The Jornada Experimental Range was formed in 1912 and is world-known for scientific rangeland research. Allowing development to occur near its southern border would threaten the integrity of long-term research projects in the area, especially wildlife and wind erosion studies taking place nearby." – Chihuahuan Desert Nature Park, Las Cruces, New Mexico

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Address the potential for a high SAR in area waters due to drilling; examine the potentiality that a high SAR would change the chemical composition of area soils, reducing soil, air, and water permeability and decreasing native plant and irrigated crop productivity.
- Eliminate OHV use to protect the flora and fauna and the land from erosion.
- Reduce woody vegetation to decrease soil erosion.
- Analyze costs due to the loss of productivity in irrigated crops and include analysis in the socioeconomic impacts of alternatives that call for increased oil and gas drilling.
- Prohibit development that threatens the integrity of long-term research projects on wildlife, wind erosion, and other studies, near the southern border of the Jornada Experimental Range. (This will be addressed to the extent that public lands are near or adjacent to the Jornada Experimental Range.)

3.3.3 Water Resources

Issues Overview

Many comments were received concerning water resource issues including the protection of wetlands, riparian areas, watersheds, arroyos, fisheries, wildlife habitats, and aquifers. A few comments mentioned water rights and the availability of water in this arid region, stressing that future water development should recognize the rights of existing permittees and affected landowners. Several comments also suggested that the BLM consider watersheds and aquifer recharge when designating lands for disposal.

Additionally, commenters suggested the BLM ensure compliance with State water quality standards and the Clean Water Act. Specifically, some comments suggested that, to protect water quality, livestock grazing should be prohibited near arroyos that drain into the Rio Grande.

Representative Comments

"Riparian ecosystems, generally speaking, comprise a very small percentage of the landscape in the Chihuahuan Desert, and provide critical habitat for obligate and facultative riparian species. The Rio Grande is made further unique in that it is the only major through-flowing river in the Chihuahuan Desert. As such, the Rio Grande serves large-scale ecological and evolutionary functions essential for sustenance of the Chihuahuan Desert biodiversity." – World Wildlife Fund, Chihuahuan Desert Field Office, New Mexico

"Real estate development on every available acre is not an option for our desert community, which must deal realistically and continually with the issue of water availability." – Individual, Mesilla, New Mexico

"Preserve for watershed maintenance and critical wildlife habitat. There is economic value in increased tourism associated with healthy riparian and wetland resources." – Individual, Elephant Butte, New Mexico

"Future water development such as drilling of new wells should recognize and respect existing water rights of permittees and affected landowners." – New Mexico State University, Las Cruces, New Mexico

"Consider the entire watershed and the issue of aquifer recharge when proposing lands for disposal." – Sierra Club Southern New Mexico Group, Sierra County, New Mexico

BLM Management Concerns

- Newly acquired public lands along the Tularosa River, approximately 900 acres, are not addressed in the existing resource management plan (White Sands RMP). Consider the public and private ownership pattern when developing and analyzing the effects of management decisions on the river and its associated watershed.
- Consider the effects of drainage and run-off from public land onto adjacent private properties.
- Assess private lands adjacent to public lands that are subject to flooding.
- Consider the need for and effects of control measures on adjacent public lands, such as retaining acreage on the downhill side of the public land for the installation of appropriate control structures.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Preserve and protect the Rio Grande and associated watersheds for the riparian habitat it provides for wildlife.
- Protect the natural drainage system that feeds into Issack Lake.
- Establish criteria to define a process for developing protective buffers around natural features, such as the natural drainage system.
- Protect stream corridors, dry washes, and associated watersheds—including the upland areas within the stream corridors—so that they support various forms of wildlife and provide natural runoff.
- Support the Citizens' Task Force for Open Space Preservation "A Vision: Open Space and Trail System for Doña Ana County, New Mexico" (Citizens' Plan for Open Space and Trails Vision), which would provide protection of the arroyos.
- Adopt requirements to ensure that eligible and suitable rivers are protected pending decisions on their designation, and ensure that designated rivers and river corridors are managed to preserve their values.
- Exclude livestock grazing from riparian areas and arroyos.
- Prohibit oil and gas development in riparian areas, or stipulate that there be no surface occupancy allowed in those areas.
- Analyze how mineral development and associated impacts such as waste pits, roads, pipelines and other uses will be regulated so as to avoid impacts to riparian areas and wetlands.

- Within the Mesilla Valley Bosque Park, designate all public lands within the subwatershed that drains into the proposed new State park as an ACEC in order to provide flood and water quality protections and a development buffer, and to protect wildlife habitat.
- Protect the Filmore Arroyo.
- Consider the entire watershed and the issue of aquifer recharge when proposing lands for disposal.
- Close roads and trails that cross natural springs and seeps.
- Ensure that the RMPs comply with the Clean Water Action Plan that requires "managing natural resources on a watershed basis…."
- Prohibit the issuance of rights-of-way in riparian and wetlands areas.
- Analyze the long-term economic costs associated with water pollution and the lack of water recharge and include analysis in the socioeconomic impacts of alternatives that call for increased oil and gas drilling.
- Analyze the impacts on fisheries and their restoration and include analysis in the socioeconomic impacts of alternatives that call for increased oil and gas drilling.
- Analyze the costs associated with the loss of irrigated crop productivity and include analysis in the socioeconomic impacts of alternatives that call for increased oil and gas drilling.

Issues That Can Be Addressed Administratively

- Comply with the Clean Water Act.
- Identify facilities (e.g., Alameda Dam) in need of repair to ensure safety and determine safety precautions, and establish guidance and priorities for assessing the conditions of such facilities.
- Require plans for roads and other development corridors that cross arroyos.
- Require that proposed road development not impede or slow water flow in any way.
- Do not permit structures that would impede, redirect, or otherwise obstruct flood flows within the 100-year floodplain.
- Complete a comprehensive inventory of the riparian areas and wetlands in the Planning Area, pursuant to BLM Manual MS-1737.22.
- Complete a comprehensive inventory of the streams and rivers to determine their eligibility for protection as a wild, scenic, or recreational river.
- Develop a monitoring program that measures biodiversity and wildlife populations, soil erosion, vegetation health, nonnative species extant within the population, water quality and quantity, and the impacts of other uses such as grazing, OHV use, and other recreation uses and activities.
- Ensure that narrative standards are fully met, if applicable as determined by the State of New Mexico water quality standards.
- Establish monitoring protocols for every watershed within the Planning Area to meet the narrative provisions established by the State of New Mexico.
- Implement BLM's Riparian-Wetland Initiative, particularly the objective of restoring 75 percent of riparian areas to 'proper functioning condition.'
- Develop a drought-management plan.

- Assist the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers with implementation and enforcement of Clean Water Act Section 404.

Issues To Be Considered in Another Part of the EIS

- Establish current conditions in the affected environment, and goals and objectives for every watershed within the Planning Area to meet the narrative provisions by the State of New Mexico.

Issues Not To Be Addressed in the EIS

- Do not allow oil and gas development in Otero Mesa because of the potential risk of damaging the aquifer for drinking water. *Oil and gas development in Sierra and Otero Counties was addressed in the RMPA/EIS for Federal Fluid Minerals Leasing and Development in Sierra and Otero Counties. The decisions made in that RMP Amendment will stand unless new information necessitates changes (e.g., the designation of an ACEC within the current planning effort).*
- Estimate the risk of flooding due to retention pond failure onto private property and habitat. *Flood control structures are managed by various other agencies; management of these structures is not within BLM's jurisdiction.*

3.3.4 Biological Resources

Vegetation and Noxious Weeds

Issues Overview

A majority of the comments regarding vegetation expressed concern about the presence of noxious weeds within the Planning Area. Commenters requested that BLM increase the control measures and educate the public about noxious weeds. For example, it was recommended that BLM establish guidance about appropriate times to refrain from ground-disturbing activities in order to prevent the spread of invasive species. There were concerns that the following allowable uses on public lands have potential to introduce invasive species into native plant communities: (1) new access roads, (2) grazing, (3) motorized and nonmotorized vehicles traveling through known locations of sensitive plant species, (4) wood cutting areas, (5) communication sites, and (6) right-of-way corridors. Many comments supported the expansion and protection of specially designated areas—such as ACECs, WSAs, and areas of wildlife and botanical interest and continue—as a measure of protection against noxious weeds. Other commenters were concerned about maintaining the integrity of existing vegetation communities.

Representative Comments

"The loss of native species and the spread of noxious weeds across the west has enormous economic costs to the public and private interests." – New Mexico Wilderness Alliance/The Wilderness Society, New Mexico

"Otero Mesa and the Nutt grasslands should be designated ACECs to protect the rare Chihuahuan Desert grasslands and other environmentally significant plants and animals." – Individual, El Paso, Texas.

"Managing the public land for grazing does maintain it in undeveloped (or minimally developed) condition. Continuing to manage extensive ranges for grazing maintains the natural visual quality of the landscape and the plant communities. It has been demonstrated through research that grazing in arid habitats causes changes or impacts to native plant communities (simply because native plant communities are still adapting to and becoming modified by introduced livestock that consume vegetation in a different manner than the native wildlife that have evolved here)." – Native Plant Society of New Mexico, Rio Rancho, New Mexico

"The TriCounty RMPs should provide that relict and undisturbed plant communities must be managed for their protection; no activities that could negatively affect these communities should be allowed. Protection of riparian plant communities should receive special attention in the TriCounty RMPs, and native cottonwood and willow communities along riparian areas should be targeted for protection and reestablishment where they have been eliminated or degraded." – New Mexico Wilderness Alliance/The Wilderness Society, New Mexico.

BLM Management Concerns

- Identify strategies and measures for improving and coordinating the control of noxious weeds.
- Analyze the problem of noxious weeds and identify effective strategies for coordinating management approaches on public lands. For example, Border Patrol activities increase the spread of noxious weeds and coordination with the agency regarding the issue could establish effective strategies to reduce the problem.
- Identify desired plant community for Sierra and Otero Counties.
- Develop preventive measures for the control of noxious and invasive weeds for the Planning Area.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Increase measures for control of noxious and invasive species.
- Close roads and trails through known habitat or locations of sensitive plant species.
- Do not allow activities that could negatively affect undisturbed plant communities.
- Protect native cottonwood and willow communities along riparian areas and reestablish eliminated or degraded communities.
- Designate Otero Mesa and Nutt Grasslands for protection of the rare Chihuahuan Desert grasslands.
- Establish guidance as to when avoidance of ground-disturbing activities is preferred and appropriate to prevent the spread of invasive species.
- Determine the location and characteristics of native plant communities and rare or special status species.
- Prioritize areas with threatened, endangered, or sensitive plants for noxious weed control activities.
- Establish the following standards for restoring and promoting native plant communities:
    - Prohibit chaining, roller-chopping, or similar methods of vegetation manipulation, due to the widespread disturbance they cause.
    - Exclude livestock from a restoration/revegetation site for sufficient time to determine that the restoration has been successful.
    - Use chemical treatments for noxious weed species only if damage to other resources in the area by noxious weed invasion will be significant, imminent and certain, and if damage to other resources (e.g., damage to native species) by chemical treatment is determined to be of less significance than the noxious weed problem.
    - Identify areas for which fire could improve the vegetation communities and then allow natural fires to burn in these areas.

- Establish monitoring plots to determine the effectiveness of the treatments used for invasive plant control and to provide baseline data of overall change in conditions.
- Carefully regulate the harvesting of fuel-wood, and only allow in areas that have already been disturbed.

Issues That Can Be Addressed Administratively

- Enforce permits, grants, stipulations, etc., for the spraying of invasive species.
- Exclude fuel-wood cutting from areas with threatened, endangered, or sensitive plants.
- Exclude grazing from areas with threatened, endangered, or sensitive plants.
- Do not allow reseeding or surface-disturbing restoration after fires in areas with special status plant species.
- Emphasize and enforce the inventory and treatment of invasive weeds by companies, permittees, and others during and after ground disturbing activities and subsequent reclamation.
- Increase education opportunities for the public regarding noxious and invasive species.
- Target the following noxious weeds for management: African rue, Malta starthistle, camelthorn, jointed goatgrass, spotted knapweed, onionweed, and yellow starthistle.

Issues To Be Considered in Another Part of the EIS

- Analyze the reasons and option for both restoration and prevention in the future for invasive species in the Planning Area.
- Determine the effect of ground disturbance resulting from rangeland management actions, including grazing on invasive species.

Special Status Species

Issues Overview

Many comments received regarding special status species recommended retaining public lands and designating wildlife movement corridors as ACECs to protect populations of bighorn sheep and other species. For example, some commenters felt that lands north of the town of Organ, west of the White Sands Missile Range boundary, and south of the National Aeronautic Space Administration (NASA) boundary should be retained and/or acquired. Some were concerned about the possibility of bighorn sheep contracting diseases from domestic sheep and goats, which could cause catastrophic die-offs. As a measure of protection against this, there was a suggestion to establish adequate buffer zones around bighorn sheep habitat areas. It also was recommended that bighorn sheep should be used as a management indicator species during the planning process.

Commentors also identified areas important for biodiversity—riparian areas and other important wildlife habitats such as migration routes, wintering areas, birthing areas, caves, spawning areas, and colonial nesting and roosting areas were singled out as areas deserving special protection. The Organ, San Andres, and Franklin Mountains also were identified as high priority areas for preservation of biodiversity.

Representative Comments

"The Department [of Game and Fish] also requests that the Las Cruces Field Office consider the Department's Long-range Plan for Desert Bighorn Sheep Management, 2003-2013. Specifically, the

Department suggests that the RMPs consider the goals and objectives identified within the Department's Desert Bighorn Sheep Management Plan." – New Mexico Department of Game and Fish, Santa Fe, New Mexico

"Though FNAWS [Foundation for North American Wild Sheep] supports free-enterprise and private land rights, we also support that the 'rights' be practiced in a responsible manner. Good stewardship of our lands protecting our indigenous species should be a priority to your agency as well as the local private owner." – Foundation for North American Wild Sheep, Cody, Wyoming

"Increased human activity, noise, and a greater chance of exposure to exotic animals and domestic pets could negatively impact the bighorn population. Maintaining a large undeveloped block of public land will greatly reduce the impacts of urban growth on the wildlife populations and habitats within the southern San Andres Mountains and within the Refuge." – United States Department of Interior, Fish and Wildlife Service, Albuquerque, New Mexico

"Travel corridors for desert bighorn sheep are important to maintain viable populations and allow for genetic interchange between groups of sheep." – Southwest Environmental Center, Las Cruces, New Mexico

"We can not let millions of years of evolutionary development go down the drain for short-term economic advantage to the few. Our natural heritage must be preserved." – Individual, Elephant Butte, New Mexico

BLM Management Concerns

- Manage future candidate sensitive status species and species of concern. Currently, there are 16 federally listed species and numerous special status species that need to be protected.
- Support the FWS's efforts to reintroduce the Aplomado Falcon and take into consideration for designation of 10-J Habitat, which requires that a Habitat Management Plan is developed. The Aplomado Falcon Restoration Project is a non-essential experimental population project handled Restoration Program through Section 10-J of the Endangered Species Act.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Designate the Organ, San Andres, and Franklin Mountains as high priority for protection of biodiversity.
- Protect riparian ecosystems, which provide critical habitat for obligate and facultative riparian species.
- Preserve and conserve the Rio Grande riparian corridor within Doña Ana County.
- Maintain movement corridors for special status species, including the designation of movement corridors within ACECs.
- Consider the Long-Range Plan for Desert Bighorn Sheep Management, 2003-2013 when developing goals and objectives.
- Consider improving range conditions on existing and potential bighorn sheep ranges.
- Comply with and seek to implement any recovery plans and/or biological opinions applicable to listed species.
- Ensure that actions are not likely to jeopardize the continued existence of a listed species or result in the destruction or adverse modification of critical habitat.

- Develop standards for domestic goats and domestic sheep to protect the bighorn sheep from diseases, with the flexibility to enforce more stringent standards when biological conditions demand action in this respect.
- Do not permit communication sites, oil and gas drilling pads, and utility and road rights-of-way in areas known to support special status species populations.

Issues That Can Be Addressed Administratively

- Ensure that fire management decisions comply with NEPA and the Endangered Species Act.
- Concentrate law enforcement efforts in areas with special status species habitat.
- Establish objectives for upward population trends of all listed species present or likely to be present.
- Establish, monitor, and enforce standards to ensure that biological assessments and other analyses are done in compliance with Section 7 using up-to-date scientific information.
- Consult with FWS and/or National Marine Fisheries Service.
- Further the purposes of the Endangered Species Act by carrying out programs for the conservation of listed species.

Wildlife and Wildlife Habitat

Issues Overview

A majority of the comments received regarding wildlife and wildlife habitats supported the establishment of wildlife movement corridors to protect wildlife from the urban expansion into areas around Las Cruces. Some commenters recommended the establishment of ACECs for this purpose and to protect wildlife movement corridors and preserve existing wildlife habitat. Some requested that the BLM acquire lands critical as wildlife habitat. Others expressed their support for the proposed Vision for Open Space and Trail System and the West Mesa Regional Park Retention Plan for the preservation of wildlife habitat. Riparian corridors were valued as (1) existing habitat, (2) existing, rare water features providing critical habitat in the Chihuahuan Desert, and (3) movement corridors for various wildlife species.

Representative Comments

"Animals can't thrive in isolated pockets without relatively safe access to the food and diverse gene pools in other areas. Plants need room to grow." – Individual, Las Cruces, New Mexico

"I have been a resident of Las Cruces since 1983 and like most of us, have seen 'the land' and 'space' diminishing. Please consider 'thoughtful balance' for 'harmony' between people, land and animals." – Individual, Las Cruces, New Mexico

"Riparian ecosystems, generally speaking, comprise a very small percentage of the landscape in the Chihuanhuan Desert, and provide critical habitat for obligate and facultative riparian species." – World Wildlife Fund/Chihuahuan Desert Field Office, New Mexico

"We believe that public lands in the future should be used less as a mechanism for subsidizing the cattle industry and more as a place for preserving wildlife and habitat and as space for outdoor pursuits." – Individual, Las Cruces, New Mexico

"I believe BLM land should be held mainly for recreational use by the general public. In addition I believe these lands should be refuges for wildlife as well as plant life that is native to these areas." – Individual, Dallas, Texas

"Preserve and restore wildlife habitat." – Individual, Elephant Butte, New Mexico

BLM Management Concerns

- Determine whether changes to existing Habitat Management Plans are necessary.
- Evaluate the National Wildlife Federation's proposal for an ACEC for black-tailed prairie dog habitat.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Designate ACECs to ensure protection of wildlife movement corridors for species such as pronghorn, bighorn sheep, mule deer, cougars and wolves (refer to Section 3.4.9 for more information).
- Designate ACECs to protect wildlife habitat (refer to Section 3.4.9 for more information).
- Designate an ACEC to protect black-tailed prairie dog habitat.
- Designate Nutt Grasslands as an ACEC to protect potential aplomado falcon, potential prairie dog habitat, and pronghorn habitat.
- Ensure biological diversity is preserved.
- Protect wildlife habitats such as migration routes, wintering areas, birthing areas, caves, spawning areas, and colonial nesting and roosting areas.
- Protect the existing wildlife corridor in Selden Canyon.
- Close OHV areas where wildlife is at risk of adverse effects from OHV use.
- Determine how the TriCounty RMP will complement or affect the statewide Comprehensive Wildlife Conservation Strategy.
- Consider the decisions made in the Comprehensive Wildlife Conservation Strategy in the development of the RMP.
- Define the process for determining whether an action covered by the TriCounty RMP will negatively impact wildlife or habitat identified in the Comprehensive Wildlife Conservation Strategy.
- Improve habitat for quail and other wildlife species.
- Prohibit right-of-way and utility corridors that would interrupt the contiguous wildlife corridors.
- Coordinate the preservation of West Mesa Regional Park for wildlife connectivity and habitat including the trails connecting the park to the Mesilla Valley Bosque State Park.
- Establish protective stipulations for big game species to include all winter range areas.
- Establish protective stipulations for raptors, not to be limited to occupied nests.
- Retain land for valuable wildlife habitat for bighorn sheep, mule deer, mountain lions, and numerous other species.

- Exclude wind energy development and its associated infrastructure because it is incompatible with areas of critical habitat and habitats important for imperiled species.

Issues That Can Be Addressed Administratively

- Study/analyze the impact of oryx on vegetation.
- Establish policies regarding increasing habitat "edge," recognizing that increasing edge can be detrimental to some species.
- Coordinate with the NMGFD to ensure that the decisions in the RMP do not negatively impact the Comprehensive Wildlife Conservation Strategy.

Issues To Be Considered in Another Part of the EIS

- Address the potential effects of growth resulting from the proposed New Mexico Regional Spaceport on the San Andres National Wildlife Refuge, including the population of bighorn sheep found there.

Issues Not To Be Addressed in the EIS

- Manage destructive activities on arroyos located on private property to protect drainage, aesthetic qualities, and wildlife impacts. *Actions on private property are not within the BLM's management jurisdiction.*
- Reduce non-native species like oryx by allowing them to be hunted in greater numbers. *Hunting is managed by NMGFD.*

3.3.5 Cultural Resources and Tribal Concerns

Issues Overview

Comments received pertaining to cultural resources focus on identifying and protecting these resources. A majority of the comments regarding cultural resources advocate the adoption of the Citizens' Plan for Open Space and Trails Vision. One of that plan's main goals is to "preserve for public enjoyment and learning significant historical and cultural sites."

A large number of comments suggested that cultural resources need to be protected from vandalism, theft, and damage in general by (1) limiting access, (2) designating specific tracts of land for protection, and (3) undertaking resource inventories. Some comments indicated that oil and gas drilling, and the associated OHV use for monitoring purposes, would increase damage to archaeological sites, thus diminishing the educational and aesthetic value of affected cultural resources. One comment also indicated that the Native American community should identify sites of traditional religious and cultural significance for protection.

Representative Comments

"The Las Cruces Field Office must carefully consider the effects of all RMP decisions on archaeological and cultural values. Since it will be difficult to evaluate the effect of decisions when the location of cultural resources is unknown, the BLM should undertake an archaeological inventory whenever necessary. In particular, in regards to travel planning, the BLM should consider where motorized and nonmotorized routes are directing people, inventory cultural resources along those routes, and carefully consider the potential impacts to those resources." –New Mexico Wilderness Alliance/The Wilderness Society, New Mexico

"Protect historical and cultural resources such as rock art sites and the Butterfield Historic Trail." – Individual, Las Cruces, New Mexico

"Protect historical and cultural resources throughout the planning area." – Individual, Doña Ana County, New Mexico

"Many towns and counties across the nation are now protecting their open spaces as well as their historic sites and buildings. There is immeasurable value in saving both here in Las Cruces and Doña Ana County." – Individual, Doña Ana County, New Mexico

"Respect, preserve and document all cultural and historical sites." – Individual, Elephant Butte, New Mexico

"Thoroughly document all cultural and historic resources. Increasing population pressures often lead to vandalism and irreparable loss of the information related to these resources." – Individual, Elephant Butte, New Mexico

BLM Management Concerns

- Identify local cultural resources.
- Establish appropriate ACECs and guidance for protection, and for public awareness and enjoyment.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Preserve and protect the following areas of cultural and historic significance within the Planning Area:
    - Pat Garrett murder site
    - Numerous petroglyph sites
    - Los Tules Pit House site
    - Mexican land grants
    - Mesilla Phase Jornada Mogollon Pit House
    - Robledo trackways
    - Tortugas Mountain
- Designate special management areas that possess cultural importance (refer to Section 3.4.9 for more information).
- Protect the areas used during the Desert Soils Project that generated more than 100 scientific publications on desert soils, geology, ecology, and archaeology.
- Determine the sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect, conserve, and restore cultural resources.
- Outline specific management actions, such as stabilization, fencing, signage, closures, or interpretative development, to protect, conserve, and where appropriate, restore cultural resources.

Issues That Can Be Addressed Administratively

- Consult formally with Indian tribes and State and local governments. Consideration should be given to the specific consultations that should occur and the appropriate procedures for carrying out such consultations.

- Conduct cultural resource inventories along motorized and nonmotorized routes to reduce the impacts to those resources.
- Survey all known or discoverable cultural and historic sites, or those adjacent sites that may be adversely affected.
- Complete a cultural resource management plan that coordinates with the objectives of the RMP and seeks to provide for an appropriate proactive process of inventorying for cultural resources, making determinations of eligibility for the National Register of Historic Places, and seeking to nominate eligible properties to the National Register.
- Consult with the Native American community to determine whether there are sites or specific areas of particular concern, including sites of traditional religious and cultural significance.
- Cooperate with Tortugas, NMSU, and other knowledgeable researchers to define the early cultural story of the village of Tortugas near Mesilla.
- Increase law enforcement in the Three Rivers petroglyph site area to reduce vandalism.
- Adopt measures to protect cultural resources from artifact collectors, looters, thieves, and vandals.
- Comply with the "Preserve America" initiative (Executive Order 13287, March 3, 2003), which requires the BLM to advance the protection, enforcement, and contemporary use of its historic properties.

Issues Not To Be Addressed in the EIS

- Preserve and protect Fort Selden State Monument. *This area is in a protected status and owned by the State of New Mexico; management of this area is beyond BLM's jurisdiction.*
- Preserve and protect Mount Cristo Rey. *This area was transferred to private ownership years ago; management of this area is beyond BLM's jurisdiction.*
- Protect the Lucero Wash petroglyphs by acquiring the properties. *This land is owned and managed by NMSU; management of this area is beyond BLM's jurisdiction. However, land acquisition criteria may include opportunities to prioritize lands with cultural resource sites.*

3.3.6 Paleontology and Geology

Issue Overview

Two comments were submitted pertaining to paleontology and geology. One comment suggested that the BLM define the level of inventory needed to provide a basis for understanding the importance of geology and paleontology, and protect and conserve geologic formations and paleontological resources. Also, one commenter suggested that BLM provide interpretive media or programs to educate the public on how the Organ Mountains "got the wonderful appearance that they have today."

Representative Comment

"In terms of geologic and paleontologic resources: (1) BLM's goal should be to protect and conserve special geologic formations and paleontologic resources. (2) BLM should determine the geologic and paleontologic sites or areas that are most vulnerable to current and future impact and adopt management actions necessary to protect, conserve, and restore these resources. (3) BLM should prohibit the collection of any specimens. (4) BLM should adopt measures to protect paleontologic resources from looters, thieves, and vandals. (5) BLM should define the level of inventory needed to provide a basis for understanding the distribution, comparative importance, and potential uses of paleontologic resources

(i.e., relative sensitivity, relative opportunities for interpretive development, relative scientific importance, relative potential for research and education)." – New Mexico Wilderness Alliance/The Wilderness Society, New Mexico

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Protect and conserve special geologic and paleontological resources.
- Determine the geologic and paleontological sites or areas that are most vulnerable to current and future impacts.
- Define the level of baseline inventory needed for paleontological resources.
- Adopt management actions necessary to protect, conserve, and restore the geologic and paleontological sites or areas.
- Prohibit the collection of any specimens.

Issues That Can Be Addressed Administratively

- Develop interpretive media to educate the public about the appearance of the Organ Mountains.

3.3.7 Visual Resources

Issues Overview

The majority of comments received pertaining to visual resource management supported the adoption of the Citizens' Plan for Open Space and Trails Vision to protect scenic viewsheds from development. Several commenters advocated protecting beautiful views while leaving open OHV access. A few commenters suggested that the BLM ensure scenic value by establishing a clear management direction, describing areas of scenic importance, and defining objectives for preservation. One commenter suggested that all future power lines be built with provisions to minimize visual impacts.

A few comments were received regarding night skies. Of the comments received, most of them also mentioned preserving visual quality by addressing the issue of regional haze and air quality. One comment mentioned that oil and gas development was directly correlated with the destruction of viewsheds and deterioration of air quality by haze.

Representative Comments

"Protect the areas' scenery and other important landscape values by NOT disposing or exchanging public lands identified (for open space) by the Citizens' Task Force for Open Space." – Individual, Las Cruces, New Mexico

"BLM should ensure that scenic value is a resource that is conserved and must establish clear management direction describing areas inventoried and possessing high scenic importance with clearly defined objectives that limit surface disturbance within important viewsheds…" – New Mexico Wilderness Alliance/The Wilderness Society, New Mexico

"Maintain a 'desert view' landscape adjacent to and east of Interstate 10 extending from the southern end of Las Cruces to El Paso. This 'desert view' landscape is needed to maintain the atmosphere of desert and the 'sense of place' that have attracted so many to Las Cruces. The desert and its open vistas attract growth to Las Cruces and help maintain its prosperity. This reach of land is the only one left that extends from the mountains to the farmland. Large blocks of it, as well as arroyo corridors from the interstate to

the mountains should be maintained in public ownership." – The South Las Alturas Neighborhood Association, Doña Ana County, New Mexico

"The BLM can help preserve the beauty of this area and, thus, help our community devise a path for smart growth that provides open spaces for the preservation of natural life and beauty and for the enjoyment and education for our community." – New Mexico Wilderness Alliance/The Wilderness Society, New Mexico

"It is in our collective interests to preserve some of the East Mesa's scenic quality, and a scenic corridor easement program will enhance the area by protecting and maintaining the rural atmosphere, and providing refuge for native wildlife." – Individual, Las Cruces, New Mexico

"We support the preservation of all the natural resources we enjoy: air quality, scenic views, night skies, green areas and natural habitats ranging from river valley to desert mesas, arroyos and the surrounding mountains." – League of Women Voters, Las Cruces New Mexico

BLM Management Concerns

- Update the visual resource management (VRM) class designations, primarily for Sierra and Otero Counties.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Designate ACECs or other special management areas for the protection of scenic values (refer to Section 3.4.9 for more information).
- Incorporate the Citizens' Plan for Open Space and Trails Vision into the RMP.
- Preserve the scenic integrity of the surrounding bajadas and mountains threatened by rampant development.
- Retain and add lands to the Organ Mountains recreation area to protect scenic views.
- Assign VRM values to the West Mesa Escarpment and protect its scenic and recreational value to the community.
- Manage livestock grazing to maintain the natural visual quality of the landscape and plant communities.
- Ensure that scenic values are conserved.
- Establish a clear management direction describing areas inventoried and possessing high scenic importance including:
    - Lands proposed for wilderness designation or with wilderness characteristics should be managed as VRM Class I to "preserve the existing character of the landscape."
    - Lands within popular and easily accessible vantage points should be managed for visual resources, including clear provisions dealing with oil and gas development and other human disturbance.
    - ACECs and other special management designations and prescriptions should be used to protect scenic landscapes and lookout points within the resource area with stipulations specifically addressing and managing human development impacts, including VRM Class I to "preserve the existing character of the landscape," or VRM Class II, to "retain the existing character of the landscape," as appropriate.

- Address the issue of regional haze and the destruction of viewsheds caused by activities both within and outside the Planning Area.
- Manage the following lands proposed for special designation (refer to Section 3.4.9 for more information) for VRM Class I:
    - Penasco Canyon
    - Gyp Hills – Chalk Hills
    - Caballo Mountains
    - Southern Caballo Mountains
    - Nutt Mountain
    - Robledo Mountains – Sierra de las Uvas
    - Broad Canyon
- Manage the following lands proposed for special designation (refer to Section 3.4.9 for more information) for VRM Class II:
    - Greater West Potrillo Mountains Desert Plains
    - East Potrillo Mountain
    - Talavera area
    - Otero Mesa
    - Cornudas Mountains ACEC
    - Badger area
    - Southern Sacramento Mountains
    - Brokeoff Mountains – Guadalupe Escarpment
- Create the East Mesa scenic corridor easement program to preserve and protect scenic quality and maintain rural atmosphere.
- Preserve and protect the scenic values and traditional uses on Tortugas Mountains.
- Prohibit roadside development along Columbus Highway, such as billboards, and focus on preserving the viewshed and scenic values.
- Do not allow future power lines to traverse and obstruct viewsheds in the north-south corridor between the metro area and the Organ Mountains.

Issues That Can Be Addressed Administratively

- Assist the community in devising a plan for smart growth that provides open spaces for the preservation of scenic quality.

Issues Not To Be Addressed in the EIS

- Develop master plans that preserve habitat and viewsheds before allowing developers to acquire BLM land. *A site-specific NEPA analysis is to occur prior to the disposal of public lands; therefore, the impacts of the future use on wildlife habitat and viewsheds would be identified.*

3.3.8 Fire Management

Issues Overview

Few comments were received regarding fire management. Two comments urged the adoption of an ecologically based fire restoration program to ensure that fire can play its natural and necessary roll in the Planning Area.

Representative Comments

"Overgrazing by livestock reduces the accumulation of fine fuels on the ground, and dramatically reduces fire frequencies." – NMGFD, Santa Fe, New Mexico

"The TriCounty RMPs should establish an ecologically based fire restoration program, so that fire can play its natural and necessary role in the TriCounty RMPs area, such that the fire policy will: Focus fire suppression efforts and risk reduction management on the wildland-urban interface." – New Mexico Wilderness Association/The Wilderness Society, New Mexico

BLM Management Concerns

- Consider the Fire Management Plan that has been prepared for the LCFO.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Focus fire suppression efforts and risk reduction management in areas of wildland-urban interface.
- Establish an ecologically based fire restoration program.
- Strongly regulate and/or prohibit mechanical vegetation treatments, road building, and other fire management activities in roadless areas and other areas with sensitive resources.
- Consider the issue of fire management in areas of urban interface, particularly in the Mescalero/Bent area.
- Identify and prioritize areas where fire could improve the vegetation communities.

Issues That Can Be Addressed Administratively

- Establish provisions that will ensure that any temporary roads constructed to implement fire policy will in fact be temporary.

3.3.9 Special Management Designations

Issues Overview

The majority of comments regarding special management designations (e.g., ACECs, WSAs) were in favor of preserving open space and wilderness areas for the protection of native plants and wildlife habitat, riparian areas, recreational opportunities and scenic viewsheds. Some commenters viewed development as a threat to wilderness areas and wildlife habitat. Also, some commenters requested that existing WSAs be either designated as wilderness areas or opened to multiple uses. Others advocated stronger protection for sensitive areas and designation of ACECs.

Representative Comments

"We urge you to protect the wilderness character of all lands found to have wilderness characteristics by New Mexico citizens' groups. In addition to BLM's 272,000 acres in wilderness study areas, citizens have found 962,000 acres that have wilderness characteristics in the TriCounty Planning Area. These should be mapped in the DEIS [Draft EIS], and they should receive interim protection until Congress has made the decision for or against wilderness designation of these areas." – Individual, Phoenix, Oregon

"We support continued protection of the wilderness values of all BLM wilderness study areas." – Southwest Environmental Center, Las Cruces, New Mexico

"We would like wilderness withdrawal areas to prevent developers from building and blocking people from access to lakes and wild areas; we want our access maintained so we may travel into them to enjoy. Specifically, we want the roads in the Robledo's reopened so we may again have access." – Individual, Las Cruces, New Mexico

"Protect all existing Wilderness Study Areas such as the Robledo Mountains, the Las Uvas Mountains, the Organ Mountains, the Potrillo Mountains, the Otero Mesa, and the Jornada Del Muerto such that they will not loose their suitability for Wilderness designations." – Individual, Doña Ana County, New Mexico

"The Rio Grande has been nominated three times in the last decade as one of the top 10 most endangered rivers in America. Preservation and conservation of the Rio Grande riparian corridor within Doña Ana County should be a top priority of the Bureau." – World Wildlife Fund, Chihuahuan Desert Field Office, New Mexico

"Please do not create any more special management areas or roadless areas and close the roads and trails in these areas." – Las Cruces Four-Wheelers, Las Cruces, New Mexico

"Also, the BLM should designate ACECs to ensure to protect wildlife movement corridors for wide-ranging species such as pronghorn, bighorn sheep, mule deer, cougars and wolves. Corridors that should be protected include: San Andres Mountains, Caballo Mountains, Fray Cristobal Mountains (corridor threatened by Spaceport development), Doña Ana mountains, San Andres Mountains (corridor threatened by urban expansion of Las Cruces), San Andres Mountains, Organ Mountains (corridor threatened by highway 70 and urban expansion), Robledo Mountains, Las Uvas Mountains, Cooke's Peak, Robledos Mountains, Las Uvas, Rio Grande (corridor threatened by urban development, sand and gravel mining), other major arroyos draining to Rio Grande." – Individual, Las Cruces, New Mexico

BLM Management Concerns

- Identify the desirable management actions for all recreation sites, regardless of ACEC, special recreation management area (SRMA), or other designation.
- Prescribe management for new and existing SRMAs.
- Analyze the areas nominated for ACEC status by to determine if they should be designated as ACECs.
- Identify environmentally sensitive areas, culturally sensitive areas, areas with little environmental sensitivity, and special management provisions and levels of mitigation that should occur in each area, and avoidance areas.
- Evaluate any new inventories data of "roadless areas" provided, in accordance with current policy.
- Identify any wilderness characteristics that should be preserved and define the criteria for identifying desired characteristics.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Designate the following areas for special management to protect biological and cultural resources:

- East Potrillo Mountain Research Natural Area (RNA), to protect ecological, scenic, and cultural values, and to provide opportunities for education and research about limestone formations and cactus populations.
- Robledo Mountains – Sierra de Las Uvas Scenic and Primitive Recreation Area, to protect natural character, including roadlessness, ecological and scenic values, opportunities for solitude and primitive recreation, and prehistoric and historic sites.
- Southern Sacramento Mountains Outstanding Natural Area (ONA), to preserve the area's unusual natural characteristics and the ecological, scenic, and cultural values that these natural wonders provide.
- Brokeoff Mountains – Guadalupe Escarpment Scenic Area, to protect its natural character, including its roadlessness, scenic beauty, and ecological integrity, as well as cultural values.

- Designate ACECs to ensure protection of the following wildlife movement corridors for species such as pronghorn, bighorn sheep, mule deer, cougars and wolves:
  - San Andres Mountains to Caballo Mountains to Fra Cristobal Mountains.
  - Doña Ana Mountains to San Andres Mountains.
  - San Andres Mountains to Organ Mountains.
  - Robledo Mountains to Las Uvas Mountains to Cooke's Peak.
  - Robledo Mountains to Las Uvas Mountains to Rio Grande.
  - Other major arroyos draining to Rio Grande.

- Designate the following ACECs:
  - Isaaks Lake (for purchase) to protect important habitat for birds and other wildlife.
  - BLM lands within the subwatershed of the Mesilla Valley Bosque Park to provide flood and water-quality protection and a development buffer, and to protect wildlife habitat.
  - BLM lands adjacent to the Rio Grande historic floodplain to protect riparian habitat and rare birds.
  - Caballo Mountains, Jarilla Mountains, Mud Mountain, Percha Creek, Sacramento Mountains, Six Shooter Canyon, and Pup Canyon for rare plants, bighorn sheep, and riparian habitat.
- Designate a special management area for the petrified forest near Truth or Consequences.
- Expand Doña Ana ACEC.
- Support the West Mesa Regional Park proposal and assign VRM classes to the escarpment.
- Consider a geologic park in the Robledo Mountains to preserve dinosaur tracks.
- Omit ACEC designations and incorporate the management objectives into the RMP for certain areas.
- Designate BLM lands located between Oliver Lee Memorial State Park and La Luz as an SRMA.
- Buffer the protected areas from encroaching development.
- Within the Mesilla Valley Bosque Park, designate all public lands within the subwatershed that drains into the proposed new State park as an ACEC in order to provide flood and water quality protections and a development buffer, and to protect wildlife habitat.
- Designate all playas (intermittent terminal lakes) as ACECs to protect these important wildlife areas.

- Do not create any more special management areas or roadless areas.
- Re-evaluate the Organ Mountains ACEC boundary to ensure it is appropriate for the urban expansion.
- Protect the Butterfield Trail as it crosses near the southern end of the Robledo Mountains area.
- Maintain all existing Special Management Area designations.
- Re-establish the ACEC boundary to abut the Chihuahuan Desert Nature Park boundary.
- Manage to protect naturalness, including roadlessness, opportunities for primitive recreation, value as a wildlife corridor, and overall ecological integrity.
- Complete a comprehensive transportation planning process that limits vehicles to designated roads and allows for unnecessary and/or resource-damaging roads and trails to be closed in special management areas.

Issues To Be Considered in Another Part of the EIS

- Adaptive management should only be used where it can strengthen BLM's ability to conserve resources within the multiple use mandate, and should not be employed to relieve BLM of specific obligations, restrictions on development, or use of appropriate management tools, such as special designations.

Issues Not To Be Addressed in the EIS

- Evaluate and ensure that the WSAs meet the intent of the Wilderness Act. If the WSAs are not acted upon by Congress within five years, the designations should be omitted and the lands re-opened for multiple use. *BLM does not have the authority to remove public land from WSA status; only Congress can make that decision.*

3.3.10 Proposed Special Designations (including nominations) and Recommended Management

The following list of areas includes proposals for special designations (i.e., ACECs, which include RNAs and ONAs) as well as recommended allocations of public land that BLM makes under specific resources (e.g., SRMAs).

- ***Badger Primitive Recreation Area***. Manage to protect and enhance natural character, including roadlessness and ecological values. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed area are being met. If monitoring reveals that the objectives and standards are not being met; adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Allow no new livestock developments or mechanical methods of range restoration. Manage as VRM Class I. Manage as recreation opportunity spectrum (ROS) primitive nonmotorized and semiprimitive motorized class.
- ***Broad Canyon ACEC***. Manage to protect cultural, scenic, and ecological values. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Some routes within the ACEC could remain open only to the

permittee(s) to access and maintain existing functional stock developments. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed ACEC are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Allow no new livestock developments or mechanical methods of range restoration. Manage as VRM Class I. Manage as ROS primitive non-motorized class, and semi-primitive motorized class.

- ***Brokeoff Mountains - Guadalupe Escarpment Scenic Area***. Manage to protect its natural character, including its roadlessness, scenic beauty, and ecological integrity, as well as cultural values. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Some routes within the area could potentially remain open only to the permittee(s) to access and maintain existing functional stock developments. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed special management area are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Allow no new livestock developments or mechanical methods of range restoration. Manage for VRM Class I. Manage as ROS primitive and semi-primitive non-motorized, and semi-primitive motorized class.
- ***Caballo Mountains Scenic ACEC***. Manage to protect scenic and ecological values. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Some routes within the ACEC could potentially remain open only to the permittee(s) to access and maintain existing functional stock developments. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed ACEC are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Allow no new livestock developments or mechanical methods of range restoration. Manage as VRM Class I. Manage as ROS primitive non-motorized class, and semi-primitive motorized class.
- ***Cornudas Mountains ACEC***. Manage to protect scenic, ecological, and cultural values. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Some routes within the ACEC could potentially remain open only to the permittee(s) to access and maintain existing functional stock developments. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed ACEC are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Prohibit new

livestock developments or mechanical methods of range restoration. Manage as VRM Class I. Manage as ROS primitive and semi-primitive non-motorized and semi-primitive motorized class.

- ***East Potrillo Mountain RNA***. Manage to protect ecological, scenic, and cultural values and provide opportunities for education and research about limestone formations and cactus populations. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed RNA are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Prohibit new livestock developments or mechanical methods of range restoration. Manage as VRM Class I. Manage as ROS primitive and semi-primitive non-motorized and semi-primitive motorized class.
- ***Greater West Potrillo Mountains Desert Plains Special Management Area***. Manage to protect naturalness and ecological integrity. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Some routes within this area could potentially remain open only to the permittee(s) to access and maintain existing functional stock developments. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed special management area are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Prohibit new livestock developments or mechanical methods of range restoration. Manage as VRM Class II. Manage as ROS primitive and semi-primitive non-motorized and semi-primitive motorized class.
- ***Gyp Hills - Chalk Hills Primitive Recreation Area***. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Some routes within the area could potentially remain open only to the permittee(s) to access and maintain existing functional stock developments. Prioritize closure and restoration of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed Primitive Recreation Area are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Prohibit new livestock developments or mechanical methods of range restoration. Manage as VRM Class I. Manage as ROS primitive non-motorized class, and semi-primitive motorized class.
- ***Nutt Mountain RNA***. Manage to protect scenic and ecological values and provide opportunities for education and research about Chihuahuan Desert grasslands and unusual plant and animal associations. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Some routes within the RNA could potentially remain open only to the permittee(s) to access and maintain existing functional stock developments. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-

of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed RNA are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Prohibit new livestock developments or mechanical methods of range restoration. Manage as VRM Class I. Manage as ROS primitive non-motorized class, and semi-primitive motorized class.

- ***Otero Mesa RNA***. Manage to protect ecological values and provide opportunities for education and research about Chihuahuan Desert grasslands and its unusual plant and animal associations. Retain all public land and acquire adjacent State Trust lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed RNA are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Prohibit new livestock developments or mechanical methods of range restoration. Manage as VRM Class II. Manage as ROS primitive and semi-primitive non-motorized, and semi-primitive motorized class.
- ***Penasco Canyon Primitive Recreation Area***. Manage to protect naturalness, including roadlessness, bird habitat, and plant communities. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Some routes within the area could potentially remain open only to the permittee(s) to access and maintain existing functional stock developments. Prioritize closure of unnecessary roads and trails and restoration of natural areas to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed Primitive Recreation Area are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Prohibit new livestock developments or mechanical methods of range restoration. Manage as VRM Class I. Manage as ROS primitive non-motorized class, and semi-primitive motorized class.
- ***Robledo Mountains – Sierra de las Uvas Scenic and Primitive Recreation Area***. Manage to protect natural character, including roadlessness, ecological and scenic values, opportunities for solitude and primitive recreation, and prehistoric and historic sites. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Some routes within the primitive recreation area could potentially remain open only to the permittee(s) to access and maintain existing functional stock developments. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed primitive recreation area are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Prohibit new livestock developments or mechanical

methods of range restoration. Manage as VRM Class I. Manage as ROS primitive non-motorized class, and semi-primitive motorized class.

- ***Southern Caballo Mountains Primitive Recreation Area***. Manage to protect naturalness, ecological, and scenic values. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Some routes within the area could potentially remain open only to the permittee(s) to access and maintain existing functional stock developments. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed primitive recreation area are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Prohibit new livestock developments or mechanical methods of range restoration. Manage as VRM Class I. Manage as ROS primitive non-motorized class, and semi-primitive motorized class.
- ***Southern Sacramento Mountains ONA***. Manage to preserve the area's unusual natural characteristics and the ecological, scenic, and cultural values that these natural wonders provide. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Some routes within the ONA could potentially remain open only to the permittee(s) to access and maintain existing functional stock developments. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed ONA are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Prohibit new livestock developments or mechanical methods of range restoration. Manage as VRM Class II. Manage as ROS primitive and semi-primitive non-motorized and semi-primitive motorized class.
- ***Talavera Special Recreation Management Area (SRMA)***. Manage to protect naturalness, including roadlessness, and scenic values while developing as needed to support nonmotorized forms of recreation without impairing the character of the area. Retain all public land and acquire adjacent State Trust Lands and inholdings through exchange. Limit vehicle use to designated roads and trails. Prioritize closure of unnecessary roads and trails and restoration to natural conditions to enhance and protect the values of this area. Exclude authorizations for new rights-of-way. Close to mineral material sales. Close to fluid mineral leasing. Withdraw from locatable mineral entry. Employ Standards for Rangeland Health, including monitoring and assessment programs, to determine if the management objectives for this proposed SRMA are being met. If monitoring reveals that the objectives and standards are not being met, adjustments in permitted grazing levels and season of use will be made to the extent they are determined to be contributing factors. Prohibit new livestock developments or mechanical methods of range restoration. Manage as VRM Class II. Manage as ROS primitive non-motorized class, and semi-primitive motorized class.

3.3.11 Livestock Grazing

Issues Overview

Three issues regarding livestock grazing appeared to be of most importance as indicated by the comments received: (1) standardization of grazing management criteria regarding the amount of grass that livestock can consume, (2) standardization of grazing management criteria regarding the amount of forage available for all herbivores to consume, and (3) designation of grazing areas. Commenters also suggested that, in order to preserve water quality and riparian habitat, no grazing should occur near drainages or arroyos. Some comments supported the continued use of land by ranchers as long as they respect the rights of other land users. Several comments expressed concern about the transmission of diseases to desert bighorn sheep from domestic goats and sheep.

Representative Comments

"Restrict grazing near streams and wetlands to preserve water quality and natural habitat." – Individual, Elephant Butte, New Mexico

"The BLM should eliminate grazing in arroyos that drain into the Rio Grande to protect water quality." – Southwest Environmental Center, Las Cruces, New Mexico

"Continuing to manage extensive ranges for grazing maintains the natural visual quality of the landscape and the plant communities. It has been demonstrated through research that grazing in arid habitats causes changes or impacts to native plant communities (simply because native plant communities are still adapting to and becoming modified by introduced livestock that consume vegetation in a different manner than the native wildlife that have evolved here)." – Native Plant Society, Rio Rancho, New Mexico

"The BLM should change its grazing management standard for the entire Planning Area from 'utilization' rates, which give preference to livestock over wildlife, to the more ecologically appropriate 'stubble' height. Also, the BLM should eliminate grazing in arroyos that drain into the Rio Grande to protect water quality." – Individual, Las Cruces, New Mexico

BLM Management Concerns

- Review areas for reduced grazing or closure to grazing, or possibly the introduction of grazing.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Manage grazing to provide a balance between ranching and wildlife concerns.
- Eliminate grazing in arroyos to protect water quality.
- Change grazing management standards from "utilization rates," or the amount of grass that livestock are permitted to consume, to the more ecologically appropriate "stubble" height, or the amount of a grass plant available for all herbivores to consume.
- Manage and regularly evaluate extensive ranges for grazing to maintain the natural visual quality and plant communities.
- Employ standards for rangeland health, including monitoring and assessment programs, to determine if the management objectives are being met, and prohibit new livestock developments or mechanical methods of range restoration to occur on the following lands:
    - Penasco Canyon Primitive Recreation Area

- Gyp Hills – Chalk Hills Primitive Recreation Area
- Caballo Mountains Scenic ACEC
- Southern Caballo Mountains Primitive Recreation Area
- Nutt Mountain RNA
- Robledo Mountains – Sierra de las Uvas Scenic and Primitive Recreation Area
- Broad Canyon ACEC
- Greater West Potrillo Mountains Desert Plains
- East Potrillo Mountain RNA
- Talavera SRMA
- Otero Mesa RNA
- Badger Primitive Recreation Area
- Southern Sacramento Mountains ONA
- Brokeoff Mountains

- Consider the effects of current drought conditions on current range practices and the need to adjust those practices.
- Analyze domestic grazing methodology and management.
- Implement and enforce the New Mexico Standards for Public Land Health and Guidelines for Livestock Grazing Management.
- Identify the process by which lands can be secured for community agricultural projects.
- Do not change the number of grazing permits allocated. Temporary adjustments in livestock numbers due to environmental conditions should be thoroughly analyzed as part of the annual planning process and should reflect range conditions based on the amount of precipitation, forage availability, season of use.
- Retire grazing leases in riparian areas when the lessee relinquishes those rights. The lessee should not be able to transfer or renew rights once terminated.

Issues That Can Be Addressed Administratively

- Analyze the transmission of diseases among domestic livestock and desert bighorn sheep.
- Construct fencing around any domestic livestock to ensure that they do not escape into the wild.
- Lease BLM land for grazing after proper management has determined that the land will support such activities and only if the lessee pays the government the private market rate for the same type of lease.
- Manage for improved range conditions because overgrazing by livestock reduces the accumulation of fine fuels on the ground, which dramatically reduces fire frequencies, leading to an increase of large woody vegetation, and a decrease in available water.
- Enforce rotation or herd reduction in overgrazed areas.

3.3.12 Recreation

General Recreation (including bird watching, photography, hunting, etc.)

Issues Overview

Comments received cited diverse recreational uses within the Planning Area. A majority of the comments expressed appreciation of the existing recreational opportunities, and advocated the establishment of additional recreational opportunities because they would further contribute to the quality of life in

Southern New Mexico. Nonmotorized uses were mentioned as a form of recreation that minimizes disturbance to the natural resources in the Planning Area. Some commenters identified the preservation of particular public lands—such as the West Mesa Regional Park and the Organ Mountain recreational area—as critical to retaining the present quality of recreational life in the Planning Area. Others recommended the designation of new special recreation areas.

Some comments were submitted regarding hunting and shooting within the Planning Area—most commenters were concerned about the trash that often accompanies hunters. There were calls to place restrictions on the activities that disturb wilderness and open space.

Representative Comments

"We value and participate in rockhounding, sailing, birdwatching, hiking, camping, photographing wildlife, water sports, fishing, nature hikes, and in general enjoy the solitude, beauty, and quiet that can be found in our wilderness areas that attracts so many people to New Mexico." – Individual, Las Cruces, New Mexico

"We need to protect and preserve land for the good health of all of us. Hiking, bicycling, wildlife viewing, and solitude are among the things that brought us and keep us here in the Mesilla Valley." – Individual, Las Cruces, New Mexico

"Open spaces should be available to all, not just the physically fit. Motorized as well as nonmotorized trail systems must be provided for." – Las Cruces Homebuilders Association, New Mexico

"A major quality of life indicator happens to be recreation and open space allowance, and the ease with which it is found and accessed by the public." – Chihuahuan Desert Nature Park, Las Cruces, New Mexico

"Protective stipulations for big game species should include all winter range areas and not be limited just to "critical" winter ranges. There is little or no biological justification for limiting protections just to critical ranges. Likewise, stipulations applicable to raptors should not be limited to occupied nests. Again, there is little or no biological justification for constraining protections to this degree, and the need for additional protections should be fully considered in the EIS and required under the TriCounty RMPs." – New Mexico Wilderness Society/The Wilderness Society, New Mexico

"The Utter Springs area is used constantly by hunters sighting in their rifles and leaving homemade targets and cartridges everywhere. The Domingo Springs area is used by bird hunters each season who leave behind empty shotgun shells and beer bottles. Vandalism is also a problem." – Individual, Tularosa, New Mexico

BLM Management Concerns

- Consider all recreation use within the Planning Area in terms of the need for providing and enhancing developed and undeveloped recreation opportunities while protecting resources.
- Address types and levels of visitor services, the need for developed versus undeveloped sites, the need for additional recreation sites to meet public use, the management of special and extensive recreation areas, and the designation and management of scenic byways.
- Incorporate or be consistent with other appropriate outdoor recreation plans such as the State Comprehensive Outdoor Recreation Plan.

- Identify the desirable management actions for all recreation sites, whether they be ACEC, special management area, or other designations. Management for new and existing SRMAs will be prescribed.
- Address areas that should be closed to hunting (i.e., ACECs and recreation sites).

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Secure a backcountry byway designation for Columbus Highway.
- Support the West Mesa Regional Park proposal.
- Support the retention of Tortugas Mountain NASA withdrawal for open space protection and nonmotorized recreation.
- Provide specific areas that are limited to nonmotorized recreation and to nonmechanized recreation.
- Ensure diverse recreational opportunities.
- Enhance hiking and equestrian recreation.
- Preserve the natural trails and recreation opportunities that exist east of Stone Canyon drive in Las Cruces.
- Expand the Organ Mountains Recreation Area to protect scenic views, recreation opportunities, and wildlife habitat.
- Expand the Doña Ana SRMA.
- Manage public lands under the ROS.
- Designate the Penasco Canyon Primitive Recreation Area.
- Designate Gyp Hills – Chalk Hills Primitive Recreation Area.
- Designate Caballo Mountains ACEC.
- Designate Southern Caballo Mountains Primitive Recreation Area.
- Designate Robledo Mountains-Sierra de las Uvas Scenic and Primitive Recreation Area.
- Designate Broad Canyon ACEC.
- Designate Greater West Potrillo Mountains Desert Plains.
- Designate East Potrillo Mountain RNA.
- Designate Talavera SRMA.
- Designate Otero Mesa RNA.
- Designate Cornudas Mountains ACEC.
- Designate Badger Primitive Recreation Area.
- Designate Southern Sacramento Mountains ONA.
- Designate Brokeoff Mountains–Guadalupe Escarpment Scenic Area.
- Acquire lands critical for wildlife habitat and recreation.
- Protect Box Canyon (an area west of Las Cruces and north of Picacho Peak).

Issues That Can Be Addressed Administratively

- Address the need for and the type of recreation-use monitoring that should be implemented, including consideration of visitor use, visitor numbers, and visitor impacts.
- Implement restrictions and penalties to deter the destruction of public lands by hunters.
- Address to what extent interpretation and education opportunities should be offered, and what locations are best suited for such offerings, (i.e., visitor centers, developed sites, field locations, field office, etc.).
- Consider a Recreation and Public Purposes Act lease for the NASA withdrawal property as a regional park with recreation opportunities, and free from development.
- Prioritize recreation needs and apply the funds near the population centers.
- Enforce "tread lightly" in the Utter Springs area and the Domino Springs area.
- Provide signage to indicate private versus public lands.

Issues Not To Be Addressed in the EIS

- Preserve the Lucero Canyon (wash) in Radium Springs for non-motorized use. *This land is owned and managed by NMSU; management of this area is beyond BLM's jurisdiction.*

Off-Highway Vehicle Use

Issues Overview

Comments pertaining to OHV use were divided between proponents and opponents. However, nearly all of the comments submitted advocated placing restrictions and controlled access on public lands to prevent damage, noise, and disturbance resulting from OHV use. The public also stated that OHV users often are destructive to public lands, leaving behind trash, damaging fencing, and destroying wildlife habitat and vegetation.

Representative Comments

"Only lands which can sustain ORV use should have designated routes and all other land should be closed to ORVs." – Individual, El Paso, Texas

"I believe that there should be some open areas where OHVs could play on the hills or in the sand and not have to stay on the roads and trails. It would be great to have at least one of these close to town so the kids would have a place to ride without making new trails." – Individual, Las Cruces, New Mexico

"Off-road vehicles pose a threat to BLM lands in the Planning Area. Many existing roads are fragmenting wildlife habitat, causing erosion, and otherwise harming public lands. We believe that the BLM needs to get a handle on the extent of roads in the Planning Area by doing a comprehensive inventory of existing roads, through remote sensing and ground truthing. The BLM also should determine where its lands can sustain off-road vehicle use and set aside designated routes." – Individual, Las Cruces, New Mexico

BLM Management Concerns

- Address changes in OHV designations (i.e., open, limited or closed) in the Otero and Sierra Counties portions of the Planning Area.

- Vehicle use designations (open, closed, limited to designated routes, etc.) will be applied to all public lands. This should be done in collaboration with the cities, counties, and public, especially around Las Cruces.
- Designate individual roads and trails where appropriate for special management areas such as ACECs, WSAs, and others.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Close areas of public lands to OHV use on the western and southern boundaries of the Chihuahuan Desert Nature Park.
- Designate an open area for OHV use.
- Close roads and trails that cross natural springs and seeps.
- Categorize all public land as one of three categories for OHV use: (1) open (everywhere, except where otherwise specified), (2) limited (to existing roads and trails), or (3) closed (except on designated routes).
- Leave all roads and trails open unless posted closed, including the arroyo washes.
- Close a majority of the Planning Area from OHV use.
- Close areas to OHV use where wildlife, vegetation, and other resources or other users are at risk of adverse effects from OHVs.
- Designate all areas as either closed or limited; no areas should be designated as open.
- Consider measures to control the impacts of OHV use.
- Reduce the number of miles of trails that fragment wildlife habitat, cause erosion, and otherwise harm public lands.
- All roads and trails should be open to all vehicles and should not be downgraded to exclude normal vehicles.

Issues That Can Be Addressed Administratively

- Inventory all roads and trails in the Planning Area (a local four-wheel-drive club offered to assist with inventory using a global positioning system [GPS]).

Issues Not To Be Addressed in the EIS

- Regulate and limit noise from OHVs. *The BLM manages public lands for multiple uses and does not regulate or manage noise from OHVs.*

Trails and Access

Issues Overview

A majority of comments received regarding trails and access advocated the adoption of the Citizens' Plan for Open Space and Trails Vision. Several commenters recommended that the BLM preserve open space for recreational opportunities. Requests were made for additional equestrian trails on public lands because of the unsafe conditions on existing trails due to OHV use and speeding vehicles.

Many comments were submitted regarding trail access for nonmotorized use such as hiking, camping, biking, and horseback riding. Commenters suggested that BLM provide for more nonmotorized access, as

OHV use often conflicts with horse riding and hiking. Other comments requested that the BLM address the issue of grazing permitees restricting access on or across public lands.

Representative Comments

"I have twice seen the proposal put together by the Citizens' Task Force for Open Space Preservation and it appears to be a very fair-handed, feasible vision to maintain some contiguous open space for both recreation and wildlife." – Individual, Las Cruces, New Mexico

"It is our responsibility to preserve the diverse and open spaces for which they are coming. We need to protect and preserve land for the good health of all of us. Hiking, bicycling, wildlife viewing, and solitude are among the things that brought us and keep us here in the Mesilla Valley." – Individual, Doña Ana County, New Mexico

"I bought an existing home where I did so I could have ready access to ride my horse in the desert and gaze at a magnificent night sky – I also have the greater good at heart. Animals can't thrive in isolated pockets without relatively safe access to the food and diverse gene pools in other areas. Plants need room to grow. Humans need something real around them to ground them, whether they think of it consciously or not." – Individual, Las Cruces, New Mexico

BLM Management Concerns

- Identify the desirable management actions for all recreation sites, regardless of ACEC, special management area, or other designation.
- Prescribe management for new and existing SRMAs.
- Develop and designate trails, particularly in the Las Cruces area, and rely upon collaboration with special interests and others to carry out such a program.
- Address access to public lands in areas adjacent to the larger populations (Las Cruces, primarily).
- Access should be provided to connect open space, allowing public access to a variety of areas.
- Improve access to public lands in Piñon, areas within Otero County, and parts of Sierra County.
- Improve access to the largest contiguous segments of public lands that are now isolated.
- Improve access to high value recreation areas.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Re-examine the trail system in the Organ Mountains and loop both long and short trails.
- Continue and increase access for recreational opportunities.
- Designate trails for carriage driving.
- Provide hiking, biking, and walking corridors throughout the desert.
- Establish trails between the proposed West Mesa Regional Park and the Mesilla Valley Bosque State Park.
- Prioritize those areas in which there is a need for access coordination and additional site-specific planning.
- Provide management guidance for OHV, minerals, and other recreation access.

Issues That Can Be Addressed Administratively

- Identify those areas in which access should be improved.
- Define categories of access and priority areas to be addressed.
- Address the issue of permittees gating existing access roads to public lands.
- Coordinate with various entities to develop trails.
- Coordinate with the a regional open space and trail authority, if one is established in the future.
- Identify all roads and trails currently used, abandoned, or primitive, that might be suitable as part of a trail from Olive Lee Memorial State Park and La Luz, to the foothills and canyons on the western slopes of the Sacramento Mountains.
- Ensure access to trails by the handicapped, the mobility limited, the infirm, and the elderly.

Issues Not To Be Addressed in the EIS

- Require access via major arroyos or ridgebacks west through the private property in the Mesilla Valley Bosque State Park. *The BLM cannot require access through private property; however, BLM can acquire an easement or right-of-way for public access from the property owner.*

- Support the development of the Camino Real Trail. *BLM completed an RMPA previously to address the Camino Real Trail; decisions from that RMPA will be carried forward.*

3.3.13 Lands and Realty

Tenure (change in ownership, development, urban expansion, and property rights)

Issue Overview

Many comments regarding land and realty requested the BLM to dispose of land in a way that would control where development could occur and to coordinate with those jurisdictions in need of expansion. Many comments specifically identified lands for retention to protect wildlife movement corridors, establish new and expanded special designation areas, and provide park and trail systems.

Comments received closely related the issue of development and urban expansion with open space preservation. Comments on urban expansion specifically advocate less sprawling and/or leapfrog development. Many comments advised against urban expansion encroaching upon lands that support recreation, Class I VRM viewsheds, livestock grazing, watersheds or arroyos, wilderness areas, and wildlife habitats.

A few comments were submitted pertaining specifically to private property rights. One comment recommended that the BLM acquire “key privately owned lands” on the east side of the Doña Ana Mountains. One commenter advocated using the population growth in Doña Ana County as a chance to raise awareness about nature and ecological systems. Lastly, one comment suggested that the BLM review the Walker Management Plan’s North Douglas County Specific Plan Amendment to assist in developing criteria for land tenure and guidelines for the sale of lands with privately developed structures.

Representative Comments

“Protecting and conserving key features of the Chihuahuan Desert will be accomplished if the public learns to appreciate the natural desert landscape. Public appreciation will only come about if open space is

preserved and opportunities abound for the public to visit and enjoy the landscape." – World Wildlife Fund/Chihuahuan Desert Field Office, New Mexico

"Land acquisition of properties critical to wildlife habitat and recreation must be ongoing, it can be financed by land exchanges, at least in part." – Individual, Elephant Butte, New Mexico

"I suggest the BLM consider adding language similar to the following to the Resource Management Plan: LAND FOR SALE It is the policy of the BLM that land within this RMP can be sold if disposal will serve important public objectives, such as community expansion and economic development. In order for land to be considered for sale under this policy the land shall be contiguous and in the direct path of development. There must be sufficient capacity of public infrastructure facilities in order to ensure service to the land. The land must be developed in defined and progressive phases, (i.e. the amount of land sold should be no more than can reasonably be expected to develop within the next 5 years). Sale of parcels of land greater than 5 acres in size is subject to the following additional restrictions: The BLM may sell parcels of land that are 5 acres or greater in size, only when they are contiguous to existing water and sewer lines and paved roadways, and when development would be consistent with existing land use plans for the area including, but not limited to, other pertinent local governmental entity requirements (e.g., School Districts, County Governmental needs, sheriff, etc.)." – Individual, El Paso, Texas

"Please retain land for public use." – Individual, Unknown location

"The expansion of the city eastward seems to be unabated by the lack of comprehensive planning. For example, just how much water and natural gas are available for the future demands of the projected increases in population? What are the costs of additional sewage treatment facilities, roads, bridges, and electrical infrastructure? Where will the future schools and parks (if any) be located?" – Individual, Las Cruces, New Mexico

"We need not encourage the development and opening up of our beautiful places. Not everybody who wants to come here and build on our desert needs to. We might encourage vertical building, not everything horizontal so that sprawl encompasses everything and we are all trapped in concrete." – Individual, Las Cruces, New Mexico

"[BLM should] require complete build-out of developed areas within city limits before allowing disposal for development of public lands." – Sierra Club, Southern New Mexico Chapter

"Settlement in Western States, both past and present, is marked by contradictory assumptions of freedom and private ownership of land and resources. At this critical time, if we do not redefine our challenges in terms of sustainable systems, we will abandon the Valley and the dynamic of its population to the negative and exploitative attitudes and practices inherent to colonialism: Boom/Bust; use it up/move on. A tremendous opportunity exists in the crisis of population growth in Doña Ana County – a chance to raise awareness of what our sciences are telling us about systems and relationships, affirming ancient wisdom about the nature of our Life on Earth." – Individual, Radium Springs, New Mexico

"How will BLM identify and work with willing sellers in order to acquire key privately owned lands? We recommend that BLM acquire lands on the east side of the Doña Ana Mountains as identified in the Vision." – Citizens' Task Force for Open Space Preservation, Doña Ana County, New Mexico

BLM Management Concerns

- Plan for open space cooperatively with Doña Ana County and for orderly development of the expanding community.

- Re-address the existing decisions from the land use plans tied to the growth in Doña Ana County and competing desires and/or demands for recreational use, access, and open space interests.
- Identify appropriate guidance for land disposal and acquisition based on BLM policies and coordinate the growth polices set forth in the various city and county master and/or comprehensive plans.
- Provide an assessment of anticipated city and county needs based on current plans.
- Address the need to dispose of land for growth in the Truth or Consequences and Alamogordo areas.
- Address the result from land disposal that could affect existing flood control structures, such as the Las Cruces Dam.
- Identify lands that "could" go out of public ownership, as opposed to calling out specific disposals, exchanges or transfers.
- Review the NASA withdrawal (and other segregations), east of the city, which is in the direct path of Las Cruces growth.
- Determine how BLM should manage land if the NASA withdrawal were relinquished.
- Establish land use planning needs for lands acquired by the BLM through exchange, withdrawal revocation, Recreation and Public Purposes Act lease relinquishment, easement, and purchase.
- Identify landfill needs for existing and future populations. Identify lands that have potential for meeting city and county needs and establish provision for direct land sales to the appropriate entities.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Define the criteria and factors critical to decisions about land disposal and acquisition regarding natural, cultural, and visual resource protection.
- Retain the following land for valuable wildlife habitat for bighorn sheep, mule deer, mountain lions, and numerous other species:
    - Township 20 South, Range 3 East, Sections 28, 33, and 34
    - Township 21 South, Range 3 East, Sections 3, 4, 7-10, 14, 15, 17, 18, 21-23, 25-28, 34-36
    - Township 22 South, Range 3 East, Section 1
- Retain the public lands that surround the Jornada Experimental Range, specifically Township 21 South, Range 2 East, Sections 19, 20, 21.
- Retain existing landholdings that encompass key features and provide a buffer to preserve these features as follows:
    - Between U.S. 70 and Drippings Springs Road, acquire State Trust lands west of Baylor Canyon Road.
    - North of U.S. 70, include lands west of the base of the mountains including the San Andreas Foothills in the existing ACEC.
    - South of Talavera, retain the existing ACEC lands west of the base of the mountains.
- Retain and consolidate BLM lands within the proposed West Mesa Regional Park.
- Retain lands adjacent to the right-of-way owned by the International Boundary and Water Commission and designate a new Rio Grande ACEC.
- Retain lands currently identified for disposal on the East Mesa of Las Cruces.

- Retain the Tortugas Mountain NASA withdrawal and its management for open space protection and nonmotorized recreation.
- Retain the following lands and include in the Organ Mountains recreation area to protect scenic views, recreation opportunities, and wildlife habitat:
    - Township 23 South, Range 2 East, Sections 11 and 12
    - Township 23 South, Range 3 East, Sections 5, 7, 8, 18, 19, 29-31, and 33
    - Township 24 South, Range 3 East, Sections 4-9, 17-21, 28-30, and 33
    - Township 25 South, Range 3 East, Sections 4, 10, 15, 22, 27, 34, and 35
    - Township 26 South, Range 3 East, Sections 12 and 13
    - Township 26 South, Range 4 East, Sections 1-3, 7, 10-15, 18-20, 23-26, 29, and 30
- Retain lands identified as Expanded Organ Mountains Recreation Area and San Andres Foothills.
- Retain the Organ and Franklin Mountains ACEC and SRMA.
- Retain lands between White Sands Missile Range, U.S. 54 and south of U.S. 70 and adopt special management designations that will allow compatible uses by the DoD.
- Retain all land adjacent to McGregor Range and its current uses.
- Retain lands south of the Chihuahuan Desert Nature Park and on the East Mesa of Las Cruces.
- Do not dispose of lands adjacent to or near the borders of Fort Bliss.
- Do not dispose of lands proposed by the Citizens' Plan for Open Space and Trails Vision unless the land would remain open space.
- Acquire Township 21 South, Range 2 East, Section 36 from the State of New Mexico and include in the Doña Ana ACEC.
- Acquire the following State Trust Land and private lands and include those lands in the Organ Mountain recreation area:
    - Township 21 South, Range 3 East, Section 16
    - Township 22 South, Range 3 East, Sections 11, 14, and 23
    - Township 22 South, Range 4 East, Sections 5, 6, 10, 20-22, 27, 28, and 34.
    - Township 23 South, Range 3 East, Sections 16 and 32.
    - Township 24 South, Range 3 East, Section 16.
- Acquire private land in Isaaks Lake for important habitat.
- Consider and pursue land exchanges instead of land acquisitions.
- Increase landholdings within the historic floodplain to help restore the riparian corridor.
- Preserve all lands in Township 23 South, Range 2 East for open space, parks, schools, and churches.
- Exchange for State land in Township 23 South, Range 1 East, Section 32 with another section of BLM land.
- Exchange for the private lands in Township 23 South, Range 1 East, Sections 28, 29, and 33.
- Provide a connection along the escarpment in Township 24 South, Range 1 East, Sections 4 and 5.
- Exchange BLM lands adjacent to the Mesilla Valley Bosque State Park to the State for inclusion in the park.
- Consider providing land for community agricultural projects.

- Ensure that urban encroachment does not occur to the Las Cruces Airport by retaining public lands in the area.
- Formulate land distribution policies as part of the RMP process and consider the value of a county-wide interconnected open space and trail system.
- Identify how the BLM will make land tenure decisions (e.g., criteria for acquisition).
- Consider the entire watershed and the issue of aquifer recharge when proposing lands for disposal.
- Protect land in Township 24 South, Range 1 East, Sections 4, 5, 9, 10, and 11 with the possibility of a Recreation and Public Purposes Act lease for the lands with the Town of Mesilla.
- Reconsider all previous decisions for disposal of public lands.

Issues That Can Be Addressed Administratively

- In future land dispositions, insert deed restrictions that protect arroyos.
- Develop a protocol by which the Commanding General is informed of BLM land disposals near the White Sands Missile Range.
- Prioritize lands identified for acquisition.

Issues To Be Considered in Another Part of the EIS

- Identify any proposed or ongoing land transfers.
- Consider and analyze the needs and possibilities for land exchanges, acquisitions, and conservation easements to protect or improve biological diversity.

Issues Not To Be Addressed in the EIS

- Consider a Recreation and Public Purposes Act lease for the NASA withdrawal property as a regional park for recreation and educational opportunities. *BLM cannot lease land that has been withdrawn for another use. If the land were to revert to BLM management, a lease (such as one under the Recreation and Public Purposes Act) could be considered.*

Rights-of-Way, Corridors, Utilities, Easements

Issue Overview

Few comments were received regarding rights-of-way, corridors, utilities, and easements. However, those comments received requested that the BLM not permit any type of rights-of-way or corridors in areas sensitive to wildlife habitat or protected open space areas.

Representative Comments

"Utility corridors need to be established and sensitive areas must be off limits to these corridors. Communication sites must be designated to avoid the proliferation of antenna sites with the attendant roads and power lines." – Individual, Elephant Butte, New Mexico

BLM Management Concerns

- Identify appropriate corridors so that energy development and transport will not be hindered by a lack of programmatic level planning and cumulative environmental impact analysis.
- Expand the Anthony Gap corridor.
- Anticipate the needs for rights-of-way, including alternative energy developments (wind, solar, etc.).
- Identify infrastructure corridors for future needs.
- Designate corridors to manage rights-of-way with consideration of "avoidance and exclusion zones" and the needs of utilities.
- Identify the Western Utilities Group corridor needs and determine location and guidance for any necessary mitigation, and identify appropriate disposal and acquisition strategies.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Establish utility corridors in non-sensitive areas.
- Do not allow future transmission lines to traverse north-south between the metro area and the Organ Mountains.
- Designate a north-south transmission-line corridor on the west mesa.

Issues That Can Be Addressed Administratively

- There is potential for right-of-way requests tied to the possible Alamogordo Water Well Field for desalinization of groundwater.
- Coordinate with a possible Regional Open Space and Trail Authority with cross-jurisdictional trails and planning.
- Require plans for roads and other development corridors that cross arroyos.
- Require that proposed road development not impede or slow water flow in any way.
- Do not permit structures that would obstruct, redirect, or impede flows within the 100-year floodplain.
- Define the process for BLM involvement on conservation easements.

Issues To Be Considered in Another Part of the EIS

- Consider and analyze the needs and possibilities for land exchanges, acquisitions, and conservation easements to protect or improve biological diversity.

Issues Not To Be Addressed in the EIS

- Identify the water and natural gas availability for future demands east of Las Cruces and the costs of additional sewage treatment facilities, roads, bridges, and electrical infrastructure, and locations of schools and parks. *BLM does not propose, nor develop, community infrastructure. As part of the RMP process, BLM will coordinate with local jurisdictions regarding which lands could be made available for disposal to accommodate facilities such as schools and parks.*

- Require the (grazing, mineral) lessee to pay the going rate for the same type of lease as they would pay on the private market. The LCFO does not establish lease rates. For example, lease rates for grazing are established by Congress.

Open space

Issue Overview

A majority of the comments supported the Citizens' Plan for Open Space and Trail Vision because it provides a balance between development and maintenance of open space and/or trails while allowing for continued growth in the Las Cruces area. Open space was identified as an important factor in quality of life for providing recreational and other uses. Other comments requested that the BLM not dispose of lands that would potentially be developed, which would disrupt the existing open space that provides habitat, scenic areas, and historical resources.

Representative Comments

"The river, the mountains, the farming, the university, the easy going lifestyle – and the magnificent views that are available to all because of the existing open space." – Individual, Las Cruces, New Mexico

"We request that the BLM protect major arroyos in the Las Cruces area, especially the Fillmore Arroyo. It is, for the most part, intact from Interstate 25 to the Organ Mountains. Arroyos are an important resource for wildlife. They also provide natural drainage ways and open space that can connect the mountains to the valley floor. They are part of the natural topography that should be preserved." – Individual, Las Cruces, New Mexico

"It is also our responsibility to preserve the diverse and open spaces for which they are coming. We need to protect and preserve land for the good health of all of us. Hiking, bicycling, wildlife viewing, and solitude are among the things that brought us and keep us here in the Mesilla Valley." – Individual, Las Cruces, New Mexico

"It is crucial at this time of booming development to set aside open space to preserve and protect corridors for wildlife and native plants, as well as to guarantee that open space and the diverse ways we experience it will be available to future generations." – Individual, Las Cruces, New Mexico

BLM Management Concerns

- Plan accordingly with Doña Ana County for their open space needs as development expands.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Retain open space for natural trails and recreation that is east of Stone Canyon drive in Las Cruces.
- Retain lands designated for open space or preservation of natural features.
- Support the Vision for Open Space and Trails System in Doña Ana County.

Issues That Can Be Addressed Administratively

- Coordinate with a possible Regional Open Space and Trail Authority with cross-jurisdictional trails and planning.

3.3.14 Energy and Minerals

Issues Overview

Most of the comments submitted regarding energy and mineral resources urged the BLM to restrict oil and gas development within the Planning Area. Several comments were concerned with the contamination of water supplies, spread of noxious weeds, noise pollution, and volatile organic compound pollution, resulting from the continued extraction of oil and gas in the area. One comment advised against using wind energy development within the Planning Area because of its incompatibility with specially designated areas, sacred Native American sites, areas of critical habitat, and habitats important to imperiled species. One comment indicated that the gravel pit north of Radium Springs is unsafe in such a residential area.

Several of the comments mentioned that the economic and environmental impacts of continued and increased oil and gas drilling would be detrimental to fisheries and water resources, open space preservation, noxious weed management, protection of archaeological sites, bird habitats, and plant communities.

Representative Comments

"We must insist on an energy policy that makes us less dependent on gas and oil. Please implement a 'no drilling' policy for Otero Mesa." – Individual, Las Cruces, New Mexico

"Fluid minerals amounts to unacceptable commercial abuse with dire consequences for the watershed. In this area, the benefits to be expected are dubious and limited." – Individual, Elephant Butte, New Mexico

"Minerals [*mining*] commercial abuse, if it is allowed, it must not harm the watershed and surface must be reclaimed in an environmentally acceptable manner." – Individual, Elephant Butte, New Mexico

"Scalping the earth for a very little oil when we must develop alternatives is not acceptable. Development that enhances the pockets of a few businesses is not acceptable. I have always felt the BLM to be an ally to protect the natural environment. Please continue on that track." – Individual, Columbus, New Mexico

"I favor protecting forests, reducing grazing, eliminating mining and hazardous materials." – Individual, Las Cruces, New Mexico

BLM Management Concerns

- The use of community pits has increased in the last five years and will likely be expanded in the future.
- Although there are no existing wind-energy-generation farms, it appears that the potential certainly exists and should be considered.
- Identify extraction activities in areas with high potential for such use, then protect and reserve these sites for future use.
- Establish criteria for guiding the location (distance from a city or town) of such uses when in proximity to existing population centers, particularly fast growing areas.
- Identify opportunities for leasing of photovoltaic and concentrated solar power on public land for siting facilities, and right-of-way authorizations for power lines and access roads.
- Identify unique mineral collection areas and segregate those areas from mining claim locations.

- Identify and map where potential energy resources are located. Identify appropriate levels of mitigation that should occur in each area.
- Address major changes in mineral laws and policies.
- Carry forward those decisions from the RMPA/EIS for Federal Fluid Minerals Leasing and Development in Sierra and Otero Counties (oil, gas, and geothermal) for the Sierra and Otero Counties portions of the Planning Area into this new RMPs/EIS.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Prohibit any further development of oil and gas in the Planning Area.
- Eliminate the use of the gravel pit off Highway 185 and locate one off I-25 near Upham exit.
- Exclude wind energy development and its associated infrastructure from special designation areas.
- Designate the following proposed areas as closed to mineral material sales, fluid mineral leasing, and withdrawn from locatable mineral entry:
    - Badger Primitive Recreation Area
    - Broad Canyon ACEC
    - Brokeoff Mountains–Guadalupe Escarpment Scenic Area
    - Caballo Mountains Scenic ACEC
    - Cornudas Mountains ACEC
    - East Potrillo Mountain RNA
    - Greater West Potrillo Mountains Desert Plains
    - Gyp Hills Primitive Recreation Area
    - Nutt Mountain RNA
    - Penasco Canyon Primitive Recreation Area
    - Robledo Mountains-Sierra de las Uvas Scenic and Primitive Recreation Area
    - Southern Caballo Mountains Primitive Recreation Area
    - Southern Sacramento Mountains ONA
- Analyze all sources of income for regional economic trends rather than relying solely on employment, which will dramatically overstate the importance of oil and gas industries to the local economy.
- Regulate and limit the noise from oil and gas compressors and compressor stations resulting from exploration and well drilling.

Issues That Can Be Addressed Administratively

- Manage the community pits from a safety perspective as well as for accessibility by the public to material for private use.

Issues Not To Be Addressed in the EIS

- Change the decision from the RMPA/EIS for Federal Fluid Minerals Leasing and Development in Sierra and Otero Counties for Otero Mesa. *BLM addressed oil and gas leasing and development for Sierra and Otero Counties in that recent RMPA and the decisions made in that RMPA will stand unless new information necessitates changes (e.g., the designation of an ACEC within the current planning effort).*

- Examine the costs of the environmental impacts from the footprint associated with oil and gas development. Many environmental impacts are not quantifiable in economic terms. In addition, a strictly economic analysis is not required under NEPA.
- Analyze the impacts on fisheries from increased oil and gas drilling, and include mitigation costs in the analysis of the socioeconomic impacts. BLM will analyze impacts on fisheries from any decisions to increase oil and gas drilling; however, it is not possible to identify and/or quantify mitigation costs during the programmatic RMP efforts because site-specific mitigation would be developed for each proposed project.
- Analyze the additional costs from noxious weed mitigation from increased oil and gas drilling. It is not possible to identify/quantify mitigation costs during the programmatic RMP efforts because site-specific mitigation would be developed for each proposed project.
- Internalize non-market costs into the economic analysis of RMP alternatives in order to balance the multiple uses and benefits derived from public land. Many environmental impacts are not quantifiable in economic terms. In addition, a strictly economic analysis of the RMP alternatives is not required under NEPA.

3.3.15 Education and Scientific Research

Issues Overview

All comments received regarding education and scientific research advocated the implementation of a plan to preserve natural areas throughout the Planning Area. Comments suggested that BLM inventory and document cultural and historical areas for the purposes of educating the public.

Representative Comments

"The Jornada Experimental Range was formed in 1912 and is world-known for scientific rangeland research. Allowing development to occur near its southern border would threaten the integrity of land-term research projects in the area, especially wildlife and wind erosion studies taking place nearby."
– Chihuahuan Desert Nature Park, Las Cruces, New Mexico

"There are a number of BLM programs that should be reexamined and expanded. One example of this is to have interpretive media and programs address how the Organ Mountains got the wonderful appearance that they have today." – Individual, Las Cruces, New Mexico

BLM Management Concerns

- Ensure the public has access to information of past decisions.
- Ensure the public has access to the RMPs (e.g., through the internet, public libraries).

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Protect the areas used during the Desert Soils Project that generated over 100 scientific publications on desert soils, geology, ecology, and archaeology.
- Address to what extent interpretation and education opportunities should be offered and what locations are best suited for such offerings, (i.e., visitor centers, developed sites, field locations, field office, etc.).

Issues That Can Be Addressed Administratively

- Develop interpretive media to educate the public about the appearance of the Organ Mountains.
- Promote education opportunities, as applicable for those resources and resource uses managed by the BLM.
- Establish special management prescriptions for those BLM lands surrounding the Jornada Experimental Range.
- Educate about "tread lightly."

Issues Not To Be Addressed in the EIS

- Consider a Recreation and Public Purposes Act lease for the NASA withdrawal property as a regional park for recreation and educational opportunities. *BLM cannot lease land that has been withdrawn for another use. If the land were to revert to BLM management, a lease (such as one under the Recreation and Public Purposes Act) could be considered.*

3.3.16 Hazardous Materials

Issues Overview

A few comments were received regarding hazardous materials. All comments advocated no dumping of any sort on public lands. Also, protecting the Planning Area from pollution and hazardous materials by reducing harmful activities such as mining, overpopulation, grazing, and dumping was identified as important by the public.

Representative Comments

"Dumping of any sort on public land without the most stringent of regulations. Illegal dumping and contamination due to commercial abuse must be rigorously addressed." – Individual, Monticello Canyon, New Mexico

"I favor protecting forests, reducing grazing, eliminating mining and hazardous materials." – Individual, Las Cruces, New Mexico

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Minimize mining to reduce the potential of hazardous materials in the Planning Area.
- Do not allow public lands to be used for disposal of hazardous materials.

Issues That Can Be Addressed Administratively

- Increase law enforcement to reduce the amount of dumping in the Planning Area.

3.3.17 Public Safety, Law Enforcement, and Illegal Activities

Issues Overview

A few comments were received regarding illegal activities. Comments that were received addressed illegal dumping, vandalism, and discharging of firearms. Law enforcement was encouraged for areas with archaeological importance and critical habitat for special status species.

Representative Comments

"The Utter Springs area is used constantly by hunters sighting in their rifles and leaving homemade targets and empty cartridges laying everywhere. The Domino Springs area is used by bird hunters each season that leave behind empty shotgun shells and beer bottles. Vandalism is also a problem."
– Individual, Tularosa, New Mexico

"In the last two years we have ridden and explored the BLM lands southeast of Tularosa, by far the biggest problem is illegal trash dumping. We have filled many a trash bag just going out for an evening stroll. The landscape is littered with everything from old furniture to bags of dead animals. Broken beer bottles are everywhere and present a constant hazard." – Individual, Tularosa, New Mexico

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Continue the ability of the White Sands Missile Range to conduct safety evacuations over the areas covered in existing evacuation agreements.
- Increase law enforcement on the ranges.

Issues That Can Be Addressed Administratively

- Consider a variety of other strategies that will ensure adequate law enforcement, including the probable effectiveness of such strategies. Such strategies might include the formation of strategic alliances or partnerships and monitoring voluntary work force.
- Provide a needs assessment to determine the level and type of enforcement that is appropriate.
- Re-establish the "No Dumping" signs.

Issues Not To Be Addressed in the EIS

- Establish effective work-force planning and determine the financial resources necessary to maintain appropriate staffing levels. *The RMP process does not address the financial resources needed for staffing.*

3.3.18 RMPs/EIS Process

Issues Overview

A majority of the comments received requested that the BLM coordinate with other agencies during the planning process. A comment concluded that a successful plan will preserve and protect the natural beauty and resources on public lands. One comment requested a change in the planning criteria to include the Planning Area's scenic viewshed.

Representative Comments

"I suggest that the reworded criteria [*preliminary planning criteria*] be as follows: 'The revision and the amendment will cause the protection and enhancement of the cultural and natural resources, the scenic viewshed, and the biodiversity in the Planning Area while allowing the public the opportunity for access in a productive and meaningful way.'" – Individual, Las Cruces, New Mexico

"We feel it is critically important for the BLM, city, state, and other federal agencies to work together on a common regional land management plan, in so far as possible." – Individual, Las Cruces, New Mexico

BLM Management Concerns

- Develop a comprehensive RMP document and be clear as to what aspects of the current RMP are being superseded or remain in effect.
- Consider Border and Homeland Security needs, actions, and appropriate mitigation measures in the Planning Area.
- Determine opportunities for community involvement in nontraditional ways, such as continuing with informal citizen networks, alternative-development workshops, capacity-building workshops and others.
- Determine the level of impact that border, Homeland Security, and law enforcement actions are having on environmental resources in the Planning Area.

Issues To Be Used in the Development and Analysis of EIS Alternatives

- The following plans are proposed and/or being planned and the BLM should coordinate appropriately:
    - Proposed river habitat restoration projects
    - Rio Grande Riparian Ecological Corridor Project Comprehensive Plan
    - Town of Mesilla's Comprehensive Plan
    - Smaller community zoning projects; for example, La Union
    - City of Las Cruces Comprehensive Plan
    - Extraterritorial Zone Comprehensive Plan
    - Las Cruces Storm Water Management Policy Plan (identified arroyos appropriate for open space corridors)
    - Metropolitan Planning Organization Trail Plan
    - Sunland Park Trail Plan
    - Plans being developed and considered to create and extensive trail along the river
    - Mesilla Valley Bosque State Park

Issues That Can Be Addressed Administratively

- Identify measures that are appropriate to mitigate the effects of activities and on LCFO staffing levels.
- Participate in a regional master plan with the city, county, State, Federal, NMSU, landowners, developers, non-profit organizations, citizens, and other interests.

Issues To Be Considered in Another Part of the EIS

- Consult formally with Indian tribes and State and local governments. Consideration should be given to the specific consultations that should occur and the appropriate procedures for carrying out such consultations.
- Direct contact with Doña Ana County planners would be very helpful in providing issue identification, information, and analysis.
- Cooperate with private sector and various governmental agencies to protect and manage arroyo corridors.
- Participate in the Major Arroyo Plan and include impacts in the RMPs. (Although it is unclear what the “Major Arroyo Plan” is, BLM regularly participates in other local government and agency planning efforts and as such, would provide our expertise and suggestions into those

efforts. Also, other approved plans that have an impact on BLM's RMPs effort would be included, as necessary, in cumulative impact analyses.)

Issues Not To Be Addressed in the EIS

- NEPA analysis should be based on reasonable budget expectations, which should be clearly stated. *Though NEPA does not require that reasonable budget expectations be clearly stated, BLM does generally consider their budget when determining what would be considered a "reasonable" alternative.*

3.3.19 Social and Economic Conditions

Issue Overview

Comments received regarding social and economic conditions suggested that an economic analysis be conducted to assess the value of open space, trends of income and employment, and the socioeconomic impacts of proposed alternatives for the Planning Area. Several comments supported the implementation of the Citizens' Plan for Open Space and Trails Vision to meet community needs, and manage the incremental effects of sprawl deteriorating community character. Many comments were received regarding the cost analyses on resources from the development of oil and gas in the Planning Area.

Representative Comments

"We cannot let millions of years of evolutionary development go down the drain for short-term economic advantage to the few. Our natural heritage must be preserved." – Individual, Elephant Butte, New Mexico

"BLM should utilize a Total Economic Valuation framework for evaluating alternatives." – New Mexico Wilderness Alliance/The Wilderness Society, New Mexico

"We fully support the Vision as it will encourage the support and approval of development projects that will foster 'smart growth', and thereby meet community needs while demonstrating good planning. We need such a system as it will positively impact the health of area residents and the natural environment, protect and enhance the quality of life for area residents and provide numerous opportunities for economic development." – Individual, Las Cruces, New Mexico

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Include the economic benefits and values of open space, trails, and trail connectivity to our local economy.
- Incorporate considerations of non-market values into the analysis of RMP alternatives in order to balance the multiple uses and benefits derived from public land to the extent possible, given that environmental values and impacts are difficult to quantify in economic terms.
- Use the total economic valuation framework when evaluating alternatives developed for the RMP, and specifically for evaluating the benefits of conserving wilderness character.
- Change grazing management standard for the entire Planning Area from utilization rates, which give preference to livestock over wildlife, to the more ecologically appropriate stubble height.
- Use "total personal income" as a basis for examining economic impacts.

- For regional economic trends, include an analysis of all sources of income, rather than relying solely on employment, which will dramatically overstate the importance of oil and gas industries to the local economy.

Issues That Can Be Addressed Administratively

- Examine historic trends in county income and employment.
- Consider the indirect role of wildlands in attracting nonrecreational businesses and retirees when completing the economic impact analysis of management concerns.
- Base the reasonable budget expectations on NEPA analysis.

Issues Not To Be Addressed in the EIS

- Estimate the risk of flooding due to retention-pond failure and include these costs in the estimation of the socioeconomics impacts. *Flood control structures are managed by various other agencies; management of these structures is not within BLM's jurisdiction.*
- Complete a full accounting of the costs and benefits of each of the alternatives developed. *BLM is required to manage public land for multiple uses. Further, benefit-cost analysis is not required as part of the RMPs/EIS process.*
- Analyze the costs of road maintenance and restoration and compare these costs with the budgets available to complete the work. *It is not possible to identify and/or quantify road maintenance and restoration costs during the programmatic RMP efforts because site-specific plans would be developed for each proposed project.*
- Analyze the long-term economic costs associated with water pollution and the lack of water recharge and include analysis in the socioeconomic impacts of alternatives that call for increased oil and gas drilling. *To the extent possible, long-term socioeconomic impacts resulting from water pollution and lack of recharge will be addressed. However, many environmental impacts are not quantifiable in economic terms.*
- Analyze the impacts on fisheries from increased oil and gas drilling, and include mitigation costs in the analysis of the socioeconomic impacts. *BLM will analyze impacts on fisheries from any decisions to increase oil and gas drilling; however, it is not possible to identify and/or quantify mitigation costs during the programmatic RMP efforts because site-specific mitigation would be developed for each proposed project.*
- Analyze the costs to the loss of irrigated crop productivity and include analysis in the socioeconomic impacts of alternatives that call for increased oil and gas drilling. *BLM will analyze impacts on irrigated crop productivity from any decisions to increase oil and gas drilling; however, it is not possible to identify/quantify costs during the programmatic RMP efforts.*
- Analyze the additional costs from noxious weed mitigation from increased oil and gas drilling. *It is not possible to identify and/or quantify mitigation costs during the programmatic RMP efforts because site-specific mitigation would be developed for each proposed project.*
- Include a fiscal analysis of alternative implementation and mitigation costs. *The RMP planning process identifies the general management to occur on public lands. The analysis of costs occurs administratively and is not incorporated into the RMPs/EIS.*

3.3.20 Transportation

Issues Overview

Transportation often relates to other resource issues including recreation (more specifically OHV use), urban expansion, wildlife habitat preservation, and land ownership. Most comments received were regarding OHV and vehicular access to public lands for recreation. Several commenters supported the continued use of trails, roads, and OHV access because they are unable to hike to remote areas. However, nearly all comments submitted stressed the importance of "treading lightly" and responsible off-road transportation.

Several comments suggested that the BLM conduct a socioeconomic analysis of the value of access and connectivity within the Planning Area. One comment suggested that BLM adopt special management designations on public lands to between White Sands Missile Range and U.S. 54 that will allow for military training that is compatible with continued off-road recreational use of the Red Sands Recreational Area. Also, one commenter suggested protecting local airports and landing areas from encroachment in order to preserve air transportation opportunities in the Planning Area.

Representative Comments

"Require plans for roads and other development corridors that cross arroyos. Require proposed road development to not impede or slow water flow in any way. Do not allow concentration of stormwater flow. Do not permit structures that obstruct, redirect, or impede 100 year of traditional flow in any way." – Sierra Club, Southern New Mexico

"My primary concern is the increasing restrictions being placed on motorized vehicle traffic on public lands. Each time an area is closed to vehicle traffic, it becomes an area closed to millions of Americans, the handicapped, the mobility limited, the infirmed and the elderly. A road or trail closure also restricts (and may someday eliminate) a very healthy recreational activity enjoyed by millions of our citizens." – Individual, Las Cruces, New Mexico

"Special areas should also undergo a comprehensive transportation planning process that limits vehicles to designated roads and allows for unnecessary and/or resource damaging road and trails to be closed." – Individual, Las Cruces, New Mexico

"The goal of the Las Cruces Field Office's travel planning should be to create a travel and recreation system that provides appropriate access to public lands, contributes as needed to the regional transportation system and ensures that biodiversity, wildlife habitat condition, and overall landscape condition and function is maintained or improved." – New Mexico Wilderness Alliance/The Wilderness Society, New Mexico

Issues To Be Used in the Development and Analysis of EIS Alternatives

- Manage the Columbus Highway by prohibiting roadside development such as billboards and focusing on preserving the viewshed and scenic values. (Here the Columbus Highway is interpreted as meaning State Route 9, which is a partially paved and part gravel road that runs through southern Doña Ana, Luna, Grant, and Hildago counties from near Santa Teresa to almost the Arizona-New Mexico state line.)
- Use a 25-year planning horizon to identify any State and Federal proposals for new construction and existing road expansion.

Issues That Can Be Addressed Administratively

- Complete a travel plan similar to the one adopted by the Royal Gorge Field Office in Colorado (Gold Belt Travel Management Plan) and adopt it in the TriCounty RMPs.
- Protect primitive areas by identifying what roads warrant necessary maintenance.
- Develop a memorandum of understanding with each county related to the management of area roads.
- Provide transportation routes, under a Travel and Access Management Plan, throughout the public lands.
- Re-evaluate the existing parking restrictions on Alamo Mountain ACEC.
- Require plans for roads and other development corridors that cross arroyos.
- Require that proposed road development not impede or slow water flow in any way.
- Consider protection of resource values.

Issues To Be Considered in Another Part of the EIS

- Define how BLM will coordinate with the Department of Transportation and New Mexico State Byway Coordinator to secure backcountry byway designation.

Issues Not To Be Addressed in the EIS

- Analyze the costs of road maintenance and restoration and compare these costs with the budgets available to complete the work. *Specific road maintenance and restoration efforts will be handled on a case-by-case basis for each project, not at the RMP level*.
- Analyze the costs associated with increased monitoring of OHV use and road maintenance and include analysis in the socioeconomic impacts of alternatives that call for increased oil and gas drilling. *It is not possible to identify and/or quantify monitoring and road maintenance costs during the programmatic RMP efforts because site-specific monitoring and maintenance would be developed for each proposed project.*

3.4 TYPES OF DECISIONS ANTICIPATED TO BE MADE

In accordance with FLPMA, BLM is responsible for management of public land and its resources based on the principles of multiple use and sustained yield. Management direction is provided by a land use plan, in this case an RMPA and RMPR (RMPs). The RMPs are developed to determine decisions regarding appropriate multiple uses and allocation of resources, develop strategy to manage and protect resources, and establish systems to monitor and evaluate the status of resources and effectiveness of these management practices over time. Also, the management direction developed through the planning process needs to be adaptable to changing conditions and demands over the life of the RMP. Development of the RMPs will be in accordance with the guidance set forth in the BLM H-1601-1 – Land Use Planning Handbook.

In anticipation of this planning process, BLM developed an initial list of example questions that reflect the kinds of decisions that will need to be made in the RMPs/EIS process. These planning questions were identified in the first newsletter distributed to the public in February 2005 announcing the TriCounty planning process and scoping meetings to be held in March 2005.

Generally, questions such as the following will be answered during the planning process and in the resulting RMPs:

- How can the LCFO accommodate potentially competing interests (e.g., grazing and recreation)?
- Given the need for urban expansion, how much land should be disposed of in the Planning Area?
- What areas will be open, closed, or designated as limited to motorized access?
- What types of constraints should be placed on resource uses?
- What are the desired levels of resource production or the conditions of those resources and what are the allowable levels of resource use?
- What should be the limits and magnitude of BLM's management?

3.5 ANALYSIS OF EXISTING MANAGEMENT

BLM-administered public land in the Planning Area is managed with direction from two documents: the White Sands RMP (1986) and Mimbres RMP (1993). Since these plans were implemented 12 to 19 years ago, numerous changes have occurred in the area that require reconsideration of certain management decisions. BLM has determined there are issues related to the effectiveness of the White Sands RMP, therefore requiring a revision to the existing White Sands RMP. Since the completion of the Mimbres RMP, Doña Ana County has experienced significant growth. The rate of growth and the resulting changes in demographic characteristics affect the need for planning.

Based on demonstrated experience, many elements of the existing plans work well and remain valid, and BLM intends to carry these management decisions forward. Determining which existing management decisions will be carried forward is a part of the planning process. BLM will review the existing condition of the environment, review the existing management situation, and identify which existing management decisions should be carried forward and where there are opportunities to modify existing management direction and/or develop new management guidance. This review will be documented in the Analysis of the Management Situation, a next step in the planning process.

SECTION 4.0 DATA

4.1 DATA SUMMARY

The LCFO staff has identified the data that are required to adequately address resource and use issues and develop and analyze impacts of plan alternatives. These are summarized below. In many cases, existing resource information available in the LCFO will be used in formulating resource objectives and alternative management actions. Much of the data have been or will have to be updated, compiled, and converted into digital format (e.g., geographic information system [GIS]) for use in the planning process and for development of resource maps for the plan. GIS files are the building blocks used to quantify resources, create maps, and manipulate information during formulation of the alternatives, especially during formulation of the preferred alternative.

All GIS data developed for the RMPs will meet the data and metadata standards identified by BLM as appropriate.

4.2 DATA GAPS

Table 4-1 lists the data BLM has gathered to date, and the data that are missing but needed for the RMP.

Table 4-1 GIS Data Inventory

Data Description	Format	Dona Ana	Sierra	Otero	Date Transferred to URS	Alternate Source/Notes
Base Data						
Quickbird Imagery						
PLSS	shape	X	X	X	12/21/04	Trapped ranges, revisions necessary
DEMs		X	X	X		
DOQQs		X	X	X	12/21/04	
DRG's		X	X	X	2/10/05	
Cities	shape	X	X	X	1/20/05	Polygons of urban areas from ESRI
County Boundaries	shape	X	X	X	5/16/05	
Planning Area Boundary	coverage	X	X	X	5/4/05	Derived from counties coverage
Decision Area Boundary						Need mineral ownership
Lands & Access						
Disposal Lands	coverage	X	X	X	4/13/05	Multipule labelerrors. Update of disposal land for old_mimbres_disposal.shp. Attribute field with 31/289 polygons labeled as "disp"
ROW Avoidance and Exclusion Areas		X				
Open Space	shape				4/7/05	
Military Range boundaries						Thought of after project initiation. Is there a need for this? Nothing Available beyond Surface Ownership.
Air Quality						
Class 1 Areas						
National Weather Service Meteorological Stations						
Non-attainment Areas						
Air Quality Monitor sites						
IMPROVE Monitoring Stations						
Remote Automatic Weather Stations						
Cultural Resources						
NMCRST						
El Camino Real Trail	coverage				1/26/05	tri_camino only portion that is known; also have statewide cover that identifies probable location.
Energy & Minerals						
Subsurface Mineral Estate	shape	X	X	X	1/20/05	
Mining Districts						LR2000
Mining Claims						LR2000
Mineral Resource Data System (MRDS)					1/24/05	Transfer contained only a text file. Need to transfer again.
Existing Pits and Quarries						LR2000
Coal Leases						
Existing Oil and Gas Leases		X	X	X		
Physiographic Proviences						MLRA updated at NM-NRCS web site
Tectonic Features (troughs, belt boundaries)						
Locatable Mineral Occurrence Potential and Development Potential (Planning Area Wide)						
Saleable Mineral Occurrence Potential and Development Potential (Planning Area Wide)						
Geothermal Occurrence Potential and Development Potential (Planning Area Wide)	coverage		X	X		FROM WHITE SANDS FLUID MINERAL FEIS

Data Description	Format	Dona Ana	Sierra	Otero	Date Transferred to URS	Alternate Source/Notes
CO2 Occurrence Potential and Development Potential (Planning Area Wide)						
Oil & Gas Occurrence Potential and Development Potential (Planning Area Wide)	coverage		X	X		FROM WHITE SANDS FLUID MINERAL FEIS
Uranium Occurrence Potential and Development Potential (Planning Area Wide)						
Sodium Occurrence Potential and Development Potential (Planning Area Wide)						
Coal Occurrence Potential and Development Potential (Planning Area Wide)						
Coalbed Methane Occurrence Potential and Development Potential (Planning Area Wide)						
Wind Power Classification						
Solar Flat-plate Collection Classification						
Solar Concentrating Collection Classification						
Environmental Justice						
Census Tracts 1990 and 2000		X	X	X	URS	ESRI Data CD/ Census Web site.
Fire						
Fire History	coverage	X	X	X	1/26/05	Projection system needs to be revised
Statewide Fire Plan	coverage	X	X	X	4/26/05	
Geology						
Geology		X	X	X		
Cave Locations						Old mine shaft dataset for Horita Mountains
Palaeoecological Resources						
Jurisdiction						
Surface Management	shape	X	X	X	12/21/04	10 polygons with out own attribute populated.
Incorporated City Limits	shp	x			4/15/05	For Las Cruces only
Hazardous Materials						Old bombing range in Oterro may be a hazardous materials site
Active/Closed Landfills						
Non-point Source						
Superfund Sites						
UST Sites						
LUST Sites						
CERCLA Sites						
RCRA Sites						
Range Resources						
Fraglands	coverage	X			4/27/05	Areas on the threshold of breaking apart.
Grazing Allotments	shape	X	X	X	12/21/04	
Range Improvements	coverage	X	X	X	5/4/05	
Recreation						
El Camino Real Trail	coverage	X	X		URS	URS data library
Jornada del Muerto Trail					1/27/05	
Butterfield Trail	coverage	X	X		1/27/05	
Mormon Battalion Trail	coverage					
Butterfield Trail	coverage	X	X		1/27/05	Extends beyond Planning Area
Recreation Trails	coverage	X				

Data Description	Format	Dona Ana	Sierra	Otero	Date Transferred to URS	Alternate Source/Notes
Recreation Opportunity Spectrum Classes						
OHV Designations	coverage	X	X		4/25/05	Two areas of Open in Planning Area
Chihuahuan Desert Nature Park						
West Mesa Regional Park						
State Parks						Mesilla Valley Bosque; Elephant Butte; Cabillo
Soils						
NRCS STATSGO/SURGO		X	X			URS data library, need to revise county boundaries
Soils	coverage	X				Dona_anna_soils, polygons and points. Polygons have incorrect projection defination
Prime and Unique Farmlands						
Erosive and Fragile Soils						
T&E						
Aplomado Falcon Model		X	X	X	5/12/04	URS data library
Prairie Dot Town Locations	coverage			X	1/26/05	Two coverages with same data
Transportation						
Transporation Network	shape	X	X	X	12/21/04	Missing attribution for "adminstra" to pull in all of 506 and 70
MPO's	coverage	X			1/26/05	Updated twice/year. Received proposed and through_fare
Utilities						ROW for whole state as a geodatabase.
Communication Sites						
Pipelines						
Electric Transmission Lines	shape			X	1/24/05	Two coverages
Sierra County Electric Transmission Lines	shape		X		2/1/05	
Utility Corridors		X				General scale only
Wind Powered Generation Sites						
Utility Withdrawals						
Vegetation						
Riparian	coverage	X			1/28/05	Four coverages - Hatch and LASCR; lascr_rip_x us outline of LC 100k
Vegetation						Download REGAP landcover from SWREGAP, BLM is currently reviewing it
SWA	shape	X	X	X	1/26/05	Partial coverage in all three counties
Habitat Management Plan Areas	coverage	X			4/25/05	
Noxious weeds/non-native plants	coverage		X	X	1/25/05	Statewide geodatabase, includes treatments. 3/13 covers have data in Planning Area
Ecological Condition		X	X			
Brush Control Treatment Areas	coverage	X	X	X	5/18/05	One label error
Site Write-up Areas		X	X			Vegetation and soils
Geographic Proviences	coverage	X	X	X	1/26/05	Multiple label errors. Extends beyond Planning Area
Special Designations						
Areas of Critical Environmental Concern	shape	X	X	X	12/21/04	
Propetiary ACEC	coverage	X			2/1/05	Will not be displayed on maps for public distribution
Nominated ACEC						
Special Cultural Management Areas						
Lake Valley Scenic Byway	coverage				4/13/05	
Special Recreation Management Areas (SRMA)	coverage				4/27/05	
Wilderness Study Areas	shape	x	x	x	5/12/05	Missing labels for a Sacramento Escarpment and Robledos
Surface Water Resources						
Annual Precipitation						BLM has some data

Data Description	Format	Dona Ana	Sierra	Otero	Date Transferred to URS	Alternate Source/Notes
National Hydrography Database		X	X	X	URS	URS data library
Watershed Boundaries	coverage	X	X	X	5/23/05	Extent differs from Planning Area at west side of Sierra County; and south side of Dona Ana
Wells						
Streams	shp	x	x		1/5/05	Matches NHD for Rio Grande. Plus streams in Sierra/Decision Area
Floodplains	shp	X	X		1/24/05	FEMA data
Groundwater Resources						
Groundwater Basins	coverage		X	X		URS data library
Visual						
Visual Resource Management Classes	coverage	X			5/4/05	
El Camino Real Trail Associated VRM						Identified in Management Plan with classes.
Wildlife Resources						
Wildlife Migration Corridors						
NMGF Hunt Units		X	X	X	5/23/05	Downloaded from NMGF site
Antelope Hunt Units						Requested from NMGF 6-1-05
Wildlife Distributions						REGAP, BLM to finalize data set

SECTION 5.0 SUMMARY OF FUTURE STEPS

5.1 INTRODUCTION

The BLM planning process, a progression of nine basic steps, is presented below and described in the planning regulations (Manual 1617, Section 42).

1. Identification of issues
2. Development of planning criteria
3. Data and information collection
4. Analysis of the management situation
5. Formulation of alternatives
6. Estimation of effects of the alternatives
7. Selection of the preferred alternative(s)
8. Selection of the plan
9. Monitoring and evaluation

The process requires the use of an interdisciplinary team of resource specialists to complete each step. The process also relies on an effective public involvement program so that the end result, the RMP, will have community and political support. To achieve this, BLM is committed to continuing to engage the public and relevant agencies in the planning process. Land use planning often provides the catalyst for bringing communities, agencies, other groups, and individuals together to reach mutually beneficial goals. Over the past few years, BLM has incorporated collaborative approaches to planning and land stewardship projects. A collaborative approach to planning requires that BLM work together with tribal, State, and local governments, other Federal agencies, and interested organizations and individuals, from the earliest stages of, throughout, and beyond the planning process to address common needs and goals within the Planning Area. Collaboration increases community involvement with and support for management decisions and implementation—it establishes a long-term commitment by the participants for a shared responsibility and stewardship of the land. Based on the results of scoping, an assessment of the public's interest, and the need for participation at particular milestones of the planning process, the LCFO will prepare a Public Participation Plan to integrate public and agency involvement into and throughout the planning and environmental process.

5.2 IDENTIFICATION OF ISSUES

Issues were identified through the scoping process, which can be considered as the initiation of the overall planning process. The scoping process and the issues identified through the process are described and documented in this scoping report.

5.3 DEVELOPMENT OF PLANNING CRITERIA

Planning criteria establish constraints and guidelines for the planning process; establish standards, rules, and measures; set the scope of inventory and data collection; help identify the range of alternatives; and help estimate the extent of analysis. Based on the issues identified through the scoping process and in line with BLM management concerns, BLM drafted the planning criteria as described in Section 2.0 of this document.

5.4 DATA AND INFORMATION COLLECTION

Much of the data and information used will be extracted from existing data on file at LCFO and the BLM New Mexico State Office, or will be otherwise obtained from other local agencies and academic

institutions. Other data and information will be obtained from current BLM studies and through other relevant sources that can provide data to update and/or supplement BLM's data. The types of data used will include published and unpublished reports, maps, and digitally formatted data for use in a GIS. The RMP process typically addresses the following resources, resource uses, and related issues:

- Air quality
- Soils
- Water resources
- Biological resources (vegetation and noxious weeds, special status species, wildlife and wildlife habitat)
- Cultural resources and tribal concerns
- Paleontology
- Geology
- Visual resources
- Fire ecology
- Special management designations (ACECs, WSAs)
- Livestock grazing
- Recreation (off-highway vehicle use, trails and access)
- Lands and realty (land tenure, urban expansion, rights-of-way, utilities, corridors, easements, open space)
- Energy and minerals
- Hazardous materials
- Public safety, law enforcement, and illegal activities
- Social and economic conditions
- Transportation

During the data-collection step of the process, BLM will initiate specific coordination with agencies, including the FWS for Section 7 consultation (under the Endangered Species Act) and the State Historic Preservation Officer for Section 106 consultation (under the National Historic Preservation Act), to ensure that these processes will be completed in conjunction with the RMP process.

5.5 ANALYSIS OF THE MANAGEMENT SITUATION

The Analysis of the Management Situation is a deliberate assessment of the current situation in the Planning Area. The documentation is a compilation of information appropriate to and commensurate with the planning issues. The Analysis of the Management Situation provides a profile of the existing condition of the environment, description of the existing management (e.g., laws, regulations, policies, management direction), and analysis of opportunities to continue or modify the existing management situation.

5.6 FORMULATION OF ALTERNATIVES

BLM, in collaboration with relevant agencies and the public, will develop a range of reasonable alternatives (i.e., combinations of management strategies) to the existing management situation. These alternative will (1) address the issues identified during scoping, (2) comply with BLM's planning regulations and policies, (3) comply with the FLPMA requirement to manage public lands according to the principle of sustained yield and multiple use of the lands, and (4) comply with all other relevant laws and regulations. Also, an alternative that calls for no action will be addressed. The no-action alternative assumes that existing management will continue.

Formulation of alternatives is the most prominent milestone task for collaboration and public participation. Because the development of alternatives is a critical step for which careful and thorough collaborative planning is needed, BLM intends to schedule public meetings to discuss the alternatives for the Planning Area. The meetings will most likely be informal workshops with the general public, interested organizations, and agencies.

5.7 ESTIMATION OF EFFECTS OF THE ALTERNATIVES

BLM then will assess the potential effects of the RMP alternative management strategies on the natural and cultural resources and the human uses of these resources.

5.8 SELECTION OF THE PREFERRED ALTERNATIVE

Based on the information generated in the previous step, the LCFO will identify and recommend to the BLM New Mexico State Director a preferred alternative management plan. The Draft RMPs/EIS will be prepared and distributed to the public for review and comment for a period of 90 days. Public meetings (hearings) will be scheduled during the comment period. The availability of the Draft RMPs/EIS and public meetings will be announced via a notice in the *Federal Register*, various media, a planning bulletin, and on the project Web site.

5.9 SELECTION OF THE PLAN

Based on the scoping results and after thorough consideration of the public and agency comments regarding the Draft RMPs/EIS, the LCFO will recommend to the BLM New Mexico State Director the Proposed RMPs and will publish the RMPs along with the Final EIS as one document (Proposed RMPs and Final EIS). A final decision will be made after a 60-day Governor's Consistency Review and a simultaneous 30-day protest period. The Record of Decision and approved RMPs will then be published. The availability of the Proposed RMPs/Final EIS will be announced via a notice in the *Federal Register*, various media, a planning bulletin, and on the project Web site.

5.10 MONITORING AND EVALUATION

Over time, BLM will monitor and evaluate actions, resource conditions, and trends to determine the effectiveness of the RMPs and to ensure that implementation of the RMPs is achieving the desired results. The RMPs will be kept current through minor maintenance, amendments, or revisions as demands on resources change, as the resources change, or as new information is acquired.

SECTION 6.0 REFERENCES

United Stated Department of Interior, Bureau of Land Management (USDI, BLM). 2005. *H-1601-1 – Land Use Planning Handbook*. March.

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James Kent Associates, 2003. *Preliminary Assessment of Community Interests and Communication Strategies by Geographic Area: The Las Cruces Field Office Planning Area*. June.