

INTERNAL DRAFT

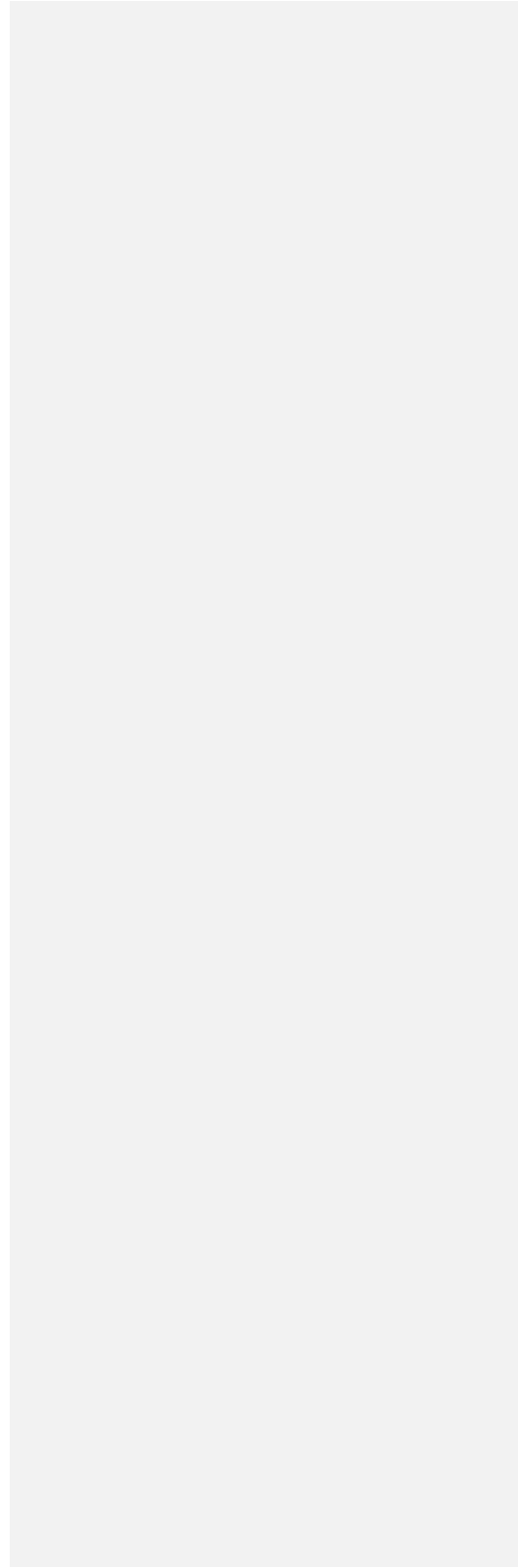
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## Appendix R

Substantive Comments

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# Appendix R. Substantive Comments

## R.1 INTRODUCTION

Substantive comments are those that suggest the analysis is flawed in a specific way. Generally, they challenge the accuracy of information presented, the adequacy, methodology, or assumptions of the environmental or social analysis (with supporting rationale), or present new information relevant to the analysis or reasonable alternatives (including mitigation) other than those presented in the document. Such substantive comments may lead to changes or revisions in the analysis or in one or more of the alternatives.

There may be many or no substantive comments in a letter, such as the following:

### 1. Issues requiring clarification or modification of an alternative

### 2. Issues requiring development of an alternative that was not previously given serious consideration

### 3. Issues requiring improvement or modification of the analysis

### 4. Issues that are out of scope of the planning area or the plan itself

Although these may not necessarily be substantive comments, depending on their nature, they could be included in the comments that have a response in the plan, for example, as follows:

**Response:** *This comment pertains to management activities that will be analyzed on a site-specific basis after this resource management plan (RMP) has been approved.*

### 5. Issues that can be resolved through clarification of intent in a section of the Proposed RMP/Final [Environmental Impact Statement \(EIS\)](#)

### 6. “Super-substantive” issues that would lead to a revised or supplemental draft EIS

This includes major data gaps or other relevant and important issues that are missing and have never been exposed to the comment process.

### 7. Procedural issues that were not captured in numbers 1–6, above ([Council on Environmental Quality \[CEQ\]](#) calls these “methodology”):

These should be easy to spot. They do not relate directly to the scope—actions, alternatives, and impacts. For example, “I need more time to comment”; “You took too much time to . . . .”; “Your method for determining consistency, compatibility, conformity, compliance, etc. is good/bad.”

Some of the substantive comments were repeated several times; however, the comments in this appendix represent the full array of the substantive comments that the [United States \(US\) Department of Interior \(DOI\)](#), [Bureau of Land Management \(BLM\)](#), Rio Puerco Field Office (RPFO) received.

32 **R.2 COMMENTS KEY**33 **Letter** *Number#*

34	1. San Felipe Pueblo	Pueblo of San Felipe, <a href="#">Governor</a> : Anthony Ortiz
35	2. Not Avail.	Not provided
36	3. Placitas, New Mexico	Cosmos Dohner
37	4. Dallas, TX	<a href="#">US Environmental Protection Agency (EPA)</a> Region- 6, Chief, <a href="#">Office</a> - of
38		Planning & Coordination, Rhonda Smith
39	5. ABQ, New Mexico	Native Plant Society, <a href="#">Albuquerque (ABQ)</a> Chapter <a href="#">President</a> , George
40		Miller
41	6. ABQ, New Mexico	David Ryan
42	7. Not available	Barbara Friedman
43	10. Cuba, New Mexico	Dennis Umshler
44	13. Placitas, New Mexico	Kelly Garner
45	14. Placitas, New Mexico	Kevin Quail
46	15. Placitas, New Mexico	Sara Wendel-Ogelsby
47	16. Placitas, New Mexico	Lew Fisher
48	17. Not available	Name not provided
49	18. Not available	Name not provided
50	38. Placitas, New Mexico	Phillip Mercurio
51	44. Placitas, New Mexico	Mary Summers
52	53. Baltimore, Maryland	Continental Trail Divide Society, <a href="#">Director</a> -, James Wolf
53	54. Placitas, New Mexico	Randall Benton and Ida Simpkins
54	56. ABQ, New Mexico	Roger Holden
55	57. Placitas, New Mexico	Kevin Quail
56	58. Santa Fe, New Mexico	New Mexico Natural History Institute, Secretary, Roger Peterson
57	60. Placitas, New Mexico	Douglas Cook
58	63. Placitas, New Mexico	Diane Ransom
59	64. Placitas, New Mexico	Budd Berkman
60	65. ABQ, New Mexico	Coby Muckelroy
61	66. ABQ, New Mexico	Sandra Lapham
62	67. Santa Fe, New Mexico	Evalyn Bemis

63	68. Colorado	<a href="#">US Department of Agriculture, Forest Service (USFS)</a> , Rocky Mountain
64		Region Continental Divide National Scenic Trail, Greg Warren
65	70. Corrales, New Mexico	Scott Lake
66	71. Not available	Clay Robinson
67	72. Indianapolis, Indiana	Paul and Margarete Brandenburg
68	74. ABQ, New Mexico	Natalie Atherton
69	75. ABQ, New Mexico	Spencer Nelson
70	77. Placitas, New Mexico	Meg Leonard
71	80. Placitas, New Mexico	Susan Lucas
72	81. Placitas, New Mexico	Dorothy E. Noe
73	87. ABQ, New Mexico	Carolyn Dodson
74	88. Durango, Colorado	Daniel Hoff
75	90. The Wilderness Society	Nada Cutler, Senior Counsel
76		New Mexico Wilderness Alliance, Judy Calman, Staff Attorney
77		Wild Earth Guardians, Bryan Bird
78		Sierra Club, Rio Grande Chapter, Norma McCallan, Vice Chair
79		New Mexico Sportsman/Back Country Horsemen of New Mexico,
80		Chair
81		New Mexico ConservAmerica, Bill Wiley, President
82	91. Placitas, New Mexico	Sandra and Charles Johnson
83	94. Placitas, New Mexico	Adelina Sosa
84	95. Placitas, New Mexico	Las Placitas Association jointly with Eastern Sandoval Citizens
85		Association, Sandy Johnson, LPA Pres., and Orin Safier, ES-CA Pres,
86		for Bob Gorrell
87	104. Placitas, New Mexico	Linda Brooks Robinson
88	108. ABQ, New Mexico	New Mexico Environmental Services <a href="#">Department</a> , John Ackler,
89		Project Manager
90	109. Pueblo of San Felipe	Governor Anthony Ortiz
91	112. Placitas, New Mexico	David and Susan Gutt
92	114. Placitas, New Mexico	Max Ramey
93	118. Placitas, New Mexico	Peter Callen
94	119. Placitas, New Mexico	Peter and Karla Bakke
95	121. Placitas, New Mexico	Thomas and Karen Tyler

96	126. Placitas, New Mexico	William R. Rainey
97	130. Placitas, New Mexico	Al and Lolly Jones
98	138. Placitas, New Mexico	Deb Slaney Iwerks
99	143. Placitas, New Mexico	Audrey and Allen Harrison
100	144. ABQ, New Mexico	Kathy Cokon
101	145. ABQ, New Mexico	Chuck Harris
102	146. Espanola, New Mexico	R. Kirkpatrick
103	147. ABQ, New Mexico	Joan and Mark Wolf
104	149. Las Cruces, New Mexico	New Mexico Department of Agriculture, Jeff M. White
105	150. ABQ, New Mexico	Hawks Aloft, Gail Garber, Executive Director
106	154. ABQ, New Mexico	New Mexico Backcountry Hunters and Anglers, Oscar Simpson, Chair
107	156. Placitas, New Mexico	Overlook HOA Bill Brown
108	157. Placitas, New Mexico	Reid Bandeen
109	158. Rio Rancho, New Mexico	John J. Corcoran III
110	159. ABQ	NM 4-Wheelers, BOD Frank Whiston
111	160. Rio Rancho, New Mexico	New Mexico Off Highway Alliance, Mark R. Werkmeister, Board
112	162. Placitas, New Mexico	Dawn Foster
113	163. Santa Ana, New Mexico	Pueblo of Santa Ana, Director Department of Natural Resources, Alan Hatch
114		
115	164. Placitas, New Mexico	Martin A. Clifton
116	169. Placitas, New Mexico	Carol and Bruce Gabel
117	172. Rio Rancho, New Mexico	Rex Stone
118	173. ABQ	Richard Yeck
119	174. N/A	Art Bova
120	176. Placitas	Pete Lindsley
121	181. Cuba	Richard Kozoll
122	182. ABQ	Uwe and Karen Schroeter
123	185. ABQ	East Mountain Regional Trails Council, Mike Madden
124	186. Placitas, New Mexico	Kathleen Johnson
125	187. Placitas, New Mexico	Michael W. Chynoweth

126	188. Santa Fe, New Mexico	Kenneth Alan Collins
127	196. Sandia Park, New Mexico	Julie Sprott
128	199. ABQ	Susan Selbin
129	201. ABQ	James E. Lucero
130	203. Placitas, New Mexico	Natara Landrau
131	205. ABQ	Wild Earth Guardians, <a href="#">Board</a> - Member Jon Spar
132	207. Santa Fe, New Mexico	Norma McCallan
133	208. Santa Fe, New Mexico	Fran Hardy and Bob Demboski
134	209. ABQ	Jeff and Paula Boggs
135	212. Placitas, New Mexico	Michael Sare
136	215. Palm Springs, CA	Vito Degrigoli
137	223. ABQ	Elaine McGivern
138	226. ABQ	Jon Knudsen
139	233. Rio Rancho	Del Duncan
140	242. Placitas, New Mexico	Wild Horse Observers Assoc., Patience O'Dowd and Kevin Quail, and
141		Jordan Beckett, Beckett Law, Medford, Oregon
142	243. ABQ	Mike Ritchie
143	254. Placitas, New Mexico	Orin Safer
144	255. Placitas, New Mexico	Marie Sibrell
145	263. Jemez Springs, NM	Linda Bedre Vaughn
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**Table R-1. Substantive Comments by Resource Category**

Letter Number	Comment Number	Category	Comment Text	Response
90	53	Recreation	Coordinated Management of Wildlands with Cibola National Forest: The lands managed by the Rio Puerco Field Office are distributed around 6 counties and are also adjacent to lands managed by other agencies. Notably, lands managed by the Cibola National Forest share boundaries with the Rio Puerco Field Office and provide an important opportunity for coordinated management. For instance, the BLM's Chamisa WSA [Wilderness Study Area] is adjacent to the Forest Service Guadalupe Inventoried Roadless Area (IRA), creating a total area of more than 26,000 roadless acres. In addition, the BLM's Ignacio Chavez WSA is adjacent to the Cibola's Ignacio Chavez Contiguous IRA, creating a total of more than 35,000 roadless acres. Similar opportunities exist around lands with wilderness characteristics, ERMAs [Environmental Recreation Management Area], and ACECs [Areas of Critical Environmental Concern] in the Rio Puerco Field Office. We have created and attached a map (Attachment 3 [see ATT 3] to these comments, incorporated by reference) showing the relationship between lands of conservation value in the Rio Puerco Field Office and the adjacent areas managed by the Cibola National Forest. The Cibola has just begun the revision of its forest management plan and will be creating an assessment for public review in the upcoming months. [Footnote 24: See <a href="http://www.fs.usda.gov/detail/cibola/landmanagement/planning/?cid=fsbdev3_065627">http://www.fs.usda.gov/detail/cibola/landmanagement/planning/?cid=fsbdev3_065627</a> ] Recommendation: This is an opportune moment to evaluate cooperative management of wildlands and wildlife that do not recognize the borders between the two agencies but could benefit from cooperative management across those borders, above and beyond addressing transfer of the Crest of Montezuma. We recommend that the BLM work with the Forest Service to maximize management that takes into account values managed by both agencies, and include this commitment in the Rio Puerco RMP in relation to lands with wilderness characteristics, WSAs, ERMAs, SRMAs [Special Recreation Management Areas], ACECs and wildlife corridors.	The Forest Service was one of the BLM's collaborating partners in the development of the Draft <a href="#">Resource Management Plan (RMP)/Environmental Impact Statement (EIS)</a> . Furthermore, in Draft RMP/EIS Chapter 2, Section 2.2.16.2.3 (Special Designations, Congressionally Designated Trails, Management Common to All Alternatives), language that was intended as a general management strategy was clarified in the Proposed RMP/Final EIS (Section 2.2.16.2, Special Designations, Congressionally Designated Trails, Management Common to All Alternatives) and also included in Proposed RMP/Final EIS Section 2.2.16.4 (Special Designations, Wilderness Areas and Wilderness Study Areas ( <a href="#">WSA</a> ), Management Common to All <del>Alt6.36</del> Alternatives), as follows:  "For wilderness and WSAs, the BLM would maximize partnership and cooperative management opportunities (e.g., cooperate with private landowners to install trail markers, provide public access, and work with other government agencies that have similar designations on lands near or adjacent to BLM special designations)."
63	2	Recreation	I am extremely concerned that each of the alternative plans includes the majority of the land being open to cattle grazing, mining, and off road vehicle use. How can these uses even be considered without first conducting environmental studies and disclosing potentially harmful environmental impacts to the public? Where are the discussions of the effect of all of this on sensitive ecological species? What about the management of critical water areas that need to be restored? All of this information is lacking in the DEIS. As for those alternatives that are suggested, I support Alternative B which includes closure to minerals and no surface occupancy	Draft RMP/EIS Chapter 4, Environmental Consequences details how the different resources would be affected by grazing, minerals development, and off-highway vehicle use under the various alternatives. For example, impacts on the public are disclosed in Draft RMP/EIS Section 4.1.2 (Travel Management) and Section 4.2.5 (Recreation and Visitor Services); impacts on ecology are disclosed in Draft RMP/EIS Section 4.2.12 (Vegetative Communities) and Section 4.2.11 (Special Status Species); and impacts on water are disclosed in Draft RMP/EIS Section 4.2.9 (Soil and Water Resources).
91	24	Recreation	The preferred Alternative seems to be missing any consideration of the many comments submitted by us, Placitas residents and organizations during the original 2008 scoping period. While those scoping comments may not have been as "substantive" as you now require, those comments were obviously unanimous in rejecting mining on the Placitas BLM parcels. Yet that is the preferred Alternative of the Plan. Explain the BLM's rationale for any Management Class designations less than Class II under any alternative, but especially under Alternatives B and C, based on comments and input received by BLM from LPA [Las Placitas Association], ES-CA [Eastern Sandoval Citizens Association], and Pathways during the scoping process in 2008. This input could not possibly have been interpreted in any way that suggests that high or even moderate change to the characteristic landscape was acceptable.	The BLM considered all comments received during the public comment period, but it is not required to respond to the nonsubstantive portions of your comment (see BLM National Environmental Policy Act <a href="#">[NEPA]</a> Handbook, H-1790-1, 6.9.2.2). Regarding the substantive portions of your comment, under the current management prescriptions (1986 RMP, as amended), the BLM recognized that all federal mineral estates include what is below private surface and is currently open for potential mining. The visual resource management (VRM) analysis stage involves determining whether the potential visual impacts from surface-disturbing activities or developments would meet the management objectives established for the area, or whether design adjustments would be required (BLM Handbook H-8431-1). In the Placitas area, the overall management prescriptions continue to be, primarily, permitted livestock grazing and dispersed recreation. In general, the range has been highly affected due to trespass livestock overgrazing over many years. Based on the need to manage the above-mentioned resources, VRM Class <del>III</del> IV-level protection <a href="#">would provide</a> the appropriate level of visual resource protection. Sensitivity rating is a measure of public concern for scenic quality. This was <a href="#">taken into account/considered</a> during the overall visual resources inventory.

**Commented [AB1]:** Angie: I don't think this comment needs any edits but please confirm

**Commented [AA2R1]:** On 11/9/2021, Jenna provided GIS spreadsheet (RPFO\_GIS\_calcs\_V03\_20211115.xlsx) with VRM classes in Placitas area by alternative (see tab "alts\_VRM"). Based on that spreadsheet, Alt A is 3,000 acres VRM IV and 1,300 acres undesignated VRM; Alt B is 900 acres VRM II and 3,400 acres VRM III; Alts C, D, and E are 4,300 acres VRM IV. Based on this, changed the response to state Class IV because that is what Alt C (the Proposed RMP) would be, and the comment specifies the Preferred Alternative (Alt C) from the DEIS.

Letter Number	Comment Number	Category	Comment Text	Response
162	17	Recreation	<p>Section 2.1.7 and Maps 95 - 98 -- Map 95 shows no Management Class designation for Placitas Parcels B and C, and Management Class IV designation for Parcel A. Map 96 shows that Parcel C (the Crest) is designated Class II, and Parcels A and B as Class III, allowing for "low" and "moderate" changes to occur to the characteristic landscape, respectively. Alternatives C (the BLM's "preferred" alternative) and D, shown on Maps 97 and 98, respectively, shows all 3 Placitas parcels as being designated Class IV (allowing for "high" changes). LPA [Las Placitas Association], ES-CA [Eastern Sandoval Citizens Alliance], Pathways [Pathways: Wildlife Corridors of NM], etc., spent significant time and effort in 2008 Scoping meetings with the BLM providing significant "local" views on the communities' "acceptable" uses for the various Placitas parcels. Explain the BLM's rationale for any Management Class designations less than Class II (meaning III or IV) under any alternative, but especially under Alternatives B and C, based on comments and input received by BLM from LPA, ES-CA, and Pathways during the scoping process in 2008. This "local" input could not possibly have been interpreted in any way, as suggesting that "high" or even "moderate" change to the characteristic landscape was acceptable. It is disingenuous that the BLM so completely and blatantly disregarded meaningful public input solicited and received during the scoping process of this Plan, especially after acknowledging that "The Public Scoping Report (BLM 2008) has identified that special attention (emphasis added) is needed to address mineral development within the Planning Area (i.e., leasable, salable, and locatable minerals) in consideration of other land and resource uses and values." This blatant disregard for the public's input into the process, without sufficiently detailed justification or explanation provided by the BLM in the Plan, is unacceptable under applicable regulatory laws.</p>	<p>The BLM considered all comments received during the public comment period, but it is not required to respond to the nonsubstantive portions of your comment (see BLM <a href="#">National Environmental Policy Act/NEPA Handbook</a>, H-1790-1, 6.9.2.2). Regarding the substantive portions of your comment, the VRM classes are established to protect the management objectives of an area. All BLM-administered land is inventoried and analyses are conducted to determine the resources within a geographic area. The primary drive to manage a geographic area for a specific resource is based on the resource existing on the area. As far as the Placitas area, the Crest of Montezuma has had very little impact from use or from other resources; therefore, the natural resources have remained relatively undisturbed. Based on the management objectives to protect the resources on the Crest of Montezuma, VRM Class II is appropriate. The Placitas A parcel has been highly affected by overuse, primarily due to overgrazing and vegetation trampling by trespass livestock. Parcel A's primary resources identified were "permitted livestock grazing," which has not happened in over 5 years, and dispersed recreation. Based on those primary resource objectives and the current state of Parcel A, VRM Class III provides the appropriate level of visual resource protection.</p> <p>As for the mineral potential of the Placitas parcels, based on the mineral potential reports, the Placitas area contains the highest salable mineral potential in all of the RPFO. Under the mandate of the Federal Land Policy and Management Act of 1976 (FLPMA), the BLM is required to develop a management scheme for such resources. Under the current RMP (1986 RMP, as amended), all federally owned minerals are open for potential extraction, which includes the salable minerals on both BLM-administered surface and split estate. Permitting a salable mineral extraction project is a discretionary action that would require an application and site-specific NEPA analysis. Under Alternative EC, the BLM would manage visual resources in the Placitas tract in accordance with a management scheme similar to the 1986 RMP, as amended. Sensitivity rating is a measure of public concern for scenic quality. This was <a href="#">taken into account/considered</a> during the overall visual resources inventory.</p>
160	14	Recreation	<p>The DEIS erroneously presumes solitude and primitiveness only appeal to the non-motorized public and bases its Environmental Consequences conclusions on that fundamental error. The DEIS engages in pre-analysis decision-making. It concludes, with no data, no evidence, and no analysis presented, that other forms of recreation are lower "impact" than motorized travel. The Agency clearly crosses the line from science-based decision-making to value-judgment when it makes statements such as this:</p> <p>"Lands with wilderness characteristics would have beneficial impacts to recreation and visitor services. These lands would provide increased recreational opportunities to user groups that prefer wilderness characteristics such as solitude and primitiveness, in addition to existing Wilderness Areas and WSAs [Wilderness Study Areas]. Under Alternative B, lands with wilderness characteristics would be closed to motorized travel; thereby restricting OHV use on BLM lands in the Planning Area. Under Alternative C, lands with wilderness characteristics decisions would close 26,110 acres to motorized vehicle traffic, limit motorized vehicles to existing primitive routes on 4,075 acres, and open 7,329 acres in the Cimarron Mesa area to motorized vehicle travel. Both Alternatives B and C provide recreational opportunities on the same amount of land, but Alternative B would have a more positive impact for low-impact recreation opportunities (such as hiking), while Alternative C would provide more opportunity for motorized vehicle recreation." [Footnote 18: DEIS, page 4-119] The Agency has made two value judgments that presuppose an outcome we can only conclude is "supported" or "desired" by the agency:</p> <p>1) Non-motorized recreationists are the only users of our public lands that desire "solitude and primitiveness".</p> <p>2) Non-motorized recreation is less impactful than motorized recreation. Both of these are broad generalizations that neither meet the standards for science-based decision making required by Council for Environmental Quality (CEQ) regulations nor meet the "eye-test" for the non-biased analysis expected of our public servants in the Agency. Let's examine each of these outrageous assumptions. The Agency, in this document, assumes a general characterization of both motorized users and non-motorized users that is, at best, a fallacy: "OHV users enjoy cross-country travel and free play...In contrast, other recreational user groups, such as hikers, campers, and wildlife viewers, are adversely impacted by open travel areas. Often these groups prefer more secluded settings." [Footnote 19: DEIS, page 4-121] The assumption that non-motorized recreationists are the only members of the public who desire and seek out solitude and primitive experiences flies in the face of the scoping document published for this very NEPA exercise. "A high quality route system seeks to maximize the mileage available to users and for all user types. This maximum mileage is desired to keep use within sustainable levels, meet future projected growth, and to provide a sense of solitude and discovery. Believe it or not, the motorized public enjoys the</p>	<p>The prescriptions designed for these categories apply specifically to wilderness areas, WSAs, and lands with wilderness characteristics and are not field office wide. The analyses specifically for wilderness areas and WSAs are conducted in accordance with the specific requirements that are set for these two specific categories of special designations.</p> <p>Designating management prescriptions for special designations is based on both the scientific and technical conclusions derived from the NEPA analyses and the regulatory parameters and mandates set by FLPMA and CEQ regulations. The FLPMA states that preserving and protecting certain BLM-administered lands in their natural condition is part of the BLM's mission (43 <a href="#">US Code [USC]</a> 1701 (a)(8)). Manuals 6310 and 6320 affirm that the protection of the wilderness characteristics of BLM-administered lands is a high priority for the BLM and is an integral component of its multiple-use mission.</p> <p>As far as travel management on these lands, it may be limited, or existing motorized or mechanized (e.g., mountain bike) access may be consistent with protecting wilderness characteristics. At the same time, it takes into consideration the quality and availability of recreation opportunities, public access needs, modes of travel, and compatibility with resource management objectives and protection of wilderness characteristics. The analyses do not attempt to categorize one type of impact as "more righteous" than another. The intent of the analyses is to merely describe the expected impact of the various uses and users on the resources.</p> <p>The BLM also does not make the broad statement that the only members of the public who desire solitude are the nonmotorized users. There are many areas in the RPFO that motorized users may drive to find solitude if that is what they desire.</p>

**Commented [AB3]:** Angie: Please review this response (focus on the second paragraph) and update as needed. I have not made any changes to it yet

**Commented [AA4R3]:** The preliminary PRMP/FEIS maps from July 2020 (and carried forward in the November 2021 preliminary PRMP/FEIS) show the Placitas areas as VRM Class IV in Alternatives A (current management; 1986 RMP), C, and E. Because Alternative C is the same as Alternative A, this response is correct as written.

Need to verify Placitas VRM with Jenna. Emailed Jenna on 11/2/21: "Placitas VRM—The preliminary PRMP/FEIS maps from July 2020 (and carried forward in this upcoming November 2021 preliminary PRMP/FEIS) show the Placitas areas as VRM Class III in Alternative B and VRM Class IV in Alternatives A, C, and E (in this instance I do care about Alt E). Please provide the Placitas VRM classes by alternative."

**Commented [AA5R3]:** On 11/9/2021, Jenna provided GIS spreadsheet (RPFO\_GIS\_calcs\_V03\_20211115.xlsx) with VRM classes in Placitas area by alternative (see tab "alts\_VRM"). Based on that spreadsheet, Alt A is 3,000 acres VRM IV and 1,300 acres undesignated VRM; Alt B is 900 acres VRM II and 3,400 acres VRM III; Alts C, D, and E are 4,300 acres VRM IV. Based on this, the response is correct as written.

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
			<p>same attributes of public land that the non-motorized public enjoys, including solitude and the thrill of discovery.” [Footnote 20: Scoping Report, Section 2.2.8, page 51]</p> <p>“I also hunt and use my vehicle to access distant areas to get away from the populace. Use of the four wheel drive trails for this purpose is important to my solitude when hunting. I like to camp in remote areas and enjoy gazing at the stars when out there in the backcountry. Therefore, maximizing routes that travel through areas and connect with other routes is important.” [Footnote 21: Scoping Report, Section 2.2.8, page 51] In fact, the only representative comments in the Scoping Report to use the term “solitude” were submitted by motorized recreationists! The Agency, as an official monolithic entity, also understands and acknowledges that the desire for solitude and primitive is not limited to nonmotorized consumers. In its description of WSA management, it specifically recognizes that even motorized users derive benefit from wilderness characteristics:</p> <p>“BLM manages WSAs to ensure that existing wilderness characteristics of naturalness, solitude, primitive and unconfined recreation opportunities, and special features are not impaired. Currently acceptable uses include hiking, hunting, horseback riding, backpacking, biking, or vehicle use on primitive “ways” established prior to enactment of FLPMA [Federal Land Policy and Management Act], and other activities that do not result in impairment of the wilderness values”. [Footnote 22: Scoping Report, Section 2.6.7] But there is a darker side to an assumption that motorized users all enjoy cross country travel and “free play” (what is the definition and connotation of “free play” in this context?). It can signal gross prejudice for one user group over another. The Agency has no congressional authority to make value judgments. The second error identified above, the result of apparent widespread Agency bias, is the more egregious of the two. Here is the offending passage again:</p> <p>“Alternative B would have a more positive impact for low-impact recreation opportunities (such as hiking), while Alternative C would provide more opportunity for motorized vehicle recreation.” The Agency has the obligation, via NEPA, to draw conclusions on which alternatives might be more favorable to a specific use. But they absolutely do not have the right or omniscient discernment to categorize a certain user group to be more “low impact” than another. The BLM has to no right or call to make value judgments as to which forms of recreation is more “righteous” or even more impactful as a general blanket statement. “Impact” is, by its very nature, site specific. It gives a dark insight into the minds of the document’s authors when they term a specific use (ie. Hiking) as “low” impact. Low impact compared to what? We are highly concerned that such bias predisposes the Agency, or at least some of its personnel, to favor one user group over another and therefore some uses over other uses. Review the DEIS and remove the predispositions and blatant biases from the document. The document is supposed to serve as the basis for the decisionmaker’s careful and thoughtful consideration of the alternatives presented. Removing inequities such as the ones identified helps ensure a more likely dispassionate and reasoned decision.</p>	<p>The purpose of this RMP is to ensure that BLM-administered lands in the Planning Area are managed in accordance with the multiple-use and sustained-yield principles mandated by the FLPMA (43 USC 1702). In general, as resources are identified and analyzed in a field office, the job of the BLM is to design the proper management prescriptions for such resources, while weighing the potential for all other uses. In some cases, some resources require specific management prescriptions that may prohibit some uses; however, such management prescriptions would not be applicable field office wide.</p> <p>The Proposed RMP, which contains management actions from the Draft RMP/EIS alternatives analyzed in detail, balances resource use and extraction. Under Alternative CE, the Proposed RMP, Cimarron Mesa is an open <a href="#">off-highway vehicle (OHV)</a> area.</p>
75	1	Recreation	<p>My general comment is that no matter what the ultimate plan, compliance by the public is a necessary part of it. Please consider stating that compliance needs more resources and more new methods in the long run. If this is a specific part of the plan, then we will have more leverage in asking our federal government to provide you with more funds and personnel. This may not happen this year or the next, but we can keep working on it. More specifically, in the areas of Travel Management (Section 2.2.18), Forests and Woodlands (section 2.2.5), and Mineral Resources (2.2.10) there needs to be some statement that the most sensitive areas will need to have increased resources to force compliance with the rules and management methods established by the BLM. These increased resources might include more personnel to patrol the areas, more signage, more education sessions for the people of New Mexico to inform them of the value of protecting certain areas and utilizing other, designated, areas for their activities (commercial as well as personal), stronger barriers as well as well understood alternative travel routes, and new methods that we cannot envision now but that might be found with a little practical research.</p>	<p>The RMP development process defines an overall land use management strategy with resource-specific management prescriptions to protect those resources. The enforcement and implementation process essentially happens outside the scope of the RMP development process. The funding of personnel to enforce and implement the RMP is a budgetary process that is primarily managed and dictated through congressional action. As for the travel management aspect of the RMP, the BLM notes the comment and will take it into consideration during the development of the travel plan. This will begin after the Approved RMP/Record of Decision is signed.</p>
162	19	Recreation	<p>Map 48 - Explain what this figure is supposed to be showing. The map title is Crest of Montezuma and in the List of Maps the file name is Recreation Crest_of_Montezuma, yet the legend only indicates parcel “ownership”. The only additional information afforded by the “blow-up” insert is a more detailed boundary of the parcel. What and where is the information on recreation?</p>	<p>Draft RMP/EIS Map 48 depicted the boundary line of the proposed Crest of Montezuma Recreational Site, and information on recreational activities was included in the Draft RMP/EIS Chapter 2, Section 2.2.12.4.4.6 bullet titled “R&amp;VS” (recreation and visitor services).</p> <p>The BLM has updated the descriptions of recreation management areas in the Proposed RMP/Final EIS. See Proposed RMP/Final EIS Section 2.2.12.4, Extensive Recreation Management Areas, and Proposed RMP/Final EIS Appendix P, Description of Recreation Management Areas.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
160	13	Recreation	<p>There are many confusing and confounding errors in the Special Designation area of the Environmental Consequences section.</p> <p>Table 4.50 does not have the correct acreages aligned with the appropriate ERMAs [Extensive Recreation Management Areas]. The Environmental Consequences chapter also describes there being "one SRMA [Special Recreation Management Area] and 21 ERMAs proposed under Alternatives B, C, and D" [Footnote 15: DEIS, page 4-118] when in reality, there are only six ERMAs proposed. The public may become confused when attempting to correlate the described impacts in Section 4 with the erroneous acreages listed in Table 4.50 as the impacts don't correspond logically to the size of the various ERMAs listed. If they correctly identify the error, they are then forced to rely on the correct (?) acreages scattered throughout Section 2.2.12.4 located in another volume of the DEIS. Section 4.2.5.1.3 also states:</p> <p>"Under Alternative A, no specific management decision is proposed for managing the CDT [Continental Divide Trail]." [Footnote 16: DEIS, page 4-118]</p> <p>Table 2.23 states otherwise:</p> <p>"Management prescriptions would apply to a 2,000 foot-wide corridor around the CDNST [Continental Divide National Scenic Trail] (11,474 acres)" [Footnote 17: DEIS, Table 2.23]</p> <p>Correct the erroneous table and the special designations information in the Environmental Consequences section and provide a corrected copy of the DEIS for the public to comment upon after review</p>	<p>Thank you for your comment. All of these errors have been corrected in the Proposed RMP/Final EIS.</p>
66	3	Recreation	<p>Offer the additional alternative of No vehicle access (except authorized use and major access points) within entire San Juan Basin Badlands ERMA [Extensive Recreation Management Area] Vol 1, p 2-62; Relocate OMG [Oh-My-God 100 Race] A Zone to the west to avoid Mesa Chijuilla and Mesa De Cuba Badlands Vol 1, p 2-62; No petrified wood, fossil or mineral collecting within the entire San Juan Basin badlands ERMA Vol 1, p 2-55,56 Goals 2.21.1.1; or as worst case : (map 3b).</p>	<p>The motorized vehicle use management prescriptions in Draft RMP/EIS Table 2.23 have been updated in the "Travel" row of Proposed RMP/Final EIS Table 2-36 to say "limited to designated roads and trails" consistent with current BLM policies and recreation planning manuals. The road and trail system will be designated through the travel management planning process, which will incorporate public participation and comments. This travel management planning process will begin after the Approved RMP/Record of Decision is signed.</p> <p>Prohibiting collection of petrified wood in portions of the San Juan Basin Badlands <a href="#">Extensive Recreation Management Area (ERMA)</a> was analyzed in Alternative B of the Draft RMP/EIS and Proposed RMP/Final EIS.</p>
58	1	Recreation	<p>BLM's standard format--a conservation-directed alternative and a production directed one--has been carried to excess here. For instance under B you exclude livestock from all wilderness, which would be illegal. Under D you leave nearly all wilderness lands open to mineral leasing, which seems farfetched. Most ridiculous is that according to p. 2-44 Alternative B will eliminate 96,414 of your present 119,065 livestock AUMs [animal unit months]- a laughable idea in any BLM context. (P. 2-159 has 17,203 AUMs eliminated by B, but even this is an "unreasonable" alternative by Bureau standards.</p> <p>I take these excesses to be an effort to ensure that your preferred Alternative C is the only reasonable one. But that is also an invitation to design one's own alternative. Our preferred alternative is B--your most important responsibility is conservation. But B needs modification, partly because it is so extreme.</p>	<p>The RPFO agrees that conservation is one of the BLM's most important responsibilities in managing BLM-administered lands; however, the BLM's primary directive is to manage BLM-administered lands under the principles of multiple use and sustained yield, in accordance with BLM land use plans. This directive is specifically described by the <a href="#">Federal Land Policy and Management Act of 1976 (FLPMA)</a> Section 302. Also, the Taylor Grazing Act, Section 2, directs the Secretary of the Interior "to preserve the land and its resources from destruction or unnecessary injury."</p> <p>Analyzing an alternative that removes all grazing from special designation and wilderness is not excessive or farfetched but rather in conformance with both FLPMA and the Taylor Grazing Act. The Proposed RMP/Final EIS is the BLM's effort to consider all resource conflicts in a geographic area and attempt to design the most equitable management objective.</p>
66	4	Recreation	<p>Why Preserve [the San Juan Basin Badlands Extensive Recreation Management Area]?</p> <ol style="list-style-type: none"> <li>1) maintain and improve ecosystems, and protect from deterioration of the total natural environment (fauna, flora, insects, trees, soils, rocks, watershed, canyons, all of the environmental landscape).</li> <li>2) maintain and preserve for study of geology, ecosystems environments for now and the future.</li> <li>3) especially crucial to protect from deterioration because of the continuation of climate change and its effects on the environment, particularly environments such as these which are significantly fragile despite the appearance of the landscape as unchanging over time.</li> </ol>	<p>Designating an area as an <a href="#">Extensive Recreation Management Area (ERMA)</a> requires specific management consideration in order to address recreation use, demand, or recreation or visitor services. Once an ERMA is designated, the management focus is to support and sustain the principal recreation activities and protect the associated qualities and conditions that allowed the area to be designated as an ERMA. Furthermore, incompatible uses, including some recreation, may be restricted or constrained to achieve the ERMA objectives. The RPFO agrees that each of the issues presented in your comment are relevant under the designation of the San Juan Basin Badlands ERMA, and it considered these issues when developing the management alternatives.</p> <p>Under Alternative <a href="#">CE</a>, the Proposed RMP, 5347,7800 acres would be managed, and <a href="#">would be</a> protected accordingly, as part of the San Juan Basin Badlands ERMA.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
263	7	Recreation	"I'd like to add that simply creating a document to designate this area as protected will not do anything if added enforcement efforts aren't taken in parallel. I urge the BLM to step up enforcement efforts as this plan is put into place, to insure not only that the ERMA [Extensive Recreation Management Area] is enforced, but to educate people about the fragility of this area. I believe that over time, education is the real key to protecting our natural wonders."	The RMP development process defines an overall land use management strategy with resource-specific management prescriptions to protect those resources. The enforcement and implementation process essentially happens outside of the scope of the RMP development process. The BLM notes the comment and will take it into consideration when developing the implementation plan.
233	7	Recreation	Above all else, sufficient enforcement resources must be allocated to ensure effective protection of scenic, ecological, wildlife, forestry and paleontological resources within the entire ERMA [Extensive Recreation Management Area]. The most expedient way to accomplish this is to halt all but authorized vehicle use within the entire ERMA, except for a few major public access routes. I have enjoyed hiking through this unique ecological treasureland. From the petrified trees to the magnificent rock formations, stands of old junipers, and long vistas from the mesa tops, I believe this area qualifies for the highest level of protection that ERMA can provide.	Under Alternative B, the BLM considered closing portions of the San Juan Badlands ERMA to off-highway vehicles. The RMP development process defines an overall land use management strategy with resource-specific management prescriptions to protect those resources. The enforcement and implementation process essentially happens outside of the scope of the RMP development process. The funding of personnel to enforce and implement the RMP is a budgetary process that is primarily managed and dictated through congressional action. As for the travel management aspect of the RMP, the BLM notes the comment and will take it into consideration when developing the travel management plan, which will begin after the Approved RMP/Record of Decision is signed.
70	1	Recreation	"If I were to state my high level hopes for any RMP approach adopted, it would be that the BLM provide sufficient enforcement resources to ensure effective protection of scenic, ecological, wildlife, forestry and paleontological resources within the entire ERMA [Extensive Recreation Management Area]. The most expedient way to accomplish this is to halt all but authorized vehicle use within the entire ERMA, except for a few major public access routes. Secondly, an effective way must be found to protect old-growth junipers from illegal cutting. Thirdly, the rich collections of petrified wood must be protected. What I have seen in some of the badlands units rivals – if it does not exceed - the petrified wood found in Petrified Forest National Park, Arizona.  In support of the above goals, I believe there should be 1) an additional alternative, namely, no vehicle access (except authorized use and up to but no further than at major access points) within the entire San Juan Basin Badlands ERMA Vol I, p 2-62; 2) relocation of OMG [Oh-My-God] A Zone to the west to avoid Mesa Chijuilla and Mesa De Cuba Badlands Vol I, p 2-62; 3) no petrified wood, fossil or mineral collecting within the entire San Juan Basin badlands ERMA Vol I, p 2-55,56 Goals 2.211.1."	<ol style="list-style-type: none"> <li>1. Clarification in accordance with the most recent travel management planning guidance was made in the San Juan Basin Badlands ERMA travel prescriptions (Proposed RMP/Final EIS Section 2.2.12.4 and Appendix P). Motorized travel would be limited to designated roads and trails. Roads and trails will be designated with public participation through the travel management planning process, which will begin after the Approved RMP/Record of Decision is signed.</li> <li>2. The location of the Oh-My-God event is on a 3-year rotation cycle within the Endurance Trails ERMA to avoid damage to the area. A location west of Mesa Chijuilla and Mesa de Cuba is one of these sites.</li> <li>3. The BLM recognizes that one of the unique characteristics of the San Juan Basin Badlands ERMA is its petrified wood resources. Under Alternative B, the collection of petrified wood would be prohibited in portions of the San Juan Basin Badlands.</li> </ol>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
188	2	Recreation	<p>"I am far too busy working and paying taxes to read the entire 800-page RMP document which I heard took you 4 years, after numerous delays, to finally publish. The fact that while you were writing this document you let 1200 Grandfather juniper trees, many over 1000 years old, be destroyed does seem a bit ironic, does it not? When are federal agencies going to get the point that we taxpayers want results not paperwork? Because I am so busy, to save time, I am using research and quotes and paraphrasing of statements made by folks far more expert than I to express my management preferences as follows: ""Our San Juan Basin Badlands Resolve: Above all else, sufficient enforcement resources must be allocated to ensure effective protection of scenic, ecological, wildlife, forestry and paleontological resources within the entire ERMA [Extensive Recreation Management Area]. The most expedient way to accomplish this is to halt all but authorized vehicle use within the entire ERMA, except for a few major public access routes.""</p>	<p>The BLM considered all comments received during the public comment period, but it is not required to respond to the nonsubstantive portions of your comment (see BLM <a href="#">NEPA National Environmental Policy Act Handbook</a>, H-1790-1, 6.9.2.2). Regarding the substantive portions of your comment, the management prescriptions for the forest resources in Chapter 2 were developed based on an adaptive management strategy. Draft RMP/EIS Section 2.2.5.2 states one of the BLM's primary objectives is to "Reduce the incidence and impacts of timber trespass and tree theft. This includes, but is not limited to, collaborating with other agencies, increasing collection areas, and increasing the presence of law enforcement."</p> <p>The BLM recognizes that illegal wood cutting is an issue in areas managed by the BLM's Albuquerque and Farmington District Offices; however, enforcement and implementation happens outside of the scope of the RMP development process. These are popular areas for hiking and dispersed recreation and have scenic and resource values that are important to many people.</p> <p>The BLM is committed to managing BLM-administered lands in a responsible and sustainable manner in order to balance various needs. The BLM will continue to implement enforcement and compliance, as well as education and outreach, to communities in this area to address the illegal woodcutting problem. BLM field office staff will engage with local communities, partner agencies, and affected stakeholders to meet the needs of rural communities, while protecting valuable woodland resources.</p>
121	24	Recreation	<p>"Travel Management</p> <p>Under Sections 5(a)(5) and 7(c) of the National Trails System Act [NTSA], as summarized in the Comprehensive Plan (IV.B.6.b.), motor vehicle use by the general public is prohibited on the CDNST [Continental Divide National Scenic Trail] (with exceptions pertaining to emergencies and landowner access) unless such use is consistent with the applicable land management plan and:</p> <ul style="list-style-type: none"> <li>- The vehicle class and width were allowed on that segment of the CDNST prior to November 10, 1978, and the use will not substantially interfere with the nature and purposes of the CDNST, or</li> <li>- That segment of the CDNST was constructed as a road prior to November 10, 1978.</li> </ul> <p>We have no objection to this aspect of Alternative B (Map 90), under which the CDNST would be closed to motor vehicle use. Alternative C (Map 91), however, would allow Limited use of such vehicles along the entire CDNST north of Deadman Peaks. In principle, the prescriptions would be reviewed within five years in the course of travel management planning (2.2.18.3.1, p. 2-130). With but a few exceptions, the decisions should be made now, not deferred. The DRMP/EIS shows the existing route and an alternative route (currently under study in cooperation with the Forest Service [Footnote 1: Letter from Maria T. Garcia, Santa Fe National Forest Supervisor, and Tom Gow, RPFO [Rio Puerco Field Office] Manager, June 14, 2012 (1950). The exact alignment of a relocated CDNST would be determined as part of this study. One alternative that might be considered would pass east of Cuba, but then pick up the current Mesa Portales segment at some point south of N.M. 197. Another matter that might come up is the establishment of a side route to connect the CDNST with Cuba, so as to facilitate hikers' resupply opportunities. We do not find any need to modify our comments above to deal with these potentialities.) north of Jones Canyon Spring. - The existing route. Traveling south, this route follows roads through Cuba and then for approximately seven miles runs along New Mexico Highway 197. We assume that these roads were constructed and open to motor vehicle use in 1978 and therefore, under NTSA 5(a)(5), may continue to be open to such use. Nearly all of the existing route from the highway to Deadman Peaks is a new travelway, established expressly for purposes of the CDNST and was not a route for use by motor vehicles in 1978. In accordance with the statutory direction in Section 7 of the Trails Act, this route should now be categorized as Closed. [There are two short portions that appear to have been used by vehicles and might be classified as Limited until reviewed as part of the travel management planning process. The first is Highway 197 to Arroyo Chijuilla (35 57.07 N, 107 01.30 W). The second is north of Rincon de los Viejos (35 47.697 N, 107 01.555 W to 35 47.058 N, 107 02.620 W)] There is also a very short roaded section immediately south of Deadman Peaks; if it is not within the Closed area on Map 91, it might also be classified as Limited if additional information is needed here before arriving at a final decision.]</p> <ul style="list-style-type: none"> <li>- The study route. Under present circumstances, it might be premature to do more than to restrict motor vehicle use to existing routes, so we find it acceptable to use the Limited classification here. However, the DRMP/EIS should acknowledge that a revised route is under study and should indicate that appropriate travel management prescriptions will be included in any decision authorizing CDNST relocation."</li> </ul>	<p>The travel management plan for the RPFO will be a very labor intensive and technical document. The RPFO is deferring the development of a travel management plan until after the Approved RMP/Record of Decision is signed, consistent with BLM policy. The general management prescriptions in the Approved RMP/Record of Decision will serve as the guide for developing site-specific transportation and travel management prescriptions. In general, under the "limited" category, motorized travel would be limited to existing roads, primitive roads, and trails. Subsequent travel planning decisions would transition "limited to designated routes" within all resource categories. This concept is mentioned in Draft RMP/EIS Section 2.1.2, Travel Management. Essentially, when the travel management plan is developed, and adhering to guiding and regulatory documents, such as The National Trails System Act, the road system in the geographic areas designated as "Limited" would transition travel only on "designated" routes. Those designated routes would comply with the specific resource regulatory requirements and management goals. The BLM will take this public comment into consideration during the travel management planning process.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
53	4	Recreation	<p>“Visual Resource Management [VRM]: VRM analysis has the potential to greatly limit the ability of utilities to maintain and expand infrastructure. The VRM goals (page 46) and overall visual resource analysis in the Draft Rio Puerco RMP/EIS are consistent with multiple use mandates and are written in such a way to allow the maintenance, upgrade, expansion, and development of future utility facilities. As PNM understands it, Class I areas are largely restricted to Wilderness Study Areas. ACECs [Areas of Critical Environmental Concern] managed for scenic values are Class II. BLM will make every effort to avoid siting new energy facilities within a Class II designation but the project could be constructed with special stipulations. As might be anticipated, Class II is greatly expanded in Alternative B and most restricted in Alternative D. Alternative C appears to be fairly balanced with existing energy corridors appearing to cross some Class III areas. PNM would appreciate clarification as to the implications of maintenance and of new construction in Class III areas which are managed to partially retain the existing character of the landscape with changes to the landscape characterized as moderate.”</p>	<p>In accordance with Draft RMP/EIS Section 2.2.7.3.2, “Existing authorized easements, permits, leases, rights-of-way, and withdrawals would be recognized as valid existing rights and carried forward.” When a site-specific project is proposed, the degree of contrast between the proposed activity and the existing landscape is measured (contrast rating). The contrast rating process compares the proposed activity with existing conditions, element by element (form, line, color, texture), and feature by feature (land/water surface, vegetation, structures). The contrast rating is compared with the appropriate VRM classification to determine if contrasts are acceptable. If the proposed project exceeds the allowable contrast, the BLM <del>makes a decision</del>decides to (1) redesign, (2) abandon or reject, or (3) proceed, but with mitigation measures stipulated to reduce project contrast. Class III Objective: To partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate and based on the existing viewshed.</p>
243	13	Recreation	<p>“Objectives 2.2.5.2 Identify, maintain, and restore forests with late-succession (old-growth) characteristics under direction provided by the Healthy Forest Restoration Act of 2003 or the most current applicable legislation. Reduce the incidence and impacts of timber trespass and tree theft. This includes, but is not limited to, collaborating with other agencies, increasing collection areas, and increasing the presence of law enforcement. It would seem to me that restricting access to this region to existing access roads, and to restrict all off-road vehicle access would be appropriate. Maybe considering a permitting process such as used the Coyote Buttes area of Utah and Arizona would also be appropriate.”</p>	<p>The forest management approach presented in the Draft RMP/EIS is based on an adaptive management strategy. Forest health will be managed based on the target landscape goals that the RPFO forester determines are necessary for forest health. This essentially means that forest impacts would be spread throughout the areas needing management. This would reduce the stress on any one specific site and would close areas that are not under management by the forester. Also, the travel management plans that will be developed for recreation areas, for example, will designate roads that will define and protect the characteristics of the recreation area and close off all other roads, limiting access to protected areas.</p>
145	3	Recreation	<p>“We [The Wilderness Society et al.] support this management alternative [Alternative B’s focus on dispersed recreation, paleontological research, and backcountry experience for the proposed San Juan Badlands Extensive Recreation Management Area (ERMA)], yet have several concerns with BLMs preferred Alternative C and Alternative D. Draft RMP, Section 2.2.12.4.4.1. 4</p> <p>As summarized in the preferred alternative and Alternative D, BLM would continue to allow the collection of petrified wood in both the Torreon Fossil Fauna East and West Zones, and Ceja Pelon Zone. What makes these areas so desirable for outdoor recreation is the fact that they possess outstanding geological components, such as petrified wood and fossils. To altogether authorize and permit the collection of these rare resources is not only a mistake, but also an irresponsible management policy that could overwhelm the resource and ultimately degrade the values of the ERMA. Coming across a many hued petrified log or a landscape strewn with petrified wood chips is one of the unique characteristics of these badlands and cannot be replaced if destroyed or removed.</p> <p>Furthermore, the Draft RMP wholly omits any analysis of the impact of illegal tree-cutting and fails to offer prescriptions that address this growing problem. It is inadequate for BLM to ignore this issue entirely in the Draft RMP, for inaction on this matter will leave the many old-growth junipers and ponderosas, common throughout unit, at risk. We believe that the collection of fossils and petrified wood should be forbidden, and that motorized travel should be limited to existing primitive roads and trails, as outlined under Alternative B. Moreover, to help alleviate the problem of woodcutting within the proposed ERMA, we suggest that the Agency dedicate resources to proper signage that will notify users of which routes are closed to motorized travel, that woodcutting is not permitted, and that policies be enacted to guarantee the security of the distinctive old-growth junipers and ponderosas found in the area.”</p>	<p>The RPFO recognizes the important values that led to proposing the San Juan Basin Badlands ERMA. Prohibiting <del>of</del> petrified wood collection was considered <u>in portions of</u> <del>for</del> this ERMA, under Alternatives <u>B- and C</u>. The objectives for managing the issues mentioned in this comment are clearly defined in Draft RMP/EIS Section 2.2.5.2, as follows:</p> <ul style="list-style-type: none"> <li>Identify, maintain, and restore forests with late-succession (old-growth) characteristics under direction provided by the Healthy Forest Restoration Act of 2003 or the most current applicable legislation.</li> <li>Reduce the incidence and impacts of timber trespass and tree theft. This includes, but is not limited to, collaborating with other agencies, increasing collection areas, and increasing the presence of law enforcement.</li> </ul> <p>Analyzing illegal activities is not within the scope of the RMP. Any illegal activity conducted in the RPFO would be handled by BLM RPFO Law Enforcement and does not require specific management alternatives in order for <del>BLM</del> RPFO Law Enforcement to act.</p> <p>Under Alternative <u>EC</u>, the Proposed RMP, motorized travel would be limited to existing routes <u>or single access routes only in the San Juan Basin Badlands ERMA, depending on the recreation management zone (RMZ or zone)</u>. Further route designations would be determined through the travel management plan.</p>

**Commented [AA6]:** Alt B: Prohibit petrified wood collection in Ceja Pelon RMZ  
Alts B & C: Prohibit petrified wood collection in Torreon Fossil Fauna East and West RMZ

R. Substantive Comments (Table R-I. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
130	23	Recreation	<p>“Alternative B, Table 2.24, Vol 1, p 2-62. Denying general vehicle access and stopping all petrified wood collection is by far the best management choice, but it must be for the whole ERMA [Extensive Recreation Area Management] not just the East and West Torreon and Ceja Pelon Zones. This is also the only way to get control of the illegal wood cutting problem and start managing these unique recreational areas on a sustainable basis. Denying vehicle access would be a de facto way of stopping both illegal wood cutting and petrified wood theft. But you still must go further and adopt Alternative B, Table 4.20, Vol 2, p 4-37: which says that all ERMA’s should be closed to wood cutting. Again this seems like an obvious choice for any meaningful long-term recreational management plan.”</p>	<p>The BLM agrees that the petrified wood resource in the San Juan Basin Badlands are unique. The forest management strategies are aimed at protecting forests with late-succession (old growth) characteristics and to reduce the incidence and impacts of timber trespass and tree theft (Draft RMP/EIS Section 2.2.5.2). General travel management prescriptions have been developed in the San Juan Basin Badlands ERMA for the various zones, based on the need to protect and create the appropriate recreation experience. These prescriptions range from allowing access routes only to limiting the areas to designated roads and trails. Based on the size and resources issues in the ERMA, the BLM will develop a more comprehensive travel and transportation plan during the travel management planning process, taking all resource protection prescriptions and user input soon after the signing of the Record of Decision for the RMP.</p> <p>The Draft RMP/EIS proposes an adaptive management approach to the entire forest and woodlands in the RPFO, as opposed to singling out specific sites for management, as presented in the 1986 RMP, as amended. Due to its natural biological constraints, successful forest and woodland management is viewed as a long-term goal; however, the long-term goal is achieved with various short-term targeted flexible and adaptive management practices. The BLM believes this approach is necessary to protect the long-term productivity, biological diversity, watershed values, and social component of forest and woodland resources. It is important to note that any management direction formulated through forest and woodland adaptive management would be consistent with the requirements of NEPA, FLPMA, and BLM regulations and policies.</p> <p>As part of its effort to address the illegal woodcutting issue, the BLM recognized the limitations that the current RMP places on the RPFO to designate more desirable areas for firewood outside of what was specifically identified in the 1986 RMP. This Draft RMP/EIS, as mentioned above, places emphasis on a forest and woodland adaptive management strategy, allowing the RPFO to analyze and designate areas for firewood in most of the Decision Area, while ensuring compatibility with other resource needs and management prescriptions.</p>
172	4	Recreation	<p>Due to excessive illegal woodcutting in the Badlands in recent years, we [Sierra Club] ask that the whole San Juan Basin Badlands ERMA [Extensive Recreation Management Area] be closed to motorized traffic, except for the major access roads and for permitted activities, like ranchers traveling to a grazing allotment.</p>	<p>All resource issues will be considered, along with public input, in the development of the transportation and travel plan for the San Juan Basin Badlands ERMA. The RPFO is deferring the development of a travel management plan until after the Approved RMP/Record of Decision is signed, which is consistent with BLM policy. The travel planning is scheduled to begin soon after the final RMP decision document is signed.</p>



Letter Number	Comment Number	Category	Comment Text	Response
		Recreation	<p>Navajos have lived in the Ojo Encino area for generations. Cultural knowledge and archeological knowledge confirms the extended habitation of this area by Navajos and their ancestors. Fuelwood is a primary energy source for heating and cooking. With some modernization, many energy needs are being met by other energy sources. However, heating, and to a small degree cooking, still relies very heavily upon firewood.</p> <p>US census data indicates that as of 2011 almost 70% of households utilize firewood as their heating fuel. Only 2% of U.S. households indicate that firewood is their main heating source. A concentrated community survey that took place in the summer of 2012, which included Counselor, Ojo Encino, and Torreon chapters, indicates that the number of households that use wood as their primary heating fuel is 93%. This same survey indicates that about 9% of households also use wood fuel for cooking.</p> <p>There is the historic precedent in which Navajos (along with many other peoples) have used fuel wood as a primary heating source. However, the ability for many Navajos to utilize other heating fuel sources that are utilized by non-Navajo populations are constrained by under-development and economic impoverishment.</p> <p>Under-development in the Ojo Encino area restrains access to other heating fuel sources such as natural gas and electricity. Natural gas lines are not available in the Ojo Encino area for households to hook up to. As a result people would have to use LP gas tanks. Many fill up smaller sized tanks (100 pounds or less) in town to haul back to their houses. Obtaining fuel this way is not very efficient, and getting deliveries are not economically feasible. Electricity is also available, but 23% of households reported a lack of access to electricity. Also, there are reliability and cost concerns for using electricity as a primary heating fuel in the very rural area of Ojo Encino.</p> <p>Further, economic impoverishment is highly prevalent in the Ojo Encino area. The 2011 census data indicates that the mean household income for Ojo Encino residents is 41% of the national average. This number is probably higher than the real household income because in 2009 and 2010 this percentage was 26% and 33% of national household income respectively. Due to the severe depressed economic situation which exists in Ojo Encino it is difficult for Navajo residents to change fuel sources. Namely, firewood provides a way to save money because they can "refine" the fuel using their own labor. The technology/equipment to use firewood as a fuel source is also relatively inexpensive and can be constructed by local labor. Thus the cost of gathering, processing, and using firewood is the least expensive option for Navajo households in the Ojo Encino area.</p> <p>Changing heating fuel sources for most households in the Ojo Encino area is not viable, primarily due to economic constraints, but also underlined by cultural facets.</p> <p>To lessen the economic impacts of obtaining a firewood permit for chapter residents (by having to go to a distant office) the chapter would like the ability to issue BIM wood permits. This would make the acquisition process substantially easier and probably increase participation rates.</p> <p>The draft RMP does not adequately incorporate this data, or assess the potentially devastating effects of the proposed alternative on these resources. As a result, Ojo Encino Chapter requests that the BLM formally designate firewood as a subsistence resource for Navajo populations so that it can be protected and managed for continued subsistence use. Also, the Ojo Encino chapter would like to be engaged in active planning to help develop effective practices in conserving these heating wood sources and explore possibilities of moving into transitioning into other varied heating fuel sources.</p>	<p>The RPFO believes that, based on the language in the following sections in the Draft RMP/EIS, the issues of concern by the Navajo Chapters will be equitably addressed:</p> <p>Draft RMP/EIS Section 2.2.3.2:</p> <ul style="list-style-type: none"> <li>• Consult with Native American tribal governments on proposed land uses having the potential to impact cultural resources identified as having tribal interests or concerns, or that could affect traditional uses.</li> <li>• Maximize opportunities for cooperation with tribal governments for managing cultural resources and public education.</li> </ul> <p>Draft RMP/EIS Section 2.2.3.3:</p> <ul style="list-style-type: none"> <li>• The BLM would consider Native American requests to practice traditional activities on public lands on a case-by-case basis and would be allowed where practical and appropriate. The BLM would allow reasonable access to specific sacred sites under the American Indian Religious Freedom Act.</li> <li>• The BLM would honor trust responsibilities as they apply to public lands in the Decision Area.</li> </ul> <p>Draft RMP/EIS Section 2.2.5.2:</p> <ul style="list-style-type: none"> <li>• Provide forest products to meet public needs consistent with maintaining ecosystem health and other resource management objectives.</li> </ul> <p>Draft RMP/EIS Table 2.11:</p> <ul style="list-style-type: none"> <li>• "The BLM would permit forest product harvest (including, but not limited to, green and dead and down fuelwood/firewood, vigas, latillas, wood pellets, fuelwood, biomass, posts, nuts, berries, piñon nuts, and wildings)...area-wide" (with some exceptions in certain designated areas, which change by alternative).</li> </ul> <p>Designation of firewood as a subsistence resource is outside of the scope of this planning process, but may be considered as an implementation action by conducting more site-specific future NEPA.</p> <p>The BLM is now using an online permitting system for the sale of firewood collection permits and has an agreement with the Forest Service to sell BLM firewood permits out of the Cuba Ranger Station. These methods have been put in place to alleviate the travel burden on permittees.</p>
90	6	Recreation	<p>"Section 1.3.1.3.1.4 - Consideration should be given to coordinating with County entities on Wildfire Evacuation Planning through BLM lands, utilizing both existing and/or any future roads/tracks. This should be part of any draft Transportation Plan developed for the Plan area."</p>	<p>The BLM recognizes the importance of working with its government partners in the development of the comprehensive transportation and travel management plan. All public, private, and user groups will play a very important role in ensuring all relevant transportation and resource protection issues are considered. The RPFO is deferring the development of a travel management plan until after the Approved RMP/Record of Decision is signed, which is consistent with BLM policy. The general management prescriptions in the Approved RMP/Record of Decision will serve as the guide for developing site-specific transportation and travel management prescriptions. The BLM will take this public comment into consideration during the travel management planning process.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
90	41	Recreation	<p>"Livestock Grazing: The Pueblo [of San Felipe] is of the opinion that livestock grazing is incompatible with the management goals and objectives for the [Espinosa Ridge] ACEC [Area of Critical Environmental Concern] outlined in [sections] 2.2.16.3.10.1 and 2.2.16.3.10.2 of the Draft RMP/EIS. As the Draft RMP/EIS states in [section] 3.23.2.10, the ACEC is known to be home to at least five sensitive plant species and was originally designated a special management area ("SMA") expressly for the purpose of protecting those species. In addition, the access route to the ACEC across the Pueblo's lands is not sufficient for regular travel by the types of vehicles necessary to transport livestock in and out of the ACEC. For these reasons, the Pueblo urges the BLM to adopt either Alternatives A or B with regard to livestock grazing."</p>	<p>The management priority in the Espinazo Ridge <a href="#">Area of Critical Environmental Concern (ACEC)</a>, as described in Draft RMP/EIS Section 2.2.16.10.1, is for the protection and restoration of special status and riparian resources, geologic and paleontological resources, scenic values, and cultural resources, and, more specifically, special status plants, as detailed in the Draft RMP/EIS Table 2.41, Wildlife, Special Status Species, and Riparian Resources row. The BLM will monitor the area closely to determine if grazing (authorized or unauthorized) is leading to long-term damage of ACEC resources, which may affect the administration of permit issuance.</p>
109	8	Recreation	<p>"Grazing: We [The Wilderness Society et al.] recognize the important role grazing and ranching has historically played in New Mexico, and also recognize that grazing will continue to be part of public lands management for the foreseeable future. This RMP is an opportunity to also address the serious environmental problems which can be caused by cattle, from affecting soils and riparian areas, to potential conflicts between cows and endangered species. The BLM acknowledges in the Draft RMP (and numerous studies have indicated) that cattle can cause soil erosion, trample fragile habitat for native species, compete with native grazers like elk and deer, increase the number of interactions between humans and protected species, and perhaps most notably, significantly degrade water quality in areas where water is already extremely scarce [Footnote 6 See e.g. Freilich, JE, JM Emlen, JJ Duda, DC Freeman &amp; PJ Cafaro. 2003. Ecological effects of ranching: a six-point critique. BioScience 53(8): 759-765; Belsky, J &amp; JL Gelbard. Comrades in Harm: Livestock and Exotic Weeds in the Intermountain West in Wuerthner, G &amp; M Matteson (eds). Welfare ranching: the subsidized destruction of the American west. Island Press (2002). ]. Below [in the letter], we discuss the various impacts that cattle grazing can have on other resources in the Rio Puerco Field Office to support adopting an alternative to limit grazing where it can harm the values for which areas like ACECs [Areas of Critical Environmental Concern] and wilderness characteristics are managed, as well as to support a commitment to more proactive management of grazing on these public lands."</p>	<p>The Draft RMP/EIS proposes an adaptive management strategy for livestock grazing. The same management strategy has been responsible for an approximately 20 percent reduction in allowable animal unit months (AUMs), which equates to approximately 24,000 AUMs over the last decade. The Draft RMP/EIS proposes to protect all lands with wilderness characteristics inventoried, which essentially limits travel to authorized use only and prescribes range developments to be consistent with the protection of wilderness characteristics, in accordance with BLM Manual 6320. ACECs are proposed to be managed to protect the resources that are associated with the ACEC designation. In some instances, livestock grazing would be unavailable and proposed as an alternative, such as in the case of the Bluewater Canyon ACEC. In other instances, livestock grazing has no impact on the ACEC designation, such as the case of the Legacy Uranium Mine ACEC, which is strictly managed for safety. The overall goal of designing management prescriptions is to ensure that multiple-use principles required by FLPMA are incorporated, while ensuring that the BLM adopts the most equitable management strategy.</p> <p>The Draft RMP/EIS analyzes the environmental effects of grazing in Section 4.2.2.</p>
154	35	Recreation	<p>"We [The Wilderness Society et al.] are extremely encouraged that the BLM has included an alternative within this RMP to exclude grazing from protected or specially-designated areas. We support this alternative, especially within designated ACECs [Areas of Critical Environmental Concern] and lands with wilderness characteristics. All of the ACECs proposed in the RMP were proposed because of their wildlife, riparian, scenic, special-status species, cultural or geologic values. The science discussed above would indicate that removal of cattle from areas where the management goal is to protect values such as these would create the most progress towards that goal. Additionally, in most of the proposed ACECs, the only management difference between the preferred alternative and Alternative B is that in Alternative B, grazing would not be authorized. See, generally, Draft RMP, Section 2.2.16.3 (Areas of Critical Environmental Concern). We also support the improved protection of riparian areas from grazing. Consequently, we urge the BLM to consider Alternative B with regards to grazing, as best supporting BLM's protection of other natural resources and most consistent with best available science."</p>	<p>The Draft RMP/EIS proposes an adaptive management strategy for livestock grazing. The same management strategy has been responsible for an approximately 20 percent reduction in allowable AUMs, which equates to approximately 24,000 AUMs over the last decade. The Draft RMP/EIS proposes to protect all lands with wilderness characteristics inventoried, which essentially limits travel to authorized use only and prescribes range developments to be consistent with the protection of wilderness characteristics, in accordance with BLM Manual 6320. ACECs are proposed to be managed to protect the relevant and important values associated with the ACEC. In some instances, livestock grazing would be unavailable and proposed as an alternative, such as in the case of the Bluewater Canyon ACEC. In other instances, livestock grazing has no impact on the ACEC designation, such as the case of the Legacy Uranium Mine ACEC, which is strictly managed for safety. The overall goal of designing management prescriptions is to ensure that multiple-use principles required by FLPMA are incorporated, while ensuring that the BLM adopts the most equitable management strategy.</p>
90	40	Recreation	<p>"Loss of Recreational Resources: The Placitas BLM parcels function as significant urban interfaces to the areas of Albuquerque and Rio Rancho, offering recreational and other opportunities for the residents of those urban communities. The proposed open pit mining would physically and permanently remove "open space" recreation for these residents, some of the last available in the area. The DRMP does not address this issue."</p>	<p>An area designated as open for potential mineral extraction is not the same as permission to mine. As an example, under the 1986 RMP, as amended, every acre of BLM-administered land in the Placitas area is open for mining; furthermore, all mineral estate on private land in the Placitas area, approximately 12,000 acres, additional to the 3,100 mentioned in the comment, are also open for mining. The BLM has discretion to permit a gravel mine operation on any site after it considers all resources to be affected. To further demonstrate, over the last decade, while the BLM has received interest for gravel mining in the Placitas area, it has neither accepted nor approved any permit applications. The BLM will comply with FLPMA Section 102 part (12), which states "(12) the public lands be managed in a manner which recognizes the Nation's need for domestic sources of minerals, food, timber, and fiber from the public lands including implementation of the Mining and Minerals Policy Act of 1970 (84 Stat. 1876, 30 U.S.C 21a) as it pertains to public lands."</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
60	3	Recreation	"Parcel C/Crest of Montezuma - 916 acres: I urge that the selected alternative designate the Crest of Montezuma parcel as Closed for all categories of mineral entry. Due to active Senate legislation for the transfer of the parcel to the Forest Service, all prescriptions for increased activity on this parcel should be put on hold pending the outcome of that legislation. I favor disposal of this parcel to the Forest Service."	Until Congress decides otherwise, the BLM must continue to manage the resources on the Crest of Montezuma by taking the most balanced approach possible.
60	19	Recreation	Locatable Minerals: For all of the reasons stated in the preceding paragraphs of this section, the Pueblo urges the BLM to close the entirety of the [Espinosa Ridge] ACEC [Area of Critical Environmental Concern] to locatable mineral entry, as provided in Alternatives A and B. Alternatives C and D simply would not provide sufficient protection to the ACEC's resources and the surrounding San Felipe lands.	In accordance with the General Mining Law of 1872, the law declared all valuable mineral deposits on land belonging to the <a href="#">United States</a> to be free and open to exploration and purchase. This law provides citizens of the United States the opportunity to explore for, discover, and purchase certain valuable mineral deposits on BLM-administered lands. Any claim that would be followed by a plan of operations would require an environmental assessment, in accordance with 43 CFR, to identify the impacts of the proposed mining operations on the environment, to determine whether the proposed activity would impair the suitability of the area for preservation as wilderness or cause unnecessary and undue degradation, and to determine whether an environmental impact statement is required. Based on the protection goals and prescriptions for the Espinosa Ridge ACEC, the BLM feels that adhering to the NEPA and 43 CFR requirements, as they relate to locatable mineral entry, provide sufficient protection for the ACEC.
109	4	Recreation	Leasable Minerals: Given the lack of development activities in this area, the land use restrictions applicable to the surrounding Pueblo lands, and the limited access to the [Espinosa Ridge] ACEC [Area of Critical Environmental Concern], the Pueblo is of the opinion that the ACEC should be closed entirely to fluid mineral leasing as proposed under Alternatives A and B. The controlled surface use ("CSU") provided in Alternative C for all parts of the ACEC except Espinosa Ridge Pueblo and the Camino Real, which would only be leased under that alternative with a no surface occupancy ("NSO") designation, would not be sufficiently protective of the ACEC's resources and the surrounding San Felipe lands. The CSU stipulation provided by Alternative D to all of the ACEC's lands is not acceptable to the Pueblo for the same reasons.	The BLM considered a range of alternatives for leasable minerals management for the Espinosa Ridge ACEC. The purpose of this RMP is to ensure that BLM-administered lands in the planning area are managed in accordance with the multiple-use and sustained-yield principles mandated by the FLPMA (43 USC 1702). Under Alternative <a href="#">CE</a> , the <a href="#">proposed Proposed RMP</a> , the BLM would manage fluid minerals with a <a href="#">controlled surface use (CSU)</a> stipulation, <a href="#">except for the Espinosa Ridge Pueblo, which would be leased with an NSO stipulation throughout the ACEC.</a>
109	3	Recreation	"Soundscapes: We [The Wilderness Society et al.] have highlighted the need and methods for managing and protecting the natural soundscape through various submissions to the BLM as part of this RMP planning process. We first raised this issue in our scoping comments, and followed up with more detailed comments and management recommendations in a letter dated February 27, 2009. We also provided the RPFO with The Wilderness Society's SPreAD-GIS acoustic model, and in May 2011 we shared with BLM maps we produced, showing noise potential in our proposed Petaca Pinta SRMA [Special Recreation Management Area], that were developed using the SPreAD-GIS model (Attachment 4 [see ATT 4] to these comments, incorporated by reference).  We appreciate BLM's acknowledgement in the Draft RMP that allowing vehicles on existing routes in lands with wilderness characteristics may adversely affect the soundscape of those lands (Draft RMP, p. 2-157), as well as the no surface occupancy (NSO) stipulation put in place in Alternatives B and C within a certain line of sight/sound of recreation areas to protect resource values. Draft RMP, p. 4-87. We encourage BLM to adopt the NSO stipulation contemplated in Alternative B, which would increase the distance from recreation areas that the stipulation applies to and also give protection to undeveloped recreation areas receiving concentrated public use."	Unlike visual resources management, a BLM policy that sets standards for managing soundscapes does not exist; however, that does not mean that impacts of a specific project on or near special designations cannot be addressed. In accordance with BLM <a href="#">MS-Manual Section 7300</a> —Air Resource Management Program, the BLM would consider noise and its potential impacts on the public and the environment, as well as any appropriate mitigation measures, during the planning and authorization review process. This process is applicable to site-specific projects.

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
90	54	Recreation	<p>"Renewable Energy: In general, our groups support development of renewable energy and support its location on public lands so long as it is appropriately sited, since renewable energy development still has substantial environmental impacts. It makes sense to identify areas that are open to development, avoidance or exclusion for solar, wind and geothermal energy development. The Draft RMP acknowledges that the planning area has high potential for solar energy, low potential for wind energy, and existing resources but no current development for geothermal energy. Draft RMP, pp. 3-52, 3-64 – 3-65. Accordingly, more restrictive management for wind energy is appropriate and would avoid speculative applications. Further, BLM has now finalized the Programmatic EIS for Solar Energy Development, which should be incorporated into the Rio Puerco RMP, including exclusion areas and best management practices.</p> <p>Recommendations: Lands with wilderness characteristics, ACECs [Areas of Critical Environmental Concern], and critical habitat for threatened, endangered and sensitive species should be characterized as exclusion areas for all types of renewable energy, as proposed in Alternative B. See, Draft RMP, Table 2.30, pp. 2-75-77. Areas available for wind energy development should be limited to those areas that have higher potential, if such areas can be developed. Further, solar energy development should also be subject to the provisions in BLM's Solar PEIS."</p>	<p>Both the wind and solar energy programmatic EISs are incorporated by reference in the Draft RMP/EIS Section 1.3.4. In accordance with Draft RMP/EIS Section 2.2.8.4.1, "Allow no new rights-of way," this prescription is applicable to all lands with wilderness characteristics. In all cases relating to renewable energy, a right-of-way (ROW) would have to be granted. As for ACECs, in accordance with Draft RMP/EIS Section 2.2.16.3.2, Management Common to All Alternatives-General, bullet three, "The BLM would exclude solar energy sites from ACEC areas," and bullet four, "Unless specified below, ACECs would be avoidance areas for all rights-of-way, including wind energy and communications sites." Furthermore, bullet five states, "The BLM would designate ACECs managed for scenic values as VRM Class II." Eleven out of the 18 ACECs considered in the Draft RMP/EIS would be managed for VRM II objectives, which are "to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape. New projects can be approved if they blend in with the existing surroundings and don't do not attract attention (i.e., small-scale picnic area or primitive campground in valley shielded from view that blends with natural appearance)."</p>
90	45	Recreation	<p>Renewable Energy Management Decisions: The Pueblo is of the opinion that the management prescriptions applicable to the siting of wind, solar, or geothermal projects described in Table 2.30 of the Draft RMP/EIS for all alternatives are not sufficient to adequately protect the resources of the Espinosa Ridge ACEC [Area of Critical Environmental Concern]. The Pueblo therefore urges the BLM to adopt for the Espinosa Ridge ACEC specifically-if not for all ACECs considered in the Draft RMP/EIS generally- a new alternative that excludes the siting and construction of any renewable energy project.</p>	<p>The general prescriptions for ACECs in regard to renewable energy development are as follows: Solar—Exclude; Wind—Avoid (Draft RMP/EIS Section 2.2.16.3.2); the VRM classification for the Espinosa Ridge ACEC is VRM II (Draft RMP/EIS Section 2.2.16.3.10.1). In accordance with BLM Manual 8410-1, "The objective of this class is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape. New projects can be approved if they blend in with the existing surroundings and do not attract attention (i.e., small-scale picnic area or primitive campground in valley shielded from view that blends with natural appearance)." The BLM feels that, based on the above-mentioned management prescriptions, the proper array of alternatives presented would achieve the protection and conservation goals for the Espinosa Ridge ACEC.</p>
109	7	Recreation	<p>"Proposing additional gravel mining but not addressing traffic and the roads needed to move the gravel from the mines to local roads is unacceptable. Traffic studies need to be conducted before any proposed increased levels of mining is allowed."</p>	<p>Designating an area as open is not the same as permitting an area for mining. Such action is discretionary and bound to the permitting process and project-specific environmental analysis, which would look at such issues as traffic; therefore, it is not within the scope of this RMP.</p>
15	8	Recreation	<p>"Salable minerals: The vast majority of the planning area is ""open: for salable minerals in all the alternatives opening approximately 90% or more, with very limited acreage classified as areas to ""avoid"" or ""closed."" Draft RMP, p. 2-8. The Draft RMP did not consider a meaningful range of alternatives for managing salable minerals. Salable minerals, especially industrial minerals such as sand and gravel, are plentiful in the planning area and development is expected to continue. BLM should ensure balanced use by protecting areas that have other values that would be damaged by mineral development.</p> <p>Recommendations: The Draft RMP should protect natural and cultural resources in areas designated for special management from salable mineral development. For instance, the Petaca Pinta Extensive Recreation Management Area, Boca del Oso Extensive Recreation Management Area, and San Juan Basin Badlands Extensive Recreation Management Area are all open to development in the preferred alternative and should be closed. Lands managed for wilderness characteristics should also be closed to salable minerals development. Further, lands around the community of Placitas should be closed to salable minerals development."</p>	<p>In regard to protecting natural and cultural resources, Draft RMP/EIS Section 2.2.8.4 states that lands managed to protect wilderness characteristics would be recommended for withdrawal from mineral location and closed to mineral sales. As for such areas as ACECs (see Draft RMP/EIS Section 2.2.16.1), half of the ACECs were proposed as closed salable mineral development in the Draft RMP/EIS, while half were proposed as open or avoided. This was changed in the Proposed RMP/Final EIS to closed and open to salable mineral extraction because 'avoid' is, in essence, open. Also, in the Draft RMP/EIS, 11 out of 18 of the ACECs were specifically managed for scenic values with a VRM II classification. This classification limits the visual impacts, in accordance with BLM Manual 8410-1, to the existing character of the landscape. This would provide for an overall protection level commensurate with the protection goals and objectives of each special designation. ERMA's in general are very large areas that are broken up into various zones. Based on the management objectives of the zones, the prescriptions are developed for mineral development; thus, not all zones are special designations, such as ACECs requiring protection from some mineral extraction or road closures.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
90	47	Recreation	<p>"Saleable Minerals: For all of the reasons stated in the preceding paragraphs of this section, the Pueblo urges the BLM to close the entirety of the [Espinosa Ridge] ACEC [Area of Critical Environmental Concern] to the extraction of salable minerals, as provided in Alternatives A and B. Alternatives C and D simply would not provide sufficient protection to the ACECs resources and the surrounding San Felipe lands."</p>	<p>Alternative B provides the highest protection level for Espinazo Ridge by eliminating some multiple uses. Alternatives C and D provide for a balanced approach by eliminating salable mineral availability in the areas needing the most protection, while allowing salable mineral extraction on a case-by-case basis in the select areas that can be managed for multiple uses in the ACEC. <a href="#">Alternative E in the Proposed RMP/Final EIS proposes to close the area included in the Espinazo Ridge ACEC to salable mineral extraction (Proposed RMP/Final EIS Table 2-25).</a></p>
109	5	Recreation	<p>"The DRMP also does not address the safety concerns to recreational users due to the gravel mining deep excavations not requiring protective fencing."</p>	<p>Disposals of salable minerals are discretionary actions; therefore, disposal would be considered on a case-by-case basis. Stipulations to protect important resource values would be based on interdisciplinary review of individual proposals. Extraction of salable mineral operations on BLM-administered lands would be conducted in compliance with BLM mineral materials disposal regulations (43 CFR 3600). Section 3601.4(c) includes a description of measures to take to prevent hazards to public health and safety and to minimize and mitigate environmental damage.</p>
60	11	Recreation	<p>"TMP and Assertion of Valid Existing Rights I note that you are proposing to defer development of a Travel Management Plan and designation of routes until after the RMP/EIS is complete (Page 2-5, Page 3-110, Page 4-5). The first comment is that such a deferral appears to be an improper segmentation of these critical issues from this RMP/EIS which is a violation of NEPA. However, you have provided several maps (Nos. 89 to 92) which appear to show potential road closures and have indicated you will limit use to designated routes in the interim (Page 2-130). Isn't this some type of a Plan for Travel Management? What part of the Plan is being deferred here? In addition, the road and travel Maps 73-76 referenced on Page 2-130 appear to be missing from the published document.</p> <p>I am particularly concerned with the potential closure of roads shown on map 90, in such a way as to preclude my valid and existing use of designated roads, primitive roads and trails to access my property. I currently use a number of BLM roads, primitive roads, and trails to access my private property. I especially require the use of the eastern and southern routes to access the eastern and southern half of my property, which is my only access to these areas. These routes require that I traverse a BLM designated road 1102 (part of which crosses private property), and a primitive trail established from that road to the west and south traversing to 2 gates located on my private property. All of these roads and trails are located in sections 23, 24, 25, and 26, T.20N., R.2W., N.M.P.M.</p> <p>I also note for the record that portions of the public lands adjacent to and south of my private property were not inventoried for roads and trails as part of the inventory referenced on page 2-130. In Section 3.3.4 Trails, Roads, and Railroads, you mention the Bernalillo to La Ventana railroad (Table 3.4). However, this rail route, portions of the BLM road 1102, and other BLM roads comprise the only major historic route from Bernalillo to San Ysidro, thence to San Luis, thence to La Ventana, and finally to Cuba and beyond. This route has been used since Spanish settlement times and traveled by hand and ox carts, horse, wagon, and automobiles. Only relatively recently has the major travel route been shifted to Highway 550. But this old public road is the only major route connecting these communities on the west side of the Rio Puerco. Data substantiating this history is available from county and state highway maps, USGS topographic maps, and is discussed in the book, <i>Antes Stories from the Past Rural Cuba, New Mexico 1769-1949</i> by Ester V. Cordova May. As you describe on Page 4-1, BLM will recognize valid existing rights for all resource actions and all alternatives considered. Moreover, your assumptions on Page 4-2 state that non-BLM lands would have minimal direct impacts from the RMP decisions and that "reasonable access across BLM lands" will be continued to private lands (see also Page 4-232). I am willing to meet with BLM staff so that my valid existing rights to roads and trails in these sections can be identified and properly designated in your Travel Management Plan."</p>	<p>In accordance with BLM Manual 1626, a final travel and transportation plan or network can be deferred in the RMP to be completed within 5 years of signing Record of Decision, provided that certain tasks are completed in the RMP. All these tasks were presented in the Draft RMP/EIS. One of these tasks is to define interim management objectives for areas or sub-areas. All areas in the Draft RMP/EIS have an interim management objective for travel, as depicted on Draft RMP/EIS Maps 89-92 and in Chapter 2.</p> <p>Draft RMP/EIS Maps 73-76 were inadvertently left out of the Draft RMP/EIS and are included in the Proposed RMP/Final EIS as Maps 3-16 to 3-19. As part of the transportation process, the BLM would involve all private, local government, and other users in the planning process. The intent of a transportation plan is to ensure that an actual travel network is created that address all resource protection goals, along with ensuring that it serves the users. The BLM also understands that valid existing rights will play a critical role in the development and design of this road network. The BLM has noted your comment, which will be very useful in the travel and transportation planning process.</p>
10	15	Recreation	<p>"To give a reason for closing all secondary and "social" roads in the entire San Juan Basin Badlands to vehicles I would suggest that the archaeological features and petrified wood in those areas are at risk of illegal collecting and closing the area to vehicles would help in the enforcement of those paleontologic protection laws as well."</p>	<p>These issues will be addressed during the development of the travel management plan. The general travel management prescription assigned to the fossil fauna in the San Juan Basin Badlands is for access routes only. These access routes will be determined during the transportation planning process. With input from the public, the BLM is confident that the appropriate route designation, which will provide the protection desired and in accordance with the management goals, will be achieved.</p>
74	3	Recreation	<p>"The amazing amount of huge petrified logs is another very unique part of the Cuba badlands appeal. You should expand the No Petrified wood collecting option from the East, and West Torreon and Ceja Pelon Zones to include the whole ERMA. Specifically I refer to Alternative B, Table 2.24, Vol 1, p 2-62 : No vehicle access or petrified wood collecting in the East and West Torreon Zones and Ceja Pelon Zone Vol 1, p 2-62; ) No petrified wood, fossil or mineral collecting in the entire San Juan Basin badlands ERMA Vol 1, p 2-55,56 Goals 2.211.1."</p>	<p>The BLM agrees that, in the San Juan Basin Badlands ERMA, petrified wood resources are unique. Prohibiting petrified wood collection in portions of the San Juan Basin Badlands ERMA was analyzed in Alternatives B and C of the Draft RMP/EIS and Proposed RMP/Final EIS.</p>

R. Substantive Comments (Table R-I. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
144	2	Recreation	<p>“Since the BLM’s objectives for the San Juan Badlands ERMA [Extensive Recreation Management Area], as stated in Vol. 1, P. 2 - 25, Sec. 2.2.5.2, include “to protect paleontological resources from natural or human-caused deterioration, or potential conflict with other resource uses and resource development” and “to promote stewardship, conservation, and appreciation of paleontological resources,” the best way of doing that would again be by keeping all vehicles out of this ERMA. The protection of “paleontological resources” and ORV usage are simply incompatible. Presently you offer no petrified wood collection in the East and West Torreon and Ceja Pelon Zones as Alternative B in the SJBB ERMA table in Vol.1 on page 2-62. Again, we [Uwe and Karen Schroeter] think this alternative should be expanded to include the entire ERMA. We think that Goals 2.211.1 in Vol. 1, P. 2-55, 56 also support our request that no petrified wood, fossils or minerals may be collected within the entire San Juan Basin badlands ERMA. We want future generations to enjoy the petrified wood, and the current policy that allows its removal is absolutely not sustainable. Since hikers are much less likely to carry out petrified wood, the best way to enforce this policy would again be by keeping all vehicles out of this ERMA. There is hardly a goal in the RPM concerning the San Juan Badlands ERMA that the BLM wants to achieve that would not benefit from keeping all vehicles out of this ERMA.”</p>	<p>The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of each area.</p>
182	3	Recreation	<p>“Prohibit petrified wood and fossil or mineral collecting within the entire ERMA [Extensive Recreation Management Area] as per Vol. 1, p. 2-55, and p. 56 goal 2.211.1.”</p>	<p>The BLM agrees that, in the San Juan Basin Badlands ERMA, petrified wood resources are unique. Prohibiting petrified wood collection in portions of the San Juan Basin Badlands ERMA was analyzed in Alternatives B and C of the Draft RMP/EIS and Proposed RMP/Final EIS.</p>
65	3	Recreation	<p>“Not only should there be no petrified wood collection (Alt. B) in Torreon East &amp; West &amp; Ceja Pelon units, but there should be no petrified wood collection except for research purposes in the Chihuilla zone, nor in any other special designation entity anywhere in the Rio Puerco District, i.e. no petrified wood collection in any ACEC [Area of Critical Environmental Concern], WSA [Wilderness Study Area], SMA [Special Management Area], ERMA [Extensive Recreation Management Area], or lands with wilderness characteristics.”</p>	<p>The BLM agrees that, within the San Juan Basin Badlands ERMA, petrified wood resources are unique and should be preserved and protected, which would include Chihuilla Mesa. Prohibiting petrified wood collection in portions of the San Juan Basin Badlands ERMA was analyzed in Alternatives B and C of the Draft RMP/EIS and Proposed RMP/Final EIS.</p> <p>Not all ACECs, ERMA, or lands with wilderness characteristics would be managed for the same resource values as the San Juan Basin Badlands ERMA. Some ACECs, such as the Legacy Mines ACEC, would be designated for safety purposes, and adding a prescription to prohibit the collection of petrified wood would not be reasonable.</p>
199	7	Recreation	<p>“We would also like to request a prohibition on petrified wood and fossil collecting in the Badlands. The RMP as it stands only prohibits collection in limited areas. If prohibition is not enacted soon these areas will be empty of one of their most special, unique, and irreplaceable features, thereby cheating the generations to come and making impossible the scientific discoveries that may have resulted.”</p>	<p>The BLM agrees that, in the San Juan Basin Badlands ERMA, petrified wood resources are unique. Prohibiting petrified wood collection in portions of the San Juan Basin Badlands ERMA was analyzed in Alternatives B and C of the Draft RMP/EIS and Proposed RMP/Final EIS.</p> <p>Under Alternative C, the proposed RMP, the BLM considered <del>has would</del> prohibiting the collection of paleontological resources, including petrified wood, in the San Juan Basin Badlands ERMA Torreon Fossil Fauna East and West Zones.</p>
146	4	Recreation	<p>“Rights-of-way: The Draft RMP provides distinct management approaches for pipelines, roads, communication and other sites, and transmission lines separately, which is an appropriate way to distinguish among the many uses of rights-of-way. See, detailed management set out in Draft RMP, Table 2.12, pp. 2-35 - 2-37.</p> <p>Recommendation: In general, the RMP proposes sufficient protections in Alternative B. However, further protection is needed from transmission lines in national scenic and historic trails, areas of critical environmental concern, and cultural sites. No power line proposed through New Mexico’s Renewable Energy Transmission Authority to carry wind or solar energy from one portion of New Mexico has suggested siting through the Planning Area. However, for lands already accommodating high voltage power lines, we urge consideration of their re-use for transmission lines that carry renewably generated electricity.”</p>	<p>Any proposal for transmission lines must comply with the NEPA review process and specific resource designation management prescriptions. These prescriptions may include VRM, wildlife, plant communities, or other resource protection requirements. Under BLM Manual 2801 guidance, the BLM efforts should minimize the proliferation of separate ROWs and promote sharing of ROWs. It is the intent of the BLM to follow this guidance in permitting ROWs as stringently as possible. Three different allocations for ROWs for power lines are referenced in the Draft RMP/EIS (Section 3.8.2, Maps 24–26). The BLM has formally designated ROW corridors and use areas in the RPFO Decision Area, and it is making attempts to group compatible facilities where possible to avoid any potential resource conflicts.</p>

Letter Number	Comment Number	Category	Comment Text	Response
90	49	Recreation	<p>“Utility Corridors and NEPA Analysis: The Utility Corridor discussion included in Section 3.8.2 makes it clear that the BLM recognizes that existing utility corridors must be protected in order to safeguard present and future electric service. The BLM has formally designated utility corridors, made attempts to group compatible facilities wherever possible, and refers de facto corridors established by existing linear facilities. The document also alludes to corridors designated by the Western Utility Group that cross BLM land. PNM [PNM Energy] understands that existing corridors are protected in each of the RMP alternatives, although the number of acres open for such rights-of ways is severely limited under alternative B (pg. 4.53). Discussion does not include reference to the 368 corridors analyzed in the West Wide Energy Corridor Final PEIS, although one of the corridors does not appear to pass through the RPRMP area. We do note that none of the previously established corridors are plotted on the Right-of-Way (Transmission Line) Maps 22-26. We would request that the original corridors included in the 1986 RMP, corridors designated by the Western Utility Group, and the 368 corridor are graphically presented in each of the transmission maps presented in Maps 24-26.</p> <p>We also note that large blocks coded for avoidance or exclusion in Maps 24- 26 render siting through the area problematic. We were confused as we tried to understand the basis for avoidance areas on these maps. Whereas the exclusion areas (ACECs [Areas of Critical Environmental Concern] and WSAs [Wilderness Study Areas]) are clear, the avoidance areas along the corridors mentioned above did not appear to conform to identifiable resource concerns. We do understand that identified avoidance areas do not preclude the siting of new power line corridors or the maintenance of existing lines. We would, however, request clarification as to the nature of those avoidance areas as resulting stipulations affect not only new construction but the responsible operations and maintenance of existing lines.”</p>	<p>The avoid classification for ROWs is associated with management prescriptions, such as VRM Classes I and II, habitats for special status species, and other resource management objectives. Proposed RMP/Final EIS Tables 2-5 and 4-28 have updated acreages for ROW designations by designation under each alternative. Under Alternative <a href="#">CE</a>, the <a href="#">proposed Proposed RMP</a>, the BLM has attempted to make the avoidance areas for land use authorizations <a href="#">more clear/clearer</a>. The Proposed RMP/Final EIS Chapter 2 Land Use Authorizations maps were revised to show energy corridors.</p>

INTERNAL DRAFT

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
108	2	Recreation	<p>“Protect by limiting vehicular access. Vehicular intrusion can easily destroy this fragile landscape and allow vandalism and illegal removal of fossils, trees, and other protected resources. While hiking in Torreon West, Caja Pelon and Chihuilla zones, I encountered ATV two-tracks that cut across delicate dune-like formations, people cutting timber, and pick-up trucks far off existing roads.</p> <p>Volume I, Table 2.24 lists alternatives for vehicular access in the various zones. I strongly support Alternative B as a minimum to limit vehicles to existing roads. A better alternative would be prohibit vehicular access in all the ERMA [Extensive Recreation Management Area] except the 2–3 major public access roads, and to extend the Ceja Pelon Zone north to include the northern portions of Ceja Pelon and Penistaja Mesas”</p>	<p>The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of the travel management areas.</p> <p>The San Juan Basin Badlands ERMA, as described in the Draft RMP/EIS, included all the areas identified in this comment; the Oh-My-God 100 area has been changed to the Endurance Trails <a href="#">Special Recreation Management Area (SRMA)</a> in the Proposed RMP/Final EIS. The BLM selected the boundaries for the zones in the <a href="#">San Juan Basin Badlands ERMA</a> based on the like resources inventoried and management needs. Overall, the ERMA proposes the following zones in <a href="#">Alternative C</a>:</p> <ul style="list-style-type: none"> <li>• Torreon Fossil Fauna East and West—These zones are designated as an ACEC in the Draft RMP/EIS and restrict travel to <a href="#">the single access routes</a> only. These zones were based on the similar paleontological resources. In the Proposed RMP (Alternative <a href="#">EC</a>), this area would be managed <a href="#">as a zone in the ERMA and</a> as an ACEC <del>(not as a zone in the ERMA)</del>; travel would be <a href="#">allowed on the single access route only limited to existing primitive roads and trails</a> (Proposed RMP/Final EIS Table 2-35 <a href="#">and Appendix P, Section P.10.2</a>).</li> <li>• Oh-My-God A-C Zones (Endurance Trails SRMA in the Proposed RMP/Final EIS)—These zones <a href="#">are would be</a> designated based on the established special event that has been permitted for over a decade. The events are rotated annually to minimize the surface disturbance and allow a 2-year period for the sites to recover from any potential impacts.</li> <li>• Ceja Pelon—This zone <a href="#">would be is</a> set aside for its geological significance and paleontological significance in the ERMA. <a href="#">Motorized travel would be allowed on the access route only. This zone is assigned an access route only prescription for travel.</a></li> <li>• Chihuilla Zone—This zone <a href="#">would be is</a> set aside for its geological and dispersed recreational potential. The travel designation for this zone <a href="#">would be is</a> limited to <a href="#">designated-existing primitive roads and trails. Construction of new roads would be considered on a case-by-case basis for permitted special event activities.</a></li> <li>• Historic Homesteads—While this area <del>is would not be</del> a specific zone, it is found within the Chihuilla zone and is specifically identified in the Draft RMP/EIS for its interpretive and educational potential as a cultural resource.</li> </ul>
5	3	Recreation	<p>“To accomplish these goals [no woodcutting, no removal of petrified wood, preservation for dispersed recreation], vehicle access to the area must be restricted except for emergencies and roads designated strictly for recreational use.”</p>	<p>The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of the travel management areas.</p>



R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
81	6	Recreation	"I would suggest blocking all vehicle (including ORV) access to all of the Badland areas. I would suggest something like is found at the protected Badlands (Bisti, Denazin and Ojito). There one finds a parking area and a fence which prevents vehicles from entering. Making the parking area friendly to car camping would be an added benefit. Blocking vehicles from entering will preserve the trees, the petrified wood and limit erosion in these fragile soils."	The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of the travel management areas
88	3	Recreation	"The Placitas public land is a fragile high plains desert suffering from prolonged drought. The protection of biological soil crust structural integrity and diversity is needed. The soil and grasses need a reprieve from ATVs and other motorized traffic to recover. If land is prescribed for public use, and a portion should be for this purpose and also wildlife corridor, it will be appropriate to have no motorized traffic allowed. However since utility access is sometimes necessary, motorized travel restricted two designated and clearly marked roads is needed. The existing Power Line road that runs north and south and the cross traffic ridge road running east and west can provide adequate access for utility maintenance. Those routes need to have appropriate and maintained signage and stepped up patrols. The signs warning users to remain on designated roadways only need to be restored at all entrances. Damage to soil and grasses has been devastating since July 2010 when the signs describing that restricted usage were capriciously removed by Ranger Hawkas."	The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of the travel management areas
91	51	Recreation	"I am writing to state my support of the San Juan Badlands Extended Recreation Management Area (ERMA) as outlined in Alternative B. I personally feel that ERMA would be best served if all vehicles are kept out... except for major access points and authorized use. This would preserve this special landscape, prevent illegal wood cutting and greatly assist in the reduction of the removal of the petrified wood."	The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of the travel management areas
144	2	Recreation	"The key to all resource protection is proper "travel management." Severely restricting all vehicle travel, including ORVs, in the ERMA [San Juan Basin Badlands Extensive Recreation Management Area] will achieve 90% of all conservation objectives by stopping direct tire damage and the recent explosive resource theft. Of course, none of this means anything if it is not enforced. In these times of shrinking federal agency budgets, you simply must focus money and efforts where it really matters."	The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of the travel management areas
226	7	Recreation	"Off-Highway Vehicles (OHV) - We strongly recommend that the Placitas BLM parcels be closed to off-highway vehicles, since people live in close proximity to this land, and will suffer from the noise, dust, and destruction of the land caused by these vehicles."	The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of the travel management areas

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
119	26	Recreation	<p>"I am in favor of Alternative B in many of these areas where increased roads are not reasonable, and Alternative C on certain existing road travel. It is important before making new roads and trails that a proper EIS is done, and if these roads and trails are improved at all, modern trail techniques must be used. (I will point out that over 100 miles of new multi-use trails have been designed and built in the relatively new Fort Stanton Snowy River NCA [National Conservation Area] under the guidance of the Roswell FO [Field Office]. These trails are state-of-the-art and are designed to not wash out like some of the older existing BLM trails.) Lands with fossils and paleontological sites are also mentioned and these should be protected for the future, and not be used as salable minerals. Limited collection should be allowed in some areas, but this decision must be made on a case-by-case basis by field specialists and not decided just by looking at a map."</p>	<p>Route designations and decisions will be made during the travel management planning process. Any new roads proposed will go through the necessary NEPA process.</p>
199	6	Recreation	<p>"Deferred Travel Management Planning: BLM's Land Use Planning Handbook generally directs the Agency to complete a travel management network during development of a resource management plan. Incorporating travel management decisions into the RMP is the best way to ensure travel designations are made in the context of other resources and to provide a landscape-level approach to travel planning. However, the Land Use Planning Handbook allows for deferral of travel planning provided the RMP identifies a preliminary route network and establishes a process for future travel planning. The Land Use Planning Handbook provides guidelines for addressing travel planning in the RMP even if comprehensive travel planning is deferred. Appendix C to the Handbook (at pp. 18-19) states: If the final travel management network is to be deferred in the RMP, then the RMP should document the decision-making process used to develop the initial network, provide the basis for future management decisions, and help set guidelines for making road and trail network adjustments throughout the life of the plan. The identification of the uncompleted travel management networks should be delineated in the land use plan and the following tasks completed for each area:</p> <ol style="list-style-type: none"> <li>1) Produce a map of a preliminary road and trail network;</li> <li>2) define short-term management guidance for road and trail access and activities in areas or sub-areas not completed;</li> <li>3) outline additional data needs, and a strategy to collect needed information;</li> <li>4) provide a clear planning sequence, including public collaboration, criteria and constraints for subsequent road and trail selection and identification;</li> <li>5) provide a schedule to complete the area or sub-area road and trail selection process; and</li> <li>6) identify any easements and rights-of-ways (to be issued to the BLM or others) needed to maintain the preliminary or existing road and trail network.</li> </ol> <p>If the decision on delineating travel management networks is deferred in the land use plan to the implementation phase, the work normally should be completed within 5 years of the signing of the ROD for the RMP.</p> <p>Of primary importance is producing a map, to be included in the RMP, which identifies the preliminary route network. This map establishes the "existing" network and therefore determines which routes are open in the interim period between finalizing the RMP and finalizing a designated travel network. The map also allows for better understanding of current resource use in the Rio Puerco Field Office and is necessary to inform decision-making in the RMP and set a baseline for future travel planning.</p> <p>The Rio Puerco Draft RMP states that a preliminary inventory of the route network is shown in Maps 73-76 (Draft RMP, p. 2-129). However, Maps 73-76 in the Draft RMP are ACEC [Area of Critical Environmental Concern] maps. No other maps appear to include the route inventory; the only travel management maps included in the Draft RMP show OHV area designations (Maps 89-92). The RMP must include a map of a preliminary road network. Furthermore, the Draft RMP states that "The BLM would consider existing routes open to vehicle travel unless indicated as closed on the ground by signs, barricades, or other physical structures or topography those appropriately direct users." Draft RMP, p. 2-129. This could lead to proliferation of additional user-created routes in the interim period until comprehensive travel planning is completed. BLM must include a map of existing routes in the RMP and specify that only those routes identified on the map are to be considered open."</p>	<ol style="list-style-type: none"> <li>1. The preliminary road inventory was mentioned in the Draft RMP/EIS, but the maps were inadvertently excluded in the Draft RMP/EIS. They are included in the Proposed RMP/Final EIS as Maps 3-16 to 3-19.</li> <li>2. A general prescription defining the short-term management guidance is prescribed field office wide. Maps delineating the general travel management prescriptions were included in the Draft RMP/EIS (Maps 89-92) and Proposed RMP/Final EIS (Maps <del>2-28 to 2-862-67</del> to 2-70). More specifically, the short-term management guidance is specified in each resource category. For example, Draft RMP/EIS Table 2.24 lists the various zones and travel designations for the San Juan Basin Badlands ERMA. Also, management guidance for travel designations is provided in Draft RMP/EIS Section 2.2.18.3, Travel Management, Management Common to All Alternatives.</li> <li>3. Draft RMP/EIS Section 3.20 identifies the data needs and needed information.</li> <li>4. Draft RMP/EIS Section 2.2.18.3.1, Travel Management Planning, provides the planning sequence, which includes public participation guidance.</li> <li>5. Draft RMP/EIS Section 2.2.18.3.1, bullet three, states at what point the road selection process will take place.</li> <li>6. The preliminary road inventory did not identify any easements or ROWs that were needed to be issued to the BLM or others in order to maintain the existing road network.</li> </ol> <p>The statement, "The BLM would consider existing routes open to vehicle travel unless indicated as closed on the ground by signs, barricades, or other physical structures or topography those appropriately direct users," was removed from the Proposed RMP/Final EIS.</p> <p>The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of each area.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
81	7	Recreation	<p>"Areas and Routes Closed to Motorized Use: BLM can and should make travel planning decisions in this RMP to protect specific resources, such as losing sensitive and specially designated areas to motorized use. We support BLM closing lands managed to protect wilderness characteristics to motorized travel and limiting travel to designated routes in areas managed to minimize impacts to wilderness characteristics. Draft RMP, p. 2-38-2-39. We also support BLM proposing OHV closures in the range of alternatives to provide for quiet, backcountry recreation experiences in recreation management areas and to protect sensitive natural and cultural resources in ACECs [Areas of Critical Environmental Concern]. Recommendations: BLM should adopt closures to motorized use to protect sensitive resources and support quiet recreation opportunities. Specifically, we recommend BLM evaluate and implement additional OHV closures or limitations in the following important areas:</p> <ol style="list-style-type: none"> <li>1. San Juan Badlands - Limit to major access roads and for authorized uses. Limit use of the Oh My God raceway routes to the three routes identified in the Draft RMP and limit to annual use on a rotating basis, with no new race routes to be created.</li> <li>2. Cimarron Mesa - Eliminate user-created routes and manage them to protect wilderness characteristics.</li> <li>3. Petaca Pinta ERMA [Extensive Recreation Management Area] – Additional routes around Cerro Verde that are not needed for access should be closed."</li> </ol>	<p>The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of each area.</p>
173	1	Recreation	<p>"Travel management planning in Section 2.2.18.3.1 fails to incorporate the necessary data collection elements necessary for a full and complete inventory of existing roads and trails. The same section also fails to identify establishment of BMP's for mitigating or restoring roads and trails that are having unacceptable adverse impacts. The document also fails to describe engaging interested user groups in route system identification development and resource impact mitigation.</p> <p>Recent travel management activities by the US Forest Service highlight woefully inadequate existing road and trail inventories. Ongoing litigation draws attention to how inadequate road and trail inventories can lead to expensive and successful court challenges to those inventories. Experience has shown that three additional data collection elements are absolutely essential to creating accurate baseline inventories of existing roads and trails: 1) Solicitation of the public for knowledge of routes ""missing"" from existing inventories and maps, 2) On-the ground verification of linear and curvilinear features identified from aerial photography, and 3) Professional mapping/inventorying of missing inventoried routes by qualified firms providing those services.</p> <p>The DEIS text also fails to call for the identification of BMP's for the mitigation and restoration of roads and trails to a sustainable condition when they are found to be causing unacceptable adverse impacts to resources. The DEIS identifies the importance of an adequate road and trail system for many reasons (access, resource management, economic benefit, etc). The permanent closure of any existing road and trail should be the last resort if unacceptable adverse impacts to resources are identified. Mitigation and restoration should always be considered. The New Mexico 4 Wheelers [NM4W] and other organized motorized recreation organizations have repeatedly expressed their willingness to assist the Rio Puerco Field Office in the identification and development of additional recreation opportunities and have volunteered to help with needed mitigation projects when motorized recreation is adversely impacting resources: ""In summary, the RPMA has tremendous opportunities to serve the needs of the motorized recreational public including the local 4WD community. The NM4W stands ready and willing to assist the office in identifying, developing, and maintaining both existing routes and designated trail systems and areas."" [Footnote 13: Scoping comment by New Mexico 4 Wheelers, submitted 5/29/2008] Add the missing data collection elements described above to inventorying activities. Add the requirement for the identification of BMP's for mitigating and restoring roads and trails when they are having unacceptable adverse impacts. Add engaging interested and impacted user groups in identifying and developing sustainable motorized recreation opportunities and engaging them in necessary mitigation projects."</p>	<p>Issues</p> <ol style="list-style-type: none"> <li>1. The preliminary road inventory was mentioned the Draft RMP/EIS, but the maps were inadvertently excluded in the Draft RMP/EIS. They are included in the Proposed RMP/Final EIS as Maps 3-16 to 3-19.</li> <li>2. A general prescription defining the short-term management guidance is prescribed field office wide. Maps delineating the general travel management prescriptions were included in the Draft RMP/EIS (Maps 89-92) and Proposed RMP/Final EIS (Maps <a href="#">2-67 to 2-702-28 to 2-86</a>). More specifically, the short-term management guidance is specified in each resource category. For example, Draft RMP/EIS Table 2.24 lists the various zones and travel designations for the San Juan Basin Badlands ERMA. Also, management guidance for travel designations is provided in Draft RMP/EIS Section 2.2.18.3, Travel Management, Management Common to All Alternatives.</li> <li>3. Draft RMP/EIS Section 3.20 identifies the data needs and needed information.</li> <li>4. Draft RMP/EIS Section 2.2.18.3.1, Travel Management Planning, provides the planning sequence, which includes public participation guidance.</li> <li>5. Draft RMP/EIS Section 2.2.18.3.1, bullet three, states at what point the road selection process will take place.</li> <li>6. The preliminary road inventory did not identify any easements or ROWs that were needed to be issued to the BLM or others in order to maintain the existing road network.</li> </ol> <p>In accordance with the BLM Planning Handbook, the <a href="#">BLM RPFO BLM</a> has opted to defer the travel management plan due to incomplete data, complexity, and controversy. A travel management plan is expected to be completed within <a href="#">five-5</a> years of signing the Record of Decision. General travel prescriptions are included in almost every resource category. For example, every special designation contains a management prescription for travel. These general travel management prescriptions set the overall guidance for the development of the travel plan, which will begin soon after the Record of Decision is signed.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
215	2	Recreation	<p>"The DRMP omits any discussion of the traffic impacts if further mining activity on Parcel A is allowed. Mining activity in the Placitas area already presents major traffic problems. There are anywhere from 5-12 gravel trucks backed up on the southbound I-25 frontage road where it intersects with I65 in the morning rush hour on any given day. The NMDOT [New Mexico Department of Transportation] proposal for a new interchange for Highways I65/550 and I-25 presumably do not take into account the addition of one third or more gravel truck traffic. Nor is there discussion in the DRMP of alternative routes for this traffic. This is not an issue that can be deferred for the BLM Travel Management Plan, to be prepared only after the RMP is finalized, and an alternative selected."</p>	<p>Draft RMP/EIS Section 4.2.6.1.1, Health and Safety, Direct and Indirect Impacts, Mineral Resources Decisions, discloses that mineral development would increase the instances of transportation. Owners of transportation (e.g., trucking) companies are responsible for understanding and abiding by all applicable transportation laws and regulations. Also, Draft RMP/EIS Section 4.2.6.2 states "Mineral development, including uranium mine development, within the Planning Area would increase vehicular traffic. City and county use plans for surrounding communities could have cumulative effects, whereby mineral resources are in development adjacent to BLM lands. State lands, including the <a href="#">New Mexico State Land Office (SLO)</a>, that are surrounded by BLM lands could have impacts from inholding development."</p> <p>Also, the RMP makes land use management allocations only and does not permit any specific projects. All project proposals, such as those for mining, are discretionary actions that require application, analyses, and federal approval. Current traffic modules and highway interchanges would be analyzed in site-specific analyses along with alternative routes for traffic related to mining activity.</p>
160	9	Recreation	<p>"Traffic/Roads Missing Information in DRMP - No proposed new gravel mining haul routes were identified in any maps. The assumption seems to be that the route identified in the 1992 plan will be used. However that right-of-way was rejected by the community in 2008 during the development of the Placitas Area Plan, adopted by Sandoval County in 2009. New or additional rights ofway needed to move gravel from the proposed mining area in Parcel A to paved roadways must be identified in the DRMP for citizens to adequately comment. The upcoming interchange re-design for Highways I65/550 and I25 has presumably not incorporated the additional traffic needed to service a one third or more increase in gravel truck traffic along the Placitas frontage road. An NMDOT [New Mexico Department of Transportation] recommendation for traffic management therefore needs to be included in the DRMP. Traffic management for significantly more gravel trucks cannot be postponed until the BLM Travel Management Plan is funded, prepared, and published for comments sometime in the future."</p>	<p>Draft RMP/EIS Section 4.2.6.1.1, Health and Safety, Direct and Indirect Impacts, Mineral Resources Decisions, discloses that mineral development would increase the instances of transportation. Owners of transportation (e.g., trucking) companies are responsible for understanding and abiding by all applicable transportation laws and regulations. Also, Draft RMP/EIS Section 4.2.6.2 states "Mineral development, including uranium mine development, within the Planning Area would increase vehicular traffic. City and county use plans for surrounding communities could have cumulative effects, whereby mineral resources are in development adjacent to BLM lands. State lands, including the SLO, that are surrounded by BLM lands could have impacts from inholding development."</p> <p>Also, the land use plan makes land use management allocations only and does not permit any specific projects. All project proposals, such as those for mining, are discretionary actions that require application, analyses, and federal approval. Current traffic modules and highway interchanges would be analyzed in site specific analyses along with alternative routes for traffic related to mining activity.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
94	6	Recreation	<p>"All of the San Juan Basin Badlands ERMA[Extensive Recreation Management Area], including the 3 Oh My God (OMG) raceway zones, should be closed to motorized traffic except for major access roads and for authorized uses (such as ranchers with grazing permits, once yearly motorcycle races on one of the OMGs, or a permit to cut wood in an official woodcutting area). Primitive roads should be blocked off and rehabilitated to prevent vehicle access for illegal woodcutting or incursions by recreational off road vehicles.</p> <p>The BLM should monitor the OMG raceway use carefully to detect environmental damage and restore degraded areas. Though each one is only used every 3 years, large numbers of fast moving motorcycles can easily cause serious erosion, soil compaction, and breakdown of trail edges on the steep slopes of the OMG trails, causing a severe impact on the unique flora, cryptogamic soils and scatterings of petrified wood on these "sky island" badlands and serious disturbance to wildlife habitat. If degradation increases, the BLM should seriously consider moving the OMG raceways to another location where the soils and vegetation are less fragile."</p>	<p>The Draft RMP/EIS presents general travel management prescriptions for the various zones in the San Juan Basin Badlands ERMA. These prescriptions are found in Draft RMP/EIS Table 2.24. In the Proposed RMP/Final EIS, <a href="#">Alternative E (the Proposed RMP) would designate motorized travel routes (see Proposed RMP/Final EIS Appendix P, Section P.10.1, San Juan Basin Badlands ERMA (All RMZs) Allowable Use Decisions- Alternative E-C</a> (Proposed RMP) management for travel would be as follows (per Proposed RMP/Final EIS Appendix P, Section P.10.2):</p> <ul style="list-style-type: none"> <li>• Torreon Fossil Fauna East and West Zones—In the Proposed RMP (Alternative <a href="#">EC</a>), this area would be managed <a href="#">as a zone in the ERMA</a> and as an ACEC (<del>not as a zone in the ERMA</del>); travel would be limited to <a href="#">the single access route only existing primitive roads and trails</a> (Proposed RMP/Final EIS Table 2-35 and Appendix P, Section P.10.2).</li> <li>• Oh-My-God Zones A–C—The Oh-My-God zones were revised in the Proposed RMP/Final EIS to be the Endurance Trails SRMA.—The SRMA would be limited to permitted events only, and new trails would be <del>7</del> considered on a case-by-case basis (Proposed RMP/Final EIS Appendix P, Section P.8.2).</li> <li>• Ceja Pelon Zone—Motorized travel would be allowed on the access route only. <del>Construction of new roads would be considered on a case-by-case basis for permitted special event activities.</del></li> <li>• Chijuilla Zone—Motorized travel would be limited to existing primitive roads and trails. <del>Construction of new roads would be considered on a case-by-case basis for permitted special event activities.</del></li> </ul> <p>The BLM has permitted the Oh-My-God race for well over a decade. The race sponsors have been compliant with all applicable permit stipulations during that time. The BLM is diligent in monitoring before, during, and after each permitted event. The objective of moving the race yearly between three different sites achieves the BLM's goal of minimizing the impact on the permitted area.</p>
95	26	Recreation	<p>"NMOHVA [New Mexico OHV Alliance] supports the "open" designation of the Cimarron Mesa zone as an interim measure until identification and development can establish an appropriate designated trail system. The identification and development of a designated route system must necessarily include extensive input and collaboration with the motorized recreation community, specifically organized groups that have expressed an interest in such a trail system. Given that a route designation process was scheduled to occur by 1987 in the existing RMP and that it has not yet occurred 25 years later, we strongly support the initial "open designation" on Cimarron Mesa until a designated system can be established. NMOHVA reiterates its willingness to work with the Rio Puerco Field Office to identify and develop a high quality trail system that would meet the needs of 4WD, ATV/UTV, and off road motorcycle (single track) enthusiasts. Add a description and timeline for the development of a sustainable, high quality motorized trail system at Cimarron Mesa. Collaborate with NMOHVA and other interested organized groups and users to identify and develop the trail system."</p>	<p>The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of each area. The route designation for Cimarron Mesa and the rest of the RPFO would be determined, with public involvement, within this time frame. More specifically, in regard to Cimarron Mesa, the BLM would ensure that all possible interested parties are contacted to participate with route designations.</p>
154	9	Recreation	<p>"Parcels A, B, and C are all within a mile or two of residential areas, and it is time the BLM recognize that these areas need to now be modeled like modern outdoor recreational areas that are safe for the public, visitors and wildlife, rather than the multi-use conventions managed for the majority of BLM land."</p>	<p>The BLM-administered lands near Placitas are open for public dispersed recreation and other uses. Part of the BLM's mission, in accordance with NEPA (42 USC 4321 et seq.), is to consider management options for the planning areas that may be reasonable, based on the resources of that area. NEPA regulations adopted by the Council of Environmental Quality, which are binding of federal agencies such as the BLM, require agencies to "rigorously explore and objectively evaluate all reasonable alternatives" (40 CFR 1502.14(a)). In addition, FLPMA requires BLM to manage for multiple use. In the case of the Placitas area, based on the resources inventoried, multiple use continues to be a prudent and viable management strategy, which, as mentioned above, includes dispersed recreation.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
205	1	Recreation	<p>"I firmly believe that meaningful and holistic protection of each of the San Juan Basin Badlands would bring additional tourism resources over the long-term. This is exemplified by the fact that I have made numerous trips to the area because of one UNM field trip a few years ago. I had no idea that such unique areas existed, and I had the urge to explore more often. I had driven through Cuba many times in the past, but more recently I have stopped in Cuba and made it sort of a base for my many recent trips to the badlands. I know many people have similar experiences, and the word is spreading. However, I fear that failure to protect these areas will discourage future visitation."</p>	<p>The BLM must identify potential WSAs for size (roadless areas of at least 5,000 acres or of a manageable size, and roadless islands), naturalness (generally appears to have been affected primarily by the forces of nature), and opportunities (provides outstanding opportunities for solitude or primitive and unconfined types of recreation). The San Juan Basin Badlands does not meet these criteria, as defined for such designations, based on the current management plan (1986 RMP, as amended) and uses. <a href="#">The SMA designation for the Torreon Fossil Fauna within the San Juan Basin Badlands ERMA of 2,891 acres in the 1986 RMP, as amended, is proposed under Alternative E (the Proposed RMP) as the Torreon Fossil Fauna ACEC (5,900 acres).</a></p>
164	10	Recreation	<p>"[From ATT 1] Economy/Tourism: It is no coincidence that Economy and Ecology both begin with the Greek word ""eco"" for ""house."" A healthy economy and ecology are by no means mutually exclusive. Quite the contrary, when adopting a realistic, long-term view, a sustainable economy in the end must be based on a healthy ecology. Five well-protected recreation areas west of Cuba, if promoted and managed properly, with their weird, colorful rock forms, inspiring trees, amazing petrified wood caches, and genuine high desert solitude could bring significant tourist dollars into the area from nearby population centers like Albuquerque and Rio Rancho, and also from diverse travelers along US Highway 550 from the rest of the state, country and even world. Tourism is one of NM's most important economic activities. Cuba has ample recreational potential, with its mountains and badlands, that should be developed to expand both the local and state economic base. Low-impact tourism, if managed properly, is far more sustainable than destructive practices like wood cutting, grazing, ORV and 4X4 usage of small ""2 track"" roads that penetrate some of these fragile areas. Several of these badlands are very accessible with fairly level hiking routes suitable for the whole family, while others offer long distance, off-trail scrambling and climbing challenges for experienced backcountry hikers. These areas could also draw many photographers and artists if properly promoted. Several other recreation projects underway in the Cuba area would benefit from a new SJBB-ERMA [San Juan Basin Badlands Extensive Recreation Management Area]. A recently completed section of the Continental Divide Trail runs by these 5 badlands with potential for side trails to some of the badlands. The recently developed Sandoval County Fair Grounds in Cuba is set up for RV and other camping. Plans are afoot to use the Fair Grounds to begin promoting Cuba as a tourist destination. There is also a new trail from the west side of town up to Santa Fe National Forest atop highly scenic Mesa De Cuba."</p>	<p>Coinciding with several of the points in this comment, the BLM proposes the San Juan Basin Badlands ERMA. Specific travel management and management plans will follow the Proposed RMP/Final EIS. In the travel management plan, the BLM will consider the protection needs and user needs associated with the various zones in the ERMA. Furthermore, specific management plans will be updated or written for the special designation in the ERMA. The BLM will consider all factors, regulatory requirements, and public input when it prepares the site-specific protection and travel plans.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
65	6	Recreation	<p>“Areas and Routes Closed to Motorized Use: BLM can and should make travel planning decisions in this RMP to protect specific resources, such as closing sensitive and specially designated areas to motorized use. We support BLM closing lands managed to protect wilderness characteristics to motorized travel and limiting travel to designated routes in areas managed to minimize impacts to wilderness characteristics. Draft RMP, p. 2-38-2-39. We also support BLM proposing OHV closures in the range of alternatives to provide for quiet, backcountry recreation experiences in recreation management areas and to protect sensitive natural and cultural resources in ACECs [Areas of Critical Environmental Concern]. Recommendations: BLM should adopt closures to motorized use to protect sensitive resources and support quiet recreation opportunities. Specifically, we recommend BLM evaluate and implement additional OHV closures or limitations in the following important areas:</p> <ol style="list-style-type: none"> <li>1. San Juan Badlands - Limit to major access roads and for authorized uses. Limit use of the Oh My God raceway routes to the three routes identified in the Draft RMP and limit to annual use on a rotating basis, with no new race routes to be created.</li> <li>2. Cimarron Mesa - Eliminate user-created routes and manage them to protect wilderness characteristics.</li> <li>3. Petaca Pinta ERMA [Extensive Recreation Management Area] – Additional routes around Cerro Verde that are not needed for access should be closed.”</li> </ol>	<p>The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of each area.</p> <p>San Juan Basin Badlands OHVs—The proposed San Juan Basin Badlands ERMA is composed of varying zones (Draft RMP/EIS Table 2.55; Proposed RMP/Final EIS Section 2.2.12.4 and Appendix P, Section P.10) that provide a diverse recreation experience. For each zone, a general travel management designation was prescribed to either protect or provide for the type of use the zone would be managed for.</p> <p>The Oh-My-God zones are well-established recreation sites that have been compliant for over a decade. Maintaining these recreation sites provides for those extensive recreation opportunities, while not intruding on the other conservation and recreation goals of the remainder of the San Juan Basin Badlands ERMA. In the Proposed RMP/Final EIS, this area would be managed as the Endurance Trails SRMA, per BLM policy (Handbook H-8320-1, Planning for Recreation and Visitor Services), which was issued in 2014 after the Draft EIS was published.</p> <p>Cimarron Mesa—A portion of Cimarron Mesa is specifically set aside for OHV use to provide for an OHV recreation user experience.</p> <p>Petaca Pinta ERMA—In accordance with Draft RMP/EIS Table 2.25, the motorized travel would be limited to designated primitive roads and trails. The BLM would manage the Cerro Verde zone as described in the Draft RMP/EIS ACEC section. The Draft RMP/EIS ACEC section Table 2.41 travel for the Cerro Verde would be limited to authorized use.</p>
243	9	Recreation	<p>“There is no place for ORV usage in the ERMA [San Juan Basin Badlands Extensive Recreation Management Area]. This is a very unique place in many ways: geologically, paleontologically and ecologically. The benefits to wildlife and the scenic and long term recreation benefits to business and quality of life are far too valuable to destroy by ORV usage. Again stop all ORV use.</p> <p>““2.2.18.3 Management Common to All Alternatives- from Vol 1, p 2 -129,131 The following management prescriptions would be in place as interim management until the Travel Management Plan (TMP) is complete: Where OHVs are causing or would cause considerable adverse effects on soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, Wilderness suitability, other authorized uses, or other resources, the BLM would immediately close the affected areas to the type(s) of vehicle causing the adverse effect until the adverse effects are eliminated and measures implemented to prevent recurrence.</p> <p>Designation for OHV use would consider the long-term sustainability of resources such as wildlife habitat, cultural resource values, Wilderness values, watersheds, visual quality, recreational values, and other resource uses.”</p>	<p>The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of each area.</p>
90	33	Recreation	<p>“It is nearly impossible to assess alternatives without even the barest draft Travel Management Plan. This lack of ability to assess the travel and trails, and off-highway vehicle use impacts of these alternatives is particularly notable since the BLM specifically states that ““the public scoping comments reflect the most interest and concern in off-highway vehicle (OHV) use”“.” It is wholly inadequate then, to ignore this raised concern by depriving the public of a draft Travel Management Plan that would assist the public in its evaluation of alternatives, for this most important aspect. It seems logical and reasonable to develop a draft Travel Management Plan for public review as part of the DRMP/DEIS process, prior to development and issuance of the Proposed RMP and Final EIS.”</p>	<p>In accordance with the BLM Planning Handbook, the BLM RPFO BLM has opted to defer the travel management plan due to incomplete data, complexity, and controversy. A travel management plan is expected to be completed within 5 years of signing the Record of Decision. General travel prescriptions are included in almost every resource category. For example, every special designation contains a management prescription for travel. These general travel management prescriptions set the overall guidance for the development of the travel plan, which will begin soon after the Record of Decision is signed.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
145	2	Recreation	<p>"The Management Common to All Alternatives contains unduly restrictive language governing the use of OHV's. In 2.2.18.3, the Management Common to All Alternatives section, the Agency states:</p> <p>"Where OHVs are causing or would cause considerable adverse effects on soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, Wilderness suitability, other authorized uses, or other resources, the BLM would immediately close the affected areas to the type(s) of vehicle causing the adverse effect until the adverse effects are eliminated and measures implemented to prevent recurrence."</p> <p>We suggest that a much more reasonable and achievable statement would conclude "...until the adverse effects are satisfactorily mitigated and suitable measures implemented to prevent reoccurrence." The proposed statement could (and will be) used by certain special interest groups to permanently remove all OHV use for any adverse effect. We assume that is not the intention as it would violate the BLM's multiple use mandate. The same section also states:</p> <p>"The BLM would consider existing routes open to vehicle travel unless indicated as closed on the ground by signs, barricades, or other physical structures or topography those appropriately direct users." A more NEPA-compliant and defensible statement would be, "the BLM would consider existing routes open to vehicle travel unless closed by a duly authorized closure order and indicated as closed on the ground by signs, barricades, or other physical structures or topography to appropriately inform and direct users."</p>	<p>The BLM added to the text in Travel Management, Management Common to All, "Where OHVs are causing or would cause considerable adverse effects on soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, wilderness suitability, other authorized uses, or other resources, the BLM would immediately close the affected areas to the type(s) of vehicle causing the adverse effect until they are satisfactorily mitigated and suitable measures are implemented to prevent recurrence."</p> <p>In response to this comment, the BLM changed the bullet to read, "Where OHVs are causing or would cause considerable adverse effects on soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, Wilderness suitability, other authorized uses, or other resources, the BLM would immediately close the affected areas to the type(s) of vehicle causing the adverse effect until they are satisfactorily mitigated and suitable measures are implemented to prevent recurrence."</p> <p>Bullet number 10 in Draft RMP/EIS Section 2.2.18.3 was deleted in the Proposed RMP/Final EIS.</p>
91	49	Recreation	<p>"2.2.12.4.4.1 - San Juan Basin Badlands ERMA [Extensive Recreation Management Areas] Objective Statement, R&amp;VS [Recreation and Visitor Services], Implementation Decision - ORV use is another problem. Under the BLM charter they cannot be banned. But changing other guidelines in the Conservation and Monument charters should be examined to address this very important issue. Recommend that OHV vehicle sizes and types, driving restrictions, noise levels and trash to be included in the 2015 RMP be as stringent as possible."</p>	<p>Based on the need to protect resources, off-road vehicles can be restricted. These restrictions can include limiting their use to specific sites or roads or prohibited in "closed" areas, such as units of the National Wilderness Preservation System. The travel and transportation management plan is to be completed within 5 years of the Approved RMP and will address the issues of OHVs more specifically. Additionally, pursuant to FLPMA, the BLM manages public lands with the goal of multiple use and sustained yield.</p>
160	8	Recreation	<p>"The Agency states that an assessment for paleontological resources would be required for OHV open areas:</p> <p>"The BLM would complete/require assessment and mitigation for paleontological resources for proposed actions, including but not limited to: land disposal actions, surface-disturbing activities, and OHV open areas.</p> <p>Actions may include inventories, monitoring, or data recovery." [Footnote 1: RMP/EIS p. 2-54] The BLM does not specify how this will be accomplished or when it will be completed. "Open-ended" plans for enabling assessments are troubling, as any agency failure to accomplish the planned and/or required activities due to resource constraints or reprioritization can leave the motorized recreation community unable to utilize the resources as provided for in the DEIS. RESOLUTION OF COMMENT #1: Provide a specific timetable for the completion of the paleontological resource assessment lest the lack of Agency follow-through is used to effectively deprive the public of an identified recreational resource (an OHV open area). Provide a specific recourse for the public if lack of resources or other issues within the Agency do not allow the Agency to complete required assessments in a timely manner."</p>	<p>In accordance with Draft RMP/EIS Section 2.2.18.3.1, Travel Management Planning, "The BLM would prioritize selection of future activity-level travel planning areas based on: 1) the degree of conflicts with other resources/uses; 2) the proximity of areas to population centers and residential areas; 3) special management areas and special designations; and 4) areas and associated boundaries where private and other federal lands are contiguous to public lands." These are the factors that will determine how the activity level planning will be prioritized.</p> <p>Furthermore, until a specific management decision on travel planning is made by specific resource or special designation, Draft RMP/EIS Section 2.2.18.3, Management Common to All Alternatives, states " Unless otherwise restricted by management actions identified by specific resource or special designation, motorized travel in OHV areas designated as 'limited' would be restricted to existing roads, primitive roads, and trails (note that the combination of roads, primitive roads, and trails are referred to as 'routes')." This ensures that an interim management plan for OHVs is in place until activity-level transportation planning is completed.</p>
173	6	Recreation	<p>"2-184, -191. Alt. B's 24% of special-status-species habitat closure to motorized travel is much preferable to C's 17%. Protection from ORVs is as important as protection from mineral extraction. We do not complain about C's overall acreage assignments for limited and closed areas, but ORVs should be locked out of potential wilderness fawning/calving areas, specialstatus- species habitat, and riparian areas, except for needed access routes."</p>	<p>Specific timing limitations are assigned to areas that the BLM intends to limit during critical calving times for wildlife protection. The various alternatives cover the ranges, from a high conservation level to high-end use. The Draft RMP/EIS Alternative C (the <a href="#">Preferred Proposed Alternative RMP</a>) and <a href="#">Proposed RMP/Final EIS Alternative E (the Proposed RMP)</a> <del>were</del> <u>was</u> designed with a balanced approach, which considers all resource conflicts and uses.</p>



R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
160	1	Recreation	<p>“Our [Hawks Aloft, inc] management request for the San Ysidro ERMA [Extensive Recreation Management Area] Vol 1, p 2-70 : Alternative B, Table 2.27, Vol 1, p. 2-70: Restrict motorized travel to the access. -OR- worst-case scenario, Alternative C, Table 2.27, Vol 1, p. 2-70: Restrict motorized travel to the access roads and limited play areas. Significant efforts to reduce off-trail damage to known riparian areas should be made to protect special-status species including Southwestern Willow Flycatcher habitat if Alternative C is selected.”</p>	<p>The San Ysidro ERMA (2,500 acres) would <del>not</del> be designated under the Proposed RMP (Alternative <del>C</del>; Proposed RMP/Final EIS Appendix P, Table P-1). The San Ysidro Trials Area would be designated as an SRMA (Proposed RMP/Final EIS Appendix P, Table P-1 and Section P.1.1). Under Alternatives <del>C and D, and E</del>, motorized travel would be limited to the access road, except for the continued authorized use of designated play areas and event areas, and mechanized travel would be allowed on designated roads and trails. The gates into the area would remain locked, and the key would be available at the BLM RPFO (Proposed RMP/Final EIS Appendix P, Section P.1.1.2).</p>
58	34	Recreation	<p>The other obvious point is that Travel Management does not include just OHV use. The preponderance of travel considered by a typical Travel Management decision is access. Access by hunters, land managers, hikers, grazing allottees, horseback riders, mountain bikers, etc. Yet, in almost every single one of the assessments on a resource type/area, the travel management decision statement is either limited to one concerning OHV use or OHV use is especially singled out even after the general statements are made. Provide fair and unbiased “coverage” of OHV use and its potential impacts as a subset of the larger recreation segment and as an even smaller piece of the much larger transportation sector, or as the even more minor bit of the overall multiple-use panoply.</p>	<p>In accordance with 43 CFR 8342.1, the BLM is required to have OHV area designations. In accordance with the regulations, these areas must be designated as open, limited, or closed to motorized activities. Such areas are defined in 43 CFR 8340.0-5, (f), (g), and (h) respectively. Furthermore in accordance with BLM Manual 1626 (Travel and Transportation Management) “Technological advances in OHVs and the volume of motorized recreation on public lands have required a shift in policy where the designation or retention of large areas open to unregulated cross-county travel is no longer a viable management strategy.” While the Draft RMP/EIS defines travel areas based on the three categories, only the closed classification restricts motorized vehicles. The limited category may not necessarily close areas to OHV use in all cases, but it may limit OHV use to designated roads and trails, depending on the resource conflicts within the area. The travel management planning would consider all users and resources protection issues as it is developed. The BLM would take all public input into consideration during the travel management planning process.</p>
150	2	Recreation	<p>“We specifically requested the agency consider the development of a “rock crawling” area in the scoping comments. We specifically identified the San Ysidro Trials Area Zone as an ideal candidate area. The DEIS continues to identify the existing area as limited to trials motorcycles as the only allowed motorized use.</p> <p>We appreciate and support the concept of the OHV “open” area (Cimarron Mesa) identified in the preferred alternative. We also strongly support the continuation of the BLM and the New Mexico Trials Association (NMTA) long history of a very fruitful Memorandum of Understanding. That being said, our scoping comments outlined why the western portion of the San Ysidro Trials Area (unused at this time by any motorized use including trials motorcycles) is an ideal rock crawling venue. Yet, none the alternatives identified [Footnote 3: DEIS, page 2-70] by the Agency include any consideration for 4WD use in that zone. The DEIS does not provide any rationale as to why the proposal was rejected or offer any evidence that would support limiting motorized use to just the eastern half of the zone.</p> <p>Yes, the establishment of rock crawling/4WD access would be an enhancement over the No-Action alternative. But the DEIS makes it clear that motorized recreation is a rapidly growing segment of public use: ““The expanding population of the Planning Area over the last 25 years has resulted in competition for public land resources, as was evident during the internal and external scoping process. This competition, along with emerging issues and changing circumstances, resulted in the need to revise the existing plan.”” [Footnote 4: DEIS, page 1-8]</p> <p>““Albuquerque and Santa Fe, the largest population areas in New Mexico, are located within the Planning Area. The population growths of these two cities are expected to continue. The vast majority of this population use the public lands for their recreation purposes.”” [Footnote 5: DEIS, page 3-61]</p> <p>In fact, motorized recreation is one of the fastest growing segments of the recreation industry: ““Between the time of the NSRE conducted in 1994-1995 and the NSRE done in the fall of 1999 and summer 2000, there was a 32-percent increase in number of OHV operators participating in the activity. This represented growth from about 27.3 million OHV users in 1994-1995 to about 37.6 million in 1999-2000 (Cordell et al. 2004, p. 71). Growth continued from 1999-2000 to the 10 most recent NSRE [National Survey on Recreation and the Environment] interviewing period, the fall of 2007. Added were about 3 million OHV users.”” [Footnote 6: Off-Highway Vehicle Recreation in the United States and its Regions and States: An Update National Report from the National Survey on Recreation and the Environment (NSRE), page 9]</p> <p>This trend is especially strong in the West, where New Mexico has the 7th highest rate of participation in the US at 27.2%. [Footnote 7: Off-Highway Vehicle Recreation in the United States and its Regions and States: An Update National Report from the National Survey on Recreation and the Environment (NSRE), page 21.] In the meantime, the population of the planning area has experienced rapid growth:</p> <p>““Most of this growth occurred in Sandoval County, which increased by 648% or 114,684 persons; more than 10% of the total statewide increase. Population growth in Bernalillo, McKinley, and Torrance counties also increased by 109%, 65%, and 196%, respectively, over this period. The aggregate total of Cibola and Valencia counties increased by 211% over this period (63,267 persons)”” [Footnote 8: DEIS, page 3-74]</p>	<p>The travel management planning process would analyze existing routes and new routes if necessary. It is projected to be completed within 5 years of the Approved RMP/Record of Decision. The San Ysidro Trials Area is a dedicated area, set aside for trials motorcycles; it has been surveyed for cultural resources and cleared for such use. The areas that remain open for OHV use in the field office do not necessarily restrict the type of use, but it may restrict the areas of use. Specific OHV events, such as rock crawling, in the open areas would require site-specific NEPA analyses in order to permit the event. This process was essentially the same one that current ongoing events are required to comply with. Any additional and new events would have to follow the same process, based on the BLM’s special recreation permits (SRP).</p> <p>Special recreation permits (SRPs) are authorizations that allow specified recreation uses of BLM-administered lands and related waters. They are issued as a means to manage visitor use, protect natural and cultural resources, and provide a mechanism to accommodate commercial recreational uses. Authorized by the Land and Water Conservation Fund Act, there are five types of uses for which these permits are required: commercial, competitive, vending, individual or group use in special areas, and organized group activity and event use.</p> <p><b>1. Commercial Use</b>—This is defined as recreational use of BLM-administered lands and related waters for business or financial gain. When any person, group, or organization makes or attempts to make a profit, receive money, amortize equipment, or obtain goods or services as compensation from participants in recreation on BLM-administered lands, the use is considered commercial. Examples include: Outfitters and guides, jeep tours, horse trail and wagon train rides, cattle drives, and photography associated with recreation.</p> <p><b>2. Competitive Use</b>—This means any organized, sanctioned, or structured use, event, or activity on BLM-administered land in which two or more contestants compete and either (1) participants register, enter, or complete an application for the event or (2) a predetermined course or area is designated. Examples include: OHV races, horse endurance rides, mountain bike races, and rodeos.</p> <p><b>3. Vending</b>—Vendor permits are temporary, short-term, non-exclusive, revocable authorizations to sell goods or services on BLM-administered lands in conjunction with a</p>

Letter Number	Comment Number	Category	Comment Text	Response
			<p>The combination of rapidly increasing population in the planning area [Footnote 9: DESI, page 3-74] and rapid growth in OHV use means that OHV users are dramatically underserved: ““As the population in the area continues to increase, the demand for recreational uses of public land and visitor services has also increased. The public has expressed interest in using several RPFO [Rio Puerco Field Office] areas for hiking, camping and off-highway vehicle (OHV) use””. [Footnote 10: Scoping Report, 2.2.3.1]</p> <p>““Around the state of New Mexico, recreation is viewed as critical for youth development and playing an important role in providing youth with positive outlets for energy as well as instilling an environmental ethic at an early age””. [Footnote 11: DEIS, page 3-61]</p> <p>The newly identified ““open”” area at Cimarron Mesa is a long overdue start to a viable solution. However, the Cimarron Mesa area is severely hindered by long and difficult access and will be for the foreseeable future. Other suitable areas, like the San Ysidro Trials zone, offer a reasonable response to match the recreating public’s need with sustainable and quality motorized recreation opportunities.</p> <p>Consider the San Ysidro Trials Area and other accessible areas for the identification and development of additional trails systems and motorized-recreation focused ERMA/SMA [Extensive Recreation Management Areas/Special Management Areas]. Provide evidence and rationale to support the rejection of areas formally proposed by the public.”</p>	<p>recreation activity. Examples include: T-shirt sales in conjunction with a raft race, a hot dog stand at a motocross event, firewood sales in a BLM-administered campground, and shuttle services.</p> <p><b>4. Special Area Use</b>—Special areas are officially designated by statute or by order of the Secretary of the Interior.</p> <p>Examples include: Camping in long-term visitor areas in California and Arizona, floating many BLM-managed rivers, backpacking in Grand Gulch Primitive Area, hiking in the Aravaipa Canyon Wilderness Area, and recreational mining in designated areas in California.</p> <p><b>5. Organized Group Activity and Event Use</b>—Organized group/event permits are for noncommercial and noncompetitive group activities and recreation events. Examples include: A large scout camp-out, a fraternity activity, a large family reunion, or a dual sport event.</p> <p>The objectives of the BLM recreation permitting system are to satisfy recreation demand within allowable use levels in an equitable, safe, and enjoyable manner, while minimizing adverse resource impacts and user conflicts. In issuing recreation permits to users of BLM-administered lands, the BLM authorizes permittees to use the lands or related waters for permitted purposes. This represents a privilege to use BLM-administered lands or related waters, which is subject to the terms and conditions of the permits.</p> <p>Recreation permits are managed in a manner that is consistent with management objectives determined in resource management plans, recreation area management plans, or in their absence, through recreation management objectives resulting from analysis of resources and visitor use for each area.</p>

INTERNAL DRAFT

Letter Number	Comment Number	Category	Comment Text	Response
160	17	Recreation	<p>“Per the DEIS, the Herrera ERMA [Extensive Recreation Management Area] is established to focus on OHV use and contains no management decisions to support OHV use.</p> <p>The Agency states the objective of the Herrera ERMA: “Management of the Herrera ERMA would focus on off-highway vehicle (dune buggy) use, and paleontological interpretation and study.” [Footnote 12: DEIS, page 2-71]</p> <p>Yet the Management Decisions documented in Table 2.28 don't include any OHV use in the Bony Canyon ACEC [Area of Critical Environmental Concern] Zone and OHV use is limited to existing roads and trails in the other two zones. We fail to see how this can be considered a “focus” on OHV use.</p> <p>It is also unclear what is meant by “dune buggy events” in the R&amp;VS [Recreation and Visitor Services] (an acronym that is itself not listed in the provided “Acronyms and Abbreviations List”). The DEIS states that the Agency is going to “stipulate permitting requirements” for dune buggy events. This statement means absolutely nothing. The Agency could merely “stipulate” that there can be no events and meet the R&amp;VS.</p> <p>Document management decisions for the Herrera ERMA that identify, develop, encourage, support, and sustain (i.e., “focus”) on OHV use. Use current/up-to-date terminology to describe OHV recreation niches. Develop R&amp;VS that are clear, concise, and don't leave the public guessing (or Agency personnel mis-interpreting) the intent of the management prescriptions.”</p>	<p>Under Alternative <del>CE</del>, the <del>proposed alternative</del> Proposed RPM, the BLM would <del>not</del> designate the Herrera ERMA (18,400 acres); however, the BLM did consider it under Alternatives B, C, and D-. The dune buggy area would still exist, but it would be limited to existing routes. Applications for permits for dune buggy use would be evaluated by the BLM on a case-by-case basis.</p> <p>The specific designations of routes and trails dedicated to OHV use in the Herrera area will be a function of the travel management planning process, which is to be completed within 5 years of the Approved RMP/Record of Decision being signed. In accordance with Manual 1626 (Travel and Transportation Manual), open areas for OHV or opportunities will be limited to a size that can be effectively managed and geographically identifiable. The site-specific analyses would have to be conducted for specific events. This is true for all allowable uses, as described in the management prescriptions. For example, an area that is designated open for salable material extraction, sand and gravel, does not allow open mining without site-specific analyses and permits. An interested party must submit an application and further analyze the impact on the human environment and be permitted. Similarly, while areas are open for livestock grazing, the same process would apply. Such would be the case with specific events or activities in all areas. The Draft RMP/EIS sets general management prescriptions for use of the inventoried resources of all types, recreation being one; however, all activities must be accomplished with the primary goals mandated by FLPMA, as follow:</p> <p><b>The Federal Land Policy and Management Act (FLPMA)</b>—FLPMA is the organic act that provides overall legislative direction to the BLM for all its management activities and responsibilities. Specific sections that pertain to BLM's travel and transportation responsibilities include:</p> <ul style="list-style-type: none"> <li>• 43 U.S.C. §§1701 (a)(8) (§102(a)(8)): “the public lands be managed in a manner that will protect the quality of scientific, scenic, historical ecological, environmental, air and atmospheric, water resource, and archeological values; that, where appropriate will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic animals; and that will provide for outdoor recreation and human occupancy and use.”</li> <li>• 43 USC U.S.C. §§1701 (a) (h): “The term 'sustained yield' means the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources of the public lands consistent with multiple use.”</li> <li>• 43 USC U.S.C. §§1732 (a): “The Secretary shall manage the public lands under the principles of multiple use and sustained yield, in accordance with the land use plans developed by him under §1712 of this title when they are available, except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law.</li> </ul>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
160	6	Recreation	<p>“San Juan Basin Badlands ERMA [Extensive Recreation Management Area]:</p> <p>I have grave concern about the location of Oh My God (OMG) raceway zones in the vicinity of fragile Mesa de Cuba, Mesa Chijuilla, Mesa Penastaja, Ceja Pelon, and Cejita Blanca badland areas. I am particularly concerned about proposed OMG A that conflicts with the CDNST SRMA [Continental Divide National Scenic Trail, Special Recreation Management Area] Alternative B that designates lands adjacent to southwest Mesa de Cuba. It is my opinion that OMG A should be eliminated or, as a poor second choice, replaced by a narrow corridor positioned well away from Mesa de Cuba and Mesa Chijuilla.</p> <p>Most severe threats to the entire San Juan Badlands ERMA include motor vehicle intrusion and destruction, fuel wood cutting, petrified wood collecting, and campfires. Ideally they would all be eliminated from the ERMA, but at a very minimum these activities need to be carefully restricted, monitored and controlled.”</p>	<p>The Continental Divide National Scenic Trail does not go near the Mesa de Cuba, Mesa Chijuilla, Mesa Penastaja, Ceja Pelon, and Cejita Blanca badland areas.</p> <p>The BLM agrees that, in the San Juan Basin Badlands ERMA, petrified wood resources are unique. Prohibiting petrified wood collection in portions of the San Juan Basin Badlands ERMA was analyzed in Alternatives B and C of the Draft RMP/EIS and the Proposed RMP/Final EIS.</p> <p>The specific designations of routes and trails dedicated to OHV use in the Herrera ERMA will be a function of the travel management planning process. In accordance with Manual 1626 (Travel and Transportation Manual), open areas for OHV use or opportunities will be limited to a size that can be effectively managed and geographically identifiable. The Oh-My-God Trials event has received extensive analyses and has been managed for well over a decade. The three sites were designated to prevent undue stress in any one area by cycling the event annually among the three sites. The BLM designed these prescriptions by taking into consideration all potential impacts and past experience with the event and its participants. Over that decade the BLM has had no violations of the permitted conditions for the event, and the impacts have been significantly reduced by cycling it among the three proposed sites.</p> <p>The BLM took in consideration the protection of the petrified wood resources in one of the alternatives in the Draft RMP/EIS. While the RMP can generally prohibit an action, such as illegal woodcutting and petrified wood collecting, the enforcement of that prohibition by law enforcement officers is outside the scope of the RMP.</p>
160	7	Recreation	<p>We [Uwe and Karen Schroeter] request that the Ceja Pelon Zone is extended north to include the northern portions of Ceja Pelon and Penistaja Mesas and that OMG [Oh-My-God] A Zone is relocated to the west to avoid both Mesa Chijuilla and Mesa de Cuba Badlands (see Vol. 1, P. 2-62). We see a potentially positive outcome from trying to co-exist with occasional, highly supervised ORV use, if the participants in turn respect our rights to protect these exceptionally fragile badlands areas within the ERMA [Extensive Recreation Management Area] from the well-documented severe damage ORV races cause. Ideally OMG A should be abolished entirely.</p>	<p>The proposed San Juan Basin Badlands ERMA is composed of varying zones (Draft RMP/EIS Table 2.55; Proposed RMP/Final EIS Section 2.2.12.4 and Appendix P, Section P.10) that provide a diverse recreation experience. For each zone, a general travel management designation was prescribed to either protect or provide for the type of use the zone would be managed for. For example, in the Torreon Fossil Fauna (both East and West) in Alternative C (Proposed RMP), motorized travel would be limited to the single access routes only. This is to ensure protection of the fossil and petrified wood resources. In the Oh-My-God Zones A, B, and C (which, in Alternative C [the Proposed RMP], would be managed as the Endurance Trails SRMA instead of a recreational management zone under the San Juan Basin Badlands ERMA in the Proposed RMP/Final EIS), the BLM would continue to permit the event trails, with new trails authorized on a case-by-case basis. The impacts of the event would be limited to the approved routes within the SRMA.</p> <p>The Oh-My-God zones are well-established recreation sites that have been compliant for over a decade. Maintaining these recreation sites provides for those recreation opportunities, while not intruding on the other conservation and recreation goals of the other portions of the San Juan Basin Badlands.</p> <p>The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPPFO, will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of each area.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
181	3	Recreation	The area at the end of Southern, in Rio Rancho, should become a permanent BLM OHV park. National OHV races have been held in this area, with BLM and New Mexico State Lands permission. So, this area needs to be official in an OHV designation.	The area in Rio Rancho at the end of Southern is not BLM-administered lands; rather it is private land. The BLM does not manage any lands in the metro area or closely surrounding Rio Rancho, Bernalillo, or Albuquerque. The closest BLM-administered lands near any metro area is Placitas. The BLM has not permitted such events in this area because it is private land.
182	4	Recreation	<p>"We [The Wilderness Society et al.] fully support this management alternative [Alternative B's Focus on non-motorized, dispersed recreation for the Petaca Pinta Extensive Recreation Management Area (ERMA)], yet take issue with BLM over several provisions outlined under Alternative C and Alternative D.</p> <p>Alternative C and Alternative D propose to manage the entire 18,269 acres of the Cimarron Mesa Zone for open OHV use. These management practices would have adverse consequences on Cimarron Mesa, and could pose severe impacts on the overall Petaca Pinta ERMA. BLM found that 7,329 acres of Cimarron Mesa possesses wilderness characteristics, stating that the area offers "outstanding opportunities for hiking, hunting and other forms of primitive recreation" (Section 3.9.2 [of the draft RMP/EIS]). Generally, actions that create surface disturbance impact the natural character of lands with wilderness characteristics and the setting for experiences of solitude and primitive recreational activities. Motorized uses in this area will detract from opportunities for both solitude and primitive forms of recreation."</p>	<p><del>The Petaca Pinta ERMA is not proposed for designation under the Proposed RMP (Alternative E; Proposed RMP/Final EIS Appendix P, Table P-1); however, the BLM considered the OHV Limited Area in the Petaca Pinta ERMA under Alternatives B, C (the Proposed RMP), and D.</del></p> <p><del>The Draft RMP/EIS included the Cimarron Mesa zone in the Petaca Pinta ERMA (in Alternatives B, C, and D). However, according to BLM policy (Handbook H-8320-1, Planning for Recreation and Visitor Services) that was issued in 2014 after the Draft RMP/EIS was published, this zone was changed to an SRMA (the Cimarron Mesa SRMA) in Proposed RMP/Final EIS (Alternatives B, C, and D) according to clarifying definitions for SRMAs. The management prescriptions of the ERMA zone in the Draft RMP/EIS and the SRMA in the Proposed RMP/Final EIS are the same. Alternative B analyze managing the 7,300 acres with wilderness characteristics as closed to motorized and mechanized travel, and the remainder of the SRMA as limited to existing primitive roads and trails. Alternatives C (the Proposed RMP) and D analyze the 7,300 acres with wilderness characteristics as open to cross-country OHV use.</del></p>
209	3	Recreation	2-84. Motorbikes on Continental Divide Trail? Do other land managers allow that? Seems bad.	Rules along the Continental Divide National Scenic Trail for each agency vary. Generally, motorized travel is avoided but not completely excluded, and it is sometimes prohibited. There are times when the Continental Divide National Scenic Trail must cross a road or when it runs parallel to an existing road. In these areas, motorized travel is allowed if there are no other options. In certain segments of the Continental Divide National Scenic Trail, mountain bikes are allowed, just as equestrian use is allowed on certain segments. As stated in National Trails System Act— [16 USC 1246(c)]: "Other uses along the trail, which will not substantially interfere with the nature and purposes of the trail, may be permitted . . . [To] the extent practicable, efforts be made to avoid activities incompatible with the purposes for which such trails were established. The use of motorized vehicles by the general public along any national scenic trail shall be prohibited . . ." Some sections of the Continental Divide National Scenic Trail may go along or near established roads, but otherwise guidance instructs that the Continental Divide National Scenic Trail prohibit motorized vehicle use.
90	3	Recreation	The BLM should be proactive in considering the increase of non-vehicular recreational use of said lands [BLM lands around Placitas]. Hiking, biking, and equestrian trails should be incorporated into the RMP, particularly in a time when recreational use of BLM land is favorable. (The White Mesa bike trail is an excellent example of this).	While an initial road inventory has been completed for the entire RPFO, to include the Placitas parcel, specific designations for travel have not been analyzed or determined. Public input, along with management goals, will drive this process when it begins, soon after the final Record of Decision is signed.

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
58	12	Recreation	<p>“Dispersed camping: We appreciate that the Draft RMP prohibits camping within 150 feet of riparian areas in the planning area; however, the Draft RMP failed to provide any other details on dispersed camping - specifically where motorized and mechanized travel will be permitted off of designated routes. We recommend BLM allow visitors to disperse camp generally, but restrict motor vehicle travel for the purposes of dispersed camping according to a combination of the following options, as dictated by resource, safety, and private property concerns:</p> <p>(1) BLM visitors may park a motor vehicle within one vehicle length from the edge of the road surface when it is safe to do so and without causing damage to the resources of the public lands (campers walk to access a backcountry camp of their choosing); and/or</p> <p>(2) Motor vehicles may access signed campsites via designated camp spur routes that are signed and demarcated on a public access map.</p> <p>By way of example, we draw your attention to the Dry Creek Travel Management Plan (TMP), developed by the BLM’s Uncompahgre (Colorado) Field Office. We fully support the policy adopted in the Dry Creek TMP, and encourage the Rio Puerco RMP to put in place a similar policy for the full Rio Puerco Field Office. Notably, page 184 of the Dry Creek EA [Environmental Assessment] states:</p> <p>Off-Route Parking, Camping, and Game Retrieval Policy:</p> <p>““Due to higher levels of public use on the Public Lands and National Forests, BLM and Forest Service managers are concerned that the long-standing 300 foot regulation is outdated and no longer provides adequate protection of vegetation and other resources. One of the major concerns with the 300 foot regulation is that new routes are often created through repeated use, and these new routes in turn become the starting points for additional 300-foot long or longer extensions. As a result of these concerns, both the Forest Service and BLM are revising their regulations to decrease or eliminate the distance that motor vehicles can legally drive off routes to park, camp, and retrieve game.””</p> <p>The Dry Creek Record of Decision CO-150-2008-33 EA, Page 3, states: ““Parking In order to minimize resource impacts and help prevent new user-created routes, users are allowed to park motorized or mechanized modes of travel immediately adjacent and parallel to available designated routes for any purpose. Parking is limited to one vehicle-width from the edge of the route. Users are encouraged to park motorized or mechanized modes of travel in already disturbed areas whenever possible, consider safety, and keep routes passable for other users.</p> <p>Camping: Short spur routes leading to popular dispersed campsites are designated and identified. Dispersed camping is allowed in other areas, consistent with parking requirements described above.””</p> <p>Recommendations: We support the policy set out in the Dry Creek TMP and request that this or a similar policy be incorporated in the Rio Puerco RMP, and/or subsequent travel management planning. The long-standing 300 foot regulation for dispersed camping is simply excessive. At the very most, we could accept a specified distance for cross country travel on a limited subset of specifically designated routes that have the necessary characteristics (such as soil composition, topography, vegetation, and use levels) that can sustain such use. All other roads and areas should be limited to designated sites, spurs and delineated parking areas. The Rio Puerco RMP should also recognize and address dispersed camping impacts that are regularly found to be significant and lasting; the RMP should assess those impacts field office wide and take comparable steps to mitigate them and set policies that will help manage and preserve the access and sustainability of these opportunities for years and decades to come.”</p>	<p>Camping on BLM-administered lands away from developed recreation facilities is referred to as dispersed camping. These sites are widely dispersed and undeveloped and are generally not signed as campsites. The BLM’s overall policy (BLM Manual: H-8320-1— Planning for Recreation and Visitor Services) is to allow dispersed camping on all the lands it administers, with the following conditions and exceptions:</p> <ul style="list-style-type: none"> <li>• Dispersed camping is generally allowed on BLM-administered lands in New Mexico for no more than a period of 14 days within any period of 28 consecutive days. The 14-day limit may be reached either through a number of separate visits or through 14 days of continuous overnight occupation during the 28-day period. After this time period, you must relocate to another site at least 25 miles away. The purpose of this is to prevent damage to sensitive resources caused by continual use of any particular areas.</li> <li>• Camping is prohibited within 900 feet of any developed water source such as a guzzler or watering trough, so that the water is accessible to wildlife and livestock. Please do not park your vehicles near these waters or take any actions that would disturb wildlife or livestock from using these waters.</li> <li>• Campfires must be attended at all times. Campers must comply with all fire restrictions.</li> <li>• When using a motorized vehicle for camping access within a “Limited Use Area,” limit your parking and vehicle-based camping to no more than 300 feet from an established road.</li> <li>• Camping is permitted within all units of the National Wilderness Preservation System administered by the BLM in New Mexico. However, all motorized and mechanized vehicles and equipment are strictly prohibited in these areas.</li> <li>• Campers must not dispose of refuse, hazardous materials, sewage, or gray water, in any manner that would pollute the surrounding area. Please pack it out, and dispose of those materials properly.</li> <li>• Individual BLM Field Offices may have additional or supplemental special camping rules or guidelines. Please call the BLM Field Offices or visit BLM’s individual recreation websites for this information.</li> </ul> <p>Dispersed camping must not:</p> <ul style="list-style-type: none"> <li>• conflict with other authorized uses;</li> <li>• occur in areas that are posted as being “closed to camping;” or</li> <li>• in some way adversely affect wildlife species, livestock, or natural or cultural resources.</li> </ul> <p>Different BLM field offices manage their resources differently, based on site-specific conditions. The 150-foot camping restriction from riparian areas is to protect these rare isolated areas from excessive degradation.</p>
112	10	Recreation	<p>We [The Wilderness Society et al.] support use of ERMA’s [Extensive Recreation Management Areas] and SRMA’s [Special Recreation Management Areas] to support backcountry recreation in the Rio Puerco Field Office. These areas should also be managed with clear signage regarding permitted and prohibited activities, as well as educational signs regarding the other values in the areas. Further, the Rio Puerco RMP should protect lands with wilderness characteristics to provide desirable recreation experiences for hikers, backcountry hunters, and other non-motorized/mechanized public land users.</p>	<p>The travel management plan will be developed within 5 years after the Approved RMP is completed. The BLM will consider the issues in this comment when it develops the travel management plan. The travel management plan will also include a sign plan.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
154	20	Recreation	We [The Wilderness Society et al.] support use of ERMA's [Extensive Recreation Management Areas] and SRMA's [Special Recreation Management Areas] to support backcountry recreation in the Rio Puerco Field Office. These areas should also be managed with clear signage regarding permitted and prohibited activities, as well as educational signs regarding the other values in the areas. Further, the Rio Puerco RMP should protect lands with wilderness characteristics to provide desirable recreation experiences for hikers, backcountry hunters, and other non-motorized/mechanized public land users.	The travel management plan will be developed within 5 years after the Approved RMP is completed. The BLM will consider the issues in this comment when it develops the travel management plan. The travel management plan will also include a sign plan.
90	18	Recreation	We [Sierra Club] encourage signage throughout their proposed ERMA's [Extensive Recreation Management Area] - warning signs such as: No Woodcutting, No petrified wood collection, No motorized travel, and informational signs such as: identification of the geological layers on the cliffs, description of plants and wildlife in the area, and explanations of why you should avoid stepping on cryptogamic soils	The BLM will develop the travel management plan after the Approved RMP/Record of Decision is signed, and at that time it will consider the issues in this comment. The travel management plan will include signs to indicate which roads and areas are closed to OHV travel.
154	18	Recreation	"We support Cimarron Mesa being managed as an open OHV area and offer these comments towards developing the area:  Obtain federal ISTEA [Intermodal Surface Transportation and Efficiency Act] funds (and the state equivalent) for kiosks, trail markers, signage, staging areas, etc."	The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed during the travel management planning process. The travel management planning process, which includes public involvement, will begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the <a href="#">Rio Puerco Field Office RMP</a> , will be divided into travel management areas, which will allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of each area.
207	6	Recreation	"The "guidance" for requirements in issuing Special Recreation Permits (SRP) is too restrictive.  Table 2.22 on page 2-58 describes requiring a SRP Group permit for a group of four or more vehicles and/or twenty or more people staying two or more consecutive nights in the same public land location and requiring a SRP Group permit for a group of 15 or more vehicles and/or 30 or more people using public land as day-use. This "guidance" described in Table 2.22 is unwieldy and far too restrictive. Many organized OHV groups would regularly exceed this limit (especially the 15 vehicle limit) on a semi-regular basis even through their normal club activities. For instance, the New Mexico 4-Wheelers (NM4W) have well over fifty member families. A reasonable turn-out from the membership and a few guests can easily take them over the 15 vehicle/30 people limit. Remember, this is not an "event" with registration, fees, or anything of the sort. This is merely a casual day use outing, simply consisting of a group of vehicles enjoying public roads on a sunny New Mexico day. The same concern holds true for requiring a permit for four or more vehicles camping together. Any overnight outing by a club like the NM4W would likely trigger the requirement for a SRP Group permit even though the outing is not a commercial event. There are even many family hunting parties that will regularly exceed the four vehicle overnight limit.  We assume that it is not the Agency's desire to have to process a permit each and every time a club or extended family group wants to have a casual trail ride or an overnight camping trip. Such unnecessary bureaucracy is a waste of the Agency's limited resources and is only likely to alienate the public and dissuade the public from complying.  Another issue is the use of the term "guidance" for Table 2.22. By not setting an absolute limit on the activity, the public is left to guess whether the BLM will be trying to enforce the SPR [SRP] limits listed or not. Even worse, it can leave the requirements for "compliance" to the whims of specific Agency personnel.  Establish specific limits (not "guidance") so that the public knows what to expect and how to stay compliant. Increase the limits to 50 vehicles/75 people for day use and 10 vehicles/20 people for the overnight camping use. Another option to consider would be to let organized clubs apply for and operate under an annual or biennial SRP permit that would allow non-commercial (no fee) club activities to operate under the higher limits proposed above without having to obtain a permit for each activity."	<a href="#">Special recreation permit SRP</a> applications will be considered on a case-by-case basis. The BLM specifically follows policy in the SRP Handbook 2930-1, which states in I.E, "Organized group or event permits are intended for group outdoor recreation activities or events which are neither commercial nor competitive. The authorized officer determines when a permit is required based on planning decisions, resource concerns, potential user conflicts, or public health and safety issues. A group is loosely defined as more than one person participating in a recreation activity or event. The threshold size of a group requiring a permit would be impossible to establish on a national basis. The threshold, if any, must be determined for each area (for example, 10 people in a sensitive riparian area may constitute an organized group, but a less sensitive upland area may be able to handle 200 people without the need for special management). Thresholds must be based upon planning, resource concerns, potential user conflicts, and public health and safety. Field Offices are encouraged to develop thresholds through land use planning for when permits are required for organized groups and events for specific types of recreation activities, land areas, or resource settings."

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
147	4	Recreation	To clarify the zones for maximum protection, extend the Ceja Pelon Zone north to include the northern portions of Ceja Pelon and Penistaja Mesas. Also, relocate OMG [Oh-My-God 100 Race] A Zone to the west to avoid Mesa Chijuilla and Mesa De Cuba Badlands (see attached map [not attached]).	<p>For Oh-My-God Zones A, B, and C (which, <a href="#">in Alternative C [the Proposed RMP]</a>, would be managed as the Endurance Trails SRMA instead of a recreational management zone under the San Juan Basin Badlands ERMA <a href="#">in the Proposed RMP/Final EIS</a>), the BLM would continue to permit the event trails and would authorize new trails on a case-by-case basis. The impacts of the event would be limited to the approved routes in the zone. These zones are <a href="#">well-established</a> recreation sites that have been compliant for over a decade. Maintaining these sites—provides for those extensive recreation opportunities, while not intruding on the other conservation and recreation goals of the remaining five zones.</p> <p>The San Juan Basin Badlands ERMA recreation management zones were designed based on the similar type resources and management objectives, which were derived through extensive analyses. Based on these analyzes, the BLM does not propose to extend the ERMA beyond what is presented in the Draft RMP/EIS (Proposed RMP/Final EIS Appendix P, Table P-1).</p>
160	2	Recreation	I understand that two BLM parcels (599 acres and 386 acres) located in T12N, R06E are up for disposal. I request that they be considered an urban interface, best used for public recreation, since half the population of the state resides within an hour's drive of this location.	Identifying a parcel for potential disposal does not necessarily mean that the BLM will immediately dispose of the parcel. As an example, most of the parcels that were available for disposal under the 1986 RMP, as amended, have been retained throughout the 28-year lifespan of the RMP. Essentially, identifying a parcel as available for disposal ensures that, if future conditions are warranted and a need is found, the BLM would have the opportunity to sell, exchange, or transfer to another agency that parcel; however, all prescriptions until such time would apply. In the case of the mentioned parcels, dispersed public recreation would continue to be applicable.
5	7	Recreation	Section 2.1.8 and Maps 11 - 14 - "Disposal" of Parcel C (the Crest) is appropriate, pending legislation in the U.S. Congress proposing transfer to the U.S. Forest Service. The BLM should consider either "disposal" or management as a non-vehicular recreation/conservation area with public access for Parcel B, since it is a relatively small parcel and is located near and amongst several high-density, residential subdivisions.	<p>The parcels, known as A, B, and C by the Placitas community, on Township 13 North, Range 05 East, are marked as disposal tracts under Alternatives C (<a href="#">the Proposed RMP</a>) and D, and E (<a href="#">the Proposed RMP</a>). It is the general policy of the BLM that undeveloped federal lands under its administration are available to the public for camping and general recreation, with the following provisions:</p> <ul style="list-style-type: none"> <li>• Camping is limited to 14 days within a 2-mile radius in a 28-day period</li> <li>• Pack out what you pack in</li> <li>• Avoid camping within 200 feet of any water source</li> <li>• Do not leave campfires unattended</li> </ul>
56	1	Recreation	<p>"The issue of Land Disposal and a Recreation Park alternative proposal:</p> <p>We oppose any transfer of Parcels A, B or C referenced above, or the BLM/Placitas Open Space to the Bureau of Indian Affairs for any purposes including purposes of providing these lands to the Santa Ana or San Felipe Pueblo Tribes in trust or the sale or transfer of these parcels to any other entity other than Parcel C in the proposed transfer to the Forest Service. We believe that the BLM should proceed with plans not discussed in the BLM Draft to provide, as the preferred alternative, a plan to develop these parcels, A, B and C as public recreational spaces, with the use limited to hiking, biking and equestrian trail activities, along with in Parcel A, limited RV, horse trailer and tent camping in a manner consistent with other BLM recreational areas like the site at the BLM/Fort Stanton, NM recreational park. The recreational area should be designed to facilitate vehicle visits by handicapped people."</p>	The lands that are identified for disposal in the Draft RMP/EIS are based primarily on meeting the BLM objective of consolidating federal lands into larger tracts and not specifically granted to any one entity; therefore, all small and isolated parcels in the RPFO are identified for disposal. Identifying lands for disposal does not necessarily mean that they would be disposed of immediately; instead, if an opportunity for consolidating lands into larger tracts arises, the BLM, by regulation, cannot sell or exchange lands that are not specifically identified as available for such actions in the Draft RMP/EIS. As for recreation on these parcels, it is the BLM's general policy that undeveloped federal land under its administration is available for public camping and general recreation.



R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
162	18	Recreation	Here in the East Mountains, our area of interest is the two parcels which share their borders with the City of ABQ [Albuquerque] Golden Open Space, located in T12N, R06E. Currently, the draft RMP lists these parcels up for "disposal" in all four "Alternative" scenarios. BLM recently had archaeological surveys done, and found them to possess "cultural interest". For that reason, they must remain in public domain; hence, they cannot be sold to a private party. City of ABQ Open Space Division expressed an interest in these parcels to BLM a few years ago, that if they ever came up for disposal, they would be interested. I checked with City Open Space, and they are still interested. The two BLM parcels have a combined area of almost 1,000 acres. These 1,000 acres would be a welcomed addition to the existing 1200- acre Golden Open Space. Today, Golden Open Space has almost 5 miles of volunteer-constructed non-motorized recreational trails, and will have approx.10 miles total in a few years, at completion. "This area should be considered an urban interface, best used for public recreation, since half the population of the state resides within an hour's drive of this location. The City of ABQ [Albuquerque] Open Space Division is interested in obtaining them under the "Recreation and Public Purposes Act", just as they acquired Golden Open Space from this BLM field office many years ago"	Under all alternatives, these areas are considered for disposal or exchange. Prior to any disposal or exchange, the BLM would conduct a site-specific analysis to identify any concerns about resources potentially leaving the public trust.
164	3	Recreation	Comment: We [the Broadband group] believe the BLM parcels [BLM Land Bordering T12N, R06E (City of Albuquerque Golden Open Space)] should be designated and used consistent with the existing City of Albuquerque Golden Open Space. It is our understanding that all BLM alternatives call for disposal of these tracts. We feel that would negatively impact short and long term recreational opportunities and compromise the intended use of the Golden Open Space.	Under all alternatives, these areas are considered for disposal or exchange. Prior to any disposal or exchange, the BLM would conduct a site-specific analysis to identify any concerns about resources potentially leaving the public trust.
185	1	Recreation	The 195 acre Parcel B should be retained by the BLM, and used solely for recreation. It is now used for recreation by many residents of Placitas. The land is topographically too rough for major residential development. I assume it costs very little for BLM to retain and maintain this acreage, and neither BLM nor the community would gain much by disposing of the property.	<p>The BLM-administered lands near Placitas are open for dispersed public recreation. The goal of the BLM is to consolidate as much of the BLM-administered land holdings for better management and preservation. All isolated and small tracts of land field office wide, including the Placitas area, are identified for disposal under Proposed RMP/Final EIS Alternative CE (the Proposed RMP). Having an area classified as a disposal land does not necessarily mean that it would immediately be disposed of. If and when there is an opportunity to sell or exchange land for consolidation, by regulation, the BLM must have had the land identified for disposal in the most current RMP; otherwise an RMP amendment would be necessary.</p> <p>Prior to any disposal or exchange, the BLM would conduct a site-specific analysis to identify any concerns about resources potentially leaving the public trust.</p>
196	1	Recreation	I regularly walk in the Placitas Open Space and the adjacent BLM lands. I frequently see other people in these areas. Based on my experience, I believe the DRMP underestimates the recreational value of these lands to local and wider area residents. I oppose any use or disposition of the BLM parcels near Placitas which would limit public access and recreational use of these lands.	<p>The BLM-administered lands near Placitas are open for dispersed public recreation. The goal of the BLM is to consolidate as much of the BLM-administered land holdings for better management and preservation. All isolated and small tracts of land field office wide, including the Placitas area, are identified for disposal under Proposed RMP/Final EIS Alternative CE (the Proposed RMP) preferred alternative. Having an area classified as a disposal land does not necessarily mean that it would immediately be disposed of. If and when there is an opportunity to sell or exchange land for consolidation, by regulation, the BLM must have had the land identified for disposal in the most current RMP; otherwise an RMP amendment would be necessary.</p> <p>Prior to any disposal or exchange, the BLM would conduct a site-specific analysis to identify any concerns about resources potentially leaving the public trust.</p>
254	43	Recreation	The Pueblo [of San Felipe] is of the opinion that, until the lands comprising the [Crest of Montezuma] ERMA [Extensive Recreation Management Area] are reacquired by the Pueblo, the proposed management alternatives provided in Table 2.29 of the Draft RMP/EIS are generally compatible with the BLM's goals of maintaining recreation opportunities while protecting the ERMA's resource values. With regard to salable and locatable minerals, the Pueblo finds the management decisions contained in Alternatives B and C (Preferred) appropriate for the Crest of Montezuma ERMA. With regard to travel, the Pueblo endorses Alternative B, which would permit only primitive, non-motorized travel within the ERMA. With regard to leasable minerals, the Pueblo is of the opinion that none of the proposed alternatives all of which provide for fluid mineral leasing with a CSU [Controlled Surface Occupancy] stipulation-goes far enough. Given the proximity of the ERMA to densely populated areas of Placitas on one side and the pristine Sandia Wilderness on the other, the BLM should adopt a revised Alternative C (Preferred) that closes the ERMA entirely to fluid mineral leasing.	This error was corrected; based on the administrative record and analyses, Alternative B should have been no surface occupancy (NSO) for leasable minerals on the Crest of Montezuma.

**Commented [AB7]:** Angie: I think, looking at Section 2.2.7.3 in Chapter 2, we can just change Alt E reference to Alt C and no other changes are needed, but please confirm

**Commented [AA8R7]:** Need to verify Placitas disposal with Jenna. Emailed Jenna on 11/2/21: "Placitas disposal— The lands and realty disposal maps for Alternatives C and E are different for the Placitas area. Alternative C would retain the bulk of Placitas area lands, while Alternative E would make them available for disposal. Please provide the Placitas lands disposal by alternative."

**Commented [AA9R7]:** On 11/9/2021, Jenna provided GIS spreadsheet (RPFO\_GIS\_calcs\_V03\_20211115.xlsx) with disposal in Placitas area by alternative (see tab "alts\_landrealty"). Based on that spreadsheet, Placitas disposal is Alt A=0 acres; Alt B=900 acres; Alts C, D=4,200 acres. Based on this, changed the response to indicate that Placitas area lands would be available for disposal under Alt C (the Proposed RMP).

**Commented [AB10]:** Angie: I think, looking at Section 2.2.7.3 in Chapter 2, we can just change Alt E reference to Alt C and no other changes are needed, but please confirm

**Commented [AA11R10]:** Need to verify Placitas disposal with Jenna. Emailed Jenna on 11/2/21: "Placitas disposal— The lands and realty disposal maps for Alternatives C and E are different for the Placitas area. Alternative C would retain the bulk of Placitas area lands, while Alternative E would make them available for disposal. Please provide the Placitas lands disposal by alternative."

**Commented [AA12R10]:** On 11/9/2021, Jenna provided GIS spreadsheet (RPFO\_GIS\_calcs\_V03\_20211115.xlsx) with disposal in Placitas area by alternative (see tab "alts\_landrealty"). Based on that spreadsheet, Placitas disposal is Alt A=0 acres; Alt B=900 acres; Alts C, D=4,200 acres. Based on this, changed the response to indicate that Placitas area lands would be available for disposal under Alt C (the Proposed RMP).

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
255	23	Recreation	<p>Ceja Pelon, Mesa de Cuba, Mesa Penistaja, Mesa Chijuilla and Cejita Blanca are all areas that are now within the 70,000+ acre San Juan Basin Badlands ERMA as defined within your current RMP Draft. We [Uwe and Karen Schroeter] support with important exceptions noted below, the creation of a San Juan Badlands Extended Recreation Management Area (ERMA) as outlined in Vol 1 - section 2.2.12.4.4.1. We feel that the San Juan Basin Badlands are best served, not just in terms of ecological health, but also for recreational hikers, photographers and solitude-seekers like us, if all vehicles are kept out of the entire San Juan Basin Badlands ERMA (except for major access points and occasional authorized use). This would preserve a wilderness experience, prevent illegal woodcutting and stop the removal of petrified wood. And most of all, it would greatly simplify the enforcement. Presently you offer vehicle closure in the East and West Torreon and Ceja Pelon Zones as Alternative B in the table in Vol.1 on page 2-62. We think this alternative should be expanded to include the entire ERMA.</p>	<p>The proposed San Juan Basin Badlands ERMA is composed of varying zones (Draft RMP/EIS Table 2.55-1; Proposed RMP/Final EIS Section 2.2.12.4 and Appendix P, Section P.10) that provide a diverse recreation experience. The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed in the travel management plan, which would involve the public and users in the planning process. The travel management planning process begins after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which would serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, would be divided into travel management areas. This would allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of the travel management areas.</p> <p>The BLM agrees that, in the San Juan Basin Badlands ERMA, petrified wood resources are unique. Prohibiting petrified wood collection in portions of the San Juan Basin Badlands ERMA was analyzed in Alternatives B and C of the Draft RMP/EIS and the Proposed RMP/Final EIS.</p> <p>The Torreon Fossil Fauna East and West zones were also designated as an ACEC in the Draft RMP/EIS and restrict travel to <a href="#">the single</a> access routes only. These zones were based on the similar paleontological resources. In the Proposed RMP (Alternative EC), this area would be managed <a href="#">a zone in the ERMA and as an ACEC (not as a zone in the ERMA)</a>; travel would be <a href="#">allowed on the single access route only limited to existing primitive roads and trails</a> (Proposed RMP/Final EIS Table 2-35 and Appendix P, Section P.10.2).</p> <p>The RMP does not address enforcement nor budgeting specifically. This is because they are not a planning decision but rather an implementation decision already addressed by other regulations; however, one of the objectives in Draft RMP/EIS Section 2.2.5.2 states "Reduce the incidence and impacts of timber trespass and tree theft. This includes, but is not limited to, collaborating with other agencies, increasing collection areas, and increasing the presence of law enforcement." A major component of accomplishing this objective is taking a holistic management approach of the forest and woodland resources by managing them as one resource. This approach allows the forester to open areas in the entire field office, thus reducing the impacts on areas that have received traditionally high use, based on the limitations of the 1986 RMP, as amended (Table 2.11). This approach is not expected to generate more users, but rather disperse the users throughout the RPFO, minimizing the impacts while protecting special designations and other resources accordingly. This approach applies to other traditional uses, such as nut and berry collection by Native and local populations (Table 2.11).</p>
109	13	Recreation	<p>"[From ATT 1] The Long View: SRMA [Special Recreation Management Area] designation for these 5 [Nacimiento] badlands is the first step toward a regional economic and quality of life development effort. Inclusion in the newly formed National Landscape Conservation System would be a logical next step.</p> <p>However, a regional San Juan Basin Badlands National Monument consisting of the 15 San Juan Basin badlands connected by San Juan Basin Badlands National Scenic Byway (US 550) would definitely be an economic boom to the whole area, especially Cuba, where the national monument headquarters and visitors center would be located. Considering the badlands' very substantial geological, paleontological and ecological resources, it would be highly feasible to use the more accessible areas as outdoor classrooms and research labs to stimulate science education at all levels from primary to university. The New Mexico Museum of Natural History already does research and educational outreach programs here. Their role could be greatly expanded by even adding a museum branch and educational center in conjunction with the national monument visitors' facilities.</p> <p>The diverse Pueblo Tribes, Navajo and Apache presence along 550 makes tribal cultural visitors centers highly feasible. Include Chaco Canyon and there is a diverse tourism draw that would expand the economic base to include the substantial Native American presence here. Europeans in particular are very interested both in badlands scenery and Native American Culture. Proper development and promotion are all that is needed to help northwestern New Mexico join Colorado, Utah and Arizona in reaping the considerable economic benefits of Four Corners international tourism."</p>	<p>The BLM cannot designate national monuments; only the president or congress has the authority to do so. Therefore, the request is outside the scope of the BLM's authority and this RMP.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
182	I	Recreation	<p>“Clarification of Co-Management with Acoma Pueblo: When driving toward the Petaca Pinta WSA [Wilderness Study Area], the public passes through [the] line managed by the Acoma Pueblo and then the road seems to enter public land. At this point, a sign states: ““You are entering land managed by the Pueblo of Acoma and the Bureau of Land Management. Please remain on existing roads and close all gates.”” See, attached photo of sign (Attachment 5 [see ATT 5] to these comments, incorporated by reference). We have reviewed the RMP and did not see any discussion of joint management areas in the Field Office or how those lands are being managed. We are concerned that the public will not understand the management of these lands or how to comply with the agreed-upon management.</p> <p>Recommendations: BLM should specifically address this area in the RMP to explain the agreement reached with the Pueblo of Acoma and the management goals. BLM should also provide further detail in signage to ensure the public understands and complies with the intended management of the area.</p> <p>Recommendations: BLM should make the MOU or other agreement available to the public, explain the management in this RMP, and also clarify the meaning of this arrangement in notice to the public to ensure compliance.”</p>	<p>The BLM and the Pueblo of Acoma have a co-management agreement for the associated grazing allotment. There are no other co-management agreements with the Pueblo of Acoma for any other resource values managed by the BLM on the WSA. The signage in reference basically informs the public that, while traveling through the area, they will cross both BLM-administered and Pueblo of Acoma land interchangeably, thus changing jurisdiction several times.</p>
243	II	Recreation	<p>2-65, -55, and elsewhere. San Juan Basin Badlands. Not enough information is given in the Draft RMP on proposed management; for instance Chapter 2’s treatment does not touch on the huge problem of woodcutting: illegal or not? All wood harvest should be forbidden in the ERMA [Extensive Recreation Management Area]. Enforcement is a major problem; it will be helped by cutting motorized use to a bare minimum of major access routes (and closing Mesa de Cuba and Mesa Chijuilla). Fossil (including petrified wood) collecting should also be forbidden in the ERMA. Enforcement is the big problem and should be given more resources. Boundaries of the Ceja Pelon Zone should be extended to include the northern parts of Ceja Pelon and Pensitaja Mesa.</p>	<p>The BLM agrees that in the San Juan Basin Badlands ERMA, petrified wood resources are unique. Prohibiting petrified wood collection in portions of the San Juan Basin Badlands ERMA was analyzed in Alternatives B and C of the Draft RMP/EIS and the Proposed RMP/Final EIS.</p> <p>The RMP does not address enforcement nor budgeting specifically. This is because they are not a planning decision but rather an implementation decision already addressed by other regulations; however, one of the objectives in Draft RMP/EIS Section 2.2.5.2 states “Reduce the incidence and impacts of timber trespass and tree theft. This includes, but is not limited to, collaborating with other agencies, increasing collection areas, and increasing the presence of law enforcement.” A major component of accomplishing this objective is taking a holistic management approach of the forest and woodland resources by managing them as one resource. This approach allows the forester to open areas in the entire field office, thus reducing the impacts on areas that have received traditionally high use, based on the limitations of the 1986 RMP, as amended (Table 2.11). This approach is not expected to generate more users, but rather disperse the users throughout the RPFO, minimizing the impacts while protecting special designations and other resources accordingly. This approach applies to other traditional uses, such as nut and berry collection by Native and local populations--(Table 2.11).</p> <p>The San Juan Basin Badlands ERMA recreation zones were identified based on interdisciplinary teams made up of the various scientists and specialists in the RPFO. The zones in the ERMA were carved out based on like resources and management potential. The BLM does not expect to add any additional acreage to the zones, based on the results of the analytical process.</p>
90	56	Recreation	<p>“Thank you for recognizing the value of the San Juan Basin Badlands and their need for special-status and protection. Designation as Extensive Recreation Management Areas (ERMAs) is a start, though I would like to see greater protection for these areas, as possibly Areas of Critical Environmental Concern (ACEC) - since they do meet the qualifications -- or even as designated Wilderness Areas. What historically happened with the Bisti Wilderness Area could happen here as well. I and many other lovers of these areas would like the BLM to extend the Badlands ERMA zone of the Ceja Pelon north to include the northern portions of Ceja Pelon and Penistaja Mesas. And please relocate the OMG [Oh-My-God 100] raceway zone (if it is truly needed) outside of the sensitive Badlands areas.”</p>	<p>ACEC designations must meet important and relevant resource values that must require special management attention to protect those identified values (BLM Manual 1613.12). Special management attention requires the formulation of management practices expressly developed for the area to protect the important and relevant values from uses permitted by the Draft RMP/EIS. These are management measures which “would not be necessary or prescribed if the critical and important features were not present” (BLM Manual 1613.12). The management prescriptions in the Draft RMP/EIS for the Chijuilla Mesa and Ceja Pelon zones provide the appropriate management and protection for the resources in the area. In addition, the BLM sees no need to relocate the race, as requested.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
58	8	Recreation	We [Sierra Club] support their [BLM] designation of the Badlands into 4 San Juan Basin Badlands zones (Ceja Pelon, Torreon Fossil Forest East & West, and Chijuilla) as a part of their proposed 71, 155 acre San Juan Basin Badlands ERMA (Extensive Recreation Management Area), with full Alternative B protections (Alternative B is always the conservation alternative). For further protection we urge that the Ceja Pelon & Chijuilla zones be designated as ACECs (Areas of Critical Environmental Concern) as are the other 2 Badlands zones.	ACEC designations must meet important and relevant resource values that must require special management attention to protect them (BLM Manual 1613.12). Special management attention requires the formulation of management practices expressly developed for the area to protect the important and relevant values from uses permitted by the Draft RMP/EIS. These are management measures “would not be necessary or prescribed if the critical and important features were not present” (BLM Manual 1613.12). The management prescriptions in the Draft RMP/EIS for the Chijuilla Mesa and Ceja Pelon zones provide the appropriate management and protection for the resources in the area.
146	2	Recreation	<p>“I support the designation of the Badlands into 4 San Juan Basin Badlands zones (Ceja Pelon, Torreon Fossil Forest East &amp; West, and Chijuilla) as a part of their proposed 71, 155 acre San Juan Basin Badlands ERMA (Extensive Recreation Management Area), with full Alternative B protections (Alternative B is always the conservation alternative). For further protection, we urge that the Ceja Pelon &amp; Chijuilla zones be designated as ACECs (Areas of Critical Environmental Concern) as are the other 2 Badlands zones.</p> <p>These are spectacular and easily damaged unique places. Limited managed public access without motorized vehicles could go a long way towards bringing attention and protection to these special places. Petrified wood should not be allowed to be taken out and the ancient junipers and bonsai ponderosa should be protected from cutting. Increased managed public use and ranger patrolling would help. Once these very unique ancient trees are cut it will be hard with climate change, etc., for anything remotely similar to be restored over time. The public needs to be educated about the importance of the habitat of these irreplaceable wild lands. Wood cutting should not be allowed in this zone.</p> <p>Some other viable option for the cost of heating needs to be developed to help the impoverished populations that are cutting these trees. I support the Sierra Club’s efforts and recommendations.”</p>	ACEC designations must meet important and relevant resource values that must require special management attention to protect them (BLM Manual 1613.12). Special management attention requires the formulation of management practices expressly developed for the area to protect the important and relevant values from uses permitted by the Draft RMP/EIS. These are management measures “would not be necessary or prescribed if the critical and important features were not present” (BLM Manual 1613.12). The management prescriptions in the Draft RMP/EIS for the Chijuilla Mesa and Ceja Pelon zones provide the appropriate management and protection for the resources in the area. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with wilderness characteristics managed to protect wilderness characteristics, in an effort to meet public demand and benefit land health.</a> <a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</a>
208	1	Recreation	<p>“Petaca Pinta: The Petaca Pinta Wilderness Study Area (WSA) is arguably one of the most remote landscapes that can be explored on public lands in the Rio Puerco Field Office. From atop the various ridgelines within the Petaca Pinta WSA, one is afforded grand views on all sides. To the west, the majestic Blue Water Mesa, with its colorful palette and stark geology, seemingly cuts the blue horizon in half and then slides off to the east in Grand Canyon-esque fashion. In the north, over thirty miles away, the soaring Mount Taylor rises above the Rio Puerco Valley like a caretaker of the land – its peak often covered in snow during the winter. To the southeast, the jagged Sierra Ladroneas WSA can be observed as its sheer slopes seemingly carve up the surrounding Chihuahuan Desert basin floor.</p> <p>Under both Alternative B and Alternative C, the Draft Rio Puerco RMP proposes to designate the Petaca Pinta Extensive Recreation Management Area (ERMA). ERMA’s are managed to “support and sustain the principal recreation activities and the associated qualities and conditions of the ERMA,” such that management is “commensurate with the management of other resources and resource uses” Instruction Memorandum (IM) 2011-004. ERMA’s may be appropriate to designate for quiet-use, backcountry experiences and layer with other special designations that are compatible with quiet recreation, such as areas of critical environmental concern (ACEC) and lands with wilderness characteristics.</p> <p>The Petaca Pinta ERMA is an extraordinarily isolated landscape, where volcanic buttes and knobs lay scattered around the valley floors. Tuffs of red, orange, and black rock, carved by years of wind and water, form many dramatic canyons and bowls throughout the proposed ERMA. The majority of the area is predominantly natural and undeveloped, with the few scattered imprints of man “such as primitive and naturally reclaimed routes, stock tanks, and fencing” substantially unnoticeable, if not out-right hidden from the average observer. The views from atop Volcano Hill are immense and breathtaking, with the Sandia and Manzano Mountains looming above the Rio Grande Valley to the east. Pronghorn are often common in the abundant grasslands and rolling volcanic hills that characterize the five zones outlined in the Draft RMP.</p> <p>Under Alternative B of the Draft RMP, we support the BLM in designating the Petaca Pinta ERMA at 69,118 acres, with 26,657 acres designated for non-motorized use and 61,000 acres proposed for a backcountry experience. The proposed Petaca Pinta ERMA would consist of five zones that include Pronoun Cave ACEC, Cerro Verde ACEC, Volcano Hill, Cimarron Mesa, and Sandy Wash (Table 2.25 [of the Draft RMP/EIS]). Both the Volcano Hill and Cimarron Mesa inventory units are areas that the BLM has identified as Lands with Wilderness Characteristics (Section 3.9). Management practices and guidance as outlined under Alternative B for the Petaca Pinta ERMA would focus on dispersed recreational activities including hiking, wildlife viewing, and an overall backcountry experience.”</p>	<a href="#">The 1986 Rio Puerco RMP established the Petaca Pinta SMA (13,789 acres) and WSA (11,700 acres). Under Alternatives B, C, and D, the BLM would designate the area as an ACEC (12,100 acres) and manage it for wildlife and scenic values. Under the Proposed RMP (Alternative E in the Proposed RMP/Final EIS), the Petaca Pinta ERMA would not be proposed for designation.</a>

Letter Number	Comment Number	Category	Comment Text	Response
205	5	Recreation	<p>“San Juan Badlands: Located in the northernmost region of the Rio Puerco Field Office lie some of the most geologically unique formations found in the district - if not indeed, on the entire continent of North America. The proposed San Juan Basin Badlands ERMA [Extensive Recreation Management Area] contains irreplaceable hoodoos, colorful cliffs, iconic sculpted grandfather juniper and ponderosa trees, fragile biological soil crusts and the prevalence of petrified wood logs. Over centuries, volcanic ash showers from the San Juan Mountains have deposited trace metals and extra silicates, which provide for brilliant colors and detailed crystalline copies of bark, knotholes, and tree rings in the region. These “paleontological resources include an exposed Paleocene Nacimiento formation bearing the type of reference faunas for the Puercan and Torreonian land-mammal ages” and is “the largest intact area of this resource in North America.” Draft RMP, Section 2.2.16.3.20.1, pp. 2-11 - 2-123. With such outstanding geological values present in the area, the San Juan Basin Badlands ERMA offers excellent opportunities for the public to explore an ancient land that is not only exclusive to New Mexico, but also to the Rio Puerco Field Office. BLM should manage the San Juan Basin Badlands to ensure that these exceptional resources are protected and preserved, so as to allow the public an opportunity to experience backcountry recreation, along with the study and research of paleontological elements and to prevent unnecessary degradation in the region.</p> <p>Under both Alternative B and Alternative C, the Draft RMP proposes to designate the San Juan Basin Badlands ERMA, as described in the four zones on Table 2.24 [of the Draft RMP/EIS]. As noted in the previous section, ERMA’s are managed to “support and sustain the principal recreation activities and the associated qualities and conditions of the ERMA,” such that management is “commensurate with the management of other resources and resource uses.” IM [Instruction Memorandum] 2011-004. ERMA’s may be appropriate to designate for quiet-use, backcountry experiences, paleontological research, and layer with other special designations that are compatible with quiet recreation - such as areas of critical environmental concern.</p> <p>Under Alternative B of the Draft RMP, we support BLM in designating the San Juan Basin Badlands ERMA at 71,155 acres, with more than 11,000 acres closed to motorized use and overall 63,642 acres managed with an emphasis on backcountry experiences. The proposed San Juan Basin Badlands ERMA would designate the following four zones: Torreón Fossil Fauna East and West, Oh-My-God 100 Race (A-C), Ceja Pelon, and Chijulla. Management practices and guidance as outlined under Alternative B for the ERMA would focus on dispersed recreational activities including hiking, paleontological research and study, and an overall backcountry experience, while allowing for rotated racing on a three-year basis in the Oh- My-God 100 Race (A-C) Zone, per regulations permitted in 43 CFR, Part 2930.”</p>	<p>The Proposed RMP (Alternative CE) for the San Juan Basin Badlands ERMA combines the planning decisions that best meet the multiple use and sustained yield mandates of Section 103(c) of FLPMA (43 USC 1702(c)). Based on the size and resources in the San Juan Basin Badlands ERMA, the BLM’s Proposed RMP (Alternative CE in the Proposed RMP/Final EIS) represents the best combination of decisions to achieve its goals and policies. It best responds to the purpose and need and best resolves the issues pertinent to the planning efforts and management prescriptions for the ERMA.</p>
90	2	Recreation	<p>“The proposed Boca del Oso ERMA [Extensive Recreation Management Area] is located in a portion of the RPFO [Rio Puerco Field Office] that contains a high density of Wilderness Study Areas (WSAs). Many of these WSAs are very popular with outdoor recreationists, such as the Cabezón Peak WSA. Others, like the Ignacio Chavez and Chamisa WSAs are rather remote landscapes that offer users exceptional opportunities for solitude and unconfined or primitive forms of recreation. The presence of these WSAs helps to increase the Boca del Oso ERMA’s overall backcountry experience.</p> <p>Under both Alternative B and Alternative C, the Draft RMP proposes to designate the Boca del Oso ERMA, as described in the eleven zones on Table 2.26. As noted in the previous section, ERMA’s are managed to “support and sustain the principal recreation activities and the associated qualities and conditions of the ERMA,” such that management is “commensurate with the management of other resources and resource uses.” IM 2011-004. This approach is appropriate for the Boca del Oso, especially as it is explicitly identified as appropriate to layer with other special designations that are compatible with quiet recreation - such as ACECs [Areas of Critical Environmental Concern], lands with wilderness characteristics, and WSAs.</p> <p>Under Alternative B and Alternative C of the Draft RMP, we support BLM in designating the Boca del Oso ERMA at 134,474 acres, with more than 50,000 acres limited to motorized travel over existing primitive roads and trails, and the remainder of the area managed with an emphasis on backcountry experiences. The proposed Boca del Oso ERMA would designate the following eleven zones: Chamisa WSA, Ignacio Chavez ACEC, Cabezón Peak ACEC, San Luis Mesa ACEC, San Miguel Dome ACEC, Ancestral Way, Azabache, Cerro, and the Continental Divide Trail. In addition to ACECs, the zones contain other areas with special management prescriptions that include cultural resources and lands with wilderness characteristics. Management practices and guidance as outlined under Alternative B for the ERMA would focus on dispersed recreational activities including hiking, hunting, horseback-riding, wildlife viewing, cross-country skiing and other backcountry experiences.”</p>	<p>The BLM corrected a typographical error listing the acreage for the Boca del Oso ERMA as 134,474 acres in the Draft RMP/EIS; the actual size is 106,400 acres, as corrected in the Proposed RMP/Final EIS. Under the Proposed RMP (Alternative CE in the Proposed RMP/Final EIS), the Boca del Oso ERMA (106,400 acres) would <del>benefit be</del> proposed for designation to promote the protection of Wilderness values and dispersed recreational activities in the Boca del Oso ERMA, including hiking, hunting, horseback riding, wildlife viewing, cross-country skiing, and other activities.</p>
90	5	Recreation	<p>Backcountry Recreation: We [The Wilderness Society et al.] appreciate that BLM followed the approach set out in IM [Instruction Memorandum] 2011-04 in the Draft RMP and has proposed designating ERMA’s [Extensive Recreation Management Areas] and a Special Recreation Management Area (SRMA) with detailed management prescriptions to provide backcountry recreation opportunities. In general, we recommend that the BLM continue to improve and expand opportunities for quiet recreation such as hiking, backpacking, wildlife viewing, back country hunting, and horseback riding in the Rio Puerco Field Office. Designating recreation management areas with objectives and management prescriptions to protect and promote quiet recreation experiences is a useful way for BLM to satisfy this demographic of public land user. We have provided specific comments on these areas throughout these comments. However, we also want to emphasize that managing lands for wilderness characteristics, per the management prescriptions included in Section 3.9 [of the draft RMP], is another way for BLM to provide opportunities for quiet recreation in natural and scenic areas within the Rio Puerco Field Office.</p>	<p>Approximately 37,500 acres were identified as lands with wilderness characteristics in the Draft RMP/EIS (Section 2.2.8). In order for an area to qualify as this, it must possess sufficient size, naturalness, and outstanding opportunities for either solitude or primitive and unconfined recreation. In the RPFO, the areas identified in Draft RMP/EIS Section 2.2.8 met the criteria.</p> <p>In addition, travel management (including road and traffic management) is outside the scope of this RMP. A separate travel management planning process will be performed after the Approved RMP/Record of Decision is signed.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
154	5	Recreation	<p>“The scenic and recreational values of the proposed Petaca Pinta ERMA [Extensive Recreation Management Area] represent some of the finest public lands found in the RPFO [Rio Puerco Field Office]. These much sought-after values are in ever increasing decline throughout the region due to population growth and development. As demand continues to grow, it is important that the BLM identify lands suitable for a backcountry experience and manage those lands in accordance so as to protect their conservation, historic, cultural, and biological qualities. The Petaca Pinta ERMA, as summarized in Alternative B of the Draft RMP, captures these qualities remarkably well. We recommend BLM designate the Petaca Pinta ERMA, and manage Petaca Pinta A, Cimarron Mesa, and Volcano Hill inventory units for their wilderness characteristics in accordance with supporting management actions and implementation-level planning guidance outlined in Alternative B. Furthermore, we recommend BLM limit travel in the Cerro Verde ACEC [Area of Critical Environmental Concern] Zone to non-motorized use, unless authorized by permit, and that the overall ERMA be recommended for withdrawal from locatable mineral entry.”</p>	<p>Petaca Pinta A was evaluated as protected for lands with wilderness characteristics in Alternative C (the Proposed RMP) (Draft RMP/EIS Table 2.51). Volcano Hill was evaluated as protected under Alternative B and managed to minimize impacts under Alternative C (the Proposed RMP). Most of Cimarron Mesa would be protected under Alternative C (the Proposed RMP) (Draft RMP/EIS Table 2.51). For the Cerro Verde ACEC (Draft RMP/EIS Table 2.43), travel would be restricted to authorized use in Alternative C (the Proposed RMP), along with recommending the area for withdrawal for locatable minerals. In the Proposed RMP (Alternative C of the Proposed RMP/Final EIS), <del>no</del> some lands would be managed to protect wilderness characteristics, minimize impacts on Wilderness characteristics, or emphasize multiple use. The Petaca Pinta ERMA would <del>not</del> be designated (50,900 acres), and the Cerro Verde ACEC would <del>not</del> be designated (4,600 acres), similar to Alternative A (no action).</p>
154	14	Recreation	<p>All four zones identified in the [proposed San Juan Badlands] ERMA [Extensive Recreation Management Area] may meet the criteria of lands with wilderness characteristics, as landscapes of 5000 plus acres in a natural or primitive condition, providing outstanding opportunities for solitude and primitive forms of recreation. Closure of existing primitive roads and their rehabilitation, recommended below, could address any questions regarding their roadlessness.</p>	<p>Factors in consideration of lands with wilderness characteristics are, for example, manageability, emphasizing it on other multiple uses as a priority over protecting wilderness characteristics, and emphasizing other multiple uses while applying management restrictions and protecting characteristics as a priority over other multiple uses. In the case of the San Juan Basin Badlands ERMA, the area serves multiple uses, including paleontological scientific research, dispersed recreation, and special events. These multiple uses that create the ERMA provide the management emphasis.</p> <p>The travel management plan will be developed after the Approved RMP is completed. The issues in this comment will be considered at the time the travel management plan is developed. In wilderness areas and WSAs, OHV use is prohibited. The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed in the travel management plan, which would involve the public and users in the planning process. The travel management planning process begins after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which will serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, would be divided into travel management areas. This would allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of the travel management areas.</p>

Letter Number	Comment Number	Category	Comment Text	Response
90	4	Recreation	<p>In the Draft RMP, BLM has acknowledged the outstanding paleontological attributes that make the San Juan Basin Badlands so exceptional. These much sought-after values are in ever increasing decline throughout the region due to population growth and development, as well as unrestricted tree-cutting and irresponsible OHV use. As demand continues to grow, it is important that BLM identify lands suitable for a backcountry experience, including paleontological research, and manage those lands in accordance so as to protect their conservation, historic, cultural, biological, and geological qualities. The San Juan Basin Badlands ERMA [Extensive Recreation Management Area], as summarized in Alternative B of the Draft RMP, captures these qualities remarkably well. We recommend BLM designate the San Juan Basin Badlands ERMA, designate the Torreon Fossil Fauna East and West Zones ACEC [Area of Critical Environmental Concern], and expand this ACEC to incorporate additional lands with these values. We also request that the Ceja Pelon &amp; Chijuilla zones be designated as ACECs (Area of Critical Environmental Concern) and that all four of these Badlands zones considered for their wilderness characteristics, as well. Moreover, we recommend BLM limit travel in the Chijuilla Zone to existing primitive roads and trails; that the Ceja Pelon Zone be closed to motorized use, unless authorized by permit, and that the overall ERMA be recommended for withdrawal from locatable mineral entry. Further, collection of petrified wood should be prohibited. Finally, the OMG [Oh-My-God 100] raceway routes should be limited to one route per year to start and monitored and reevaluated each year.</p>	<p>The proposed San Juan Basin Badlands ERMA is composed of varying zones (Draft RMP/EIS Table 2.55-; Proposed RMP/Final EIS Section 2.2.12.4 and Appendix P, Section P.10) that provide a diverse recreation experience. For each zone, a general travel management designation was prescribed to either protect or provide for the type of use the zone would be managed for:</p> <ul style="list-style-type: none"> <li>• Torreon Fossil Fauna East and West—These zones are designated as an ACEC in the Draft RMP/EIS and restrict <u>motorized</u> travel to <u>the single access routes</u> only. These zones were based on the similar paleontological resources. In the Proposed RMP (Alternative EC), this area would be managed as <u>a zone in the ERMA and as an ACEC (not as a zone in the ERMA)</u>; travel would be <u>limited to allowed on the single access route only existing primitive roads and trails</u> (Proposed RMP/Final EIS Table 2-35 and Appendix P, Section P.10.2).</li> <li>• Oh-My-God A-C Zones (now called the Endurance Trails SRMA in the Proposed RMP/Final EIS)—These zones are designated based on the established special event that has been permitted for over a decade. <u>The SRMA would be limited to permitted events only, and new trails would be considered on a case-by-case basis (Proposed RMP/Final EIS Appendix P, Section P.8.2).</u> The events are rotated annually to minimize the surface disturbance and allow a 2-year period for the sites to recover from any potential impacts.</li> <li>• Ceja Pelon—This zone is set aside for its geological significance and paleontological significance in the ERMA. <u>This zone is assigned an access route only prescription for travel. Motorized travel would be allowed on the access route only.</u></li> <li>• Chijuilla Zone—This zone is set aside for its geological and dispersed recreational potential. <u>The travel designation for this zone is limited to designated roads and trails. Motorized travel would be limited to existing primitive roads and trails. Construction of new roads would be considered on a case-by-case basis for permitted special event activities.</u></li> </ul> <p>The mineral development prescriptions in the San Juan Basin Badlands ERMA vary, based on the protection and management goals of the different zones. The mineral prescriptions in Draft RMP/EIS Table 2.24 are general to the overall ERMA, with zone-specific prescriptions found in the individual source designation sections.</p> <p><u>Under Alternative E, the proposed RMP, the BLM would manage the San Juan Basin Badlands ERMA as open to mineral development. Under the Proposed RMP/Final EIS (Alternative CE), the Torreon Fossil Fauna East and West Zones ACEC, would be NSOCSU for leasable minerals, open to recommended for withdrawal from locatable mineral entry development, and closed open to salable mineral extraction.</u></p> <p>The BLM agrees that in the San Juan Basin Badlands ERMA petrified wood resources are unique. Prohibiting petrified wood collection in portions of the San Juan Basin Badlands ERMA was analyzed in Alternatives B and C of the Draft RMP/EIS and the Proposed RMP/Final EIS.</p> <p>Designation of other sites as ACECs and/or lands with wilderness characteristics in the proposed San Juan Basin Badlands ERMA would not meet the goal and management objectives for the site. This is primarily due to the multiple uses that the ERMA provides for the public.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
90	10	Recreation	<p>“Cimarron Mesa: The Cimarron Mesa inventory unit is located east of the Volcano Hill inventory unit and Pronoun Caves ACEC [Area of Critical Environmental Concern]. In 1985, the BLM completed a land exchange in this area that created a contiguous block of public lands. The 7,329-acre Cimarron Mesa inventory unit is of sufficient size to make protection of wilderness characteristics practicable, and is predominantly natural, having several stock tanks and fences which are substantially unnoticeable. The screening provided by topography and vegetation of the area provides areas in which solitude is outstanding, and the area also includes outstanding opportunities for hiking, hunting, and other primitive forms of recreation.</p> <p>Under Alternative B, the Agency would manage Cimarron Mesa to protect its wilderness characteristics, yet Alternative C and Alternative D would manage Cimarron Mesa for VRM [Visual Resource Management] Class III, which would compromise the areas wilderness values and naturalness. Additionally, under Alternative C and Alternative D, Cimarron Mesa would be entirely open to motorized travel, which would have adverse impacts on the areas wilderness characteristics. Draft RMP, Section 3.9.2) We strongly recommend that BLM protect the wilderness characteristics of Cimarron Mesa as outlined in the Draft RMP under Alternative B. By protecting the wilderness characteristics of Cimarron Mesa, BLM will help to increase the backcountry experience of the overall Petaca Pinta ERMA [Extensive Recreation Management Area].”</p>	<p>Cimarron Mesa was inventoried for its potential wilderness characteristics. Approximately 1,600 acres are highly used by OHV users. Based on the topography and natural boundaries of Cimarron Mesa and use, these approximately 1,600 acres would continue to be open for OHV users.—Under the Proposed RMP (Alternative <u>CE</u> of the Proposed RMP/Final EIS), the BLM would manage <a href="#">all-lands-with-wilderness-characteristicsCimarron Mesa</a> to emphasize multiple use.</p>
154	4	Recreation	<p>We [The Wilderness Society et al.] support BLMs overall management goals under Alternative B for the Boca del Oso ERMA [Extensive Recreation Management Area], which focuses on the “protection of wilderness values and dispersed recreational activities.” Draft RMP, Section 2.2.12.4.4.3. There are currently five WSAs [Wilderness Study Areas] within the proposed Boca del Oso ERMA, as well as several additional areas the BLM found to possess wilderness characteristics. The Chamisa E unit, as well as the Ignacio Chavez A, B, and C units all meet the wilderness characteristic criteria of naturalness because the scattered imprints of human activity, such as primitive vehicle routes and fences, are substantially unnoticeable due to the dense vegetation, rugged foothills, and steep slopes. Draft RMP, Section 3.9. Under Alternative B, the BLM would manage Chamisa E and all three Ignacio Chavez inventory units to protect their wilderness characteristics. Alternative C, however, would have adverse consequences on the three Ignacio Chavez units by managing the areas to only minimize impacts and evaluating surface disturbing activities, including saleable minerals, on a case-by-case basis. Furthermore, Alternative C would allow forest product removal within the units, which could create an environment for surface disturbing activities.</p>	<p>After an area is inventoried and found to possess wilderness characteristics, the BLM must then <del>decide</del><u>make a decision as to</u> whether the area will be managed for those characteristics or for other priority multiple uses. This analysis and management decision is made through a public land use planning process. One of the primary elements to consider, in accordance with BLM Manual 6320 (Considering Land with Wilderness Characteristics in the BLM Land Use Planning Process), is compatibility with protection. This is the degree to which use or development of each resource is compatible with or conflicts with management of the area to protect wilderness characteristics.—Under the Proposed RMP (Alternative <u>CE</u> of the Proposed RMP/Final EIS), the BLM would, <u>depending on the area,</u> manage <del>all-</del>lands with wilderness characteristics to <u>protect wilderness characteristics, minimize impacts on wilderness characteristics, or</u> emphasize multiple use.</p>
154	15	Recreation	<p>Designate the 4 San Juan Basin Badlands as part of the proposed San Juan Basin Badlands ERMA [Extensive Recreation Management Area], with Alternative B protections, and additionally ask that the Ceja Pelon &amp; Chijuilla units be designated as ACECs [Areas of Critical Environmental Concern]. All 4 of these Badlands units should be considered for their wilderness characteristics, as well.</p>	<p>The ERMA management prescriptions provide the varied management scheme that is appropriate for a 70,000-plus-acre site. Since the intent of designating the ERMA is to provide for several zones of varying recreational, educational, and OHV use, the management prescriptions described in Chapter 2 represent the protection level that is corresponding to the intended use.</p>



Letter Number	Comment Number	Category	Comment Text	Response
199	5	Recreation	<p>"Ignacio Chavez A, B, and C: All three Ignacio Chavez inventory units meet the wilderness characteristic criteria of naturalness because the scattered imprints of human activity, such as primitive vehicle routes and fences, are substantially unnoticeable due to the dense vegetation, rugged foothills, and steep slopes. These three inventory units also possess outstanding opportunities for solitude and primitive or unconfined recreation because of their proximity to the Ignacio Chavez WSA [Wilderness Society Area]. These areas have topographic and vegetative screening that provides outstanding opportunities for the experience of solitude, and a variety of primitive and unconfined recreational opportunities exist in this area, including hiking, camping, hunting, wildlife viewing, horseback riding, and photography.</p> <p>The Ignacio Chavez A inventory unit is located between the Ignacio Chavez WSA to the east, the San Miguel Dome (proposed ACEC [Area of Critical Environmental Concern]) to the north, and the Cibola National Forest to the south and west. In 1980, the 2,462-acre unit was separated from the Ignacio Chavez WSA by a road. The road is no longer in use and has returned to a natural condition. As a result, when the area is considered in conjunction with the Ignacio Chavez WSA, the area is of sufficient size to make protection of wilderness characteristics practicable.</p> <p>The Ignacio Chavez B inventory unit is located between the Ignacio Chavez WSA to the south and east and BLM lands to the north and west. A road leading to a line camp along the east boundary of this unit partially separates it from the adjacent WSA. However, the southern part of the unit is not separated from the Ignacio Chavez WSA. The activities associated with the road and line camp are outside the unit and do not affect wilderness characteristics in the unit. As a result, the 1,541-acre Ignacio Chavez B inventory unit, when considered in conjunction with the adjacent WSA, is of sufficient size to make protection of wilderness characteristics practicable.</p> <p>The Ignacio Chavez C inventory unit is located between the Ignacio Chavez WSA to the south, the Ignacio Chavez B inventory unit to the west, BLM land to the north, and private land to the east. The 72-acre Ignacio Chavez C inventory unit is separated from the Ignacio Chavez WSA by a quarter-section line. When considered in conjunction with the adjacent WSA, this inventory unit is of sufficient size to make protection of wilderness characteristics practicable.</p> <p>Under Alternative B, the Agency would manage all three Ignacio Chavez inventory units to protect their wilderness characteristics, while under Alternative C the Agency would manage the areas to minimize impacts to their wilderness characteristics, by closing the areas to the extraction of leasable minerals and evaluating surface disturbing activities, including saleable minerals, on a case-by-case basis. Furthermore, Alternative C would allow forest product removal consistent with wilderness characteristics by assuring new routes are not established and that prescribed fire be used in harvested areas. Motorized use would be limited to designated routes, and construction of new range improvements and current authorized livestock grazing would also be allowed under Alternative C. Under Alternative D, wilderness characteristics of these areas would not be protected (Section 3.9.3). We strongly recommend that BLM protect the wilderness characteristics of the Ignacio Chavez A, B, and C inventory units as outlined in the Draft RMP under Alternative B. By protecting the wilderness characteristics of Ignacio Chavez A, B, and C, BLM will help to increase the backcountry experience of the overall Boca del Oso ERMA [Extensive Recreation Management Area]."</p>	<p>The Ignacio Chavez A, B, and C units in general meet the criteria for lands with wilderness characteristics and share boundary lines, in some cases, with the Ignacio Chavez WSA. In accordance with BLM Manual 6320, consideration for lands with wilderness characteristics is manageability and resource values and uses that may be forgone if wilderness characteristics are protected. Based on the vicinity of two WSAs and the resource values near the Ignacio Chavez A, B, and C zones, this would be adequate to protect these tracts of land for their wilderness characteristics. <del>Under the Proposed RMP (Alternative C of the Proposed RMP/Final EIS), the BLM would, depending on the area, manage lands with wilderness characteristics to protect wilderness characteristics, minimize impacts on wilderness characteristics, or emphasize multiple use. Under the Proposed RMP (Alternative E of the Proposed RMP/Final EIS), the BLM would manage all lands with wilderness characteristics to emphasize multiple use.</del> The BLM would manage WSAs for the nonimpairment of each WSA's wilderness characteristics under BLM Manual 6330 until designated or released from further consideration by Congress.</p>
90	27	Recreation	<p>Lands with wilderness characteristics identified by BLM comprise just five percent of the surface acreage managed by the Rio Puerco Field Office. All of these lands should be managed to protect their wilderness characteristics and management prescriptions should be strengthened to enhance naturalness, opportunities for solitude and opportunities for primitive or unconfined recreation. In addition, since more explicit guidance on inventorying lands with wilderness characteristics was issued after BLM completed its inventory, BLM should evaluate its inventory and update it to ensure that all lands with wilderness characteristics have been identified and considered for management.</p>	<p>The BLM conducted a field office wide inventory of its lands in the development of the analysis of the management situation report. Based on that assessment, it determined that approximately 37,410 acres met the criteria for lands with wilderness characteristics, while other lands had other resource values that drove management objectives and goals. The assessment is consistent with the guidance in BLM Manual 6310.</p>

Letter Number	Comment Number	Category	Comment Text	Response
90	28	Recreation	<p>“Lands with Wilderness Characteristics: BLM now has current guidance requiring updating its inventory of lands with wilderness characteristics and considering protection of those values. The Federal Land Policy and Management Act (FLPMA) requires the BLM to inventory and consider lands with wilderness characteristics during the land use planning process. 43 U.S.C. [section] 1711(a); see also Ore. Natural Desert Ass’n v. BLM, 531 F.3d 1114, 1119 (9th Cir. 2008). IM [Instruction Memorandum] 2011-154 and Manuals 6310 and 6320 contain mandatory guidance on implementing that requirement. The IM directs BLM to “conduct and maintain inventories regarding the presence or absence of wilderness characteristics, and to consider identified lands with wilderness characteristics in land use plans and when analyzing projects under [NEPA].”</p> <p>Lands with wilderness characteristics are roadless areas of 5,000 acres or more (or a smaller, manageable size) with landscapes generally in a natural or undisturbed condition (Section 2.2.8 of Draft RMP). These areas also provide outstanding opportunities for solitude and primitive forms of recreation (non-motorized and non-mechanized activities in undeveloped settings). Generally, actions that create surface disturbance harm the natural character of these areas and the setting for experiences of solitude and primitive recreational activities. Motorized uses in these areas also detract from opportunities for both solitude and primitive forms of recreation. As a result, management to protect wilderness characteristics and the experiences they provide also preserves the natural condition of the land.</p> <p>In 2010, the BLM updated its wilderness inventory of the Rio Puerco Field Office and identified 37,514 acres of lands with wilderness characteristics beyond those areas already designated as Wilderness or WSAs [Wilderness Study Areas]. Draft RMP, Section 3.9. BLM has identified seven individual areas with wilderness characteristics: Petaca Pinta A; Ignacio Chavez A, B and C; Chamisa E; Volcano Hill, and Cimarron Mesa. Alternative B would manage all 37,514 acres managed to protect their wilderness characteristics. The preferred Alternative C would not protect Cimarron Mesa at all and would only “minimize impacts” to wilderness characteristics for Ignacio Chavez A, B and C. Alternative D would all but remove protection for wilderness characteristics, except for a paltry 2,239 acres.”</p>	<p>In Draft RMP/EIS Alternative C, based on manageability criteria, the Ignacio Chavez A, B, and C units would all be managed to protect wilderness characteristics (Draft RMP/EIS Table 2.14).</p> <p>In Draft RMP/EIS Alternative C, a portion of Cimarron Mesa would specifically be set aside for OHV use in order to provide for an OHV user’s recreation experience; under the Proposed RMP (Alternative C of the Proposed RMP/Final EIS) a 1,700-acre the Cimarron Mesa OHV SRMA (18,300 acres) would be managed for open to cross-country OHV Use use (Proposed RMP/Final EIS Appendix P, Section P.4 and Table P-1). Under the Proposed RMP (Alternative E-C of the Proposed RMP/Final EIS), the BLM would manage all the Cimarron Mesa lands with wilderness characteristics unit to emphasize multiple use. In the Draft RMP/EIS, Alternative B analyzed closing the 7,300-acre Cimarron Mesa lands with wilderness characteristics unit to motorized and mechanized travel and limiting the remainder of the SRMA to existing primitive roads and trails.</p>
154	27	Recreation	<p>2-162, -182, -189. Wilderness characteristics should be protected. Therefore the 37,514 acres judged to have wilderness characteristics should be closed to all mineral entry and as much as practicable closed to off-road vehicles. We do not see how you can claim to protect wilderness characteristics if you allow lands to be drilled or dug up.</p>	<p>Lands with wilderness characteristics are protected under the general protection criteria listed in Draft RMP/EIS Section 2.2.8.4.1, which would be managed to protect wilderness characteristics using the following prescriptions:</p> <ul style="list-style-type: none"> <li>• Close to extraction of leasable minerals</li> <li>• Close to mineral sales</li> <li>• Withdraw from mineral location</li> <li>• Retain BLM-administered lands in federal ownership</li> <li>• Prohibit forest product removal</li> <li>• Close to travel, except for authorized use</li> <li>• Allow no new rights-of-way</li> <li>• Allow no new wildlife and range developments that are inconsistent with the maintenance of wilderness characteristics</li> <li>• Allow for the maintenance of existing wildlife and range developments</li> <li>• Allow no new recreational developments</li> <li>• Allow surface disturbance on a case-by-case basis, when necessary for reclamation, emergencies, or valid existing rights; include mitigation to minimize impacts on wilderness characteristics</li> <li>• Manage lands as VRM II.</li> </ul> <p><del>Under the Proposed RMP (Alternative C of the Proposed RMP/Final EIS), the BLM would, depending on the area, manage lands with wilderness characteristics to either protect wilderness characteristics, minimize impacts on wilderness characteristics, or emphasize multiple use. Under the Proposed RMP (Alternative E of the Proposed RMP/Final EIS), the BLM would manage all lands with wilderness characteristics to emphasize multiple use.</del></p>

Letter Number	Comment Number	Category	Comment Text	Response
154	28	Recreation	<p>“Here is some information regarding Designated Wilderness within the United States:</p> <p>1. The United States National Forest and Grasslands encompass approximately 193 million acres. Within these units there are 439 Designated Wilderness units comprising approximately 37 million acres or 19.2% of the US Forest System. These 439 Designated Wilderness units do not include millions of other acres designated as Wilderness Study Areas or administratively managed as defacto Wilderness Areas. 2. The Wilderness Act prohibits commercial enterprises, structures, roads or motorized equipment (i.e.: snowmobiles, ATV’s, chainsaws, bicycles, strollers, handcarts, etc.). 3. We presently have a lot of Designated Wilderness in the US and very few people visit Designated Wilderness areas.</p> <p>Now, back to the Draft RMP/EIS where the Agency identifies Lands with Wilderness Characteristics:</p> <p>Rio Puerco Field Office RMP/EIS, Chapter 2: Proposed Alternatives 2.2.8 Lands with Wilderness Characteristics</p> <p>The BLM has identified lands with wilderness characteristics (LWCs) for management consideration in this planning effort. Wilderness characteristics include the combination of size (the area has at least 5,000 acres or is of sufficient size to be managed as Wilderness), naturalness (the area generally appears to have been affected primarily by the forces of nature, with the imprint of human work substantially unnoticeable), and outstanding opportunities for solitude or primitive and unconfined recreation.</p> <p>2.2.8.1 Goal</p> <p>Protect Wilderness characteristics on those lands with characteristics (as defined in section 3.2.1.1) that are identified for protection through this RMP.</p> <p>The Agency states that the identified LWCs have ““outstanding opportunities for solitude or primitive and unconfined recreation”” yet recent USFS data shows that the majority of the population avoids visiting wilderness. Table 2.14 [ATT 2] shows how all of the alternatives beside No Action are imposing the largely undesirable Wilderness access restrictions. The BLM’s goal as stated in 2.2.8.1 to ““Protect wilderness characteristics on those lands with Wilderness characteristics (as defined in section 3.2.1.1) that are identified for protection through this RMP”” is clearly to align with minority special interest groups promoting Wilderness land management.”</p>	<p>Section 201 of FLPMA requires the BLM to maintain an inventory of all BLM-administered lands and their resources and other values, including wilderness characteristics. It also provides that the preparation and maintenance of the inventory shall not, of itself, change or prevent change of the management or use of BLM-administered lands.</p> <p>In order for an area to qualify as lands with wilderness characteristics, it must possess sufficient size, naturalness, and outstanding opportunities for either solitude or primitive and unconfined recreation. In addition, it may also possess supplemental values, as follows:</p> <ul style="list-style-type: none"> <li>• <b>Size</b>—The area must be over 5,000 acres of roadless, contiguous BLM-managed lands. Areas smaller than 5,000 acres may qualify if it is practical to preserve and use them without damaging their current condition. In addition, also qualifying are roadless areas of less than 5,000 acres that are contiguous with lands that have been formally determined to have wilderness or potential wilderness values, or any federal lands already managed for the protection of wilderness characteristics, such as wilderness areas or wilderness study areas.</li> <li>• <b>Naturalness</b>—Must appear to have been affected primarily by the forces of nature, and any work of human beings in the area must be substantially unnoticeable. Minor human impacts, such as a water troughs or fences, may often be considered substantially unnoticeable.</li> <li>• <b>Outstanding opportunities for solitude or primitive, unconfined recreation</b>—The area must offer a visitor the chance to avoid evidence of other people or provide for outstanding opportunities for primitive recreation and an unconfined type of recreation activity, such as hiking and fishing. Solitude or outstanding primitive recreation opportunities do not have to be available in all portions of the area. An area may possess outstanding opportunities through either the diversity of possible recreation opportunities in the area or the outstanding quality of one opportunity.</li> <li>• <b>Supplemental values</b>—If size, naturalness and outstanding opportunities criteria are met, then ecological, geological, or other features of scientific, educational, scenic, or historic values may be noted, but they are not required to qualify as lands with wilderness characteristics.</li> </ul> <p>After an area is inventoried and found to possess wilderness characteristics, the BLM must then <a href="#">make a decision as to decide</a> whether it will be managed for those characteristics or for other priority multiple uses. This analysis and management decision is made through a public land use planning process.</p> <p><a href="#">Under the Proposed RMP (Alternative C of the Proposed RMP/Final EIS), the BLM would, depending on the area, manage lands with wilderness characteristics to either protect wilderness characteristics, minimize impacts on wilderness characteristics, or emphasize multiple use. Under the Proposed RMP (Alternative E of the Proposed RMP/Final EIS), the BLM would manage all lands with wilderness characteristics to emphasize multiple use.</a></p>
58	29	Recreation	<p>We [PNM] would request that the boundaries of the Ojito Wilderness do not intrude into our existing right-of-way for our WW345kV bulk power corridor which passes immediately west of the area. The recently established wilderness area is immediately adjacent to our existing authorization in several locations and the wilderness status could jeopardize our ability to properly maintain this critical infrastructure. We appreciate your recognition of the importance of this issue and your expressed intent to alter the wilderness boundary to a distance of at least 100ft outside of our existing right-of-way.</p>	<p>In accordance with Draft RMP/EIS Section 2.2.7.3.2: “Existing authorized easements, permits, leases, rights-of-way, and withdrawals would be recognized as valid existing rights and carried forward.”</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
159	4	Recreation	<p>"I support the BLM's decision to protectively manage the majority of wilderness-quality lands in the preferred alternative. BLM should also manage Cimarron Mesa to protect its wilderness characteristics.</p> <p>Cimarron Mesa has outstanding opportunities for hiking, hunting, and other primitive forms of recreation, but left unprotected it is at risk to uncontrolled off-road vehicle use. At a minimum, the BLM should minimize impacts to wilderness characteristics on Cimarron Mesa by limiting motorized vehicles to designated routes."</p>	<p>Part of the BLM's multiple use mission requires it to keep a current inventory of wilderness characteristics. The agency must consider protection of these values in land use planning decisions. The agency does consider the effects other resources would have on wilderness characteristics; however, the BLM considers actions concerning lands with wilderness characteristics on a case-by-case basis and provides the appropriate protections necessary for these lands after evaluating the parameters surrounding the proposed action.</p> <p><i>In the Draft RMP/EIS, Alternative B analyzed closing the 7,300-acre Cimarron Mesa lands with wilderness characteristics unit to motorized and mechanized travel and limiting the remainder of the SRMA to existing primitive roads and trails. The Draft RMP/EIS preferred alternative (Alternative C) for Cimarron Mesa was to carve out the areas that are specifically used for off-road recreation and exclude those areas from the tract that was proposed to be protected for its wilderness characteristics (Draft RMP/EIS Table 2.14). Under the Proposed RMP (Alternative E-C of the Proposed RMP/Final EIS), the BLM would manage the Cimarron Mesa all lands with wilderness characteristics unit to emphasize multiple use.</i></p>

INTERNAL DRAFT

Letter Number	Comment Number	Category	Comment Text	Response
90	2	Recreation	<p>"I have some data the BLM must include as a part of the FEIS to aid the decision maker in making an informed decision for the Rio Puerco RMP. The following website contains information gathered by the USFS on recreational visits on national forest lands:  <a href="http://apps.fs.usda.gov/nrm/nvum/results/R01-R02-R03-R04-R05-R06-R08-R09-R10.aspx/Round3">http://apps.fs.usda.gov/nrm/nvum/results/R01-R02-R03-R04-R05-R06-R08-R09-R10.aspx/Round3</a></p> <p>For ease of use, we will include this excerpt from the cover page of the National Visitor Use Monitoring Results:</p> <p>The National Visitor Use Monitoring (NVUM) program provides science- based estimates of the volume and characteristics of recreation visitation to the National Forest System, as well as the benefits recreation brings to the American public. Information about the quantity and quality of recreation visits is required for National Forest plans, Executive Order 12862 (Setting Customer Service Standards), and implementation of the National Recreation Agenda. The NVUM Program ensures that all visitor statistics for National Forests and grasslands produced by the Forest Service use a standardized measure. These standards were established by the Forest Service in the 1970s; however, their application is now stricter than in the past. For example, visitors must be physically recreating on Forest Service managed lands for a visit to count. They cannot be passing through, viewing from a non-Forest Service managed road, or just using restroom facilities.</p> <p>Although this information is for recreational visitation of USFS land, it is reasonable to consider it for BLM land as well since USFS visitors would also visit BLM lands for the same recreational goals.</p> <p>We have used the National Visitor Use Monitor website to generate the following report on the USFS area that includes New Mexico [ATT 1]:</p> <p>It is clear that most of the forest visitors went to other places than Designated Wilderness areas. In fact, Wilderness Visitation accounts for 3.3% of all total US Forest Service Recreation visits. Recent Forest Service data indicates there were a total of 199.7 million recreation visits to the US Forests nationwide. In contrast, Designated Wilderness visits account for only 6.6 million visits.</p> <p>We urge the BLM to avoid designating more Wilderness Areas or "Wilderness Study Areas." There is no need to have more land put aside in the United States that is seldom, if ever, visited by outdoor recreationists."</p>	<p>Section 201 of FLPMA requires the BLM to maintain an inventory of all BLM-administered lands and their resources and other values, including wilderness characteristics. It also provides that the preparation and maintenance of the inventory shall not, of itself, change or prevent change of the management or use of BLM-administered lands.</p> <p>In order for an area to qualify as lands with wilderness characteristics, it must possess sufficient size, naturalness, and outstanding opportunities for either solitude or primitive and unconfined recreation. In addition, it may also possess supplemental values, as follows:</p> <ul style="list-style-type: none"> <li>• <b>Size</b>—The area must be over 5,000 acres of roadless, contiguous BLM-managed lands. Areas smaller than 5,000 acres may qualify if it is practical to preserve and use them without damaging their current condition. In addition, also qualifying are roadless areas of less than 5,000 acres that are contiguous with lands that have been formally determined to have wilderness or potential wilderness values, or any federal lands already managed for the protection of wilderness characteristics, such as wilderness areas or wilderness study areas.</li> <li>• <b>Naturalness</b>—Must appear to have been affected primarily by the forces of nature, and any work of human beings in the area must be substantially unnoticeable. Minor human impacts, such as a water troughs or fences, may often be considered substantially unnoticeable.</li> <li>• <b>Outstanding opportunities for solitude or primitive, unconfined recreation</b>—The area must offer a visitor the chance to avoid evidence of other people or provide for outstanding opportunities for primitive recreation and an unconfined type of recreation activity, such as hiking and fishing. Solitude or outstanding primitive recreation opportunities do not have to be available in all portions of the area. An area may possess outstanding opportunities through either the diversity of possible recreation opportunities in the area or the outstanding quality of one opportunity.</li> <li>• <b>Supplemental values</b>—If size, naturalness and outstanding opportunities criteria are met, then ecological, geological, or other features of scientific, educational, scenic, or historic values may be noted, but they are not required to qualify as lands with wilderness characteristics.</li> </ul> <p>After an area is inventoried and found to possess wilderness characteristics, the BLM must then <a href="#">make a decision</a> as to whether it will be managed for those characteristics or for other priority multiple uses. This analysis and management decision is made through a public land use planning process. <a href="#">Under the Proposed RMP (Alternative C of the Proposed RMP/Final EIS), the BLM would, depending on the area, manage lands with wilderness characteristics to either protect wilderness characteristics, minimize impacts on wilderness characteristics, or emphasize multiple use.</a> <a href="#">Under the Proposed RMP (Alternative E of the Proposed RMP/Final EIS), the BLM would manage all lands with wilderness characteristics to emphasize multiple use.</a></p>

Letter Number	Comment Number	Category	Comment Text	Response
154	25	Recreation	<p>“Continental Divide Trail: The Continental Divide National Scenic Trail is the longest of three inter-continent trails in the United States, and offers users a high quality, scenic, primitive hiking and horseback-riding recreational experience. The Rio Puerco Field Office is fortunate to have long portions of the Continental Divide National Scenic Trail under its jurisdiction and the opportunity in this RMP to ensure the public experiences the trail as it was envisioned.</p> <p>In the Draft RMP, BLM is proposing a Special Recreation Management Area (SRMA) for the Trail. SRMAs are managed to protect and enhance a targeted set of activities, experiences, benefits, and desired recreation setting characteristics, such that recreation is to be the dominant use. IM 2011-004. Generally, SRMAs are intended for more intensive management, with an emphasis on detailed management prescriptions that promote the overall use and enjoyment of the area. The purposes of the Continental Divide National Scenic Trail are to “connect people and communities to the Continental Divide by providing scenic, high-quality, primitive hiking and horseback riding experiences, while preserving the significant natural, historic, and cultural resources along the Trail.” Draft RMP, Section 3.18.2.</p> <p>Under Alternative B of the Draft RMP, BLM proposes to designate the Continental Divide National Scenic Trail SRMA, totaling 38,808 acres, to provide a hiking and travel experience that also protects the historical and cultural significance of the trail. Key activities that the SRMA is managed to provide are hiking, horseback riding and mountain biking. Management would apply to a half-mile wide corridor around the trail in Alternative B (covering more than 38,808 acres), to a half-mile wide corridor where routes have not yet been determined and to a 2000-foot-wide corridor for the remainder in Alternative C, and to a 2000-foot-wide corridor in Alternative D (covering 11,474 acres) Table 2.23.</p> <p>Recommendation: Designation of the Continental Divide national Scenic Trail SRMA for a half-mile wide corridor in the RMP, as proposed in Alternative B, would best support a recreation experience consistent with the purpose for which the Trail was designated, and we encourage the BLM to do so.”</p>	<p>Under the Proposed RMP/Final EIS (Alternative <b>CE</b>), the corridor for the Continental Divide National Scenic Trail would be 1,000 feet from trail (2,000 foot wide corridor).</p>
90	16	Recreation	<p>The final RMP needs to incorporate the direction contained within the 2009 CDNST [Continental Divide National Scenic Trail] Comprehensive Plan, which replaced the 1985 CDNST Comprehensive Plan. The amended CDNST direction is described in a Federal Register Notice that was published on October 5, 2009 (74 FR 51116). The 2009 CDNST Comprehensive Plan was transmitted by Acting Deputy Chief Richard Sowa to Director Robert Abbey in October 2009.</p>	<p>This Draft RMP/EIS complies with the 2009 Continental Divide National Scenic Trail. More specifically, Chapter III Section E (Land and Resource Management Plans) states: “Land and resource management plans are to provide for the development and management of the Continental Divide National Scenic Trail as an integrated part of the overall land and resource management direction for the land area through which the trail passes.” A varied array of resource and potential conflicts associated with the lands near or on the Continental Divide National Scenic Trail are addressed in this RMP; thus, the different alternatives are presented as management options. Alternative <b>CE</b> designates the <a href="#">23,200+4,400</a>-acre Continental Divide National Scenic Trail, as described in Table 2-36: Continental Divide National Scenic Trail Management Decisions by Alternative, of the Proposed RMP/Final EIS.</p>
154	16	Recreation	<p>“We have examined the direction of Manual 6280 based upon the recognition of a CDNST [Continental Divide National Scenic Trail] right-of-way that extends one-half mile on either side of the route of travel and a CDNST management corridor that extends through the background as observed from the route of travel. The right-of-way width is based upon the Forest Service Manual guidance with respect to the boundary of a CDNST management area. FSM 2353.44b.7. The management corridor width is based upon the Manual direction to perform a viewshed analysis and documentation of the elements of the landscape that are seen, seldom seen, and not seen from the National Trail, including the foreground, middle ground, and background of the viewshed of the National Trail. Chapter 3.2.E.1.</p> <p>Guidance with respect to scenic and visual resources is addressed in Manual 6280 4.E.1. The land use plan and associated NEPA analysis should consider designating national scenic trails in VRM [Visual Resource Management] Class I or II, where not adversely impacted by existing cultural modifications. Where cultural modifications currently exist, the plan should consider whether the Corridor should be classified as VRM Class III or classes which are more visually protective, to retain or improve the existing visual setting. (Planning should include description of how activities managed to VRM Class III support the nature and purposes of the national trail and how uses are managed to avoid visual conflict - even where VRM Class III extends beyond the boundary of the Corridor.) “The influence that the visual setting has on the National Trail is not to be undervalued” Also, “VRM Class IV should not be considered for use within [the Corridor] as “The objective of Class IV is to provide for management activities which require major modifications of the existing character of the landscape.” (We recognize that BLM may delineate a Corridor of lesser width than the viewshed. Even so, however, VRM IV should not be considered there because of the visual impacts associated with major modifications of the landscape; Class III would extend beyond the boundary of the Corridor in that case.)</p> <p>Comment: The DRMP/EIS needs to be revised to apply Manual 6280 management guidance on scenic and visual resources. As we indicated above, VRM Class I should be as proposed by BLM in Maps 96 and 97; VRM Class II should be applied (at least to the foreground-midleground) along the CDNST in the portion shown as VRM Class III on Map 97; VRM Class II should be applied (at least to the foreground-midleground) at Mesa Portales and from Jones Canyon Spring to Deadman Peaks; and the remainder of the viewshed should be designated as VRM Class III (or more protective).”</p>	<p>The BLM has clarified the VRM class designations for the Continental Divide National Scenic Trail to align with BLM Manual 6280 (Proposed RMP/Final EIS Table 2-36).</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
68	1	Recreation	<p>“Guidance with respect to travel management is addressed in Manual 6280 4.E.4. BLM must consider closure of national scenic trails through the land use planning process. If route designation is deferred to the implementation- level plan, then the RMP shall prioritize area(s) that encompass the Corridor to be the first travel management area(s) to complete a travel management plan within the planning area. National scenic trails should be managed primarily for foot travel and are normally closed to motorized vehicle use. (However, in this case, motorized vehicles may continue to be used on trails under BLM jurisdiction, where allowed at the time of designation [November 10, 1978] and authorized through the land use planning process, but such use must not substantially interfere with the nature and purposes of the CDNST[Continental Divide National Scenic Trail].) The RMP should establish considerations for the relocation of trail segments (for such reasons as improved setting quality, water sources, and reduced conflict with motorized use). BLM, in coordination with the Secretary of Agriculture, may identify and recommend (within or outside the Corridor) connecting trail designations for routes that would adjoin two points along a national trail, or side trail designations that provide additional points of public access.</p> <p>Comment: The DRMP/EIS needs to be revised to apply Manual 6280 management guidance for travel and transportation management. As we proposed above, the existing CDNST within the planning area should be designated to be closed to motorized vehicles except for roads specified in Manual 6280 4.2.E.4.vi - thus, New Mexico Highway 197 would remain open. If more information is needed with respect to any of the segments we noted in our discussion of travel management, above, the approved RMP might assign them a Limited classification on an interim basis; but the RMP should indicate that these segments will be addressed in the first travel management plan within the planning area. Considerations relating to the potential new route north of Jones Canyon Spring should be included; and the RMP should provide for the closure of this route to motorized vehicles when and if it is approved.”</p>	In accordance with BLM Manual 6280, considering closure, rerouting, and rehabilitating routes is based on the route not meeting national trail goals and objectives. No rerouting, rehabilitation, or closure is required because the routes presented in the Draft RMP/EIS meet the national trail goals and objectives.
53	7	Recreation	<p>“Continental Divide Trail [CDNST] SRMA [Special Recreation Management Area]:</p> <p>The existing CDNST segment from La Ventana Mesa north to Mesa Portales, the Chijuilla Wash and NM Highway 197 is proposed to be replaced by a route crossing US 550 nine miles south of Cuba and then proceeding northeasterly to the Santa Fe National Forest boundary north of the abandoned Nacimiento Mine. Furthermore, we [Step Into Cuba] have proposed new trail north of the current CDNST terminus on NM Highway 197 and west of Mesa de Cuba until entering the canyon of the Chijuillita Wash and then proceeding east to the top of Mesa de Cuba in the Santa Fe National Forest. As the likelihood of hikers using both trail routes in the future is high, it is my opinion that Generous SRMA corridors for both current and future CDNST routes and connections should be created. This is best accomplished by Alternative B on Map 050 between pages 4-124 and 4-134 in Volume II of the Draft Plan. In order to preserve the wilderness quality of these trail routes, most roadway use for motor vehicle crossing of the corridor should be kept to an absolute minimum and, when necessary, only over unimproved roads.”</p>	Alternative B for the Continental Divide National Scenic Trail corridor has been corrected to 0.5 miles. The Proposed RMP (Alternative <a href="#">CE</a> ) for the Continental Divide Trail corridor is 1,000 feet from the trail (a 2,000-foot-wide corridor).
53	8	Recreation	<p>“Continental Divide Trail</p> <p>I support the management of this trail to meet goals and objectives set out in pages 2-83, 84, and 85. To achieve these goals the widest designated area of protection (1/2 mile-Alternative B) should be included under all the alternatives, not the 1000 feet proposed in Alternatives A, C, and D. Preserving this trail and the adjacent lands in perpetuity should be a very high priority because of the unique quality and geographic importance of this trail for recreation. As development increases in the future, having this preservation of open space and the maximum buffer possible will be even more important.”</p>	Alternative B for the Continental Divide National Scenic Trail corridor has been corrected to 0.5 mile. The Proposed RMP (Alternative <a href="#">CE</a> ) for the Continental Divide Trail corridor is 1,000 feet from the trail (a 2,000 foot wide corridor).
181	2	Recreation	<p>“Applying Continental Divide National Scenic Trail (CDNST) management prescriptions (no motorized use) to a half-mile corridor where routes have not yet been determined is excessively detrimental to other forms of established public recreation.</p> <p>It is bad enough that the CDNST is being developed solely for non-motorized recreation, that the Agency is not actively working to promote a motorized equivalent, and that so much of the current alignment has already displaced historical motorized use. There is no reason to preclude motorized use on a half mile wide corridor, especially when the lack of agreed upon alignment results in multiple half mile wide corridors being subject to this excessive management prescription (see Map 050 for an example).</p> <p>The current 2000 foot corridor is adequate protection for the CDNST as the Agency has failed to demonstrate a need for extending the corridor width to half a mile.”</p>	Alternative B for the Continental Divide National Scenic Trail corridor has been corrected to 0.5 miles. The Proposed RMP (Alternative <a href="#">CE</a> ) for the Continental Divide Trail corridor is 1,000 feet from the trail (a 2,000-foot-wide corridor).
53	2	Recreation	<p>The Placitas BLM parcels are significant urban interface, yet this aspect is missing from the DRMP. Any new mining/development on those parcels that curtails recreational activities, negatively impacts the greater Albuquerque area and the urban centers of Sandoval County. The Placitas BLM parcels are adjacent to the suburban residential community of Placitas, the Town of Bernalillo, and the San Felipe and Santa Ana pueblos. Some of these communities have densities comparable to or greater than outlying parts of urban areas such as Albuquerque, Rio Rancho and Santa Fe. Furthermore, these parcels are near Albuquerque, and residents of that city are invited to participate in various recreational activities on these parcels. In fact, the City of Albuquerque manages the Placitas Albuquerque Open Space, just to the south of Parcel A, as a part of the greater Albuquerque recreational area.</p>	The BLM-administered lands near Placitas are open for public recreation. Additionally, the travel management plan will analyze roads, routes, and trails on all Decision Area lands. Permitting salable mineral development is a discretionary action. Site-specific analysis for proposed mineral activity in the Placitas area will help the BLM consider alternatives before it <a href="#">makes a decision/decides</a> .

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
160	3	Recreation	<p>“Urban Interface:</p> <p>The Placitas BLM parcels are adjacent to the suburban residential community of Placitas, the Town of Bernalillo, and the San Felipe and Santa Ana pueblos. Some of these communities have densities comparable to or greater than outlying parts of urban areas such as Albuquerque, Rio Rancho and Santa Fe. Furthermore, these parcels are near Albuquerque, and residents of that city are invited to participate in various recreational activities on these parcels. In fact, the City of Albuquerque manages the Placitas Albuquerque Open Space, just to the south of Parcel A, as a part of the greater Albuquerque recreational area. The Placitas BLM parcels are significant urban interface, yet this fact is missing from the DRMP. Any new mining/development on those parcels that curtails such recreational activities, negatively impacts the greater Albuquerque area and the urban centers of Sandoval County.”</p>	<p>The BLM-administered lands near Placitas are open for public recreation. Additionally, the travel management plan will analyze roads, routes, and trails on all Decision Area lands. The BLM recognized the importance that the Placitas BLM-administered lands have to the surrounding communities. The RMP planning process takes into consideration the issues brought forth by these surrounding communities that have arisen since the development of the 1986 RMP.</p> <p>Part of the BLM’s mandate from FLPMA Section 202 is to consider present and potential uses of the BLM-administered lands, along with the relative scarcity of values involved. Due to the existing resource conflicts on the Placitas tract, the site does not meet the classification requirements for either an ERMA or SRMA; however, the site would remain open to dispersed recreation use, as defined in the glossary.</p>
91	32	Recreation	<p>“Urban Interface:</p> <p>The Placitas BLM parcels are significant urban interface to the areas of Albuquerque and Rio Rancho, offering recreational and other opportunities for the residents of those urban communities.</p> <p>The Placitas BLM parcels are adjacent to the suburban residential community of Placitas, the Town of Bernalillo, and the San Felipe and Santa Ana pueblos. Some of these communities have densities comparable to or greater than outlying parts of urban areas such as Albuquerque, Rio Rancho and Santa Fe. Furthermore, these parcels are near Albuquerque, and residents of that city are invited to participate in various recreational activities on these parcels. In fact, the City of Albuquerque manages the Placitas Albuquerque Open Space, just to the south of Parcel A, as a part of the greater Albuquerque recreational area. The Placitas BLM parcels are significant urban interface, yet this fact is missing from the DRMP. Any new mining/development on those parcels that curtails such recreational activities, negatively impacts the greater Albuquerque area and the urban centers of Sandoval County.”</p>	<p>The BLM-administered lands near Placitas are open for public recreation. Additionally, the travel management plan will analyze roads, routes, and trails on all Decision Area lands. The BLM recognized the importance that the Placitas BLM-administered lands have to the surrounding communities. The RMP planning process takes into consideration the issues brought forth by these surrounding communities that have arisen since the development of the 1986 RMP.</p> <p>Part of the BLM’s mandate from FLPMA Section 202 is to consider present and potential uses of BLM-administered lands, along with the relative scarcity of values involved. Due to the existing resource conflicts on the Placitas tract, the site does not meet the classification requirements for either an ERMA or SRMA; however, the site will remain open to dispersed recreation use, as defined in the glossary.</p>



Letter Number	Comment Number	Category	Comment Text	Response
95	9	Recreation	<p>“We believe that the DEIS severely under reports the economic impact of recreation in the planning area, specifically the economic impact of motorized recreation. The DEIS reports the total estimated economic impact from recreation (total recreation, not just motorized recreation) on the Planning Area: ““After separating the contributions made from local residents, recreation contributes 32 jobs and \$1.02 million in labor income (see Table 3.20). Local recreationists on BLM-administered lands contribute another 12 jobs and \$416,000 in labor income for a total of 44 jobs and \$1.4 million in labor income on an average annual basis.”” [Footnote 23: DEIS, page 3-81]</p> <p>We realize that the Bureau routinely relies on IMPLAN to estimate economic impact but we suggest that there are other sources of information that may provide more realistic estimates and call into question the accuracy of the IMPLAN output. At the very least, the additional information sources suggest that a higher range of impact is likely.</p> <p>Suggested sources: Economic Contribution of Off-Highway Vehicle Recreation in Colorado - <a href="http://coloradotpa.org/news/news/cohvco-economic-contribution-of-off-highway-vehicle-recreation-in-co.html">http://coloradotpa.org/news/news/cohvco-economic-contribution-of-off-highway-vehicle-recreation-in-co.html</a></p> <p>Economic Benefits of Off-Highway Vehicle Recreation to Arizona - <a href="http://www.americantrails.org/resources/economics/AZohvecon.html">http://www.americantrails.org/resources/economics/AZohvecon.html</a></p> <p>The Outdoor Recreation Economy - <a href="http://www.outdoorindustry.org/pdf/OIA_OutdoorRecEconomyReport2012.pdf">http://www.outdoorindustry.org/pdf/OIA_OutdoorRecEconomyReport2012.pdf</a></p> <p>The first two studies focus specifically on the economic impact of OHV recreation in two of our neighboring states. While there are significant differences in scope and scale when comparing Colorado or Arizona to the planning area, the studies are still useful as one can interpolate to accommodate the smaller planning area.</p> <p>The Arizona data is particularly useful as it was completed by Arizona State University for the State of Arizona and presents the data by counties. The data presented from rural counties, including those directly across the state line from the planning area, makes data and conclusions much easier to apply to the planning area in NM. The final study takes a look at the economic impact from all recreation across the US but does include a break out for motorized recreation. Again, it is a much larger ““pie”” but one can infer some important information from simple ratios when the study is applied to the planning area.</p> <p>It is important to accurately portray the economic impact in the DEIS because decisions made via the guidelines presented in an RMP can have a profound effect on the economic viability of New Mexico. This is especially true for the smaller, rural communities in and on the periphery of the Planning Area:</p> <p>““The BLM’s Recreation 2000 Strategic Plan recognizes that the BLM’s recreation program is an important part of the economic base of the western states, and helps to satisfy the growing public demand for outdoor recreation by providing tourism-related opportunities on BLM-administered lands.”” [Footnote 24: DEIS, page 3-61]</p> <p>Incorporate additional ““data points”” from other recreation economic impact studies into the DEIS to provide a more realistic range of the potential economic impact of recreation on the planning area.”</p>	<p>Recreation estimates have been recalculated in the <a href="#">Proposed RMP/Final EIS</a> using updated input data. Calculations include only non-local visitor spending and do not include spending on recreation materials or supplies by non-local visitors at their place of residence. These estimates are not intended to capture the full contributions from recreation in the local economy, but rather the portion associated directly with recreation on BLM-administered lands from these non-local visitors. As discussed in the methodology section, calculations for spending are based on average spending by type of trip—overnight or day trip—based on values derived from the Forest Service’s National Visitor Use Monitoring program national estimates (White 2017; see Chapter 6, References). While estimated contributions represent a small portion jobs and income in the regional economy, the BLM acknowledges in the <a href="#">Proposed RMP/Final EIS/FEIS</a> that contributions at the local community level may be more_important.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
157	27	Recreation	<p>“Dispersed camping: We appreciate that the Draft RMP prohibits camping within 150 feet of riparian areas in the planning area; however, the Draft RMP failed to provide any other details on dispersed camping - specifically where motorized and mechanized travel will be permitted off of designated routes. We recommend BLM allow visitors to disperse camp generally, but restrict motor vehicle travel for the purposes of dispersed camping according to a combination of the following options, as dictated by resource, safety, and private property concerns:</p> <p>(1) BLM visitors may park a motor vehicle within one vehicle length from the edge of the road surface when it is safe to do so and without causing damage to the resources of the public lands (campers walk to access a backcountry camp of their choosing); and/or (2) Motor vehicles may access signed campsites via designated camp spur routes that are signed and demarcated on a public access map. By way of example, we draw your attention to the Dry Creek Travel Management Plan (TMP), developed by the BLM’s Uncompahgre (Colorado) Field Office. We fully support the policy adopted in the Dry Creek TMP, and encourage the Rio Puerco RMP to put in place a similar policy for the full Rio Puerco Field Office.</p> <p>Notably, page 184 of the Dry Creek EA [Environmental Assessment] states:</p> <p>Off-Route Parking, Camping, and Game Retrieval Policy: Due to higher levels of public use on the Public Lands and National Forests, BLM and Forest Service managers are concerned that the long-standing 300 foot regulation is outdated and no longer provides adequate protection of vegetation and other resources. One of the major concerns with the 300 foot regulation is that new routes are often created through repeated use, and these new routes in turn become the starting points for additional 300-foot long or longer extensions. As a result of these concerns, both the Forest Service and BLM are revising their regulations to decrease or eliminate the distance that motor vehicles can legally drive off routes to park, camp, and retrieve game.) The Dry Creek Record of Decision CO-150-2008-33 EA, Page 3, states:</p> <p>Parking In order to minimize resource impacts and help prevent new usercreated routes, users are allowed to park motorized or mechanized modes of travel immediately adjacent and parallel to available designated routes for any purpose. Parking is limited to one vehicle-width from the edge of the route. Users are encouraged to park motorized or mechanized modes of travel in already disturbed areas whenever possible, consider safety, and keep routes passable for other users. Camping Short spur routes leading to popular dispersed campsites are designated and identified. Dispersed camping is allowed in other areas, consistent with parking requirements described above. Recommendations: We support the policy set out in the Dry Creek TMP and request that this or a similar policy be incorporated in the Rio Puerco RMP, and/or subsequent travel management planning. The long-standing 300 foot regulation for dispersed camping is simply excessive. At the very most, we could accept a specified distance for cross country travel on a limited subset of specifically designated routes that have the necessary characteristics (such as soil composition, topography, vegetation, and use levels) that can sustain such use. All other roads and areas should be limited to designated sites, spurs and delineated parking areas. The Rio Puerco RMP should also recognize and address dispersed camping impacts that are regularly found to be significant and lasting; the RMP should assess those impacts field office wide and take comparable steps to mitigate them and set policies that will help manage and preserve the access and sustainability of these opportunities for years and decades to come.”</p>	<p>As stated in Draft RMP/EIS Section 3.13, Recreation and Visitors Services, recreation programs in the RPFO are managed according to multiple-use principles, unless specified otherwise by law. The RPFO’s primary goal is to ensure the continued availability of outdoor recreation opportunities that are not readily available from other sources. Recreation use is managed to protect the health and safety of users, to protect natural and cultural resource values, and to promote public use and enjoyment of the BLM-administered lands. Most BLM-administered land is managed to maintain a freedom of recreational choice with a minimum of regulatory constraints. Current management direction for dispersed recreation (which includes dispersed camping) is provided in 43 CFR 8300 and subsequent BLM manuals, guidance, and policy. Any changes to the regulations will be adopted by the RPFO to include vehicle parking while users are participating in dispersed recreation on BLM-administered lands.</p>
160	15	Recreation	<p>“Above all else, sufficient enforcement resources must be allocated to ensure effective protection of scenic, ecological, wildlife, forestry and paleontological resources within the entire ERMA [Extensive Recreation Management Area].</p> <p>The most expedient way to accomplish this is to halt all but authorized vehicle use within the entire ERMA, except for a few major public access routes.</p> <p>I have enjoyed hiking through this unique ecological treasure land. From the petrified trees to the magnificent rock formations, stands of old junipers, and long vistas from the mesa tops, I believe this area qualifies for the highest level of protection that ERMA can provide.”</p>	<p>The Proposed RMP defines an overall land use management strategy, with resource-specific management prescriptions to protect those resources. The enforcement and implementation process essentially happens outside of the scope of the RMP development process. The funding of personnel to enforce and implement the RMP is a budgetary process that is primarily managed and dictated through congressional action. As for the travel management aspect of the RMP, the BLM notes the comment and will take it into consideration during the development of the travel plan, which will begin after the final RMP decision record is signed.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
90	20	Recreation	<p>"All four zones identified in the [proposed San Juan Badlands] ERMA [Extensive Recreation Management Area] may meet the criteria of lands with wilderness characteristics, as landscapes of 5000 plus acres in a natural or primitive condition, providing outstanding opportunities for solitude and primitive forms of recreation. Closure of existing primitive roads and their rehabilitation, recommended below, could address any questions regarding their roadlessness."</p>	<p>Managing the wilderness resource is part of the BLM's multiple use mission. Lands with wilderness characteristics provide a range of uses and benefits, in addition to their value as settings for solitude or primitive and unconfined recreation. Section 201 of FLPMA requires the BLM to maintain an inventory of all BLM-administered lands and their resources and other values, including wilderness characteristics. It also provides that the preparation and maintenance of the inventory shall not, of itself, change or prevent change of the management or use of BLM-administered lands. Four primary factors must be met in order for an area to qualify as lands with wilderness characteristics: sufficient size (5,000 or more acres), naturalness, outstanding opportunities for solitude or primitive and unconfined recreation, and supplemental values. In the case of naturalness, the area must appear to have been affected primarily by the forces of nature, and any work of human beings must be substantially unnoticeable. In reference to the San Juan Basin Badlands ERMA, several resource management objectives and goals would prohibit naturalness at the required levels for lands with wilderness characteristics. Part of the ERMA <del>is</del> would be managed for scientific research that would allow occasional fossil study and permitted excavation, and part of the ERMA was proposed to be managed for OHV events that have been permitted and successfully managed for over a decade; this latter area has been removed from the ERMA in the Proposed RMP/Final EIS and is currently proposed as the Endurance Trails SRMA (Proposed RMP/Final EIS Appendix P).</p>

INTERNAL DRAFT

Letter Number	Comment Number	Category	Comment Text	Response
67	1	Recreation	<p>"In the Draft RMP, BLM has acknowledged the outstanding paleontological attributes that make the San Juan Basin Badlands so exceptional. These much sought-after values are in ever increasing decline throughout the region due to population growth and development, as well as unrestricted tree-cutting and irresponsible OHV use. As demand continues to grow, it is important that BLM identify lands suitable for a backcountry experience, including paleontological research, and manage those lands in accordance so as to protect their conservation, historic, cultural, biological, and geological qualities. The San Juan Basin Badlands ERMA [Extensive Recreation Management Area], as summarized in Alternative B of the Draft RMP, captures these qualities remarkably well. We recommend BLM designate the San Juan Basin Badlands ERMA, designate the Torreon Fossil Fauna East and West Zones ACEC [Area of Critical Environmental Concern], and expand this ACEC to incorporate additional lands with these values. We also request that the Ceja Pelon &amp; Chijuilla zones be designated as ACECs (Area of Critical Environmental Concern) and that all four of these Badlands zones considered for their wilderness characteristics, as well. Moreover, we recommend BLM limit travel in the Chijuilla Zone to existing primitive roads and trails; that the Ceja Pelon Zone be closed to motorized use, unless authorized by permit, and that the overall ERMA be recommended for withdrawal from locatable mineral entry. Further, collection of petrified wood should be prohibited. Finally, the OMG raceway routes should be limited to one route per year to start and monitored and reevaluated each year."</p>	<p>The proposed San Juan Basin Badlands ERMA is composed of varying zones (Draft RMP/EIS Table 2.55-1; Proposed RMP/Final EIS Section 2.2.12.4 and Appendix P, Section P.10) that provide a diverse recreation experience. For each zone, a general travel management designation was prescribed to either protect or provide for the type of use the zone would be managed for. For example, the Oh-My-God Zones A, B, and C would continue to permit the event trails, with new trails authorized on a case-by-case basis (in the Proposed RMP/Final EIS, this area would be managed as the Endurance Trails SRMA). The impacts of the event would be limited to the approved routes in the zone.</p> <p>The specific locations that would be limited, open, or closed in the ERMA were not identified in the Draft RMP/EIS. These would be developed in the travel management plan, which would involve the public and users in the planning process. The travel management planning process would begin after the Approved RMP/Record of Decision is signed. The BLM has completed an initial inventory of all roads (linear features) and attributes, which would serve as the basis for the travel management plan. The San Juan Basin Badlands ERMA, as well as all other areas in the RPFO, would be divided into travel management areas, which would allow the public and the BLM to be more precise in analyzing, designating, and developing travel management prescriptions that best meet the needs of the travel management areas.</p> <p>In reference to additional ACEC designations in the San Juan Basin Badlands ERMA, in addition to a finding of important and relevant resource values, a potential ACEC "must require special management attention to protect" those identified values (BLM Manual 1613.12). Special management attention requires the formulation of management practices expressly developed for the area to protect the important and relevant values from uses permitted by the RMP. In the case of zones outside the Torreon Fossil Fauna, these are managed for various recreational activities that would not warrant management measures outside of what is being proposed by the Draft RMP/EIS.</p> <p>The BLM agrees that, in the San Juan Basin Badlands ERMA, petrified wood resources are unique. Prohibiting petrified wood collection in portions of the San Juan Basin Badlands ERMA was analyzed under Alternatives B and C of the Draft RMP/EIS and Proposed RMP/Final EIS.</p> <p>Under the Proposed RMP/Final EIS (Alternative CE), in the Torreon Fossil Fauna ACEC (which was formerly the Torreon Fossil Fauna East and West Zones within the San Juan Basin Badlands ERMA), petrified wood collection would be <del>prohibited</del>allowed, and <del>travel would be limited to the single access route only</del>travel would be limited to existing primitive roads and trails, as designated through the approval of the TMP. The specific access route would be determined during the travel management planning process, with the input of the public and users.</p> <p>The Oh-My-God zones are well-established recreation sites that have been compliant for over a decade. Maintaining these sites in the San Juan Basin Badlands ERMA provides for those extensive recreation opportunities, while not intruding on the other conservation and recreation goals of the remaining five zones. The events are held annually and are rotated among three separate courses every year to allow one site to recover for 2 years before another event is held.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
90	11	Recreation	<p>“Chamisa E: This area is located between the Chamisa WSA [Wilderness Study Area], Ignacio Chavez WSA, and the Cibola National Forest in western Sandoval and eastern McKinley counties. In 1991, the New Mexico Wilderness Study Report recommended that this inventory unit be designated as wilderness (USD I BLM, 1991). In 1980 the area was separated by a road from the Chamisa WSA to the east. That road, however, was closed to the public and is no longer maintained for regular and continuous use. As a result, the 2,239-acre Chamisa E unit is of sufficient size to make managing to protect its wilderness characteristics practical. The Chamisa E unit meets the wilderness characteristic criteria of naturalness because the scattered imprints of human activity, such as primitive vehicle routes and fences, are substantially unnoticeable due to the dense vegetation, rugged foothills, and steep slopes. The Chamisa E unit also possesses outstanding opportunities for solitude and primitive unconfined recreation because of its proximity to the Chamisa WSA. A variety of primitive and unconfined recreational opportunities exist in this area, including hiking, camping, hunting, wildlife viewing, horseback riding, and photography.</p> <p>Under Alternatives B, C and D, the agency would manage Chamisa E to protect its wilderness characteristics, by closing the area to extraction of leasable and mineral sales, as well as prohibiting forest product removal and mechanized travel. Draft RMP, p. Section 3.9.1. We strongly recommend that BLM protect the wilderness characteristics of the Chamisa E as outlined in the Draft RMP. By protecting the wilderness characteristics of Chamisa E, BLM will help to increase the backcountry experience of the overall Boca del Oso ERMA [Extensive Recreation Management Area].”</p>	<p>Under the Proposed RMP/Final EIS (Alternative <a href="#">CE</a>), the BLM would manage the Chamisa E Lands with Wilderness Characteristics area— to <del>emphasize multiple-use for</del> <a href="#">protect</a> its wilderness characteristics. The federal government owns only the salable minerals in this area; this is a discretionary action. The federal government does not own the locatable or leasable minerals on the Ignacio Chavez grant.</p>
90	24	Recreation	<p>“The Ceja Pelon &amp; Chijuilla meet ACEC [area of critical environmental concern] criteria of significant scenic value and rare geologic features. See, Draft RMP, Section 3.18.4. Unstable, loose soils and sheer cliff faces can be considered a natural hazard. Their unique hoodoos, colorful cliffs, iconic sculpted grandfather junipers and ponderosas, fragile biological soil crusts and prevalence of petrified wood logs and chips are quite unique and very vulnerable to the destructive effects of illegal woodcutting, off road vehicle incursions or mineral development. These areas should also be designated as ACECs.”</p>	<p>Nominations for ACECs must stand the test of relevance and importance before they are evaluated for ACEC designation. To make this determination, a BLM interdisciplinary team uses information from both internal and external sources, including other federal agencies, state and local government, conservation groups, research institutions, and the opinions of experts. Nominated areas meeting relevance and importance criteria become potential ACECs and are considered in the array of Draft RMP/EIS alternatives. Each potential ACEC is considered for designation in at least one of the management alternatives.</p> <p>The need for special management attention and the effects of applying such management are assessed in the environmental analysis. Where it was determined that special management attention is not required to protect the relevant and important values in relation to the Proposed RMP (Alternative <a href="#">CE</a>), an ACEC designation would not be applied. In the case of the Ceja Pelon and Chijuilla Mesa recreation management zones in the proposed San Juan Basin Badlands ERMA, the specific management prescriptions in the Proposed RMP (Alternative <a href="#">CE</a>) would protect the areas properly, in accordance with the resources inventoried.</p>
58	8	Recreation	<p>“2-108. Livestock grazing is a serious problem for sensitive wildlife and plant species in Ignacio Chavez ACEC [Area of Critical Environmental Concern] &amp; WSA [Wilderness Study Area] and as much acreage as practicable should be closed. B &amp; C’s closure of Ignacio Chavez to locatable mineral entry is praiseworthy.”</p>	<p>Livestock grazing on BLM-administered lands is managed to achieve the fundamentals of rangeland health indicated by soil and site stability, hydrologic function, and biotic integrity. The Ignacio Chavez ACEC was proposed as such under Alternatives B and C (<a href="#">the Proposed RMP</a>) for the protection of multiple wildlife and special status species (Draft RMP/EIS Section 2.2.16.3.12). The BLM recognized the potential conflicts between livestock grazing and wildlife management on the Ignacio Chavez ACEC (Draft RMP/EIS Section 2.2.16.3.12).</p> <p>ACECs differ from other special designations, such as wilderness study areas, in that designation by itself does not automatically prohibit or restrict other uses in the area that are viable and compliant with the FLPMA multiple use mandate. The management of ACECs is focused on the relevant and important values. <del>Under the Proposed RMP/Final EIS, Alternative E does not move forward with ACEC designation; grazing would remain available.</del></p> <p>The federal government does not own the locatable or leasable minerals on the Ignacio Chavez grant.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
58	20	Range	<p>"I am extremely concerned that each of the alternative plans includes the majority of the land being open to cattle grazing, mining, and off road vehicle use. How can these uses even be considered without first conducting environmental studies and disclosing potentially harmful environmental impacts to the public? Where are the discussions of the effect of all of this on sensitive ecological species? What about the management of critical water areas that need to be restored? All of this information is lacking in the DEIS. As for those alternatives that are suggested, I support Alternative B which includes closure to minerals and no surface occupancy"</p>	<p>Following enactment of the Taylor Grazing Act of 1934 and subsequent adjudication, both livestock numbers and the ranchers who grazed livestock on BLM-administered land were significantly reduced. Ranchers who did receive grazing permits realized increased stability in their operations and some assurance that they had a sustainable livestock operation.</p> <p>Additionally, a portion of the fees collected for grazing livestock on BLM-administered lands was returned to the appropriate grazing district to be used for range improvements. These included such improvements as fencing to control livestock use, water developments for stockwater, and vegetation manipulations for increasing livestock forage. With the passage of the Taylor Grazing Act and establishment of permit requirements, much of the traditional "first come, first serve" operating methods used for migratory sheep operations on public rangelands were eliminated. The Taylor Grazing Act placed controls on BLM-administered land grazing and established specific grazing allotments or areas of use. In some cases, this policy forced operators to make more use of private lands through purchasing or leasing private pasture.</p> <p>The BLM recognizes that changing social values with respect to environmental protection and conservation of natural resources, as reflected by FLPMA, have brought more scrutiny to livestock grazing practices and the level of livestock grazing on BLM-administered lands. Also, the increase in the nation's population has created more BLM-administered land use conflicts as more people seek to use BLM-administered lands for a variety of purposes. As described in Proposed RMP/Final EIS Section 2.2.9.3, Management Common to All Alternatives, "The BLM will work with permit holders to apply adaptive management principles, such as reducing the number of AUMs or changing the season of use, based on forage availability. This may be implemented on an annual or long-term basis."</p>
90	25	Range	<p>"2-148, -158, -181 and others: Grazing allotments make up approximately 95% of BLM lands in the Planning Area. Compare: 2-169: Grazing allotments make up approximately 82% of BLM lands in the Planning Area."</p>	<p>This error was corrected in the Proposed RMP/Final EIS to state 82 percent.</p>
58	1	Range	<p>"Ranching on public land can also contribute to the problems of climate change, and makes adaptation to it by the BLM more difficult. While efforts are underway to reduce global emissions of greenhouse gases, it is fairly inevitable that humans will need to undertake measures to adapt to climate change and the resulting effects on natural systems, including changes in streamflow, wildfires, crop productivity, temperature, and sea level. The Western United States has an advantage in its vast, relatively well-connected holdings of federal lands that can buffer and mitigate impacts of climate change. The Secretaries of Interior and Agriculture have acknowledged these unique opportunities and directed their respective departments to address climate change. The Department of Interior ("DOI") has specified unequivocal actions towards science-based adaptation strategies to protect vital ecosystem services, including water quantity and quality, biological diversity, and fish and wildlife habitat. [Footnote 15 [USDI] U.S. Department of Interior 2009a. Empowering Natural Resource Managers to Adapt to Climate Change. U.S. Department of the Interior COP-15 Copenhagen, Dec. 7-18, 2009. <a href="http://www.doi.gov/archive/climatechange/">http://www.doi.gov/archive/climatechange/</a>. Accessed August 24, 2010.] Adaptation to the effects of climate change is an objective that fits with the mission of the BLM. In this era, grasslands will play an increasingly vital role in protecting the nation's watersheds. A recent review of climate change and the effects of livestock grazing in the West further highlights the importance of the issue in land management planning. The manuscript demonstrates unequivocally the single biggest factor compromising climate change resiliency on western landscapes is livestock production. [Footnote 16: Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild, and Feral Ungulates. Beschta, R.L. D.L. Donahue, D.A. DellaSala, J. J. Rhodes, J. R. Karr, M.H. O'Brien, T.L. Fleischner, and C.D. Williams. In Press.] The authors conclude, If effective adaptations to the adverse effects of climate change are to be accomplished on western public lands, large-scale reductions or cessation of ecosystem stressors associated with ungulate use are crucial. Federal and state land management agencies should seek and make wide use of opportunities to reduce significant ungulate impacts in order to facilitate ecosystem recovery and improve resiliency. Such actions represent the most effective and extensive means for helping maintain or improve the ecological integrity of western landscapes and for the continued provision of valuable ecosystem services during a changing climate. We strongly suggest the final RMP consider new climate science to be the best available science and incorporate it into the final EIS and decision."</p>	<p>In accordance with the Department of the Interior fiscal year 2012 economic report, grazing on BLM-administered lands accounts for only 0.41 percent of the nation's livestock receipts. Furthermore, over the last 100 years, the absolute number of livestock has increased in the West and in the US as a whole in order to meet growing demand of a growing population. Over the same period, grazing on BLM-administered lands has declined (DOI Economic Report 2012; internet website: <a href="https://www.doi.gov/sites/doi.gov/files/uploads/FY2012%20DOI%20Econ%20Report%20%28Final%29%202013-09-25.pdf">https://www.doi.gov/sites/doi.gov/files/uploads/FY2012%20DOI%20Econ%20Report%20%28Final%29%202013-09-25.pdf</a>); thus, the impact on climate change from livestock grazing on BLM-administered lands would be extremely low, in comparison with private production.</p> <p>The Proposed RMP/Final EIS proposes adaptive management for grazing in order to ensure the stability and health of the range in regard to all potential impacts. In order to accomplish its range protection goals (Proposed RMP/Final EIS Section 2.2.9.3, Management Common to All Alternatives), "The BLM will work with permit holders to apply adaptive management principles, such as reducing the number of AUMs or changing the season of use, based on forage availability. This may be implemented on an annual or long-term basis."</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
5	4	Range	<p>"2-27, -134. Alt. B would not treat woodland encroachment in grassland and sagebrush. That would be wrong. Treatment for the sake of livestock forage is unwelcome. Treatment for the sake of maintaining a balance of vegetation types is usually good. Tree invasion has been promoted by livestock grazing; that effect should be countered. We do not want to lose sagebrush because of cattle, nor, on the other hand, do we want to see an increase in sagebrush because of cattle."</p>	<p>The BLM manages vegetation manipulation in accordance with the Public Rangelands Improvement Act for Healthy/Functioning Rangelands. The BLM uses the ecological sight descriptions provided by the US Department of Agriculture, Natural Resources Conservation Service to compare the current state of the area to its historical state. Management recommendations stem from these analyses through an interdisciplinary team for the benefit of multiple resources.</p>
90	38	Range	<p>"Grazing: We recognize the important role grazing and ranching has historically played in New Mexico, and also recognize that grazing will continue to be part of public lands management for the foreseeable future. This RMP is an opportunity to also address the serious environmental problems which can be caused by cattle, from affecting soils and riparian areas, to potential conflicts between cows and endangered species. The BLM acknowledges in the Draft RMP (and numerous studies have indicated) that cattle can cause soil erosion, trample fragile habitat for native species, compete with native grazers like elk and deer, increase the number of interactions between humans and protected species, and perhaps most notably, significantly degrade water quality in areas where water is already extremely scarce [Footnote 6 See e.g. Freilich, JE, JM Emlen, JJ Duda, DC Freeman &amp; PJ Cafaro. 2003. Ecological effects of ranching: a six-point critique. BioScience 53(8): 759-765; Belsky, J &amp; JL Gelbard. Comrades in Harm: Livestock and Exotic Weeds in the Intermountain West in Wuerthner, G &amp; M Matteson (eds). Welfare ranching: the subsidized destruction of the American west. Island Press (2002).]. Below [in the letter], we discuss the various impacts that cattle grazing can have on other resources in the Rio Puerco Field Office to support adopting an alternative to limit grazing where it can harm the values for which areas like ACEC [Area of Critical Environmental Concern]s [Areas of Critical Environmental Concern] and wilderness characteristics are managed, as well as to support a commitment to more proactive management of grazing on these public lands. "</p>	<p>Following enactment of the Taylor Grazing Act of 1934 and subsequent adjudication, both livestock numbers and the ranchers who grazed livestock on BLM-administered land were significantly reduced. Ranchers who did receive grazing permits realized increased stability in their operations and some assurance that they had a sustainable livestock operation.</p> <p>Additionally, a portion of the fees collected for grazing livestock on BLM-administered lands was returned to the appropriate grazing district to be used for range improvements. These included such improvements as fencing to control livestock use, water developments for stockwater, and vegetation manipulations for increasing livestock forage. With the passage of the Taylor Grazing Act and establishment of permit requirements, much of the traditional "first come, first serve" operating methods used for migratory sheep operations on public rangelands were eliminated. The Taylor Grazing Act placed controls on BLM-administered land grazing and established specific grazing allotments or areas of use. In some cases, this policy forced operators to make more use of private lands through purchasing or leasing private pasture.</p> <p>The BLM recognizes that changing social values with respect to environmental protection and conservation of natural resources, as reflected by FLPMA, have brought more scrutiny to livestock grazing practices and the level of livestock grazing on BLM-administered lands. Also, the increase in the nation's population has created more BLM-administered land use conflicts as more people seek to use BLM-administered lands for a variety of purposes. As described in Proposed RMP/Final EIS Section 2.2.9.3, Management Common to All Alternatives, "The BLM will work with permit holders to apply adaptive management principles, such as reducing the number of AUMs or changing the season of use, based on forage availability. This may be implemented on an annual or long-term basis."</p>

Letter Number	Comment Number	Category	Comment Text	Response
58	5	Range	<p>“While we [The Wilderness Society et al.] do not oppose public grazing, we strongly urge the BLM to look at a broader picture when considering lease renewals. Grazing cattle on public lands comes with a large financial burden on taxpayers due to subsidies, significant environmental degradation, and a loss of enjoyment on the part of other users of America’s open spaces. Voluntary or gradual BLM retirement of these leases, gradual removal of cattle from Critical Habitats, ACECs [Areas of Critical Environmental Concern], WSAs [Wilderness Study Areas] and/or reducing the number of cattle allowed per allotment is a viable option for phasing out grazing where there are conflicts with or damage to other resources, and phasing in an era of greater environmental and fiscal responsibility”</p>	<p>The Draft RMP/EIS in general proposes an adaptive management strategy for the grazing programs, as demonstrated by some of the language in the Draft RMP/EIS, as follows:</p> <p>Section 2.2.9.1—Achieve healthy, sustainable rangeland ecosystems that support the livestock industry, while providing for other multiple resource values such as wildlife habitat, recreational opportunities, clean water, and functional watersheds.</p> <p>Section 2.2.9.2—Integrate livestock grazing management planning (Allotment Management Plans/Coordinated Resource Management Plans) and actions with other resource program objectives.</p> <p>Develop grazing prescriptions throughout the Decision Area to be consistent with the New Mexico Standards and Guidelines (BLM 2001), which include meeting required forage and cover requirements for species of wildlife that could occur within an allotment based on the quality and quantity of habitat present. Areas to prioritize such action include those with high wildlife value (i.e., riparian areas, threatened and endangered species habitat, and special designation areas for wildlife).</p> <p>Section 2.2.9.3—Livestock grazing would not be allowed in exclosures constructed within riparian areas using Habitat Stamp Program (HSP) dollars unless grazing the area would meet the management objectives of the EIS for Riparian and Aquatic Habitat Management in the Albuquerque Field Office (BLM 2000), an appropriate NEPA analysis is conducted, and the NMDGF is in agreement.</p> <p><a href="#">Section 2.2.9.3.1</a>—</p> <p>Relinquished permits and the associated preference would remain available for application by qualified applicants after the BLM considers if such action would meet rangeland health standards and is compatible with achieving land use plan goals and objectives.</p>
90	35	Range	<p>“In addition to the specific environmental problems which can be caused by cattle, we [The Wilderness Society et al.] are also concerned that BLM does not maximize its authority to manage grazing in order to reduce impacts on the environment - instead tending to maintain the status quo of grazing. It has been well established in case law, the Taylor Grazing Act, and in BLM policy, that grazing on public land is a privilege, not a right. [Footnote 17: See 43 U.S.C. [section] 315b. See also 43 C.F.R. [section] 4130.2(c) (“Grazing permits or leases convey no right, title, or interest held by the United States in any lands or resources.”)]. See also <i>Swim v. Bergland</i>, 696 F.2d 712, 719 (9th Cir. 1983) (“license to graze on public lands has always been a revocable privilege.”)] BLM is required to consider and balance many resources and obligations when making planning decisions, including requirements of the Endangered Species Act, the National Environmental Policy Act, the Federal Land Policy and Management Act, and others. NEPA regulations and Executive Order 13563 (2011) require federal agencies to use the best science available when making their decisions. See 40 C.F.R. [section] 1500.1 (b). The public trust doctrine, which has been upheld in American courts for various natural resources, states that natural resources should be conserved for public use and guaranteed for their benefit into the future. Finally, as then-BLM Director Bob Abbey reiterated to Congress in 2011, the multiple use mission of the BLM does not mean that every use must occur on every acre. [Footnote 18: See Statement of Robert Abbey, Director, Bureau of Land Management, Department of Interior, before House Natural Resources Committee, March 1, 2011.] We believe that, in general, when warranted by scientific evidence of the damage cattle can do to riparian areas, soils, vegetation and other resources (as acknowledged repeatedly by the BLM), as well as the negative interactions that can occur between cattle, ranchers, and endangered species, the BLM can (and often should) alter boundaries, change AUM [animal unit month] numbers, deny allotment renewals when appropriate, and otherwise actively manage ranching on public lands. The Agency has ample regulatory authority and discretion to take these actions<sup>19</sup>, and we do not believe the BLM should feel compelled to retain the status quo.”</p>	<p>As stated in the livestock grazing goals and objectives in Draft RMP/EIS Chapter 2, Section 2.2.9.2, the RPFO’s livestock grazing program would “Develop grazing prescriptions throughout the Planning Area to be consistent with the New Mexico Standards and Guidelines (BLM 2001), which include meeting required forage and cover requirements for species of wildlife that could occur within an allotment based on the quality and quantity of habitat present. Areas to prioritize such action include those with high wildlife value (i.e., riparian areas, threatened and endangered species habitat, and special designation areas for wildlife).”</p>



R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
90	41	Range	<p>“Page 2-41 to 45</p> <p>If you are going to improve the health of range land ecosystems for multiple use, you need to propose planning tools that,</p> <ol style="list-style-type: none"> <li>1. remove or reduce grazing during drought</li> <li>2. remove or reduce grazing when the land condition is poor to fair by                             <ol style="list-style-type: none"> <li>a. not renewing grazing permits and/or</li> <li>b. requiring minimum deferments of use for a minimum of 2 years up to a 10 year cycle.</li> </ol> </li> </ol> <p>The lands around Cuba are so over grazed it will take drastic measures to make them healthy. Since you did not consider the ““No Grazing Alt.”” at least do some reductions.</p> <p>You also need to enforce the grazing regulations and stop ranchers from ignoring seasonal restrictions by turning out or leaving cattle on the allotment all year.”</p>	<p>The BLM is required to comply with the New Mexico Standards for Public Land Health and Guidelines for Livestock Grazing Management. In doing so, a drought action plan is in place and is being followed. Management prescriptions are applied to allotments not meeting rangeland health standards.</p>
17	1	Range	<p>“The free roaming horses cannot be addressed without historical research, study, and inventory. They were deemed out of scope in the Scoping Process. The scoping process needs to be revisited for the horses in order for them to be adequately addressed in the rest of this public RMP process.”</p>	<p>The RPFO does not contain any wild horses, as defined in The Wild Free-Roaming Horses and Burros Act of 1971; therefore, no further analysis is necessary.</p>
58	27	Range	<p>“Science shows horses are a native species to North America. Insisting upon the use of a historical, non-science based reference to horses as livestock is nothing more than a ploy to avoid addressing the issue. Modern horses were reintroduced to North America with the Spanish settlers. Following the Pueblo Revolt, horses left behind were rounded up by the Pueblos, taken to Taos Pueblo for trade and within a decade the entire Plains Horse Culture was established from horses that came out of the Rio Grande Valley. DNA testing has shown that some of the free roaming (wild) horses around Placitas are descendants of these very Spanish Barbs. The argument surrounding who the horses belong to ignores the fact that they belong to the people of the State of New Mexico and the Pueblos collectively. They are part of our history and our heritage as well as an asset to our community as evidenced by the numerous real estate ads that tout ““see wild horses from your windows””. Most recently there was a full front page story in the Sunday Albuquerque Journal Reality section showing horses grazing next to a house for sale in Placitas. The horses deserve safe passage and protection from extinction. The BLM should play an active and positive role in preserving this heritage by assisting the desire in the community to ensure careful management of our herd size. Affidavits show horses were here in 1971 when the Wild Horse and Burro Act was passed and should be protected under that act. The BLM’s claim that the horses are ““owned”” by San Felipe is false. We heard Governor Ortiz of the San Felipe Pueblo state at a community meeting on November 17, 2012 that the horses are not owned by his pueblo; they belong to the land and the herd(s) would be carefully managed should the San Felipe Pueblo be able to reacquire the land. We fully support that initiative.”</p>	<p>The BLM recognizes the importance of preserving the naturalness and heritage associated with wild and free roaming horses, in accordance with the Wild Free-Roaming Horses and Burros Act of 1971. The establishment of the herd management areas ensures that the health, genetics, and continued survival of healthy wild and free-roaming herds is accomplished. The horses on the Placitas lands do not meet the criteria as set by the act, nor were they identified as a herd when the inventories were done in the early 1970s. At the time of the inventories, the BLM’s record shows only horses that belong to the livestock grazing permittee on the land. Due to claimed ownership, these horses could not be categorized as wild free-roaming.</p>
15	7	Range	<p>“Wild Horses deserve protection and consideration as a native wildlife species in addition to their legally protected status under the WFRHBA [Wild Free-Roaming Horses and Burros Act]. From EO [Executive Order] 13112, native species means, ““with respect to a particular ecosystem, a species that, other than as a result of an introduction, historically occurred or currently occurs in that ecosystem.”” Executive Order 13112 (1999). Turning first to historical occurrence, E. caballus originated 1.7 million years ago in North America. ““Ann Forstén, of the Zoological Institute at the University of Helsinki, has estimated that E. caballus originated approximately 1.7 million years ago in North America. More to the point is her analysis of E. lambei, the Yukon horse, which was the most recent Equus species in North America prior to the horse’s disappearance from the continent. Her examination of E. lambei mtDNA (preserved in the Alaskan permafrost) has revealed that the species is genetically equivalent to E. caballus. That conclusion has been further supported by Michael Hofreiter, of the Department of Evolutionary Genetics at the Max Planck Institute in Leipzig, Germany, who has found that the variation fell within that of modern horses.”” Kirkpatrick and Fazio 2008, The Surprising History of America’s Wild Horses, available at: <a href="http://www.livescience.com/9589-surprising-history-america-wildhorses.html">http://www.livescience.com/9589-surprising-history-america-wildhorses.html</a> (attached [see ATT 2]). Wild horses evolved in North America, and there is no evidence that they originated anywhere else in the world (Forsten 1992). Wild horses are a native wildlife species in western North America, including California and Nevada (Kirkpatrick and Fazio 2010). With respect to certain ecosystems in North America, wild horses historically occurred due to circumstances other than introduction—they evolved here. Turning next to species, species means ““a group of organisms all of which have a high degree of physical and genetic similarity, generally interbreed only among themselves, and show persistent differences from members of allied groups of organisms.”” Executive Order 13112 (1999). Hofreiter and Forstén both agree that the E. lambei are genetically equivalent to the modern horse. See Kirkpatrick, Fazio 2008, supra. The current wild horses in western North America are genetically equivalent to the native horses that were driven to extinction over 7,000 years ago (Forsten 1992, Kirkpatrick and Fazio 2010). There is no interspecies genetic distinction for domestic and wild horses, or horses that were domestic but are now wild. ““The fact that horses were domesticated before they were reintroduced matters little from a biological viewpoint. Indeed, domestication altered them little, as we can see by how quickly horses revert to ancient behavioral patterns in the wild.”” Id. Thus, there is no reason to distinguish between the domestic, wild, or feral E. caballus when making a native species determination. Turning next to the introduction issue of E. caballus, the species was restored in those western ecosystems rather than introduced. The common misconception is that because domesticated horses were brought over by colonialists, they are akin to cattle, zebra mussels, kudzu, and other invasives. Introduction means ““the intentional or unintentional escape, release, dissemination, or placement of a species into an ecosystem as a result of human activity.”” Executive</p>	<p>Prehistoric origin of a species does not necessarily equate to its protection under law. The issue at Placitas is strictly one of unwanted livestock dumped on BLM-administered land. The BLM takes the management of wild free-roaming horses very seriously; thus, this is the reason for having set aside 209 wild free-roaming horse and burro herd management areas. It is through this type of management that the historic and prestigious heritage of the wild horse is truly preserved.</p> <p>The BLM appreciates the technical data in your comment. While the development of management alternatives and analysis of impacts is highly based on technical, scientific, and historical data, resources are defined and managed on regulatory parameters and definitions set forth primarily by congressional action. Based on the BLM’s understanding of your comment and data, it would be logical to state that just about every horse in the country could be considered a native species needing protection merely due to origin of species. In reference to the protection of wild horses and burros, the Wild Free-Roaming Horses and Burros Act of 1971 set forth the definition of a wild horse and burro, the date that the herds and lands were inventoried, and their management. The act and the BLM recognize the significance of the wild horse as a symbolic historic resource and a representation of American values deserving protection. When the wild horse inventories were performed, the RPFO did not have any wild horses accounted for in Placitas. As mentioned above, while all horses may have a genetic or evolutionary connection to a prehistoric ancestor, similar to the connection between a domestic dog and a wolf, the horses in the RPFO were not classified as protected in accordance with the act.</p>

Letter Number	Comment Number	Category	Comment Text	Response
			<p>Order 13112 (1999). It is true that horses were brought to North America by humans; however, this matters very little due to the fact that with respect to certain ecosystems, <i>E. caballus</i> historically occurred, originated, and evolved along with those ecosystems. Humans simply restored the horse to its native habitat; humans did not introduce a new species. Additionally, there are parallel situations throughout the world that support the notion that <i>E. caballus</i> is a species native to ecosystems throughout North America. The Mongolian wild horse disappeared from its native range, only to be restored later: "To all intents and purposes, the Mongolian wild horse (<i>E. przewalskii</i>, or <i>E. caballus przewalskii</i>) disappeared from its habitat in Mongolia and northern China a hundred years ago. It survived only in zoos and reserves. That is not domestication in the classic sense, but it is captivity, with keepers providing food and veterinarians providing health care. Then surplus animals were released during the 1990s and now repopulate a portion of their native range in Mongolia and China. Are they a reintroduced native species or not? And how does their claim to endemism differ from that of <i>E. caballus</i> in North America, except for the length and degree of captivity?" Kirkpatrick, Fazio 2008, supra. Short haired bumblebees, native to Britain, were declared extinct. "The population of short-haired bees - scientific name <i>Bombus subterraneus</i> - has declined dramatically across most of Europe the last two decades as their habitat was destroyed. The bees were declared extinct in Britain 12 years ago." AP, Short Haired Bees Return to UK, 2012,</p>	
15 (continued)	7 (con'd)	Range (continued)	<p><a href="http://news.yahoo.com/homecoming-buzz-shorthaired-bees-return-uk-111334432.html">http://news.yahoo.com/homecoming-buzz-shorthaired-bees-return-uk-111334432.html</a>. However, the bees survived in New Zealand, and now are being restored to their native range in Britain." But for over a century a small number of the original English population has clung on in New Zealand. The bee was transported to the Pacific Ocean island country in the late Nineteenth Century to pollinate crops of red clover. New Zealand had no native species of bumblebees to help propagate crops introduced from England."</p> <p>"The incoming bumblebees will be descendants of hibernating queens that were shipped to New Zealand aboard the first refrigerated lamb boats about 120 years ago, according to Natural England. The bees established small populations on the South Island of New Zealand, where the climate is very similar to that of England."</p> <p>International Rescue Planned for Endangered British Bumblebee, National Geographic, available at <a href="http://newswatch.nationalgeographic.com/2009/06/03/bumblebee-rescue-plan/">http://newswatch.nationalgeographic.com/2009/06/03/bumblebee-rescue-plan/</a>, see also 'Extinct' British subject repatriated after 100 years, 2009, <a href="http://www.newscientist.com/article/dn17738-extinct-british-subject-repatriated-after-100-years.html">http://www.newscientist.com/article/dn17738-extinct-british-subject-repatriated-after-100-years.html</a> Horses may not have disappeared from North America as previously thought:</p> <p>"[A] considerable body of evidence has surfaced concerning the more recent survival of the horse species in North America. Though the prevailing view maintains that the entire horse family died out around ten thousand years ago at the end of Earth's last major glaciation, evidence for horse presence from anywhere from a little over seven thousand YBP (years before present) to less than 1,000 YBP is too substantial to dismiss. Among other lines of evidence, this comes in the form of fossil bones that have been age-dated to more recent times, horse geoglyphs (ground drawings) dated to about one thousand years ago (Joseph 1999), and petroglyphs, or stone depictions. "The FaunMap produced and published by the Illinois State Museum of Springfield, revealed a number of horse fossil datings within the post-Pleistocene and pre-Columbian period that occurred well after the time at which all members of the horse family are commonly believed to have disappeared from North America. Some of these are quite close to Columbus's discovery of America in 1492 (Illinois State Museum 2004)." Downer 2011, The Wild Horse Conspiracy (see attached). "By no means should horses and burros be merely labeled feral exotics, since their return is certainly the restoration of a native species in the case of the horse, and very likely the as well (Klingel 1979; also see Chapter I). In fact, all three extant branches of the horse family (and genus) originated and had their long-standing evolution in North America (MacFadden 1992). As with the horse, the desert dwelling burro should be recognized for its many positive, ecological restorations, ones that are similar to those contributed by horses, but generally in drier areas."</p> <p>Downer 2011, The Wild Horse Conspiracy (see attached). "To quote Dr. Patricia M. Fazio (2003): "[t]he key element in describing an animal as a native species is: (1) where it originated; and (2) whether or not it coevolved with its habitat. Clearly, <i>E. caballus</i> did both, here in North America." [V]arious Amerindian tribes of the Great Plains and Prairies have a saying concerning the wild horses: "The grass remembers them. In light of the more ample view of life's history provided by modern science, I respectfully stand in awe of their profound insight (Kirkpatrick and Fazio 2005; see also Henderson 1991)." Downer 2011, The Wild Horse Conspiracy (see attached). Regardless of whether the horse disappeared in North America over 7k years ago, or if the horse was present in North America until 1k years ago, or if the horse never disappeared from North America, the species still evolved as a part of numerous western ecosystems. "[T]he two key elements for defining an animal as a native species are where it originated and whether or not it coevolved with its habitat. <i>E. caballus</i> can lay claim to doing both in North America. So a good argument can be made that it, too, should enjoy protection as a form of native wildlife." Kirkpatrick, Fazio 2008, supra. We ask the BLM to consider the evidence we have provided regarding horses as native wildlife, and make a determination that the band of Placitas horses are native to New Mexico. A decision in the RMP to manage horses as native wildlife is reasonable and rationally based in science. Wild horses originated in North America, the modern horse is genetically equivalent to the early horse, and horses evolved with the ecosystem."</p>	(see above)
91	40	Range	<p>"I think that a plan needs to be developed for the over population of horses on the BLM tract as a whole. I would like to see the herd cut to ten horses or less by relocating the rest and birth control administered to the horses left on the BLM. They have completely denuded the landscape and need a better place to graze."</p>	<p>The BLM will continue to address this issue within its regulatory and legal parameters. Your comment will be noted for the records.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
242	1	Range	"The DRMP BLM has failed to address the issue of Free Range or Feral horses grazing and ranging in Parcel A and Parcel B. Horses are ranging down from the Santa Ana and San Felipe pueblos. The horses are being allowed to damage Parcel A and B, due to overgrazing."	The BLM will continue to address this issue within its regulatory and legal parameters. Your comment will be noted for the records.
126	23	Range	"I am deeply concerned about the Placitas wild horses that roam Bureau of Land Management (BLM) public lands. The Wild Horse Observers Association (WFOA) has asked the BLM to inventory the horses and designate them a herd management area, or preferably a wild horse sanctuary so the horses are not sold off or slaughtered. It is crucial that we keep the Placitas wild horses on public lands. It is of utmost urgency that BLM land decisions are divulged to the public pertaining to what land will be going to a certain tribe, agency, land grant, etc. considering the outcome will impact over 3000 acres of public lands. The horse is a noble animal, and the American West above all others owe him and his ancestors a proper thank you for his service and loyalty to mankind. He strained his loins and did the whole nine yards, ""It's time for payback"", so belly-up to the desk buckaroos and do the right thing by him, it's the humane thing to do."	The herd management areas for wild free-roaming horses was established based on inventories in the early 1970s. Based on those inventories, no wild horse herds were identified in the RPF0.  As for disposal of lands, the BLM does not pre-decide who is to receive parcels of land that are inventoried and marked for disposal. Based on the management goals of the BLM-administered RPF0, land tenure adjustments are strictly based on improving the administration of BLM-administered lands by disposing of isolated, unmanageable parcels in order to acquire inholdings within large blocks of federal land (Draft RMP/EIS Section 2.2.7.2).
164	1	Range	"Why is it that ranchers/lessee's turn off the water (i.e., windmills, solar pumps and other water sources) after they pull their cattle off a certain piece of land. The wildlife still needs the benefit of these water sources."	Wildlife-specific and natural waters are on many livestock grazing allotments that can benefit wildlife year-round; lessees and ranchers are not required to provide water for wildlife.
201	2	Range	"The cumulative impacts of grazing on Page 4-80 are completely inadequate to describe the long-term damage from overgrazing, especially in drought conditions, concerning accumulated impacts to soils, vegetation, and riparian areas. This is particularly a problem when you assume on page 4-150 (4-179 its A,C,D all assume current levels of grazing) that livestock rates in grazing allotments will remain unchanged. You need a more rigorous analysis of the cumulative impacts on vegetation, soils, wildlife, riparian areas, and recreational values if you are going to leave the grazing allotments in the current state of AUMs [Animal Unit Months], conditions rating ("I"), and lack of a process to improve land health to sustainable levels."	The cumulative impacts described in Chapter 4 adequately address the potential environmental effects when cumulative actions are considered. As for overgrazing as a cumulative factor to be analyzed, it is not a management objective of the BLM that would be deployed and analyzed for its effects. Rangeland health assessments and a standards determination are completed before grazing permits are renewed through this NEPA process and throughout the life of a permit. This is done to ensure that the best rangeland management approach is taken by the BLM.
58	16	Range	"Properly managed livestock grazing is a valuable resource management tool that can improve wildlife habitat, biodiversity, and overall ecological conditions while providing cultural and economic benefits to communities. NMDA [New Mexico Department of Agriculture] would support a final RMP that continues established preference grazing limits with necessary adjustments to annual authorized use based on resource conditions to be consistent with the New Mexico Standards and Guidelines."	Adaptive management principles are a key management strategy under the Draft RMP/EIS (Section 2.2.9.3). Regardless of the alternative selected in the Approved RMP/Record of Decision, this principle would apply across all selected management prescription grazing on BLM-administered lands.
10	13	Range	"On Page 3-40 you discuss Rangeland Health Assessments (RHAs) being completed prior to each permit renewal process. You do not discuss how the public can obtain a copy of such documents or participate during the development of these assessments. These documents should be made available for public comment prior to each permit renewal and posted online similar to the NEPA log, so that the public can evaluate if land health is improving."	All permit decisions proposed and received are issued for a 30-day public comment period prior to becoming final. Any concerned member of the public can request copies of any proposed grazing action during this time.  In reference to Draft RMP/EIS page 3-40, note that Chapter 3, Section 3.10.2 discusses that if an allotment is determined to be not meeting the Standards of Rangeland Health, then mitigation measures are placed within the terms and conditions of the grazing permit after a site-specific environmental assessment has been conducted. The improve (I), maintain (M), and custodial (C) management categories are changed administratively. Each allotment was placed into one of the three selective management categories based on present resource conditions and potential for improvement. Management categorization allows the establishment of priorities for implementing grazing management based on the need for management and potential for improved range condition, with consideration for cost-effectiveness.  "Allotment categories enable the BLM to direct attention to those areas in greatest need of management to improve a resource or resolve serious resource-use conflicts. Using management categories as a tool, BLM managers can create allotment management plans (AMPs) and cooperative management plans (CMPs). AMPs and CMPs are developed in an effort to help achieve the stated goals of the Resource Management Plan" (Draft RMP/EIS page 3-39 and 3-40).

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
149	7	Range	<p>“Range Land Health &amp; Grazing Permits</p> <p>Alternative C does address most of the key planning issues and provides a balanced approach to land management and multiple use. However, the alternative does not provide critical planning elements, such as conditions of approval and processes in grazing permit renewals to bring land where the current management is “unsatisfactory” into compliance with the 2001 NM Standards for Public Land Health and Guidelines for Livestock Grazing (“NM Standards”). The goal to manage Livestock Grazing to meet the NM Standards and to achieve healthy sustainable rangeland ecosystems that provide for other resources values such as wildlife, recreation, and functional watersheds is very important (Page 2-41). To achieve that goal for the grazing allotments denoted “I” (present range conditions unsatisfactory and present management is unsatisfactory) in the Plan cannot be achieved without more specific conditions of approval, a process to require existing grazing permittees to comply with the federal law and regulations, and the actions BLM will propose for new, existing, or renewed permits. There are no specific proposals in this Plan about how BLM will improve these damaged public lands and move the “I” to “M” (present management is satisfactory) for those allotments in this sub-standard condition of “I”.”</p>	<p>The rangeland health assessment is a monitoring tool used to determine if the Standards for Rangeland Health are being met. This determination summary is part of the content of the environmental assessment, which is available for public comment to all interested parties. The BLM is committed to working with the local operator to achieve standards and guidelines for land health. This is done on a case-by-case basis after a site-specific analysis. Also, Draft RMP/EIS Section 2.2.9.2 lists the objectives that would be achieved through the implementation of the Approved RMP. They include such objectives as integrated livestock management planning and meeting forage and cover requirements for species of wildlife that could occur in an allotment, based on the quality and quantity of habitat present.</p>
10	11	Range	<p>“Inconsistent Assumptions with Plan Goals</p> <p>I concur that a significant issue in the planning area, especially in the Cuba area, is the need “to improve access and management of public lands” and that any actions proposed in the Plan must comply with applicable regulations (Page 1-9, [section] 4140.1(b)(7)) prohibiting grazing permittees from interfering with lawful uses or obstructing free transit through or over public lands by force, threat, intimidation, signs, barrier, or locked gates) and federal law (such as the Unlawful Inclosures Act, 43 U.S.C. [section] 1063), and to permit the legitimate access of other members of the public to grazing allotments on federal public land; more rigorous enforcement procedures and/or conditions of approval on grazing permits should be proposed in this Plan. A key goal and objective of the Lands &amp; Realty portion of the Plan is to maintain access to public lands where needed to facilitate multiple use (page 2-31). This is a very important goal but cannot be achieved with some of the Plan assumptions and the lack of a Plan to make this possible on existing grazing allotments. For example: On page 3-28 you describe the currently existing crimes against persons and property by intimidation and interferences with lawful uses of public lands by physical obstructions, but later assume that all permittees are acting in compliance with the law (Page 4-24 “assumed livestock grazing activities would be carried out in compliance with existing policies and regulations at both the State and federal level”). You do not provide any plan to mitigate the existence of this situation and the current condition does not match your assumption that there is no violation of the law, especially for some grazing permittees. On page 3-112, you state that private entities block access to some BLM administered lands and that legal access to public lands is illegally gated by private landowners and permittees, yet in the Plan you assume that permittees will comply with the law (Page 4-24). It appears you have documented this illegal practice, how can you make that planning assumption? What are you going to do about these “illegal” practices, especially by grazing permittees who claim the public land belongs to them “exclusively”? It appears that BLM’s position over the past two decades is to allow these illegal actions by private landowners and grazing permittees without any investigation or referral for appropriate sanctions under Federal law. This Plan should change that lack of action and require that BLM land managers enforce the federal law and regulations and take appropriate actions against any private landowner and/or grazing permittee who violates their permit in the above described manner. Finally, the environmental impacts to recreation and visitors in Chapter 4.2.5 do not even mention, much less analyze, the impacts of private landowners and grazing permittees unlawfully obstructing and blocking roads to public lands with signs, gates, threats, and other means of preventing access to the public. This section should discuss this problem, since you have identified this issue in Chapters 2 and 3.”</p>	<p>Regarding access to BLM-administered lands, grazing permittees have no authority to control access on or use of BLM-administered land, nor can permittees restrict travel over a public road or a road with an easement that allows public travel. Lessees and permittees are not allowed to charge the public for the privilege of using BLM-administered lands.</p> <p>In addition to federal grazing leases, the BLM authorizes a variety of other uses with a number of different types of authorizations. In general, holders of these authorizations may not exclude the public from BLM-administered lands within their lease or permit area, if appropriate public easements exist. Holders do have the right to exclude the public from entering any buildings that have been authorized to be constructed under the terms of the authorization.</p> <p>Public access to BLM-administered lands is often limited in checkerboard and in other public and private intermingled landownership areas in the RPF0. If there is a public road or a right-of-way (easement) for public access through the checkerboard or intermingled land, then the public has legal access to BLM-administered land crossed by the public road.</p> <p>The public may cross private lands to access BLM-administered lands when there is a public road or right-of-way (easement) for public access across the private lands. In all other circumstances, the public must first obtain permission from the landowner to cross private lands. The landowner is not obligated to grant such permission. These provisions are enforced in accordance with 43 CFR 4100.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
10	5	Range	<p>“You state you can create an Allotment Management Plan (AMP) and Cooperative Management Plans (CMPs), but again do not provide details of how and when such plans will be developed or how the public can provide input in the plans to assure the public goals are being met on these permits. Again, on page 3-40, you discuss that methods exist for controlling when, where and how much grazing takes place to meet the goals, but later assumptions are that the permittees will have maximum AUMs [Animal Unit Months] approved (even in times of drought), will continue to have financial motivations to overutilize public lands because the rental is so low (\$1.35/ AUM) compared to private land rental (\$1.00/AUM) (Page 3-82), and that BLM will take few actions against existing permittees. This Plan should provide specific proposals for when, how, and under what circumstances BLM will develop a CMP or an AMP and how BLM will enforce the provisions of such agreements so that Federal land is on an equal footing with private lands. The public should be receiving the fair and equitable rental rate that private lands receive and this disparity is most alarming.”</p>	<p>Draft RMP/EIS Chapter 3, Section 3.10.2 discusses that if an allotment is determined not to be meeting the Standards of Rangeland Health, then mitigation measures are placed into the terms and conditions of the grazing permit after a site-specific environmental assessment has been conducted.</p> <p>The improve (I), maintain (M), and custodial (C) management categories are changed administratively, based on site assessments. Each allotment was placed into one of the three selective management categories, based on present resource conditions and the potential for improvement. Management categorization allows the establishment of priorities for implementing grazing management, based on the need for management and the potential for improved range condition, with consideration for cost effectiveness.</p> <p>Allotment categories enable the BLM to direct attention to those areas in greatest need of management to improve a resource or resolve serious resource-use conflicts. Using management categories as a tool, BLM managers can create <a href="#">allotment management plans (AMPs)</a> and <a href="#">cooperative management plans (CMPs)</a>. AMPs and CMPs are developed to help achieve the stated goals of the resource management plan.</p> <p>The RMP sets the overall management of the resources in the RPFO. The permitting process is implemented in accordance with 43 CFR 4100. More specific to issues such as AMPs, the regulatory requirements as to how these are implemented are stated in 43 CFR 4120.2; for CMPs or cooperative range improvement agreements, they are implemented in accordance with 43 CFR 4120.3-2. As for annual grazing rates, Congress sets the annual grazing rate for the BLM.</p>
10	4	Range	<p>“You state you will develop grazing prescriptions to meet forage and cover requirements for wildlife, and I presume cattle, (Page 2-41), but the Plan does not say how you will do that. What specific COAs [Conditions of Approval] will you include in renewed permits and how will you enforce COAs against existing permittees who seem to consistently not comply with their permits or federal law? How and when will you collect the data to establish baselines and then compare to proposed actions and prescriptions to determine if the “I” lands are moving towards or achieve an “M” rating? This plan should address specific provisions about how, when and under what circumstances you will develop prescriptions and what prescriptions will be needed to improve the substandard allotments to meet the NM Standards. You state on page 4.74 that grazing allotments are monitored yearly, but if that is accurate, how did so many allotments develop into the “I” category (53 listed on Appendix E)? It is clear that something needs to change, but the assumptions of this Plan seem to merely continue the past ineffective practices for grazing permit renewals and a lack of enforcement of permit conditions, grazing regulations, and federal law.”</p>	<p>Terms and conditions of grazing permits are implemented in accordance with 43 CFR 4130.3. While the Draft RMP/EIS describes the goals and objectives that the BLM wants to achieve through the management prescriptions, the <a href="#">Code of Federal Regulations CFR</a> defines the terms by which the BLM can implement such prescriptions. For example, 43 CFR 4130.3(a) states “Livestock grazing permits and leases shall contain terms and conditions determined by the authorized officer to be appropriate to achieve management and resource condition objectives for the public lands and other lands administered by the Bureau of Land Management, and to ensure conformance with the provisions of subpart 4180 of this part.” Subpart 4180 is the Fundamental of Rangeland Health and Standards and Guidelines for Grazing Administration.</p>
10	10	Range	<p>“A significant inconsistency in the Plan is the assumption that grazing permits would comply with the applicable law when you clearly state on Page 4-74, that such critical conditions as seasonal use restriction or AUM [animal unit month] numbers, “are difficult to control on allotments with scattered public parcels surrounded by private land.” Why not? Why is there no requirement to fence off the public lands or more importantly, enforce seasonal restrictions and AUM numbers by Notices of Violations or even federal grazing permit cancellation for continued non-compliance? This is especially important in times of severe drought. If you simply continue to stock the public lands with the maximum AUMs chosen by the grazing permittee, with such low rental (very troublesome since grazing jobs are less than 1% of the labor income and income from grazing is less than 2% of the total income in the planning area, Page 4-166), of course the desertification of the public lands will continue as the overgrazing and abuse of these federal allotments is unabated without enforcement of permit conditions and applicable federal law.”</p>	<p>Permittees do not select the stocking rates they would prefer. Initial resource inventories are conducted on the various parcels to determine what carrying capacity could be authorized under ideal conditions. At the time of permit application, land health assessments are conducted by the BLM to determine what level of capacity from ideal conditions can be permitted, and the permits are issued thusly. Over the last 10 years, the RPFO has been stocking at approximately 80 percent of ideal conditions due to the various impacts on the range. While a parcel may have an authorized number of AUMs, this number may differ from the permitted number, based on the health assessments. If the range is determined to not be improving, various strategies may be implemented, up to deferment of grazing.</p> <p>The statement in Draft RMP/EIS Section 4.2.9.1 regarding private land surrounding public parcels is made as an assumption to consider in designing the overall management prescriptions; this emphasizes the need to implement range improvements that would continue to achieve rangeland health goals.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
10	10	Range	<p>“You state on page 4-76 that to optimize certain vegetation treatments the land must rest for a minimum of 2 years or longer. Similar restrictions of grazing are required to protect critical riparian areas. Yet you do not state in the Plan how you will structure such deferrals and under what circumstances you will apply and enforce, such deferrals. Permitting the land to rest, especially in times of drought seems to be critical to protect the soils, vegetation, and wildlife resources, yet you do not state in the Plan how you will structure such deferrals and under what circumstances you will apply and enforce, such deferrals. Permitting the land to rest, especially in times of drought seems to be critical to protect the soils, vegetation, and wildlife resources, yet you do not provide a specific plan to deploy this critical technique. It also seems apparent that such deferral should be a critical component of the intensive management proposed for those 53 allotments that are designated “I”.”</p>	<p>Strategies to achieve improvements to the rangeland are accomplished in accordance with 43 CFR 4100. Such strategies are examined during the permitting phase, based on the conditions that are specific to individual allotments. Some of these strategies or prescriptive grazing are described in Draft RMP/EIS Volume III, Appendix C and can range from rest rotation grazing to deferred grazing. Since these are implementation actions, every potential scenario and associated mitigation action cannot be described in the management plan. The rangeland scientist will determine, based on land health assessments, if any mitigation action will be necessary throughout the life of a permit, in accordance with the above-mentioned regulations.</p>
10	6	Range	<p>“On Page 3-39, you show that allotments with an “I” designation will be managed intensively to improve the unsatisfactory ecological condition, but you do not describe anywhere in the Plan how or when you will do this intense management. Will this occur over the life of the permit, at permit renewal, or at sporadic inspections? The Plan should provide a specific proposal of how this intense management will occur, such as strict COAs [Conditions of Approval] upon permit renewals and active monitoring, including issuing Notices of Violations, penalties, and other enforcement tools to achieve the land management goals here.”</p>	<p>The RMP sets the overall management goals and prescriptions to achieve those goals. The specific enforcement of range management is accomplished in accordance with 43 CFR 4100. The <a href="#">Code of Federal Regulations</a> is the codification of the general and permanent rules and regulations for the executive branch of the federal government. It defines the permitting process through which specific restrictions or mitigation measures are accomplished. Since the potential mitigation strategies to achieve improvements on the range can vary significantly from parcel to parcel, it would be difficult to specifically state in a management plan the strategy for each parcel. The health of the range is assessed throughout the life of a permit, allowing for proper mitigation strategies if needed at any time.</p>
10	7	Range	<p>“Some proposed COAs [Conditions of Approval] would be to require (and enforce) seasonal use restrictions, reduce the number of AUMs [Animal Unit Months], especially during a drought, and impose deferrals of at least 2 years up to a 10-year cycle to allow the land to restore to the NM Standards. You list some ideas on Page 2-79 and 4-79 to 80, but do not describe how and under what circumstances you will impose which of these methods, or combination of methods, to heal the land. Creating specific COAs for permits at the time of renewal to reduce stocking rates, seasonal use restrictions, temporary closures, and rehabilitation of over-grazed public lands should be a process in this RMP so that the public is informed of when BLM will be considering these practices and for which specific permits.”</p>	<p>The Draft RMP/EIS states the goals of the grazing program in Draft RMP/EIS Section 2.2.9.1, which are to manage lands to achieve the New Mexico Standards for Public Land Health and to achieve healthy, sustainable rangeland ecosystems. Conditions change often in regard to grazing management, and the BLM’s goal is to work flexibly with operators to effect positive change in rangeland health. Allotment-specific conditions of approval would not be appropriate under this plan nor at this stage. It is through continued monitoring that mitigation strategies are implemented throughout the life of a permit, based on range conditions.</p>
10	9	Range	<p>“Cattle grazing can compromise riparian areas and impair water quality. Riparian and stream ecosystems represent only 0.5 to 1 percent of the surface area of arid lands in the eleven western United States [Footnote 7: U.S. General Accounting Office (“GAO”). 1988. Public rangelands: some riparian areas restored by widespread improvement will be slow. GAO/RCED- 88-105; see also Belsky, A.J., A. Matzke, and S. Uselman. 1999. Survey of livestock influences on stream and riparian ecosystems in the Western United States. Journal of Soil and Water Conservation 54: 419-431.], yet support an estimated 60 to 70 percent of Western bird species [Footnote 8: Omart, R.D. 1996. Historical and present impacts of livestock grazing on fish and wildlife resources in western riparian habitats. Pp. 245-279. In: P.R. Krausman (ed.), Rangeland wildlife. Society for Range Management: Denver, CO; see also Belsky et al. (1999).] and as many as 80 percent of wildlife species in New Mexico. [Footnote 9: Chaney, E., W. Elmore, and W.S. Platts. 1990. Livestock grazing on Western riparian areas. Northwest Resource Information Center, Inc.: Eagle, ID; see also Belsky et al. (1999).] Despite the immense ecological importance of these areas, studies concluded in the 1990s found that grazing was undermining the ecological integrity of these lands and their ability to support other species. For instance, the BLM found that grazing by livestock has historically damaged 80 percent of the streams and riparian ecosystems in arid regions of the western United States [Footnote 10: U.S. Department of Interior. 1994. Rangeland reform ‘94, draft environmental impact statement. Bureau of Land Management: Washington D.C.; see also Belsky et al. (1999).]. In 1990, the U.S. Environmental Protection Agency reported that, ““extensive field observations suggest that riparian areas throughout much of the West are in their worst conditions in history.”” [Footnote 11: Chaney et al. (1990).] In addition, a 1994 joint Bureau of Land Management and Forest Service report concluded that ““riparian areas have continued to decline”” since grazing reforms in the 1930’s.”” [Footnote 12: U.S. Department of Interior (1994).]”</p>	<p>Designated riparian areas in the RPF0 are covered under the Environmental Impact Statement for Riparian and Aquatic Habitat Management in the Albuquerque Field Office New Mexico (BLM 2000). Inventories of the riparian areas are to be conducted in accordance with the 2000 EIS to determine the health of these areas. Mitigation can be implemented throughout the life of a permit to ensure compliance with the intent of the 2000 EIS.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
10	12	Range	<p>"2.0 Proposed Alternatives 2.2.14.4, Page 2-80</p> <p>The DEIS indicates that under Alternative C, measures to protect sensitive resources would be implemented, but they would be less restrictive than proposed management decisions under Alternative B. For example, under Alternative C, prescribed livestock grazing would be applied on BLM lands in the Planning Area, including special designations where protected resource values would be compatible with livestock grazing. Recommendation: The DEIS does not provide sufficient information to fully evaluate the risk or the level of the protection from surface disturbing activities and livestock grazing under Alternative C for riparian and wetland habitats. The BLM should clarify Alternative C as to what "restrictions" could be imposed and what would trigger their implementation. Please define the specific protective measures or actions being referred to in the "Riparian Site Standards of New Mexico Standards and Guidelines" (BLM 2000)."</p>	<p>The Draft RMP/EIS incorporates the analyses and requirements for designated riparian areas in the RPFO covered under the Environmental Impact Statement for Riparian and Aquatic Habitat Management in the Albuquerque Field Office New Mexico (BLM 2000). In accordance with the management activities to address inventoried riparian habitats, grazing treatments can include establishing riparian pasture parameters up to total enclosure (Final EIS for Riparian and Aquatic Habitat Management, pg. 3-4, BLM 2000).</p>
154	36	Range	<p>"Section 3.15 of the EIS accurately characterizes riparian zones as important for grazing. Riparian zones contain a source of water and forage of greater quality and quantity than adjacent uplands. The analysis of threats to riparian resources lists only the grazing of livestock and not wildlife as having an impact. Unmanaged grazing by both domestic and wild animals can have detrimental impacts to riparian vegetation. The impacts analysis for riparian resources is based on the assumption that complete removal of livestock grazing will lead to increased quality in these areas. Research has shown that riparian pasture systems, compared to complete exclusion of grazing, can improve ecological conditions of the riparian area (Baker et al. 2001). Managed riparian grazing should be included in all alternatives to ensure that riparian vegetative communities are achieving their potential."</p>	<p>Per Draft RMP/EIS Section 2.2.14.3, the BLM would carry forward adaptive management strategies and permit conditions developed in accordance with the EIS for Riparian and Aquatic Habitat Management in the Albuquerque Field Office (BLM 2000).</p>
143	3	Range	<p>"2-86. Livestock grazing in Bluewater Canyon is wrong. Resource values are too great. It's hard to see why you are willing to exclude lucrative mineral extraction (p. 2-164) and unwilling to exclude money-losing, riparian destructive grazing."</p>	<p>Alternative B for Bluewater Canyon ACEC would make livestock grazing unavailable within the ACEC (Draft RMP/EIS Table 2.34), so that option was considered and analyzed in the range of alternatives. <del>Under the Proposed RMP (Alternative CE), would livestock grazing would be available within the ACEC. prohibit livestock grazing within the canyon, though livestock grazing may occur on the upper rims. Both ends of the canyon would be fenced and the canyon would have a pass made to allow people to continue down the trail. Grazing would be allowed on the rim of the canyon on the north side at Blackjack Arroyo Allotment #00450 and on the south side at Reynold Draw Allotment #00429.</del></p>
201	1	Range	<p>"The importance of consistent access to forage on federal lands cannot be overstated for the ranching industry in New Mexico. Many ranchers have invested significant resources into range improvements on federal lands that benefit both wildlife and livestock. These operations rely on consistent access to the forage on those federal lands in order to maintain economic viability. When analyzing alternatives with respect to animal unit months (AUMs) of forage available for livestock use, the descriptions of each alternative fail to provide an adequate comparison. Table 2.15 provides reductions in acreage and AUMs for livestock associated with a number of management decisions for each of the alternatives. The sum of reductions described for Alternative B is 101,367 AUMS and 803,300 acres. These amounts are not found anywhere else in the analysis. The discrepancy comes from grazing exclusions associated with special designations under Alternative B in the table. Table 2.15 states the BLM would remove 771,308 acres and 96,414 AUMs from livestock grazing within special designations. This acreage figure is found again on page 4-184. Most other sections in the document summarizing grazing reductions due to special designations under Alternative B list 137,627 acres and 17,203 AUMs; however, total acreage reported for special designations ranges from 137,627 to 185,625 acres throughout the document. Alternative B also includes a grazing exclusion for 37,514 acres designated as LWC [Lands with Wilderness Characteristics] not included in Table 2.15. These inconsistencies make analysis of the alternative difficult. Table 2.15 indicates Alternatives A, C, and D are virtually the same with respect to acreage and AUMs available for livestock use; on the other hand, Alternative B would result in significant adverse impacts to livestock grazing in the planning area. The comparison of alternatives with respect to livestock grazing provided throughout Chapter 4 is inconsistent with alternative descriptions provided in Chapter 2. Within Chapter 4, the AUMs available for livestock grazing under each of the alternatives listed in Table 4.34 is different from AUM output by alternative in Table 4.62. The analysis in Chapter 4 uses a range of maximum AUMs for each of the alternatives. The various figures provided for maximum AUMs under each of the alternatives are less than the established preference limit of 129,815 AUMs given on page 3-81. What decisions must be made to determine what the actual maximum AUMs would be for each alternative? The RMP and EIS provide no meaningful estimate of approved livestock use for each alternative, thus analysis predicts no significant differences in impacts to livestock grazing operations in the planning area. This creates a level of uncertainty, which does not allow for meaningful analysis. Any new restrictions/exclusions for grazing under each of the alternatives would affect the AUMs that are currently used. The analysis should estimate the impacts of each alternative to grazing as a departure from current actual use as the baseline." "Estimates of the economic benefit from BLM forage provided in the analysis are inadequate. Extensive cost of grazing studies have shown that ranchers, on average, spend as much per unit of forage on public lands (current fees plus additional costs of use) as is paid for private land grazing leases (Whittlesey et al. 1993). By this line of reasoning, the 2008 benefit of low cost BLM AUMs [Animal Unit Months] used in the RPFO of \$675,600 (p-3-82) actually represents additional costs of use incurred by these ranching operations compared to grazing on private land. A more meaningful estimate of the economic benefit of BLM forage would be the value of production</p>	<p>Acreages and AUMs are estimates for impact analysis. Actual numbers are to be determined and calculated at the activity level when specific actions are taken. The purpose of the information presented here is to assist in determining the impacts of programmatic actions under consideration in this planning process on various resources and resource uses. The Draft RMP/EIS grazing economic analysis are based on an average actual use of around 60 percent of total authorized AUMs over the last few years. If conditions were to improve, thus allowing for 100 percent usage, the economic impacts would be expected to track closer to the data in this comment. Also, Chapter 4 represents environmental impacts from one specific resource on all other resources based on all alternatives. Chapter 2 represents the various management schemes that can be adopted to achieve varying levels of resource protection.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
58	13	Range	<p>"The RMP describes the majority of ranching operations in the planning area to be cow/calf operations. New Mexico State University produces annual cost and return estimates for New Mexico ranches based on size and area. The Central Region accounts for the majority of BLM forage available in the planning area. The 2008 Central Region Medium Cow/Calf Budget reports a value of production on a per cow basis of \$460.80 (Lib bin and Hawkes 2008). By converting the 2008 AUM [Animal Unit Months] authorization of 70,010 (Table 3.21) to animal unit yearlong (70,010/12), the number of head of cows capable of being supported by the 2008 AUM authorizations can be estimated at 5,834. Applying the value of production estimate given above, the value of production from BLM forage would be \$2,688,307 in estimated benefit to communities within the planning area from BLM forage in 2008. This value of production methodology could also be used to measure potential economic impacts that change to authorized livestock use under each alternative would have on communities within the planning area. For example, AUM reductions due to exclusion of livestock grazing in special designated areas under Alternative B are reported as 96,414 AUMs in Table 2.15 on page 2-44. This AUM reduction translates to a \$3,702,297 reduction in the potential value of cattle production in the planning area. Impacts of this magnitude are not insignificant, and this places further emphasis on the need for estimates of authorized livestock use under each alternative."</p>	<p>Consideration for how resources are managed by the BLM are made primarily in accordance with FLPMA, Section 102, multiple-use and sustainable-yield principle. There are various factors that would be considered in designing a management prescription, which include the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, or archaeological values, along with recognizing the nation's need for domestic sources of minerals, food, timber, and fiber.</p> <p>Assigning an economic benefit or impact to just one resource would not yield the data necessary to protect a resource or even to allow a type of use. Comparing resources solely on economic contributions would also not meet the requirements for how the BLM is mandated to manage the resources in accordance with FLPMA. Considering only economics would not achieve the multiple-use principle. As a comparison, in accordance with Department of the Interior Economic Report 2012, its grazing and forage activities contributed \$1.5 billion to the economy, non-fuel (hardrock) minerals \$21 billion, recreation \$45 billion. Without full consideration of all other factors mentioned above, management priorities would not achieve FLPMA's intended goals.</p>
176	4	Range	<p>"Wildlife, Special-status Species &amp; Riparian Resources: The Pueblo is of the opinion that the management prescriptions provided in the alternatives are incompatible with the management goals and objectives outlined in the Draft RMP/EIS for the [Espinosa Ridge] ACEC [Area of Critical Environmental Concern]. The Pueblo therefore urges the BLM to adopt Alternative C (Preferred) with prescriptions that eliminate completely grazing and surface disturbing activities throughout the ACEC."</p>	<p>Alternative B would make livestock grazing unavailable in the Espinazo Ridge ACEC. Under the Proposed RMP/Final EIS, Alternative <a href="#">CE</a>, <a href="#">livestock grazing would be available within the ACEC, except grazing would be excluded from Espinazo Ridge Pueblo, if acquired lands within the ACEC and surrounding allotment would be available for livestock grazing</a>. Because things have changed since the publication of the Draft RMP/EIS, the Pueblo now owns the base water that qualifies them to the grazing preference. If the Pueblo still believes that grazing is not conducive to the area, they may work with the BLM directly to protect the area for other resources.</p>
154	31	Minerals	<p>"I am extremely concerned that each of the alternative plans includes the majority of the land being open to cattle grazing, mining, and off road vehicle use. How can these uses even be considered without first conducting environmental studies and disclosing potentially harmful environmental impacts to the public? Where are the discussions of the effect of all of this on sensitive ecological species? What about the management of critical water areas that need to be restored? All of this information is lacking in the DEIS.</p> <p>As for those alternatives that are suggested, I support Alternative B which includes closure to minerals and no surface occupancy"</p>	<p>All references to and discussion of environmental effects of the alternative planning decisions are disclosed in Chapter 4 (Environmental Consequences of Proposed Plan and Draft Alternatives). Furthermore, NEPA provides for public participation and environmental analysis of such activities as grazing and mining prior to approval of authorizations.</p>
90	36	Minerals	<p>"Vol 1, p.2-80, 2.2.15.2, 3rd bullet. Minor point, but it is impossible to prevent erosion. BMPs are implemented as erosion control methods."</p>	<p>A correction was made in the Proposed RMP/Final EIS to better represent the objective of the <a href="#">best management practices (BMPs)</a>. The word "prevent" was changed to "minimize."</p>
80	12	Minerals	<p>"Gravel mining uses lots of potable water for various purposes. Decreasing water supplies are becoming an escalating problem in this region of the world and in the Placitas area in particular. The proposed new gravel mines lies immediately above the Santa Fe aquifer, which supplies water to the Town of Bernalillo, Algodones, and a large portion of Placitas, the Santa Ana and San Felipe Pueblos, as well as a number of other communities. Yet no analysis was included in the Plan that demonstrates that the BLM has determined that the quantity and quality of the potable water used by the more than 6,000 residents will not be affected by its proposals. Certainly exploration and extraction of liquid substances, such as oil and gas, would have the significant potential of polluting our aquifer; but other mining activities, if not highly controlled and regulated can diminish the water supply and or cause water to become so arsenic concentrated that it becomes nonpotable by Federal Standards. Bernalillo water already has some arsenic concentration problems that require treatment. The fragility of the water supply anywhere in the Southwest is a major area of concern. Numerous court battles and multi-decade long state water battles are the norm here. This lack of analysis in the Plan jeopardizes our ability to have adequate access to safe, potable water. Availability of our water supply was based upon the 100 year supply analysis that was required before development of our community could take place. Who will supply our water if it becomes unpotable or exhausted due to the BLM mining prescriptions? If a 100 year water availability analysis is required before residential development; how can the Plan omit any water usage analysis for mining? Water usage and quality data is plentiful in respect to fracking and other liquid extraction. Water usage data is also readily available in respect to openpit gravel mining - it should have been a consideration in the Plans preferred alternative.</p> <p>Communities surrounding the Placitas BLM lands may soon be at a tipping point where painful choices will have to be made as to who can have water, and how much . Irrevocable damage might result without highly compelling reasons for any type of extraction activity. Placitas BLM parcels should be closed to all future mining activity for that reason alone."</p>	<p>Designating an area as open for a particular mineral is not the same as an approval for mining. Groundwater allocations are ultimately authorized by the Office of the State Engineer. The BLM would not have the authority to prevent water from being allocated by the State Engineer for any project, private or commercial. Managing the Placitas area as open for minerals ensures that future infrastructure needs for material would be met.</p>



R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
63	2	Minerals	<p>“Many areas of the RMP and DEIS mention mitigation, controlled surface use (CSU), or the use of “restrictions”, to the offset potential adverse effects. Without offering specific examples or definitions of these terms it is not possible to determine what the environment effect of the resource management actions will be.</p> <p>Recommendation: Please offer specific examples in cases where mitigation, CSU, or restrictions will be used to offset adverse environmental effects.”</p>	<p>An example of mitigation is avoiding a cultural site. An example of CSU is requiring an operator to traverse a specific route. An example of restrictions is timing restrictions. Timing restrictions are used to prevent operators from working in specific areas during specific periods in order to provide some animals time to breed or rear their offspring. More specifically, lease stipulations applicable to various resources can be found in Appendix H of the Proposed RMP/Final EIS.</p>
4	4	Minerals	<p>“2-166. Alt. C appears to provide more protection of specially designated areas from leasable and salable mineral extraction than Alt. B. There is probably some good explanation for this unusual reversal, but it escapes me. Except for Legacy Uranium Mines we think that the ACECs [Areas of Critical Environmental Concern] should be protected from surface-disturbance wherever practicable.”</p>	<p>In some instances, the prescriptions for leasable and salable mineral extraction is similar in both Alternatives B and C (<a href="#">the Proposed RMP</a>). Such would be the case when the resource protection goals of that particular special designation, such as the Continental Divide Congressionally Designated Trail, call for the most restrictive protection, regardless of other prescriptions (Draft RMP/EIS Table 2.33). In other instances, such as with the Cañon Jarido ACEC, the alternatives vary in restriction level, based on the goals and objectives for that ACEC (Draft RMP/EIS Table 2.37).</p>
58	30	Minerals	<p>“What methodology is being used to determine what part of the land is to be used for sole or singular use verses using the land for multiple uses? I had heard that BLM would like to see the land held by them to be used for multiple purposes. One issue that was brought up at the last BLM work study meeting at Bernalillo High School Gym was that BLM was struggling with the idea of multiple usage concepts. Energy companies would like to lease some of the BLM land for energy development. The problem, as I understand it is, these companies do not want to share the land with anyone else as a multiple use site for security and safety reasons. That is a true statement! The sand and gravel operations, for example, are single use activities and cannot co-exist for multiple uses? I don't think that is possible.”</p>	<p>The BLM is a multiple land use agency. It determines how areas should be managed based on area resources and how those resources could benefit the majority of the general public and meet the multiple-use mandate set by FLPMA. This is based on the resource values and conflicts identified on every acre of BLM-administered land. Understandably, the agency cannot have multiple uses in every one of those acres it manages; for example, mining is not allowed in wilderness areas, and, conversely, areas where mining is allowed does not allow for an undisturbed serene setting, such as those found in a wilderness area.</p>
58	31	Minerals	<p>“The preferred Alternative seems to be missing any consideration of the many comments submitted by me, Placitas residents and organizations during the original 2008 scoping period. However diverse and perhaps written without the “substantiveness” you now require; those comments were virtually unanimous in rejecting mining on the Placitas BLM parcels. Preferred by whom? Preferred by some out of the country based mining companies who could profit. Is it the preference of the BLM, who see their job as primarily to extract direct revenues from the lands they control “on behalf of the public”? But it is not the preference of the most of the people who live and have invested their life savings in the adjacent communities.”</p>	<p>Under the Proposed RMP/Final EIS, Alternative <a href="#">C (the Proposed RMP)</a>, <a href="#">the area 800 acres</a> around Placitas would remain open to salable mineral development.</p> <p>The <a href="#">Draft RMP/EIS preferred alternative Proposed RMP</a> (Alternative C) <a href="#">was presented to show is</a> a balanced approach, based on all issues that were considered, <a href="#">to in</a> managing the mineral resources in the area. The public concerns were well considered in the <a href="#">design of the BLM's Draft RMP/EIS preferred alternative Proposed RMP</a> (Alternative C). In general, the <a href="#">Draft RMP/EIS preferred alternative Proposed RMP</a> (Alternative C) does not represent the interest of any particular group, but rather <a href="#">the best an inclusive</a> analyzed approach to managing the resources on BLM-administered lands.</p>
72	3	Minerals	<p>“Who Prefers the “Preferred Alternative”? -- Many comments were submitted by Placitas residents and organizations during the original 2008 scoping period. However diverse those comments may have been, they were virtually unanimous in rejecting mining on the Placitas BLM parcels. This prescription is incorporated in Alternative B (the conservation alternative) of the DRMP. Alternative D (the development alternative) naturally allows for all sorts of mining and oil/gas extraction. The “preferred alternative”, Alternative C, seemingly attempts to “average out” Alternatives B and D, and allows for gravel mining in approximately 800 acres of Parcel A. This would increase the open pit mining in Placitas by about one third, and in a community that has been counting the days for the existing mines to be depleted and the land restored. How is this prescription “preferred”? It may be the preference of some mining companies who could profit. It may be the preference of a few individuals who would gain employment in these activities – though mining is certainly not the preference of the far greater number who would gain employment through residential construction, which will be curtailed if this area gets a reputation for “open season” for gravel mining. It will also not be the preference to those who work in the service industries that are so important to our communities' economic health. It may be the preference of some in the BLM, who see their job as primarily to extract direct revenues from the lands they control “on behalf of the public”. But it is certainly not the preference of the bulk of the people who live in the adjacent communities.”</p>	<p>Under the Proposed RMP/Final EIS, Alternative <a href="#">C (the Proposed RMP)</a>, <a href="#">the area 800 acres</a> around Placitas would remain open to salable mineral development.</p> <p>The <a href="#">Draft RMP/EIS preferred alternative Proposed RMP</a> (Alternative C) <a href="#">referenced was preferred by the BLM because it is the almost</a> balanced approach, based on all issues that were considered, <a href="#">to in</a> managing the mineral resources in the area. The public concerns were well considered in the <a href="#">selection of the BLM's Draft RMP/EIS preferred alternative Proposed RMP</a> (Alternative C), in that it proposes to modify the current (1986) RMP. It identified every acre of federally owned minerals near the Placitas area as open for extraction. <a href="#">The FLPMA Section 202</a> requires that the BLM recognize the need for domestic sources of minerals from BLM-administered lands. In general, the <a href="#">Draft RMP/EIS preferred alternative (Proposed RMP)</a> (Alternative C) does not represent the interest of any particular group, but rather the best analyzed approach to managing the resources on BLM-administered lands.</p>

**Commented [AB13]:** Angie: Updated references from Alt E to Alt C, confirmed change from Table 2-8, but please double check and confirm

**Commented [AA14R13]:** Need revised Alt C Placitas salable open acres from Jenna. Emailed Jenna on 11/2/21: “Placitas salable minerals—Ch2, Table 2-8 (salable minerals) shows Alt A as 7,500 acres open to salable mineral extraction in Placitas area. The BLM-authored comment response states that the 1986 RMP (=Alt A) showed 14,000 acres, including all federal minerals owned on private lands. Which acreage is accurate? Please provide the Placitas salable minerals open acres by alternative.”

**Commented [AA15R13]:** On 11/9/2021, Jenna provided GIS spreadsheet (RPFO\_GIS\_calcs\_V03\_20211115.xlsx) with salable minerals in Placitas area by alternative (see tab “alts\_min\_salable”). Based on that spreadsheet, Alt C Placitas salable open is 800 acres and closed is 6,700 acres. Based on this, Amanda's edited response is correct.

**Commented [AB16]:** Angie: Updated references from Alt E to Alt C, confirmed change from Table 2-8, but please double check and confirm

**Commented [AA17R16]:** Need revised Alt C Placitas salable open acres from Jenna. Emailed Jenna on 11/2/21: “Placitas salable minerals—Ch2, Table 2-8 (salable minerals) shows Alt A as 7,500 acres open to salable mineral extraction in Placitas area. The BLM-authored comment response states that the 1986 RMP (=Alt A) showed 14,000 acres, including all federal minerals owned on private lands. Which acreage is accurate? Please provide the Placitas salable minerals open acres by alternative.”

**Commented [AA18R16]:** On 11/9/2021, Jenna provided GIS spreadsheet (RPFO\_GIS\_calcs\_V03\_20211115.xlsx) with salable minerals in Placitas area by alternative (see tab “alts\_min\_salable”). Based on that spreadsheet, Alt C Placitas salable open is 800 acres and closed is 6,700 acres. Based on this, Amanda's edited response is correct.

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
70	4	Minerals	<p>Cave and Karst Areas: In light of the discussion on wild lands that need to be protected, I searched the documents for "caves", an area in which I have considerable experience. I support the work indicated in the document to protect all the wilderness areas indicated in the study. The RPFO [Rio Puerco Field Office] is to be commended on establishing a goal to identify and study the caves and karst features, and for their intent to protect such resources from oil and gas drilling &amp; mining. Just as water well drilling can significantly damage the aquifers so important to our limited water resources, deep punching oil and gas drilling can damage caves and karst systems. (Even shallow water wells can damage caves and aquifers just a few hundred feet beneath the surface.) The Pronoun Cave Complex is such an area, and it is important because of the surrounding potential for deep cave systems due to the significant travertine deposits. The maps were not sufficient for me to determine with a quick look if they are covering the appropriate area, and I am personally aware of multiple travertine mines in the area that were not mentioned (or at least seen by myself) in the limited text on the area. (These mines at the present seem to be dormant.) Although I am certainly in favor of Alternative B, which would expand the current ACEC [Area of Critical Environmental Concern], I would ask that additional detail be provided defining this unique area. In fact, this is a good example of the above discussion I made about having a budget item for an appropriate knowledgeable field expert for this cave area. I am not aware of any cave specialists in the RPFO, which suggests a reason for the limited information on the caves. I would suggest that the BLM work on identifying a cave specialist, perhaps in association with related areas such as archaeology, paleontology, history, geology and biology. In the mean time I would point out that decisions concerning BLM caves and their unique environment can continue to be achieved with the help of other qualified and quite capable BLM cave specialists in Roswell and Carlsbad (and I saw that one of whom contributed to the plan). Experts in the field should guide the RPFO in addressing cave related issues, and that could include over 100 New Mexico cave volunteers.</p>	<p>The Draft RMP/EIS Pronoun Cave Complex section provides the appropriate level of information that describes the uniqueness and importance of this resource. Studies and evaluations that are more in depth and detailed and that lead to the special designation and design of the management prescriptions are conducted and are saved in the administration record. The resource management plan identifies the planning goals, objectives, and prescriptions for the inventoried resources but does not set a budget or specific line budget items and needs for each resource. Setting the budget is an administrative process that is performed outside of the scope of this RMP. Lastly, for clarification, the BLM is not designating "wild lands" as part of this effort.</p>
176	09	Minerals	<p>"By law, reasonably foreseeable development scenarios must be included in the DEIS. Nowhere do I see any discussion of the Northwest Loop Road, nor is there any mention of the Western Expansion Project III. Issues such as where the pipeline will be constructed, whether land will be taken by eminent domain, and whether gas will be used for domestic use are all critical to Placitas residents."</p>	<p>Reasonably foreseeable development was analyzed in such documents as the 2010 Reasonably Foreseeable Development Scenario (RFD) for Fluid Mineral Development in the Bureau of Land Management BLM RPFO (<a href="https://eplanning.blm.gov/public_projects/lup/64954/78492/89455/Rio_Puerco_RFDS.pdf">https://eplanning.blm.gov/public_projects/lup/64954/78492/89455/Rio_Puerco_RFDS.pdf</a>). Based on these potential scenarios, management prescriptions are developed to address such potentials.</p> <p>More specifically, Chapter 4 identifies the reasonably foreseeable developments and describes the potential cumulative impacts as applicable to the various resources. For example, Draft RMP/EIS Section 4.2.14.3, Wildlife Cumulative Impacts, states "Reasonably foreseeable projects that would adversely impact wildlife include developments that would result in habitat loss or fragmentation. Mineral developments, new road projects, urban growth, renewable energy projects, and other surface-disturbing activities that occur on public, private, or tribal lands near the Planning Area could displace wildlife for the length of the project. The Desert Rock Power Plant, new transmission corridors, the proposed N55 Road Improvement Project, new uranium mines, and the Northwest Loop Road could result in habitat fragmentation and habitat loss."</p>
63	2	Minerals	<p>"The Las Huertas Creek bed is marked as closed in some maps for locatable and extractable activity, but is at the southern end of the area in all alternatives open to saleables. The DRMP does not identify how that seasonal watershed will be protected."</p>	<p>Las Huertas Creek consists of 1 mile on BLM-administered lands. Currently the seasonal watershed is protected as a riparian area under the Rio Puerco Riparian EIS.</p>
157	38	Minerals	<p>"[From ATT 14] Gravel mining impacts: Please analyze the environmental impacts of silica due gravel mining on flora and fauna, including horses and special-status species with regard to the following studies: Damage to vegetation and agriculture is possible through mechanisms such as the blocking of leaf stomata (and the inhibition of gas exchange), or reduced photosynthesis due to smothered surfaces (or in extreme cases lower ambient light levels). While such effects on vegetation are likely to be localized and reversible, they can contribute to negative public perceptions of the mining operation's environmental performance. <a href="http://www.ret.gov.au/resources/Documents/LPSPD/BPEMDustControl.pdf">http://www.ret.gov.au/resources/Documents/LPSPD/BPEMDustControl.pdf</a> Silica and grit impacts and causes high crowned teeth in herbivores: The occurrence of hypsodonty through time can be regarded as one of the most disputed and fascinating chapters of herbivore evolution. The strong quantitative support of the view of hypsodonty as a signal of ingested silica, and hence abrasiveness, is therefore the major implication and result of this study. While in our data the sum of all silicates was quantified, the elucidation of the contribution of biogenic and external silica to overall intake and the abrasive effect of the respective proportion should be in the focus of future studies. <a href="http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3081769/">http://www.ncbi.nlm.nih.gov/pmc/articles/PMC3081769/</a> High silica diets increase molar enamel. The study focuses on primates, but can be applied to across species. A statistical analysis of these variables showed that the amount of abrasive silica phytoliths in the diets of our sample primates correlated positively with the thickness of their molar enamel, constrained by the amount of leaves in their diet. <a href="http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0028379">http://www.plosone.org/article/info%3Adoi%2F10.1371%2Fjournal.pone.0028379</a>"</p>	<p>Draft RMP/EIS Chapter 4, Section 4.2.12.1.5 states that while mineral extraction would disturb approximately 1.1 percent of BLM-administered land in the Decision Area in the short term, loss of vegetation associated with surface disturbances for well pads, access roads, and minerals infrastructure would increase the potential for invasion of undesirable plant species. It also would cause a potentially irretrievable loss of vegetation productivity during the period of disturbance; however, all disturbed areas would be fully reclaimed prior to release of bonds.</p> <p>Likewise, Draft RMP/EIS Section 4.2.3.2.12 discloses that impacts from minerals decisions on wildlife and their habitats would include short- and long-term habitat loss or degradation from the removal of vegetation (surface disturbance) and subsequent occupation of areas for oil and gas well pads, open pit mines, and roads and infrastructure. The impacts of minerals decisions on wildlife resources would be reduced by using leasing stipulations and best management practices (BMPs). This would recognize and disclose the potential environmental effects on vegetation and wildlife from mineral extraction.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
13	38	Minerals	"2-86. Livestock grazing in Bluewater Canyon is wrong. Resource values are too great. It's hard to see why you are willing to exclude lucrative mineral extraction (p. 2-164) and unwilling to exclude money-losing, riparian destructive grazing."	The BLM considered a range of alternatives for livestock grazing within the Bluewater Canyon ACEC. Alternative B for Bluewater Canyon ACEC would make livestock grazing unavailable within the ACEC (Draft RMP/EIS Table 2.34), so that option was considered and analyzed in the range of alternatives. <u>Under the Proposed RMP (Alternative CE) would "livestock grazing would be available within the ACEC, prohibit livestock grazing within the canyon, though livestock grazing may occur on the upper rims. Both ends of the canyon would be fenced and the canyon would have a pass made to allow people to continue down the trail. Grazing would be allowed on the rim of the canyon on the north side at Blackjack Arroyo Allotment #00450 and on the south side at Reynold Draw Allotment #00429."</u>
58	13	Minerals	"Cumulative Impacts: The DRMP omits an adequate analysis of the cumulative impacts of increased mining activity in the Placitas area, should further mining activity be allowed on Parcel A. The DRMP dismisses long term cumulative impacts and the factors that make reclamation difficult to impossible, and ignores ""lessons learned"" from previous failed reclamation efforts in the area. In addition, the cumulative effects of 3 other nearby mines, including property value loss, recreation loss, dust, noise, light, and traffic are omitted. A truly comprehensive analysis of surface mining impacts in the vicinity of the Placitas BLM parcels will reveal that there are no future surface mining activities on these parcels that could reasonably be expected to result in acceptable cumulative impacts."	Chapter 4 of the Draft RMP/EIS analyzes impacts of all resources against each other and discloses the potential effects to include direct, indirect, and cumulative. For example, Draft RMP/EIS Section 4.2.1.2.2 discusses the potential impacts that mineral resources decisions would have on air quality. This section states "Mineral resources management decisions would likely increase emissions from equipment, fugitive dust, <u>volatile organic compounds (VOCs)</u> , <u>nitrous oxide (NOx)</u> , and greenhouse gas emissions resulting in adverse impacts. Short-term air quality impacts from minerals development and production would occur from several sources: 1) combustive emissions (vehicle tailpipe and exhaust stack emissions) from the operation of mobile and stationary source construction equipment would include NOx, VOCs, and <u>carbon dioxide (CO2)</u> ; 2) fugitive dust emissions ( <u>particulate matter smaller than 10 microns in diameter (PM10)</u> ) from earthmoving and construction activities and the operation of vehicles on unpaved surfaces; 3) Fugitive emissions of methane and other VOCs from well completions, pits, pneumatic devices, and leaks."  The whole concept of an EIS is to analyze the potential impacts associated with federal actions and to disclose them to the public. Understanding the potential for such impacts assists the BLM in developing the most balanced approach to managing the federal resources, while ensuring that the BLM complies with the FLPMA mandate for multiple use. As for the specific mineral resources near the Placitas area, the BLM took all public concerns into consideration for that area to include its requirement to ensure that viable mineral resources are retained for public use.
60	14	Minerals	"No justifying reasons are given within the DRMP for that particular location [Parcel A], only a specification of the location. Issues are simply not discussed regarding selection of this location in the preferred alternative: 1) Buffering from existing private properties in an attempt to preserve quality of life and property value; 2) The extreme friability of the soil in the Placitas area; 3) The cumulative effects on traffic, air quality, and depletion of aquifers; 4) How mining on this particular location would affect habitat for plants and animal life, and wildlife corridors."	Chapter 4 discusses how mineral resource decisions may affect all other resources. More specifically, if in the future any application for mineral activity in the Placitas area, or any other area administered by the BLM, then site-specific environmental analyses would have to be conducted and disclosed to the public prior to any approvals. All salable mineral authorizations that are discretionary must be analyzed and reviewed prior to authorization.
60	18	Minerals	"I understand there is something called the NW Loop Road in the Placitas area. I have read in the news items about a natural gas pipeline that is involved somehow with the BLM and the lands near Placitas. I have also read about high power lines taking a possible route through Placitas, and most likely other parts of the RPPFO [Rio Puerco Field Office] lands. Although I support alternate energy, I do not support ripping up the currently attractive lands in the Placitas area without more public discussion of more alternatives to these rumored (secret?) plans by developers. I especially do not support messing up any more of the visual landscape in the Placitas ""bedroom community"" and wild areas. Keep the future developments closer to the highways (like I-40 and I-25) and attempt to eliminate the gravel pits and other related commercial activities next to the interstates as well. Proposed drilling and mining in Sec. 13 & 18 in the Placitas area should be avoided at all costs. Rumors of expanding gravel pits, asphalt plants, concrete plants are all things that do not belong in a wild, natural area where wild horses, coyotes and other wild animals roam."	The Draft RMP/EIS inventories and analyzes the resources on all BLM-administered lands. While an analysis of reasonably foreseeable future projects is considered (Draft RMP/EIS Table 4.3), specific projects or private industry goals are not part of the overall analyses or decisions for the RMP. If an area is designated as open for any mineral activity, an application must be submitted and site-specific environmental analyses must be performed and disclosed to the public. Furthermore, NEPA allows for public notification and comment on proposed projects.
91	33	Minerals	"Any resource extraction to be done in only very limited areas without the stipulation that over 90% will be available for this destructive activity. Instead, if any extractive activities are to be done they will only occur after strict environmental review by all interested parties to include Native Americans, conservationists/environmentalists groups, and drilling/mining companies. This review to take place for each location and activity without any possibility of blanket coverage for the whole Petaca Pinta Country, San Juan Basin Badlands, and Continental Divide Trail."	The BLM is a multiple land use agency, which includes mining; however, prior to approval or denial of any proposals, the agency must comply with NEPA and conduct an environmental analysis on the project prior to approval. Additionally, NEPA outlines how the agency notifies and solicits comments from interested people or groups.

Letter Number	Comment Number	Category	Comment Text	Response
176	3	Minerals	<p>"I am very concerned about all types of mining in the BLM areas around Placitas. Should mining be allowed, only restoration under Alternatives A or B is acceptable. Only companies with ongoing proven environmental records free from fines, histories of previous environmental endangerment, and valid citizen complaints should be allowed leases."</p>	<p>A review of the proponent's history as well as site-specific NEPA analysis would be conducted prior to any approval or rejection of proposed projects. Furthermore, NEPA allows for public notification and comment on specific proposed projects.</p>
91	36	Minerals	<p>"Oil/Gas Extraction (Leasables) - Mineral Mining (Locatables) Based upon the minerals potential report in the current DRMP and the previous 20 year old EIS minerals report it is apparent the potential for leasables and locatables is small in the Placitas parcels. Furthermore the risk is too great to the fragile Placitas water supply to allow any mining for them in the Placitas BLM parcels. Consequently, we recommendation that all leasables and locatables activities be withdrawn from Alternatives A - D, for all 3 Placitas BLM parcels."</p>	<p>The BLM is a multiple land use agency. Multiple land use includes allowing leasable and locatable mineral development. Though the mission of the BLM is multiple land use, prior to approval or denial of any proposals, the agency must comply with NEPA and conduct an environmental analysis on the project prior to approval or denial of the proposed action. The agency would conduct the analysis, solicit comments, and develop stipulations for the activity prior to approval.</p>
94	5	Minerals	<p><b>"Aquifer Impact/Water Usage</b></p> <p>Parcel A lies immediately above the Santa Fe aquifer, which supplies water to the Town of Bernalillo, Algodones, a large portion of Placitas, the Santa Ana and San Felipe Pueblos, as well as a number of other communities.</p> <p>Certainly exploration and extraction of liquid substances, such as oil and gas, would have the significant potential of polluting this aquifer that is vital to a large local community. But other mining activities, if not highly controlled, can also contribute to pollution of the aquifer.</p> <p>While the goal of BLM and our country is to become energy independent, energy independence must certainly be considered secondary to health, safety and sufficient clean water. Hydraulic fracturing ("fracking") has increased significantly over the last decade and accordingly so has our country's production of oil and natural gas. Yet the benefits of fracking have been shadowed by some very significant, potentially attributable health, safety and welfare disasters. Fracking is not yet a fully precise science, especially relative to preserving our precious water resources.</p> <p>BLM itself has proposed rules governing "fracking". Officials at EPA report that conducting inspection and enforcement activities for oil and gas development from unconventional reservoirs is challenging due to limited information, as well as the dispersed nature of the industry and the rapid pace of development. They have also complained of the difficulty of investigating water contamination cases, partly because there is often no information on the quality of water prior to modern drilling.</p> <p>Gravel Mining Effects on Water Quantity - Gravel mining uses great quantities of water for various purposes. Decreasing water supplies are becoming an escalating problem in this region of the world, and in the Placitas area in particular.</p> <p>Gravel Mining Effects on Water Quality - As aquifer water nearer to the surface is depleted by large amounts of water use, the concentration of harmful substances increases in the remaining water supply, with substances that were deeper in the aquifer rising closer to the surface. This area already has significant challenges regarding arsenic abatement in drinking water, which has been very costly to the Town of Bernalillo, Algodones, and various parts of Placitas. Increasing mining activity by one third or more will only exacerbate this critical problem. Communities surrounding the Placitas BLM lands may soon be at a tipping point where painful choices will have to be made as to who can have water, and how much. Without highly compelling reasons for any type of extraction activity, Placitas BLM parcels should be closed to all future mining activity.</p> <p>Conclusion: The Placitas BLM parcels should be removed from potential leaseables activities due to the relatively high potential for ground-water contamination and likely aquifer depletion, coupled with the low potential of finding oil and gas in the Placitas area. Furthermore, since gravel mining also depletes available water from an area that already has challenged water quantity and quality, these activities should be excluded as well."</p>	<p>The BLM designs management prescriptions only for the resources it manages, in accordance with FLPMA. While protecting water resources is one of the BLM's mandates, underground water resources are managed and permitted by the State Engineering Office for the State of New Mexico. Any permit applications for underground water would have to be approved in accordance with State law, which governs the ownership of water rights. The BLM is mandated by FLPMA to provide for compliance with applicable pollution control laws, including state and federal air, water, noise, or other pollution standards (FLPMA, Section 202). While the BLM sets aside allocation of resources for potential use by the public, it does not necessarily mean that a blanket authorization is part of the resource allocation. In the case of mineral extraction, it is the BLM's discretion to authorize an application submittal after a complete NEPA review and disclosure of the environmental impacts on the human environment to the public. The various alternatives to achieve the project must include a "no action" alternative.</p>
72	1	Minerals	<p>"Mineral Resources: The Draft RMP/EIS correctly points out in [sections] 3.11.2.1.2, 3.11.3.1, 3.11.3.2 that the commercial development of mineral resources in the Placitas BLM lands is largely uneconomical and therefore unlikely. Nevertheless, the BLM proposes, in [section] 2.2.1 0.4.4, management alternatives in its preferred alternative for this area that would permit extraction of leasable fluid minerals under a CSU [Controlled Surface Occupancy] prescription, and open two full sections of land in the area to extraction of salable minerals and locatable mineral entry. The Pueblo is of the opinion that any development of mineral resources in the Placitas BLM lands should not be permitted and therefore urges the BLM to reject Alternatives C (Preferred) and D and adopt Alternative B. This area is too close in proximity to Placitas and the Pueblo's lands to permit future mineral resource development. The area also contains important groundwater resources. If the mineral resources in this area were of such quality and accessibility that development of them made economic sense, a different management approach might be called for. But under the circumstances that exist at this time, the management prescriptions contained in Alternative B present the only reasonable alternative."</p>	<p>Draft RMP/EIS Section 3.11.2.1.2 is in reference to metals associated with locatable minerals, Draft RMP/EIS Section 3.11.3.1 is associated with oil and gas, and Draft RMP/EIS Section 3.11.3.2 is associated with coal. In addition, Draft RMP/EIS Section 3.11.1 describes the salable mineral potential as "Sand and gravel is abundant in the Planning Area. In general, sand and gravel deposits in the area are located in Quaternary and Tertiary age deposits in playas, fluvial areas, channels, and drainages. There are currently four mineral material sales of sand and gravel in the Planning Area, located in Sandoval, Cibola, Valencia, and Tarrant Counties. There are also non-federal sand and gravel mining operations on Indian lands in the Planning Area."</p> <p>Based on the analyses, the BLM proposes that the Proposed RMP (Alternative CE) for the Placitas area is the most balanced approach.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
14	6	Minerals	"Parcel C/Crest of Montezuma - 916 acres: I urge that the selected alternative designate the Crest of Montezuma parcel as Closed for all categories of mineral entry. Due to active Senate legislation for the transfer of the parcel to the Forest Service, all prescriptions for increased activity on this parcel should be put on hold pending the outcome of that legislation. I favor disposal of this parcel to the Forest Service."	Both the BLM and the Forest Service are multiple land use agencies. Additionally, the pending legislation does not affect how the BLM or the Forest Service would manage the Crest of Montezuma.
174	3	Minerals	"It is encouraging that the Agency is recommending the area [Crest of Montezuma Extensive Recreation Management Area] be withdrawn from locatable mineral entry, closed to the extraction of salable minerals, and that fluid minerals would be leased with a CSU stipulation."	The Proposed RMP (Alternative <a href="#">CE</a> ) for the Crest of Montezuma is based on the most balanced approach, while taking resources protection goals and conflicts into consideration.
90	13	Minerals	Parcel A - 3142 acres: Locatables - Due to the very low potential of discovering locatable minerals in the area of Parcel A, I recommend that the selected alternative closes Parcel A to any locatable mineral entry, such as for gold, silver or uranium.	The process of withdrawing minerals from the Mining Law is a cumbersome process and must be conducted with the intent to protect specific inventoried resources that would not be compatible with locatable mineral entry. Based on the inventoried resources in Parcel A (Placitas area), locatable mineral entry would not conflict with any other resources protection goals for that area. Therefore, under the Proposed RMP (Alternative <a href="#">CE</a> ), 400 acres in the Placitas area would be open to locatable mineral entry.
60	16	Minerals	"In your own report, linked on the comment page, ""Reasonably Foreseeable Development Scenario for Fluid Mineral Development in the BLM Rio Puerco Field Office,"" is written:  ""Most of the oil and gas reservoirs discovered within west central New Mexico are small features. For this reason, drilling success rates are poor, and production volumes from any discoveries are not large"" (Page 10, Section IV. A.)  And for this -- a 10% to less than 20% success rate -- we have the privilege of seeing our landscape permanently scarred, because, especially in areas like the Badlands, true reclamation is impossible. These are arid landscapes, covered with cryptogamic soils, old growth junipers, and fascinating geologic formations. As it is, one cannot travel very far at all in the Badlands without the site of a ""sawhorse"" drill around every corner. And it's not a pretty site, for a hiker . . . Or for our planet. Please begin the process of opening already developed areas to renewable energy projects and closing new areas to any more resource extraction."	Areas that are left open for mineral extraction are based on analyzing the potential resource conflicts. Areas that are inventoried to need more protective prescriptions, such as special designations, may not be readily open for extraction of fluid minerals, or if they are open, this would be done under either NSO or CSU stipulations. Areas that do not present resource conflicts with potential fluid extraction may be marked as open, even if the potential for fluid minerals is low.
199	3	Minerals	Map 30 - It is very difficult to determine where the oil and gas potential exists on a map with such a large scale and without an overlay of BLM parcels. Also, it is unclear if this map covers all leasables, both fluid and solid (as the title implies or if it only shows fluid potential as stated in Section 2.1.4)? If Map 30 only covers fluid leasables, where are the areas shown within the Plan area that have solid leasables potential?	Map 3-10 shows Oil and Gas Potential Reservoirs, and Map 3-5 shows Fluid Mineral Leases.  The RPFO is open to solid leasable mineral development; unless it is specifically identified as closed by statute or administratively unavailable for the life of the plan for mineral leasing. The BLM would manage these open areas on a case-by-case basis. An appropriate NEPA review would be conducted before a nominated lease is offered for sale. Leasing is discretionary even if an area is open to development. Stipulations are added at the leasing stage, depending on inventory and analysis. Leasing stipulations are defined in the glossary (Appendix U). In total, 6,600 acres near the village of San Luis, New Mexico, are in the area of maximum development potential; however, these would not be available for further consideration for coal leasing according to the screening process. This is because the small amount of coal is low grade and not economically worth recovering. Refer to Map <a href="#">2-462-37</a> .

**Commented [AB19]:** Updated reference from Alt E to Alt C, confirmed changes with Table 2-9, no further changes needed

**Commented [AA20R19]:** Need revised Alt C Placitas locatables open acres from Jenna. Emailed Jenna on 11/2/21: "Placitas locatable minerals—Please provide the Placitas locatable minerals open acres by alternative."

**Commented [AA21R19]:** On 11/9/2021, Jenna provided GIS spreadsheet (RPFO\_GIS\_calcs\_V03\_20211115.xlsx) with salable minerals in Placitas area by alternative (see tab "alts\_min\_locatable"). Based on that spreadsheet, Alt C Placitas locatable open is 400 acres and closed is 7,500 acres. Updated response to reflect this.

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
146	8	Minerals	Section 2.1.4 - The following statement needs clarification, "For coal, a leasable solid mineral, the RPFO [Rio Puerco Field Office] would make decisions based on the coal unsuitability criteria." For example, What are "coal unsuitability criteria", and explain how and by whom are these criteria applied, used, etc.? Also, where specifically within the Plan area, is coal present?	Map 3-10 shows Oil and Gas Potential Reservoirs, and Map 3-5 shows Fluid Mineral Leases.  The RPFO is open to solid leasable mineral development; unless it is specifically identified as closed by statute or administratively unavailable for the life of the plan for mineral leasing. The BLM would manage these open areas on a case-by-case basis. An appropriate, a NEPA review would be conducted before a nominated lease is offered for sale. Leasing is discretionary even if an area is open to development. Stipulations are added at the leasing stage, depending on inventory and analysis. Leasing stipulations are defined in the glossary (Appendix U). In total, 6,600 acres near the village of San Luis, New Mexico, are in the area of maximum development potential; however, these would not be available for further consideration for coal leasing according to the screening process. This is because the small amount of coal is low grade and not economically worth recovering. Refer to Map <a href="#">2-462-37</a> .
162	11	Minerals	"Based upon the mineral potential report, leasable fluid minerals should be withdrawn from the parcel of BLM land immediately north of (and adjacent to) the community of Placitas, NM. This parcel carries the nickname of "the Buffalo Parcel," because of its shape. The parcel is located at the grids RO4E and between T12 N and T14 N on the [illegible] located in the Rio Puerco BLM RMD Draft (08112) Volume II Chapter 4 between pages 4-41 and 4-46.  I am concerned about the prospect of possible oil exploration drilling in the 3 parcels of BLM land adjacent to the communities of Placitas. Modern technology utilizes deep horizontal drilling and hydraulic/chemical fracking. There is substantial risk of ground water contamination, which can, if it occurred, destroy the community of Placitas."	Mineral activity on a BLM-administered parcel is a discretionary action, which means approval is not automatic; an application must be submitted, and the proposed project must be analyzed in accordance with NEPA. The results of the analyses would be disclosed to the public and the BLM would take public comments into consideration before making any decisions. So, if lands would be open to mineral development in the RMP, it does not necessarily mean the lands would be approved for mineral activity.
162	15	Minerals	2-93. In Cañon Jarido surface occupancy for fluid minerals is not compatible with the ACEC's [Areas of Critical Environmental Concern] objectives and should be eliminated.	The alternatives for fluid minerals presented in Table 2.37 for Cañon Jarido ACEC are as follows:  <ul style="list-style-type: none"> <li>• Alternative A—Fluid minerals would be leased with timing limitations and control surface use stipulations; the time constraint runs from February 1 to July 1.</li> <li>• Alternative B—Fluid minerals would be leased, with an NSO stipulation.</li> <li>• Alternatives C and D—Fluid minerals would be leased, with a CSU stipulation.</li> </ul> Based on the management objectives for Cañon Jarido ACEC, the array of alternatives presents three possible and viable management schemes for fluid minerals. <a href="#">Under the Proposed RMP/Final EIS, Alternative E, this area is not managed as an ACEC.</a>
16	1	Minerals	"Many areas of the RMP and DEIS mention mitigation, controlled surface use (CSU), or the use of "restrictions", to the offset potential adverse effects. Without offering specific examples or definitions of these terms it is not possible to determine what the environmental effect of the resource management actions will be.  Recommendation: Please offer specific examples in cases where mitigation, CSU, or restrictions will be used to offset adverse environmental effects."	Please refer to Draft RMP/EIS Chapter 2, Table 2.19 for the definitions of CSU, NSO and other fluid mineral leasing stipulation abbreviations. Any mitigation or additional restrictions are project- and resource-specific. Mitigation could include moving facilities to prevent impacts on other resources. CSU includes stipulating where roads or facilities can be placed in a specified area. Restrictions could include stipulating when an activity can take place, for example, from April 1 to October 1. More specifically, Appendix H lists stipulations as they would apply to the various resources.
58	14	Minerals	Maps 36A, 37A and 38A and related Section 2.1.4 text - Surface Restriction (Leasable) maps - Example for Section 2.1.4 and associated maps comment above: In Alternatives C and D, why are all 3 Placitas BLM parcels designated as "controlled surface use" when none has any potential for fluid leasables? Why aren't all three Placitas BLM parcels designated "closed" since all parcels have no potential? Also, clarify if these maps cover both fluid and solid leasables surface restrictions. If not, those areas with solid leasables must be shown somewhere within the document.	As shown on <a href="#">Draft RMP/EIS Map 030—Fluid Mineral Potential</a> , the area described in the comment has "low potential" not "no potential" for fluid minerals. Furthermore, <a href="#">Draft RMP/EIS Map 037—Surface Restrictions (Leasable) Alternative C</a> and <a href="#">Map 038—Surface Restrictions (Leasable) Alternative D</a> do not have all three "Placitas BLM parcels" listed as controlled surface use. The map indicates a combination of fluid and solid leasable minerals. <a href="#">The maps have and has been changed for in the Proposed RMP/Final EIS (Map 3-10).</a>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
162	14	Minerals	2-167. Alts. B and C look pretty good for protection of wildlife from surface disturbance, but it is puzzling that "No leasing stipulations would be applied for wildlife habitat under this alternative." Do you mean that? They should be.	Please refer to Draft RMP/EIS Chapter 2, Section 2.2.22.3, Management Common to All Alternatives, which states "The BLM would not allow mineral development activities to occur during seasonal closure periods for big game crucial and fawning habitat."
90	54	Minerals	Reclamation/Loss of Resources: The record of existing mining activity reclamation in the Placitas area, both on BLM and private lands, has been dismal. Due to the fragile nature of soils in the Placitas area and expected continued drought conditions, any increased mining activity in this area would predictably result in irretrievable loss of crucial soil and vegetative resources. Existing public recreation use will disappear along with these resources. The BLM has made no credible claims in the DRMP that these losses could be acceptably mitigated should further mining activity be allowed on the Placitas BLM parcels.	Chapter 4 analyzes the impacts that resources management decisions would have on other uses. For example, Draft RMP/EIS Section 4.2 states "According to the RFD for mineral resources, development of leasable, salable, and locatable mineral resources would contribute to surface disturbance equating to 1.1 percent of BLM-administered lands in the Planning Area over the next twenty years. It is anticipated that mineral extraction activities would be located in areas to avoid impacts to popular recreation areas. Site-specific NEPA analysis would be completed for applications for disturbance, thereby reducing opportunities for direct adverse impacts related to this disturbance."  Heavy grazing by unauthorized livestock occurs on much of the land in the Placitas area, where the topsoil has already been degraded and lost. Any proposed mineral activity would require a site-specific analysis that would consider the impacts to the existing soil conditions. Furthermore, past mining reclamation on BLM-administered land has encountered vandalism, which has likely led to undesirable results. The same type of analyses were done for every other resource measured up against recreation.
58	54	Minerals	"Erosion is not controlled. Most reclamation efforts at existing local gravel mines have met with failure due to friable, low-nutrient and highly-erodable soils, steep slopes, high winds and low annual rainfall. For example, in the "'played out'" mine at the extreme west end of Parcel A pictured above [see ATT 4], the BLM has yet to provide adequate management for the stabilization of soils and establishment of appropriate cover vegetation. As such, the BLM has effectively overseen the creation of non-vegetated "'dust bowl'". Based on this example, it is not unreasonable to assume that the 3- square mile pit contemplated in Parcel A would be satisfactorily reclaimed at anywhere near reasonable cost, especially when both private and public ownership is involved.  Such a large pit with its stark, post-removal surface profile and lack of soil stabilization and vegetation is completely unusable by any terrestrial or avian wildlife as any type of habitat, be it foraging, migration/passage, or cover. Current public recreation resources including hiking, orienteering, geo- caching and bird watching in the area to be mined, would be eliminated forever. The large-scale surface mining operations that could be permitted under Alternative A, C and D are literally the most devastating of all mining options, especially if appropriate and adequate reclamation activities are not properly undertaken. Such operations would obliterate the preexisting landforms of juniper-pinon flats dissected by small and medium-sized arroyos. Millions of tons of aggregate material would be physically removed from the site, and if not properly restored, leave behind a 3-square mile hole 100 or more feet deep, with steep, highly-erodable walls.  The impact of mining on Placitas BLM parcels extends far beyond the period of active mining, if the land is not fully reclaimed afterwards. In Parcel A there is clear evidence of past mining for which there has been no adequate reclamation. The BLM has demonstrated an inability to manage this crucial aspect of mining leases in this particular parcel. It is not likely that the agency will do significantly better in an era of governmental belt tightening, during which the presently strained resources of the BLM and other agencies will likely become even more reduced. This would leave a permanently blighted landscape where there is presently an urban interface that should be sustained for recreational uses. Additionally, the Placitas BLM parcels are recognized as important wildlife corridors and as habitats for various animals and plants. The continued lack of adequate management restoration of mined lands could be permanently disastrous to these crucial functions."	There are no federal efforts known to the BLM that recognize the Placitas parcel as an important wildlife corridor. While it does contain some vegetation, most of the terrain has failed land health assessments. Heavy grazing by unauthorized livestock occurs on much of the land in the Placitas area where the topsoil has already been degraded and lost. Any proposed mineral activity would undergo site-specific NEPA analysis that would consider the impacts on the soil conditions. Furthermore, past mining reclamation on BLM-administered land has encountered vandalism, which has likely led to undesirable results.  As for mineral activity, it is a discretionary action for approval that would require site-specific environmental analyses as part of the application process. All potential issues would have to be analyzed and taken into consideration after public involvement prior to the BLM making any decisions to permit such activity. Reclamation plans and bonding are major components of the application and authorization process.  When mine projects are proposed, the company submits a reclamation plan that is reviewed for adequacy. Reclamation plans may be found to be adequate or modifications may need to be made and a bond collected prior to project approval. An area does not necessarily need to be brought back to its original state in order to be reclaimed; however, an area needs to be brought back to a sustainable state. This means that the reclamation may be useful for a different activity than the use initially; therefore, all reclamation sites would not have the same results: some locations may not be fully reclaimed and may be in interim reclamation due to several factors; however, the BLM continues to ensure that other methods are attempted and would hold a permittee's bond until it is satisfied with the reclamation progress.
95	18	Minerals	"The Plan states that any reasonably foreseeable future activity that involves surface disturbance would have only a short-term cumulative impact to vegetative communities within the Planning Area. In this instance, the BLM states that short term is defined in the DRMP as impacts that would last for fewer than five years. Prior to surface-disturbing activities a certified engineering and reclamation plan must be approved by the authorized officer. And the plan must demonstrate how the following will be accomplished:  -Site productivity will be restored. -Surface runoff will be adequately controlled. -The site and adjacent areas will be protected from accelerated erosion, such as rilling, gulying, piping, slope failure, and mass wasting. -Nearby watercourses will be protected from sedimentation. -Water quality and quantity will be in conformance with state and federal water quality laws.  The operator must also provide an evaluation of past practices on similar terrain and be able to demonstrate success under similar conditions. Our experience with mining activity on the BLM Placitas parcels shows that this does not happen in either the short or the long term."	In reference to the area mentioned in the comment, the BLM is working with the operator to re-address the failed reclamation of the pit. The failure of this pit was due to widespread vandalism and theft of the landscape matting and landscape anchors. BLM would continue to monitor reclamation on disturbed lands permitted in the RPFO.

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
114	23	Minerals	Parcel A connects Las Huertas Creek to Pinon/Juniper woodlands, both of which are highly diverse habitats. This is the last of the undeveloped land surrounding Las Huertas Creek at this elevation. The impacts of gravel mining, roads and attendant traffic on wildlife habitats have not been analyzed and discussed in the DRMP. Gravel mining removes topsoil and vegetation completely from the face of the earth. This literally creates a hole in the continuous habitat. This hole has not been restored in previous mining operations nearby. The topography has permanently been changed - unless all the sand and gravel were brought back in to fill the massive crater that is now left, the change from habitat to moonscape is permanent.	<p>Existing and unfinished reclamation are components of a mine plan. The purpose of this document is not to address components of mine plans but to develop a management plan for the RPFO and to guide specialists to what activities can be taken throughout various locations there.</p> <p>When mine projects are proposed, the company submits a reclamation plan that is reviewed for adequacy. Reclamation plans may be found to be adequate or modifications may need to be made and a bond is collected prior to project approval. Reclamation of an area may vary, depending on the future use of an area. Some areas, like pipeline corridors, cannot have trees that could affect pipeline integrity. Consequently, an area does not necessarily need to be brought back to its original state in order to be reclaimed; however, the area needs to be brought back to a sustainable state. This means that the reclamation may be useful for a different activity than its use initially; therefore, all reclamation sites would not have the same results: some locations may not be fully reclaimed and may be in interim reclamation.</p>
91	53	Minerals	Existing, unfinished reclamation of mining sites needs to be addressed in this DEIS/RMP. Acres of barren land from abandoned mining sites are visible from miles away. It has not been restored to its pre-mining state. Proposing more mining in and around Placitas, a residential area, is unacceptable at all ever!	<p>Existing and unfinished reclamation are components of a mine plan. The purpose of this document is not to address components of mine plans but to develop a management plan for the RPFO and to guide specialists to what activities can be taken throughout various locations there.</p> <p>When mine projects are proposed, the company submits a reclamation plan that is reviewed for adequacy. Reclamation plans may be found to be adequate or modifications may need to be made and a bond is collected prior to project approval. Reclamation of an area may vary, depending on the future use of an area. Some areas, like pipeline corridors, cannot have trees that could affect pipeline integrity. Consequently, an area does not necessarily need to be brought back to its original state in order to be reclaimed; however, the area needs to be brought back to a sustainable state. This means that the reclamation may be useful for a different activity than its use initially; therefore, all reclamation sites would not have the same results: some locations may not be fully reclaimed and may be in interim reclamation.</p>
118	23	Minerals	Mitigation of existing mining impacts and land reclamation have been alarmingly inadequate, raising legitimate questions about the wisdom of expanding prospects for mitigation and reclamation. The DRMP inadequately addresses these negative impacts on quality of life and proposes no new solutions.	<p>Existing and unfinished reclamation are components of a mine plan. The purpose of this document is not to address components of mine plans but to develop a management plan for the RPFO and to guide specialists to what activities can be taken throughout various locations there.</p> <p>When mine projects are proposed, the company submits a reclamation plan that is reviewed for adequacy. Reclamation plans may be found to be adequate or modifications may need to be made and a bond is collected prior to project approval. Reclamation of an area may vary, depending on the future use of an area. Some areas, like pipeline corridors, cannot have trees that could affect pipeline integrity. Consequently, an area does not necessarily need to be brought back to its original state in order to be reclaimed; however, the area needs to be brought back to a sustainable state. This means that the reclamation may be useful for a different activity than its use initially; therefore, all reclamation sites would not have the same results: some locations may not be fully reclaimed and may be in interim reclamation.</p>



Letter Number	Comment Number	Category	Comment Text	Response
44	10	Minerals	<p>“The words “self-supplied” obviously do not mean that La Farge brought in an average of 217.57 acre feet of water from 1994 to 2001. Our community well allows each household 1/2 acre feet of water per year. That’s 162,000 gallons per household per year. So an acre foot is double that, actually 325,851 gallons. So from 1994 to 2001, La Farge alone, according to the DelAgua study attached above dated December 2002, and which references Peggy Johnson’s 2000 study many times, used approximately 325,000 X 217= 70, 525,000 gallons per year. And the BLM wants to allow even more gravel mining on the land next to Placitas? Do you even realize what you are doing by leasing this land to LaFarge North America in the first place? LaFarge is a French conglomerate—they are taking our gravel, our natural resource, turning it into cement at their mercury-spewing cement plants in this country, selling it back to us and exporting it. The profits go back to France. And they have already settled with the EPA in the past for violations of the Clean Air and Water Acts:</p> <p>Lafarge Violation Settlements <a href="http://www.epa.gov/compliance/resources/cases/civil/caa/lafarge.html">http://www.epa.gov/compliance/resources/cases/civil/caa/lafarge.html</a></p> <p><a href="http://www.epa.gov/compliance/resources/cases/civil/cwa/lafargenorthameric a.html">http://www.epa.gov/compliance/resources/cases/civil/cwa/lafargenorthameric a.html</a></p> <p>Of course they will do it again until they get caught again.</p> <p>The threat of contamination and the diminished supply of water available to our community from expanded gravel mining and/or drilling for non-existent fossil fuels should be enough to curtail such foolishness. The land should remain as it is, the status quo, because it belongs to the American people, not the BLM, as stated in the Federal Land Policy and Management Act of 1976 [FLPMA]:</p> <p>“Congress recognized the value of the public lands, declaring that these lands would remain in public ownership. The National Forest Service, National Park Service, and now, the Bureau of Land Management, are commissioned in FLPMA to allow a variety of uses on their land (of greater concern for the BLM, who is the least restrictive in terms of uses) while simultaneously trying to preserve the natural resources in them.”</p>	<p>The BLM considered all comments received during the public comment period, but it is not required to respond to the nonsubstantive portions of your comment (see BLM <a href="#">NEPA National Environmental Policy Act Handbook</a>, H-1790-1, 6.9.2.2). Regarding the substantive portions of your comment, environmental and social impacts play a major role in the selection of alternatives for managing BLM-administered resources. In comparison, in the 1986 RMP, which has been in place for over 20 years, the management prescription for all salable minerals in the Placitas area (<del>over 14,000 acres of sand and gravel</del>), which included all federal minerals owned on private lands, is open for mining. Even though the potential and open area for mining in the Placitas area has been vast, over the last 20 years only a small portion of what was available was considered for permit issuance.</p>
91	10	Minerals	<p>Gravel Mining (Salables): The DRMP does not give justifying reasons for allowing gravel mining on nearly 800 acres of Parcel A. The DRMP fails to discuss the cumulative effects of adding approximately one third more mining activity to the area. The DRMP also fails to analyze the immediate effects on Parcel A and surrounding areas with regard to such issues as soil management, plant and animal habitat, nearby property value loss, and wildlife corridors.</p>	<p>The BLM is a multiple land use agency; mining is one of many uses of the land the agency manages. The area referenced in the comment has been identified to have a high potential for sand and gravel products.</p> <p>Section 201 of FLPMA states that “The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resources . . .” Furthermore Section 102 (12) of FLPMA states “the public lands be managed in a manner which recognizes the Nation’s need for domestic sources of minerals, food, timber, and fiber from the public lands . . .” In its inventory of the resources in the Placitas area, the BLM determined that there is the potential for salable mineral (sand and gravel) on over 14,000 acres (1986 Rio Puerco RMP, as amended).</p> <p>Environmental and social impacts play a major role in the selection of alternatives for managing BLM resources. In comparison, in the 1986 RMP, which has been in place for over 20 years, the management prescription for all salable minerals in the Placitas area (<del>over 14,000 acres of sand and gravel</del>), which included all federal minerals owned on private lands, is open for mining. Even though the potential and open area for mining in the Placitas area has been vast, over the last 20 years only a small portion of what was available was considered for permit issuance.</p> <p>In the event the BLM receives a proposal for a mine, BLM would be required to conduct an environmental assessment, which includes public input. Proposals or stipulations could include a wide array of mitigation measures; for this reason, such issues as soil management, plant and animal habitat, nearby property value loss, and wildlife corridors cannot be analyzed on a hypothetical mine. The analysis would need to be based on a specific project proposal, as described in Draft RMP/EIS Chapter 4, Section 4.2.3, Mineral Resources.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
80	1	Minerals	<p>"How can mining almost 1 square mile, a third increase in gravel mining, in the Placitas parcel have ""minor"" impacts for residents and wildlife? That is what the Plan's conclusion says. It purports that the proposed actions pose a very minor and limited impact. That is erroneous and inappropriate. See Section 4.1.3, Assumptions and Methodology for Minerals Development Impacts, where the analysis of impacts of mineral development is determined by calculation the small acreage of the area affected compared to the entirety of acreage in the Plan area. Then based on the relatively small percent of acres affected out of the total, the BLM deems the affects to be minor. The mineral resource extraction will not be conducted everywhere in the Plan area; it will be conducted in 1/3 of the Placitas parcels. Removal of 1/3 of the soil base, 1/3 of the ground cover, 1/3 of the wildlife habitat is not a minor inconvenience and minor to those people and animals who use it.</p> <p>Your analysis of the effects or impacts needs to be assessed for the area in and around the proposed mineral development areas. Your assessment doesn't even address the potential impacts associated with development of transportation corridors/vehicular roadways, and affects on in-site soils, wildlife, surface and ground-water, air, etc., on Placitas. The BLM did not do a complete analysis."</p>	<p>The BLM recognizes that mining may have potential adverse effects on a select portion of the population as well as on some resources; however, the extraction of sand and gravel would also have a beneficial effect on a larger portion of the public. After a mining operation is reclaimed, the area would have a beneficial effect on other resources as well. The decision-maker takes these effects into account prior to approving or rejecting discretionary actions, such as those for gravel mining. The site-specific effects are not analyzed in the RMP; site-specific analysis would be conducted through further NEPA analysis, if or when a project is proposed. Prior to approval or rejection of mining activities, project-specific NEPA analysis would be conducted to identify conflicts and mitigation measures necessary to protect or mitigate the effects on other resources. Furthermore, NEPA allows for public notification and comment on proposed projects when they are proposed.</p>
57	1	Minerals	<p>Placitas is already surrounded by almost 3,000 acres of gravel mines that are operating without sufficient community evidence of their compliance to state and county ordinances, or EPA protection guidelines. The DRMP preferred alternative for Parcel A proposes an additional 769 acres of gravel mining yet the DRMP does not identify how the BLM plans to mitigate the expected increase that of one third more air and light pollution, noise and fugitive dust to the surrounding community of over 5000 residents.</p>	<p>The area described is open to mining and exploration under the updated 1992 RMP (BLM 1992); therefore, the BLM is not proposing to add 769 acres of mining in Parcel A; instead, <del>it</del> the BLM is identifying <u>and analyzing</u> a potential management prescription <del>to analyze</del> that varies from the current (Alternative A) management scheme, which has all 14,000 federally owned mineral acres <u>as</u> open. The BLM is a multiple land use agency. Prior to approval or rejection of mining activities, project-specific NEPA analysis <u>would isbe</u> conducted to identify conflicts and mitigation measures necessary to protect other resources. Furthermore, NEPA allows for public notification and comment on proposed projects when they are proposed.</p>
94	2	Minerals	<p>Gravel Mining (Salables) Missing Information in DRMP - It is unclear within the DRMP as to how the specific 769 acres for gravel mining within Parcel A (labeled as "New BLM Mine" in Figure 3 [ATT 3] above) was selected. No justifying reasons are given within the DRMP for that particular location, only a specification of the location. Issues such as the following are simply not discussed regarding selection of this location in the preferred alternative: 1) Buffering from existing private properties so as to preserve quality of life and property value; 2) The extreme friability of the soil in the Placitas area; 3) The cumulative effects on traffic, air quality, and depletion of aquifers; 4) How mining on this particular location would affect habitat for plants and animal life, and wildlife corridors.</p>	<p>The BLM makes management decisions based on the existence of a resource on federal land. This concept applies to all resources, including wilderness, culturally significant sites, geologic features, and mining. The mineral potential report shows that the potential for salable minerals (sand and gravel) in the entire area near Placitas is very high; thus, under the 1986/ and 1992 RMPs (BLM 1986a, 1992), 100 percent of all federally owned salable minerals is available for mining. The selected area is based on it having one of the highest potentials for sand and gravel; this is based on past bore testing. The mineral resources section in the Draft RMP/EIS addresses cumulative impacts and impacts on wildlife (Section 4.2.3.2.12, Wildlife and Fisheries Decisions) and special status species (Section 4.2.3.2.10, Special Status Species Decisions).</p>
64	1	Minerals	<p>"I am concerned that gravel mining leases should only be given to companies with proven environmental records free from fines and free from histories of previous environmental endangerment."</p>	<p>A proponent's history and a NEPA analysis would be conducted prior to approval or rejection of all projects. Furthermore, NEPA allows for public notification and comment on specific proposed projects.</p>
176	7	Minerals	<p>"Gravel mining uses lots of water for various purposes. Decreasing water supplies are becoming an escalating problem in this region of the world and in the Placitas area in particular. The proposed new gravel mines lies above the Santa Fe aquifer, which supplies water to the Town of Bernalillo, Algodones, and a large portion of Placitas, the Santa Ana and San Felipe Pueblos, as well as a number of other communities. Yet no analysis was included in the Plan that demonstrates that the BLM has determined that the quantity and quality of the potable water used by the more than 6,000 residents will not be affected by its proposals. Certainly exploration and extraction of liquid substances, such as oil and gas, would have a significant potential of polluting our aquifer, but other mining activities, if not highly controlled and regulated can diminish the water supply or cause water to become so full of arsenic that is becomes unsafe by Federal Standards. Bernalillo water already has some arsenic concentration problems that require treatment. Additional analysis needs to be performed. The fragility of the water supply anywhere in the Southwest is a major area of concern. Numerous court battles and multi-decade long state water battles are the norm here. This lack of analysis in the Plan jeopardizes my ability to have access to safe water. Availability of my water supply was based upon the 100 year supply analysis that was required before development of my community could take place. Who will supply my water if it becomes unsafe or exhausted due to the BLM mining prescriptions? If a 100 year water availability analysis is required before residential development how can the Plan omit any water usage analysis for mining? Water usage and quality data is plentiful in respect to fracking and other liquid extraction. Water usage data is also readily available in respect to open pit gravel mining - it should have been a consideration in the Plans preferred alternative."</p>	<p>Effects on water resources are analyzed in Draft RMP/EIS Section 4.2.9.</p> <p>All mineral extraction proposals are discretionary and require an application. A major component of the application process is an environmental analysis relevant to the project and the resources that it may affect. All project proponents must comply with all national and state standards as they relate to water quality and air quality. Groundwater allocations are at the discretion and authority of the New Mexico State Engineer's Office. The BLM would not have the authorization to allocate water that it does not administer or have rights to. The application process for specific mineral extraction proposals allows for public input and comment prior to the BLM making a determination. The analysis in relation to the various resources allocations and management in this plan are limited primarily to those that the BLM has authorization to manage.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
91	35	Minerals	"Extraction of the large volumes of groundwater needed for gravel mining has the potential to change groundwater flow patterns within the Santa Fe aquifer resulting in intrusion of lower quality water from deeper zones into shallower higher quality water zones currently used for human consumption and irrigation. Degradation of groundwater quality as a result of overpumping has already been documented at other locations in the Santa Fe aquifer as has the substantive costs necessary for treatment. The Overlook and surrounding subdivisions have no other alternative for residential water use than the currently utilized water wells screened in the Santa Fe Aquifer."	The Office of the State Engineer is charged with administering the state's water resources. The engineer has power over the supervision, measurement, appropriation, and distribution of all surface and groundwater in New Mexico. While the BLM recognizes that any mineral extraction may affect water resources, the authority for its regulation falls under the jurisdiction of the Office of the State Engineer.
94	4	Minerals	"Proposing additional gravel mining but not addressing traffic and the roads needed to move the gravel from the mines to local roads is unacceptable. Traffic studies need to be conducted before any proposed increased levels of mining is allowed."	No new gravel mines or drilling is proposed under any of the alternatives; therefore, site-specific analysis has not been conducted to address any of the statements made in the comment. The area described is open to mining and exploration under the updated 1992 RMP (BLM 1992). Prior to approval or rejection of mining activities, project-specific NEPA analysis would be conducted to identify conflicts and mitigation measures necessary to protect other resources. Furthermore, NEPA allows for public notification and comment on proposed projects when they are proposed. The analysis conducted for the Draft RMP/EIS is based on overall RPFO management goals, not site-specific actions.
156	24	Minerals	"Volume III, Appendix G, Page G-9, Para G.4.2. Road Construction. A road plan is not provided for access to the proposed or potential alternative mining areas north of Placitas (3,143 acres). Placitas streets and residential right-of-ways are constructed for residential access. Many are private right-of-ways with few streets paved. Access into the Placitas area in many cases is by steep, hilly, winding roads/streets, partially paved and unpaved. This road standard is a factor in the unique and treasured Placitas community atmosphere. Heavy truck or equipment traffic would destroy these accesses, be dangerous for resident travel, create noise, dust and air pollution; negatively impacting Quality of Life, property values and real estate tax revenues. Safety issues from gravel trucks include gravel flying off of loaded gravel trucks impacting pedestrians, vehicles and road surfaces. Proposing leasable, salable and locatable mining without addressing traffic, safety and the roads needed to move the gravel, etc. is unacceptable. Recommend: Traffic, road and impact studies need to be conducted and acceptable solutions developed and provided to residents before any proposed mining activity is permitted."	Site-specific NEPA analyses would identify project-specific impacts. Upon identification of said impacts, such mitigation measures as selecting an alternative route may be stipulated. Prior to approval or rejection of mining, project-specific NEPA analysis would be conducted to identify conflicts and mitigation measures necessary to protect other resources. In addition, NEPA allows for public notification and comment on proposed projects when they are proposed.
15	8	Minerals	"Allowing additional gravel mining without addressing the traffic problems arising from the transportation of the gravel is unacceptable. Already the burden caused by current gravel transport is dangerous and costly, particularly at the Interstate 25/Highway 165 interchange."	Site-specific NEPA analyses would identify project-specific impacts. Upon identification of said impacts, such mitigation measures as selecting an alternative route may be stipulated. Prior to approval or rejection of mining, project-specific NEPA analysis would be conducted to identify conflicts and mitigation measures necessary to protect other resources. In addition, NEPA allows for public notification and comment on proposed projects when they are proposed.

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Letter Number	Comment Number	Category	Comment Text	Response
154	47	Minerals	<p>“Cumulative Impacts</p> <p>The DRMP states that any reasonably foreseeable future activity that involves surface disturbance would have only a short-term cumulative impact to vegetative communities within the Planning Area. In this instance, the BLM states that short term is defined in the DRMP as impacts that would last for fewer than five years. Prior to surface-disturbing activities a certified engineering and reclamation plan must be approved by the authorized officer. And the plan must demonstrate how the following will be accomplished:</p> <ul style="list-style-type: none"> <li>- Site productivity will be restored.</li> <li>- Surface runoff will be adequately controlled.</li> <li>- The site and adjacent areas will be protected from accelerated erosion, such as rilling, gullyng, piping, slope failure, and mass wasting.</li> <li>- Nearby watercourses will be protected from sedimentation.</li> <li>- Water quality and quantity will be in conformance with state and federal water quality laws.</li> </ul> <p>The operator must also provide an evaluation of past practices on similar terrain and be able to demonstrate success under similar conditions. Missing Information in DRMP - The DRMP does not address cumulative impacts of salable mining activities in the Placitas area, as required by NEPA. Parcel A does not exist in a vacuum. Currently there is a tight cluster of 4 gravel mines on BLM and non-BLM lands on or near Parcel A, the cumulative impacts of which are already negatively impacting over 2,000 families adjacent to or near those operations. The currently undeveloped portion of Parcel A is now the only effective buffer that allows for partial mitigation of the ongoing impacts of the multiple closelyspaced open pit mines currently in operation. Opening more of Parcel A to new surface mining would exacerbate existing cumulative impacts in the areas of increased gravel haul traffic, noise, dust and further decrease adjacent property values, to name a few. The 769 acres proposed to be opened to surface gravel mining in Alternative C are directly adjacent to an 1100-acre active gravel operation on private land, potentially creating a tract of profoundly disturbed/devastated land in excess of 3-square miles in size, near the large residential communities of Algodones and Placitas. A truly comprehensive impacts analysis of surface Mining in the Placitas BLM parcels will reveal that there are no further surface mining activities that could reasonably be expected to avoid unacceptable cumulative effects. These effects exist in numerous areas, including but not limited to, human quality of life, health and safety, property values, traffic, noise, and dust. Therefore, LPA [Las Placitas Association] and ES-CA [Eastern Sandoval Citizens' Association] maintain that that no salable mineral mining should take place in the Placitas BLM parcels.”</p>	<p>There are no active mines in the identified area on BLM-administered lands; furthermore, the Draft RMP/EIS does not identify all environmental impacts from a management plan's perspective, so cumulative impacts for nonexistent mines cannot be performed. However, NEPA analyses would identify project-specific impacts. Upon identification of said impacts, such mitigation measures as selecting an alternative route may be stipulated. Prior to approval or rejection of mining, project-specific NEPA analysis would be conducted to identify conflicts and mitigation measures necessary to protect other resources. In addition, NEPA allows for public notification and comment on proposed projects when they are proposed.</p>
109	5	Minerals	<p>“Salable mineral mining proposal must be analyzed at the Plan/EIS level and cannot be deferred to the project level. (Categories: NEPA, missing analysis) Enough strategic level information and analysis procedures are currently known to exclude Parcel A from any gravel mining. This information includes nearby population, ethnicity and income level (2010 U.S. Census blocks), locations of nearby open pit mines, and opposition to mining expressed in project scoping comments. Strategic analyses should include cumulative effects of nearby active and inactive mines, addressing human health and safety, property value devaluation, loss of recreation opportunities, and loss of wildlife habitat.</p> <p>Cumulative effects analyses will show that thresholds of damage to the human environment have already been exceeded in these categories around Parcel A in Placitas. This parcel serves as the only remaining buffer between the existing multiple open pit mines and several thousand residents living along the urban interface in Placitas. Further, your mining proposal will create a crater nearly three square miles in size, when combined with the adjacent active gravel mine located on private land to the north. In the last 20 years the population of Placitas, mostly near the BLM lands, has tripled from around 1600 to over 5200 residents and is predicted to reach 10,000 at full build-out. Many local families now depend on construction and related service jobs for their livelihoods. Two decades ago, mining the parcel would not have caused the severe hardships on area families that your current recommended mining would now create. In short, your mining proposal comes 20 years too late. Environmental Justice analysis and disclosure will show disproportionate negative effects on local residents, both covered and non-covered by Environmental Justice considerations. These effects include reduction in quality of life, health and safety impacts, equity capital for property owners living near mines, the resultant loss in construction and service jobs, and loss of county services due to tax losses from property devaluation. The application of Dr. Diane Hite's statistical methods to home sales in Placitas will show the losses that are directly caused by local open pit mines. Your staff economist has a copy of this analysis method.”</p>	<p>The BLM has not had a mining proposal submitted in over a decade under either the current RMP or the Proposed RMP/Final EIS. Site-specific NEPA analysis would identify project-specific impacts if a proposal for mining were to be presented to the BLM. In the Draft RMP/EIS, Chapter 4 discloses what would be the potential impacts of mineral management decisions on all resources. The analyses of such impacts are based on understanding what mineral operations generally entail; however, site-specific analysis can only be accomplished when a project is proposed to the BLM.</p> <p>All mineral extraction proposals are discretionary and require an application. A major component of the application process is an environmental analysis relevant to the project and resources it may affect. All project proponents must comply with all national and state standards as they relate to water quality and air quality. Groundwater allocations are at the discretion and authority of the New Mexico State Engineer's Office. The BLM would not have the authorization to allocate water that it does administer or have rights to. The application process for specific mineral extraction proposals allows for public input and comment prior to the BLM making a determination. The analysis in relation to the various resources' allocations and management under this plan are limited primarily to those that the BLM has authorization to manage.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
95	28	Minerals	"The DRMP states that there would be no irreversible loss of recreational resources for any of the alternatives. However, further gravel mining does cause irreversible loss of recreation resources in the following ways: 1) short-term loss or diminishment of recreation-related scenic quality (from disturbed vegetation until vegetation regrowth); and 2) short-term irretrievable loss of scenic recreational opportunities caused by mineral development until disturbances are reclaimed."	Draft RMP/EIS Chapter 4, Section 4.2.5.1.11 states "Mineral development activities would remove recreation potential on the lands being developed and would degrade the recreation experience for most users on adjacent lands. Restrictions on mineral development would have beneficial impacts to recreation." Furthermore the analysis in this section continues, stating "According to the RFD for mineral resources, development of leasable, salable, and locatable mineral resources would contribute to surface disturbance equating to 1.1 percent of BLM-administered lands in the Planning Area over the next twenty years. It is anticipated that mineral extraction activities would be located in areas to avoid impacts to popular recreation areas. Site-specific NEPA analysis would be completed for applications for disturbance, thereby reducing opportunities for direct adverse impacts related to this disturbance." Thus, the Draft RMP/EIS does not exclude the potential adverse impacts that mining may have on recreation, but it clearly discloses potentially adverse effects.
157	39	Minerals	"As residents of Sandoval County we want to express our concern about the continued growth of gravel operations just to the north of where we live in Placitas. Aside from the obvious aesthetic degradation created by industrial enterprise, there are also public health concerns: namely dust, diesel, and accompanying truck traffic. The FDA recently released information noting diesel exhaust is a known carcinogen. We do not support continued mining in this area."	There are not any active mines in the identified area on BLM-administered lands; mining north of Placitas is within tribal jurisdiction; however, site-specific NEPA analysis would identify project-specific impacts if a proposal for mining were to be presented to the BLM. Prior to approval or rejection of mining activities, project-specific NEPA analysis would be conducted to identify conflicts and mitigation measures necessary to protect other resource values. Furthermore, NEPA allows for public notification and comment on proposed projects when they are proposed.
169	24	Minerals	"Health and Safety - It is essential that the DRMP consider the fact that there are people residing in Placitas, in some cases very close to all the BLM parcels in this area. There are health and safety concerns regarding any additional mining of any type on the Placitas BLM parcels. The gravel trucks on the roads pose a hazard to people who walk, drive, ride bicycles, and live in this area. The dust raised from gravel mining and the trucks driving through our area causes and aggravates health problems including asthma and allergies which I suffer from, and other breathing difficulties to which other more elderly residents of Placitas are susceptible. The noise from these mining activities causes constant agitation and anxiety, and people cannot enjoy living in homes near the gravel pit. When we were looking to buy our home in Placitas in 2008, we considered nice houses closer to the gravel mine, but we did not buy those houses because we could see, hear, and smell the mining activities. We are concerned about the possibility of future expansion of mining activity on Placitas BLM parcels, and we strongly recommend that all Placitas parcels be withdrawn from consideration for additional mining on any kind (salable, leasable, locatable, surface, or subsurface), for all these reasons."	Prior to approval or rejection of mining activities, project-specific NEPA analysis would be conducted to identify conflicts and mitigation measures necessary to protect other resources. NEPA allows for public notification and comment on proposed projects.
112	9	Minerals	"BLM has not researched how gravel mines would affect property values in areas near the mines."	As noted in the <a href="#">Proposed RMP/Final EIS</a> (Section 4.2.10), the RPFO historically has seen a low level of mineral resource development. The RFD for leasable, locatable, and salable minerals estimates that the same low-level trend would continue. As a result, the RPFO would continue to have the ability to adjust future mineral development activities in order to avoid conflicts and to protect other resources to the greatest extent possible.  The RMP is a planning level effort and does not provide management direction for specific gravel mine sites; therefore, analysis of property value changes would not be appropriate at the planning level. Site-specific projects would require additional NEPA analysis and would include an analysis of impacts on property value from development, as appropriate.

Letter Number	Comment Number	Category	Comment Text	Response
186	1	Minerals	<p>“The DRMP does not characterize or quantify the magnitude of quality of life impacts on the more than 2,000 residences located within 2 miles of Parcel A. Potential property value losses for residents in the Placitas, Algodones, and Bernalillo communities have not been addressed in the DRMP. When it is known that it is “open season” for gravel mining very near to these communities, these communities will predictably suffer a further loss of property value.</p> <p>When asked, the BLM real estate “expert” said he had not considered the affect on property values in the Plan. When proposing a 1/3 increase in open pit gravel mining in the proximity to one of the largest property tax producers for the county one would have to be inexperienced or in attentive to not have analyzed this affect on local homeowners. The prescriptions for the Placitas BLM parcels should lean heavily towards being a good neighbor to this important growing community. Mining activity on these BLM lands will benefit relatively few while inflicting social/economic hardships on many. Consultation with local realtors reveals that up to 1/2 of all potential buyers walk away from a property that overlooks or is within earshot of an operating mine. We live more than a mile from the La Farge conveyer operation and hear it start up every morning. An unpleasant situation in a community largely cooled by evaporative coolers that require open windows. Studies readily available have shown the negative impact to residential property values due to proximity to gravel mining. The following graph, Figure 1 [see ATT 1], is from one such study model, produced by Dr. Diane Hite of Auburn University for the areas of Ohio, Michigan, and Toronto. The exact percentage drops in Figure 1 might differ when applied to the Placitas Area, but the statistics would likely be very similar. Economists could calibrate this model to the Placitas area, using local property sale prices. The following map, Figure 2 [see ATT 2], overlays the Sandoval County Assessor’s parcel map with a projection based on Dr. Hite’s model for distances up to 3 miles from the proposed mining area. Parcels colored red have a 30% or more value loss, shading down to parcels colored green, which have a 5% or less value loss. The DRMP omits any such quantitative study of impacts on property values, either in agreement or disagreement with such studies. Thus the DRMP fails to adequately include economic/social factors in its analysis for the Placitas parcels, as BLM is required to undertake. This also impacts the viability of construction employment that many in these communities rely upon for their livelihood. A quick conversation with the Casa Rosa Food Bank, a Placitas based charity for Placitas residents, revealed many of their clients are day workers who pick up home improvement and landscaping work in the area. When that work is slow, the food bank sees more clients. The prescriptions for the Placitas BLM parcels should lean heavily towards being a good neighbor to this important growing community.”</p>	<p>Actually, the BLM is not proposing a <del>1/3</del> <sup>1/3</sup> one-third increase in mining near the Placitas area. The 1992 RMP (as amended: <a href="#">BLM 1992</a>) is the current RMP that the RPFO operates under. The 1992 RMP (<a href="#">BLM 1992</a>), currently makes available for mining all federally owned salable minerals, including that which is federally owned under private property. All issues were considered in making this decision to include all potential impacts from mineral management decision on all other resources as presented in Chapter 4 of the Draft RMP/EIS.</p>
138	9	Minerals	<p>“My only comment is that the Jones Canyon ACEC (Map 078 in Volume II) should be expanded to the south. As a BLM volunteer, and in traveling on my own, I have visited the area of the proposed ACEC more than fifty times in the past twelve years.</p> <p>The proposed Jones Canyon ACEC located on portions of sections 22, 23, 27 and 26 of T19N and R02W is centered on an area surveyed by University of New Mexico Office of Contract Archaeology (OCA) under the guidance the BLM in June 1993. OCA’s survey report was delivered to the BLM in January 1994.</p> <p>The report describes 33 prehistoric archaeological sites in the survey area. The high concentration of archaeological sites continues to the south of the survey area. In a recent visit to section 33 (privately owned) and section 34 (predominately BLM), immediately to the south of the proposed ACEC, I noted 29 archaeological sites. In other visits I have found many others. None of these sites have been officially recorded or assigned a Laboratory of Anthropology (LA) number. An October 1, 2012 inquiry of the New Mexico Cultural Resource Information System (NMCRIS) database shows no known archaeological sites in sections 33 and 34. There is a recorded archaeological site in section 35 that extends into the eastern edge of section 34. As information, there are many more archaeological sites in section 35 than what is in the NMCRIS database.</p> <p>I propose that the Jones Canyon ACEC be extended to the south to include the NW quarter section of section 35; the northern half of section 34; and the NE quarter section of section 33. As information, section 33 is privately owned and may not be eligible for inclusion. In addition to not being extensively surveyed, the proposed ACEC has seen some illegal pot hunting and excavations. One pot hunter went so far as to make a mining claim to the area. His mining claim stakes can still be found near many of the sites. This area deserves to be studied and protected. It should be included in the Jones Canyon ACEC.”</p>	<p>The Jones Canyon Community represents a concentration of population on the periphery of the central Chacoan system. The ACEC is designated to specifically protect the cultural resources that have been identified and associated with this community. While the areas that are being proposed in this comment for incorporation into the ACEC may contain cultural resources, they have not been properly inventoried and evaluated for inclusion in the Jones Canyon Community. No proposal to expand the Jones Canyon Community ACEC was raised during the internal or external scoping processes associated with the Draft RMP/EIS; therefore, they were not inventoried and cannot be included in the Jones Canyon ACEC.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
38	1	Minerals	<p>"Traffic/Roads: The DRMP omits an adequate discussion of the traffic impacts should further mining activity on Parcel A be allowed. Present mining activity in the Placitas area already presents major traffic problems. The NMDOT [New Mexico Department of Transportation] proposal for a new interchange for Highways 165/550 and 125 presumably does not take into account the addition of one third or more graveltruck traffic. Nor is there discussion in the DRMP of alternative routes for this traffic. This is not an issue that can be deferred for the BLM Travel Management Plan, to be prepared only after the RMP is finalized, and a prescription selected."</p>	<p>Site-specific NEPA analyses identify project-specific impacts. Upon identification of said impacts, such mitigation measures as selection of an alternative route may be stipulated. Prior to approval or rejection of mining activities, project-specific NEPA analyses are conducted to identify conflicts and mitigation measures necessary to protect other resources. Furthermore, NEPA allows for public notification and comment on when projects are proposed. Project-specific impacts are not within the scope of this RMP; therefore, analysis of these impacts can be deferred until a project-specific NEPA analysis takes place.</p> <p>Road inventories were completed for the entire RPFO. Based on the management goals and objectives for the Placitas area, road designations are limited to designated road and trails. The specific designations are accomplished through the travel and transportation management planning process, which is to be completed within 5 years of an Approved RMP/Record of Decision.</p>
6	50	Minerals	<p>"Traffic/Roads Missing Information in DRMP - No proposed new gravel mining haul routes were identified in any maps. The assumption seems to be that the route identified in the 1992 plan will be used. However that right-of-way was rejected by the community in 2008 during the development of the Placitas Area Plan, adopted by Sandoval County in 2009. New or additional rights ofway needed to move gravel from the proposed mining area in Parcel A to paved roadways must be identified in the DRMP for citizens to adequately comment. The upcoming interchange re-design for Highways 165/550 and 125 has presumably not incorporated the additional traffic needed to service a one third or more increase in gravel truck traffic along the Placitas frontage road. An NMDOT [New Mexico Department of Transportation] recommendation for traffic management therefore needs to be included in the DRMP. Traffic management for significantly more gravel trucks cannot be postponed until the BLM Travel Management Plan is funded, prepared, and published for comments sometime in the future."</p>	<p>Site-specific NEPA analyses identify project-specific impacts. Upon identification of said impacts, such mitigation measures as selection of an alternative route may be stipulated. Prior to approval or rejection of mining activities, project-specific NEPA analysis would be conducted to identify conflicts and mitigation measures necessary to protect other resources. Furthermore, NEPA allows for public notification and comment when projects are proposed. Project-specific impacts are not within the scope of this RMP; therefore, their analysis can be deferred until project-specific NEPA analysis takes place.</p> <p>Road inventories were completed for the entire RPFO. Based on the management goals and objectives for the Placitas area, road designations are limited to designated road and trails. The specific designations are accomplished through the travel and transportation management planning process, which is to be completed within 5 years of an Approved RMP/Record of Decision.</p>
157	15	Minerals	<p>"The Montezuma Crest BLM land goes up to the border of our land and the Diamond Tail Ranch land. We have several concerns about the plans for Montezuma Crest: The exploration or extraction of fluid, salable or locatable minerals on the quality of our well water. Our well and many others are [approximately] 300 yards from this land and any exploration or extraction of minerals could have a negative impact on our ground water. We would also like a study on any of the options and the potential impact on the quality of our well water."</p>	<p>The Draft RMP/EIS discusses groundwater quality and quantity in Draft RMP/EIS Sections 2.2.15, 3.17.2, and 4.2.9. Authorizations for mineral extraction on BLM-administered lands would require site-specific analysis and compliance with applicable environmental laws and regulations.</p>
182	6	Minerals	<p>"Missing Information in DRMP --- No proposed new gravel mining haul routes were identified in any maps. The assumption seems to be that the route identified in the 1992 plan will be used. However that right---of---way was rejected by the community in 2008 during the development of the PlacitasArea Plan, adopted by Sandoval County in 2009. New or additional rights of---way needed to move gravel from the proposed mining area in Parcel A to paved roadways must be identified in the DRMP for citizens to adequately comment. The upcoming interchange re---design for Highways 165/550 and 125 has presumably not incorporated the additional traffic needed to service a one third or more increase in gravel truck traffic along the Placitas frontage road. An NMDOT [New Mexico Department of Transportation] recommendation for traffic management therefore needs to be included in the DRMP. Traffic management for significantly more gravel trucks cannot be postponed until the BLM Travel Management Plan is funded, prepared, and published for comments sometime in the future."</p>	<p>Site-specific NEPA analyses identify project-specific impacts. Upon identification of said impacts, such mitigation measures as selection of an alternative route may be stipulated. Prior to approval or rejection of mining activities, project-specific NEPA analysis would be conducted to identify conflicts and mitigation measures necessary to protect other resources. Furthermore, NEPA allows for public notification and comment when projects are proposed. Project-specific impacts are not within the scope of this RMP; therefore, their analysis can be deferred until project-specific NEPA analysis takes place.</p> <p>Road inventories were completed for the entire RPFO. Based on the management goals and objectives for the Placitas area, road designations are limited to designated road and trails. The specific designations are accomplished through the travel and transportation management planning process, which is to be completed within 5 years of an Approved RMP.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
91	13	Minerals	<p>"The Agency states that an assessment for paleontological resources would be required for OHV open areas:</p> <p>""The BLM would complete/require assessment and mitigation for paleontological resources for proposed actions, including but not limited to: land disposal actions, surface-disturbing activities, and OHV open areas. Actions may include inventories, monitoring, or data recovery."" [Footnote 1: RMP/EIS p. 2-54] The BLM does not specify how this will be accomplished or when it will be completed. ""Open-ended"" plans for enabling assessments are troubling, as any agency failure to accomplish the planned and/or required activities due to resource constraints or reprioritization can leave the motorized recreation community unable to utilize the resources as provided for in the DEIS. RESOLUTION OF COMMENT #1: Provide a specific timetable for the completion of the paleontological resource assessment lest the lack of Agency follow-through is used to effectively deprive the public of an identified recreational resource (an OHV open area). Provide a specific recourse for the public if lack of resources or other issues within the Agency do not allow the Agency to complete required assessments in a timely manner."</p>	<p>The travel management plan is scheduled to be completed within 5 years after the signing of the Record of Decision.</p>
14	23	Minerals	<p>"The reclamation record for mining and pipeline sites has been dismal in the Placitas area. Mining sites and existing pipeline easements have not been properly reclaimed in this area in either the short or long term. Nothing is growing in areas that once provided a rich habitat for birds and wildlife. Erosion is not controlled, as the following photos, Figures 4 [see ATT 4] and 5 [see ATT 5], illustrate.</p> <p>Sufficient reclamation from the 1996 or the 2007 pipelines has yet to be completed. Mature Juniper and Pinon habitat destroyed during the pipeline installations have not been replanted and the barren strip demarking the location of the both pipelines is clearly visible from Highways 165 and 125.</p> <p>Irretrievable Loss of Resources - The large-scale surface mining operations to be permitted under Alternatives A, C and D are literally the most devastating of all mining options, especially if appropriate and adequate reclamation activities are not properly undertaken. Such operations would obliterate the preexisting landforms of juniper-pinon flats dissected by small and medium-sized arroyos. Millions of tons of aggregate material would be physically removed from the site. If not properly restored, mining will leave behind a 3-square mile hole 100 or more feet deep, with steep, highly-erodible walls.</p> <p>Most reclamation efforts at existing local pit mines have met with failure due to friable, low-nutrient and highly-erodible soils, steep slopes, high winds and low annual rainfall. For example, in the "played out" mine at the extreme west end of Parcel A, BLM has yet to stabilize soils and establish appropriate cover vegetation. As such, the BLM has effectively overseen the creation of non-vegetated ""dust bowls"".</p> <p>Based on this example, it is reasonable to assume that the 3-square mile pit contemplated in Parcel A would not be satisfactorily reclaimed at anywhere near reasonable cost, especially when both private and public ownership is involved.</p> <p>Such a large pit with its stark, post-removal surface profile and lack of soil stabilization and vegetation is completely unusable by any terrestrial or avian wildlife as any type of habitat, be it foraging, migration/passage, or cover. Current public recreation resources including hiking, orienteering, and bird watching in the area to be mined, would be eliminated forever. The impact of mining on Placitas BLM parcels extends far beyond the period of active mining, if the land is not fully reclaimed afterwards. Yet in Parcel A there is clear evidence of past mining for which there has been no adequate reclamation. BLM has demonstrated an inability to manage this crucial aspect of mining leases in this particular parcel. It is not likely that the agency will do significantly better in an era of governmental belt tightening, during which the presently strained resources of the BLM and other agencies will likely become even more reduced. This would leave a permanently blighted landscape where there is presently an urban interface that should be sustained for recreational uses. Additionally, the Placitas BLM parcels are recognized as important wildlife corridors (see above, ""7. Wildlife Corridors""), and as habitats for various animals and plants. The continued lack of adequate management/restoration of mined lands could be permanently disastrous to these crucial functions."</p>	<p>The Draft RMP/EIS discusses the management and protection of soil and water in Draft RMP/EIS Sections 2.2.15, 3.17, and 4.2.9. The cost of reclamation is paid by the proponent or authorized user. Reclamation is always required on any mineral extraction projects, and the federal government retains a bond until reclamation is either completed or reaches a satisfactory level. Reclamation of large areas is typically a long process and would not achieve acceptable levels for many years.</p>



R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
60	26	Realty	<p>I would like the BLM to allow the San Felipe pueblo to reacquire the Placitas BLM lands as they did in the "Phase II" <a href="http://www.lasplacitas.org/rio_puerco/data/San_Felipe_Land_Exchange_2001/SanFelipe_feis.pdf">http://www.lasplacitas.org/rio_puerco/data/San_Felipe_Land_Exchange_2001/SanFelipe_feis.pdf</a>, the previous (Ball Ranch) land transfer. This one-time transfer to the Pueblo of San Felipe would end all future destruction of the wildlife corridor and inhumane treatment of the free roaming horses. This transfer of ownership would also end the possibility of future land development and gravel mining (with their inherent noise/air/water quality degradation).</p>	<p>Lands or interest in lands that are available for disposal under a variety of disposal authorities, provided they meet the criteria outlined in FLPMA (Sales, Section 203, 43 USC 1713(a); Exchanges, Section 206, 43 USC 1716(a); and Reservation and Conveyance of Minerals, Section 209, 43 USC 1719(a)) or other statutes and regulations. Lands available for disposal must be identified by parcel or by specific areas on a map or by legal description.</p> <p>Under Section 206 (43 USC 1716(a)), a tract of BLM-administered land or interests therein may be disposed of by exchange by the Secretary of the Interior under FLPMA. A tract of land or interests in the National Forest System may be disposed of by exchange by the Secretary of Agriculture under applicable law. In such a situation, the Secretary determines that the public interest would be well served by making that exchange, provided that, when considering public interest, the Secretary gives fully consideration to better federal land management and the needs of State and local people. This includes the need for lands for the economy, community expansion, recreation areas, food, fiber, minerals, and fish and wildlife. Under this situation, the Secretary would find that the values and the objectives that federal lands or interests to be conveyed may serve if retained in Federal ownership would not be more than the values of the nonfederal lands or interests and the public objectives they could serve if acquired.</p> <p>The main requirement of land parcel exchange with other property owners is that the land must be identified as disposal lands in the RMP. If it qualifies, the parcel must be presented to the New Mexico BLM Land Tenure Steering Committee for its approval. This committee consists of the State Director, Associate State Director, and Field Managers from New Mexico. Land exchanges are discretionary, voluntary transactions. Either the BLM or the nonfederal party may initiate land exchange proposals. Scoping meetings to discuss the pros and cons of the proposal must be held, and the exchange must fulfill important public objectives. A land exchange proposal would be developed and would include all the processes and actions that would need to be completed for the exchange.</p>

INTERNAL DRAFT

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
94	26	Realty	<p>The San Felipe Pueblo should be allowed to acquire Placitas BLM lands, Parcel A, sections 13 and 18, as was done in the Ball Ranch land transfer. This transfer would prevent the destruction of the wildlife corridor and degradation of water and air quality which would occur if mining and other development is allowed by BLM. The Pueblo has demonstrated its commitment to protection of these resources in its conservation of its current lands. It has in place detailed covenants to protect wildlife and allow public access.</p>	<p>Lands or interest in lands are available for disposal under a variety of disposal authorities, provided they meet the criteria outlined in FLPMA (Sales, Section 203, 43 USC 1713(a); Exchanges, Section 206, 43 USC 1716(a); and Reservation and Conveyance of Minerals, Section 209, 43 USC 1719(a)) or other statutes and regulations. Lands available for disposal must be identified by parcel or by specific areas on a map or by legal description.</p> <p>Under Section 206 (43 USC 1716(a)), the Secretary of the Interior may dispose of a tract of BLM-administered land or interests therein by exchange under FLPMA. The Secretary of Agriculture may dispose of a tract of land or interests in the National Forest System under applicable law. In such a situation, the Secretary determines that the public interest would be well served by making that exchange, provided that, when considering public interest, the Secretary <del>fully considers gives full consideration to</del> better federal land management and the needs of state and local people. This includes the need for lands for the economy, community expansion, recreation areas, food, fiber, minerals, and fish and wildlife. Under this situation, the Secretary would find that the values and the objectives that federal lands or interests to be conveyed may serve if retained in federal ownership would not be more than the values of the nonfederal lands or interests and the public objectives they could serve if acquired.</p> <p>The main requirement of land parcel exchange with other property owners is that the land must be identified as disposal lands in the RMP. If it qualifies, the parcel must be presented to the New Mexico BLM Land Tenure Steering Committee for its approval. This committee consists of the State Director, Associate State Director, and Field Managers from New Mexico. Land exchanges are discretionary, voluntary transactions. Either the BLM or the nonfederal party may initiate land exchange proposals. Scoping meetings to discuss the pros and cons of the proposal must be held. The exchange must fulfill important public objectives. A land exchange proposal would be developed and would include all the processes and actions that would need to be completed for the exchange.</p>
212	3	Realty	<p>Here in the East Mountains, our area of interest is the two parcels which share their borders with the City of ABQ [Albuquerque] Golden Open Space, located in T12N, R06E. Currently, the draft RMP lists these parcels up for "disposal" in all four "Alternative" scenarios. BLM recently had archaeological surveys done, and found them to possess "cultural interest". For that reason, they must remain in public domain; hence, they cannot be sold to a private party. City of ABQ Open Space Division expressed an interest in these parcels to BLM a few years ago, that if they ever came up for disposal, they would be interested. I checked with City Open Space, and they are still interested. The two BLM parcels have a combined area of almost 1,000 acres. These 1,000 acres would be a welcomed addition to the existing 1200- acre Golden Open Space. Today, Golden Open Space has almost 5 miles of volunteer-constructed non-motorized recreational trails, and will have approx. 10 miles total in a few years, at completion.</p>	<p><a href="#">Draft RMP/EIS Chapter 2 includes the following for Alternatives C and D in Table 2-4 under "Proposed priority areas for landownership adjustment:" "Golden Area in Unit 5 – cultural resources are located on the properties that have to be protected or mitigated prior to disposal." In addition, in Draft RMP/EIS Chapter 2, Section 2.2.7.3.1, Management Common to All Alternatives, Land Tenure, states that "Public lands would not be disposed of if NRHP-eligible properties cannot be avoided, minimized, or mitigated at a reasonable cost." This recognizes the cultural resources present and the need to protect or mitigate those resources prior to disposal. Prior to any disposal, the BLM would conduct a site-specific analysis to identify any concerns to resources potentially leaving the public trust. This error was corrected in the Proposed RMP/Final EIS BLM disposal maps, and the lands are now identified for retention under the Proposed RMP (Alternative E).</a></p>

Letter Number	Comment Number	Category	Comment Text	Response
95	1	Realty	<p>“What methodology is used by the BLM to allow trading of land parcels with other property owners? The Pueblo of San Felipe has expressed an interest in trading or swapping BLM land North of Placitas and East of I-25 for other San Felipe land(s). What conditions would need to exist in order to allow this to happen? There are a large number of Placitas residents who are in favor of this for the following reasons:</p> <p>1.The San Felipe Pueblo wants to see those lands remain in their current undeveloped state way into the future. They have even stated that they would allow public access and all permitted uses would remain at current levels.</p> <p>2.The residents of Placitas, including myself, want to see the land in this area remain as is and not be used for Sand and Gravel operations, mining operations or any other form of energy exploration, such as for oil, gas, mining, solar or wind use, etc.”</p>	<p>Lands or interest in lands are available for disposal under a variety of disposal authorities, provided they meet the criteria outlined in FLPMA (Sales, Section 203, 43 USC 1713(a); Exchanges, Section 206, 43 USC 1716(a); and Reservation and Conveyance of Minerals, Section 209, 43 USC 1719(a)) or other statutes and regulations. Lands available for disposal must be identified by parcel or by specific areas on a map or by legal description.</p> <p>Under Section 206 (43 USC 1716(a)), the Secretary of the Interior may dispose of a tract of BLM-administered land or interests therein by exchange under FLPMA. The Secretary of Agriculture may dispose of a tract of land or interests in the National Forest System under applicable law. In such a situation, the Secretary determines that the public interest would be well served by making that exchange, provided that, when considering public interest, the Secretary gives full consideration to better federal land management and the needs of state and local people. This includes the need for lands for the economy, community expansion, recreation areas, food, fiber, minerals, and fish and wildlife. Under this situation, the Secretary would find that the values and the objectives that federal lands or interests to be conveyed may serve if retained in federal ownership would not be more than the values of the nonfederal lands or interests and the public objectives they could serve if acquired.</p> <p>The main requirement of land parcel exchange with other property owners is that the land must be identified as disposal lands in the RMP. If it qualifies, the parcel must be presented to the New Mexico BLM Land Tenure Steering Committee for its approval. This committee consists of the State Director, Associate State Director, and Field Managers from New Mexico. Land exchanges are discretionary, voluntary transactions. Either the BLM or the nonfederal party may initiate land exchange proposals. Scoping meetings to discuss the pros and cons of the proposal must be held. The exchange must fulfill important public objectives. A land exchange proposal would be developed and would include all the processes and actions that would need to be completed for the exchange. In addition, Congress has the authority to transfer land to the San Felipe Pueblo.</p>
182	10	Forestry	<p>“Old Growth Trees: Highly scenic, old growth trees should be considered a significant natural resource, providing valuable wildlife habitat and heritage for future generations. In our increasingly arid climate, once cut down, it will take, at best, many centuries to replace them. Ancient trees provide excellent habitat refuge for wildlife, as well as nesting opportunities on their thick branches and hollow trunks for raptors and small animals. They also support diverse vegetation and provide cover for deer and elk. Old trees preserve the history of climate and fire in their rings, and they continue to record this history as they grow. Older stands give us a better idea of what the area looked like before settlement and how natural processes operated in the absence of intensive human influence. [Footnote 1: See, Identification and Ecology of Old Ponderosa Pine Trees in the Colorado Front Range. Huckaby, Kaufmann, Fornwalt, Stoker, Dennis, General Technical Report RMRS-GTR-110, Rocky Mountain Research Station, September 2003, p.41.] The Draft RMP sets out a Forests and Woodlands management objective to ““Identify, maintain and restore forests with late-succession (old-growth) characteristics”” Draft RMP, Section 2.2.5.2. While this objective sets out a commitment to protecting old-growth trees, the RMP does not contain specific management approaches. BLM should incorporate clear commitments to protecting old-growth trees. The BLM could use signage on old growth trees to prevent cutting, as both the BLM and Forest Service already do in other areas. While attaching signs to all old growth trees is a long term project, it could be implemented first in areas of permitted woodcutting or known illegal woodcutting. Recommendations: BLM should evaluate an alternative to allow no woodcutting of ancient old-growth trees anywhere in the Rio Puerco Field Office. BLM should also ensure strong protections are incorporated in the RMP, including a program to sign old growth trees in need of protection.”</p>	<p>Forest product removal methods are discussed in Draft RMP/EIS Section 2.2.5.3.1. Illegal woodcutting is an enforcement issue and an implementation action, and no management actions are discussed in the Draft RMP/EIS for illegal woodcutting. This is because it is outside the scope of analysis. Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting as this is outside the scope of the RMP process. Although no specific management for the referenced old growth trees is within the range of alternatives in the Draft RMP/EIS, the BLM is committed to responsible forest management, which includes the use of silvicultural techniques to maintain or improve forest health. This often involves the cutting and removal of trees to maintain or improve spacing and reduce competition for resources. Often times, the most cost-effective way to implement these silvicultural prescriptions is through the issuance of commercial and personal use woodcutting permits. In addition, the BLM is required to provide timber and firewood resources to the public, in accordance with FLPMA. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</a> <a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater-Creek segment that is suitable for inclusion in the National Wild and Scenic Rivers System (NWSRS), in an effort to meet public demand and benefit land health.</a></p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
233	14	Forestry	<p>"4.0 Environmental Consequences</p> <p>4.2.9.1.1 - Vegetation Management Decisions, Page 4-184 Pages 182-184 list the beneficial impacts, and the short term and long term adverse impacts associated with removing vegetation on highly erodible soils. The most protective alternative would not allow any forest removal on highly erodible soils, and the preferred alternative would allow approximately 426, 000 acres of forest removal. Based on the information presented in Section 4.2.9.1.1; it is not possible to determine if there are any beneficial or adverse impacts achieved from designating the forest product removal areas. Recommendation: Please offer specific information detailing how forest product removal on highly erodible soils will be managed. The discussion should include methods of removal or treatment processes to be used, potential mitigation techniques to negate the adverse effects of removal, and acreages to be removed."</p>	<ul style="list-style-type: none"> <li>• Draft RMP/EIS Section 2.2.5.3.1—Silvicultural treatments may include but are not limited the following activities:               <ul style="list-style-type: none"> <li>○ Mechanical treatments such as mastication, mowing, chopping, chipping/grinding (brush cutter), or cutting.</li> <li>○ Manual treatments such as hand-cutting (chainsaw or handsaw) and hand-piling of slash.</li> <li>○ Prescribed fire including broadcast, underburn, and hand-pile burn.</li> <li>○ Chemical application or biological treatments such as insects or goats/sheep.</li> <li>○ Biomass removal from forest restoration and fuels treatment projects.</li> <li>○ Seeding including aerial or ground application (manual or mechanical).</li> <li>○ Wildland fire for resource benefit.</li> </ul> </li> <li>• Draft RMP/EIS Section 4.2.9.1.1—The vegetation management decisions would work to restore the native vegetative communities on BLM-administered lands within the Planning Area that best protect both soil and water resources. Long-term beneficial impacts from vegetation management decisions on soil and water resources would be improved land health, as defined by the New Mexico Standards and Guidelines (BLM 2001. Record of Decision for New Mexico Standards for Public Land Health and Guidelines for Livestock Grazing Management. New Mexico State Office. January 12, 2001. Internet website: <a href="https://www.blm.gov/sites/blm.gov/files/Standards%20for%20Public%20Land%20Health%20and%2026%20Guidelines%20for%20Livestock%20Grazing%20in%20New%20Mexico.pdf">https://www.blm.gov/sites/blm.gov/files/Standards%20for%20Public%20Land%20Health%20and%2026%20Guidelines%20for%20Livestock%20Grazing%20in%20New%20Mexico.pdf</a>).</li> <li>• Draft RMP/EIS Section 4.2.15.12—The protective measures required by the RPFO include the reclamation of disturbed areas following completion of the management action (e.g., well pad deconstruction, road rehabilitation, reseeding, and weed eradication). Vegetation resources would be restored or rehabilitated after proposed disturbance and/or development; therefore, minimal irreversible impacts to native vegetation resources would be associated with the management decisions proposed for Decision Area lands.</li> </ul>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
154	48	Forestry	<p>"The San Juan Badlands is home to some of the oldest juniper trees in North America, yet more than 1,200 stumps have been counted of illegally harvested old-growth junipers. One juniper was documented to be in excess of 1,000 years old. The nearby El Malpais National Monument with a similar vegetative community has documented Rocky Mountain Junipers in excess of 2,000 years old, the national record. In accordance with Alternative B, Vol. 2, Table 4.20, all wood harvesting of old-growth trees must be prohibited in the ERMA [Extensive Recreation Management Area]. The nearby Santa Fe National Forest offers ample resources for personal wood harvesting."</p>	<p>Forest product removal methods are discussed in Draft RMP/EIS Section 2.2.5.3.1. The RPFO forester collected data on illegal woodcutting in 2010 and 2011 but collected no data on the age of these trees. Approximately 1,200 trees were found to be cut illegally during this period, few of which were considered old-growth. Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting as law enforcement is outside of the scope of the RMP process; however, alternatives that offer ample supply of legal woodcutting, such as Alternatives C (<a href="#">the Proposed RMP</a>) and D, can minimize the frequency and severity of illegal woodcutting.</p> <p>Responsible forest management includes the use of silvicultural techniques to maintain or improve forest health. This often involves the cutting and removal of trees to maintain or improve spacing and reduce competition for resources. Often times, the most cost-effective way to implement these silvicultural prescriptions is through the issuance of commercial and personal use woodcutting permits. In addition, the BLM is required to provide timber and firewood resources to the public, in accordance with FLPMA. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</a> <a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</a></p>
90	21	Forestry	<p>"I would like the unique areas above [San Juan Basin Badlands Extensive Recreation Management Area (ERMA)] protected because of [their] unusual and fragile beauty. The destruction of the area makes no sense and cutting of trees for profit or for personal use needs to be prohibited on ERMA land. People can access the Santa Fe National forest for personal wood cutting -the forest health needs thinning in many areas anyway."</p>	<p>No range of reasonable alternatives can solve illegal woodcutting as law enforcement is outside of the scope of the RMP process; however, alternatives that offer an ample supply of legal woodcutting, such as Alternatives C (<a href="#">the Proposed RMP</a>) and D, can minimize the frequency and severity of illegal woodcutting. Responsible forest management includes the use of silvicultural techniques to maintain or improve forest health. This often involves the cutting and removal of trees to maintain or improve spacing and reduce competition for resources. Often times, the most cost-effective way to implement these silvicultural prescriptions is through the issuance of commercial and personal use woodcutting permits. In addition, the BLM is required to provide timber and firewood resources to the public, in accordance with FLPMA. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</a> <a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</a></p>
90	4	Forestry	<p>"Objectives 2.2.5.2 Identify, maintain, and restore forests with late-succession (old-growth) characteristics under direction provided by the Healthy Forest Restoration Act of 2003 or the most current applicable legislation. Reduce the incidence and impacts of timber trespass and tree theft. This includes, but is not limited to, collaborating with other agencies, increasing collection areas, and increasing the presence of law enforcement. It would seem to me that restricting access to this region to existing access roads, and to restrict all off-road vehicle access would be appropriate. Maybe considering a permitting process such as used the Coyote Buttes area of Utah and Arizona would also be appropriate."</p>	<p>Limiting vehicular travel would be considered with the BLM's Travel and Transportation Management Plan, which is not a part of this RMP.</p> <p>Travel management (including road and traffic management) and law enforcement are outside the scope of this RMP.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
4	3	Forestry	<p>"I am a botanist and for thirty years have lead wildflower hikes for locals and out-of-state visitors into the diverse landscapes of central New Mexico. The San Juan Badlands is a favorite area for its unique vegetation, colorful rock forms, inspiring trees, and amazing petrified wood caches. I am concerned that this ecological integrity is being rapidly destroyed by illegal wood cutting. To date 1200 live Grandfather Junipers have been cut in these areas. I urgently recommend that enforcement resources be allocated to ensure effective protection of scenic, ecological, wildlife, forestry and paleontological resources. By halting all but authorized vehicle use within the San Juan Basin Badlands, this unique environment can be preserved."</p>	<p>Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting a law enforcement is outside of the scope of the RMP process; however, alternatives that offer an ample supply of legal woodcutting, such as Alternatives C <a href="#">(the Proposed RMP)</a> and D, can minimize the frequency and severity of illegal woodcutting. Responsible forest management includes the use of silvicultural techniques to maintain or improve forest health. This often involves the cutting and removal of trees to maintain or improve spacing and reduce competition for resources. Often times, the most cost-effective way to implement these silvicultural prescriptions is through the issuance of commercial and personal use woodcutting permits. In addition, the BLM is required to provide timber and firewood resources to the public, in accordance with FLPMA. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</a> <a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</a></p> <p>In addition, travel management (including road and traffic management) and law enforcement are outside the scope of this RMP.</p>
5	7	Forestry	<p>"I have several concerns about the protection of these [New Mexico] badlands areas. First, and foremost is what I have observed to have taken place in the last couple of years at Mesa Chijuilla and Ceja Pelon, the destruction of over 1000 ancient Junipers, many of which are hundreds, if not thousands of years old. I am reminded of my visits to Great Basin National Park, where the thousand year old Bristlecones are getting the protection they deserve. I also read a recent story in High Country News called the Great New Mexico Juniper Massacre that was really horrifying. At the present rate the few remaining old growth juniper stands will be completely gone. In reference to the current RMP draft I want Alternative B, Table 4.20, Vol 2, p 4-37: No woodcutting, except for special temporary cases, within the entire San Juan Basin Badlands ERMA [Extensive Recreation Management Area]. Vol 1, p 2-26, Objs. 2.2.5.2; and Vol 1, p 2-139 Goals 2.2.22.1 and Obj. 2.2.22.2; and Vol 2, p 4-37. You simply must do a far better job in enforcing existing regulations regarding illegal woodcutting."</p>	<p>The RPFO forester collected data on illegal woodcutting in 2010 and 2011 but collected no data on the age of these trees. Approximately 1,200 trees were found to be cut illegally during this period, few of which were considered old-growth. Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting as law enforcement is outside of the scope of the RMP process; however, alternatives that offer ample supply of legal woodcutting, such as Alternatives C <a href="#">(the Proposed RMP)</a> and D, can minimize the frequency and severity of illegal woodcutting.</p> <p>Responsible forest management includes the use of silvicultural techniques to maintain or improve forest health. This often involves the cutting and removal of trees to maintain or improve spacing and reduce competition for resources. Often times, the most cost-effective way to implement these silvicultural prescriptions is through the issuance of commercial and personal use woodcutting permits. In addition, the BLM is required to provide timber and firewood resources to the public, in accordance with FLPMA. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</a> <a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</a></p> <p>In addition, law enforcement is outside the scope of this RMP.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
66	13	Forestry	<p>"The recent increase in illegal wood cutting which has taken over a 1000 of the oldest most picturesque junipers is a tragic waste. Some of your plans which you list in your public response e-brochure, such as ""obliterate the numerous two tracks"" that criss-cross the area and grind down stumps and branches, are frankly far too little too late. Irrevocable damage has been done. Ancient, once healthy natural communities have been destroyed. Instead of spending ever-decreasing financial resources to hide the damage, you must spend it on making sure that the few remaining 1000-1500 year old junipers are not cut. I attended the Alb. Public meeting and talked at length with several staff members including Tom Gow and Angel Martinez about the need for real enforcement to protect all the resources in the ERMA [Extensive Recreation Management Area]. You must focus your management goals and allocate sufficient funding and personnel to get the job done."</p>	<p>The RPFO collected data on illegal woodcutting in 2010 and 2011 but collected no data on the age of these trees. Approximately 1,200 trees were found to be cut illegally during this period, few of which were considered old-growth. Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting as law enforcement is outside of the scope of the RMP process; however, alternatives that offer ample supply of legal woodcutting, such as Alternatives C (<a href="#">the Proposed RMP</a>) and D, can minimize the frequency and severity of illegal woodcutting.</p> <p>Responsible forest management includes the use of silvicultural techniques to maintain or improve forest health. This often involves the cutting and removal of trees to maintain or improve spacing and reduce competition for resources. Often times, the most cost-effective way to implement these silvicultural prescriptions is through the issuance of commercial and personal use woodcutting permits. In addition, the BLM is required to provide timber and firewood resources to the public, in accordance with FLPMA. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</a> <a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</a></p> <p>In addition, law enforcement is outside the scope of this RMP.</p>
243	1	Forestry	<p>"I support Alternative B, Table 4.20, Vol. 2, p. 4-37 for NO woodcutting, except under very specific cases, within the entire ERMA [Extensive Recreation Management Area] as per Vol. 1, p. 2-26, Obj. 2.2.5.2, and Vol. 1, p. 2-139 Goals 2.2.22.1 and Obj. 2.2.22.2, and Vol. 2, p. 4-37. I know from personal field observations on various occasions that illegal woodcutting is severely disrupting the ecological well-being of these areas, particularly Ceja Pelon. I have seen an accelerated cutting of old, mature junipers. I also know that over 1,200 ""grandfather"" junipers, as verified by BLM studies, have been removed from these areas. This is an unacceptable situation for such a unique New Mexico resource. It was these very unique ecological specimens that had brought me back to the same areas. Please protect these areas from ATV use and implement ""two track"" road closures and more grazing restrictions, and prohibit wood cutting."</p>	<p>Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting; however, alternatives that offer an ample supply of legal woodcutting, such as Alternatives C (<a href="#">the Proposed RMP</a>) and D, can minimize the frequency and severity of illegal woodcutting. Responsible forest management includes the use of silvicultural techniques to maintain or improve forest health. This often involves the cutting and removal of trees to maintain or improve spacing and reduce competition for resources. Often times, the most cost-effective way to implement these silvicultural prescriptions is through the issuance of commercial and personal use woodcutting permits. In addition, the BLM is required to provide timber and firewood resources to the public, in accordance with FLPMA. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</a> <a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</a></p> <p>In addition, travel management (including road and traffic management) and law enforcement are outside the scope of this RMP.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
145	1	Forestry	<p>"In my opinion, the proposed San Juan Badlands area is in desperate need of protection from illegal woodcutters who have left a particularly ugly swath of destruction around Chijuilla Mesa. I have spoken to Mr. Rivers (BLM forester) and have personally attached ""seed tree"" signs to many trees in this area and am happy to learn that the area is finally being monitored on a regular basis and citations for illegal woodcutting have been issued. This needs to continue and your annual budget should reflect this effort in terms of adequate staff and equipment to protect these endangered trees from illegal wood cutting. I'm sure you are aware of the sad and embarrassing article that appeared in the September 17, 2012 issue of ""High Country News"" entitled ""The Great New Mexican Juniper Massacre"" on page 3. The article's graph indicated that over 1,000 old-growth trees have been harvested on BLM land in northern and central New Mexico. I support Alternative B, Table 4.20 , Vol 2, p 4-37 : No woodcutting , except for special temporary cases, within the entire San Juan Basin Badlands ERMA. Vol 1 , p 2-26, Obs. 2.2.5.2; and Vol 1, p 2-139 Goals 2.2.22.1 and Obj. 2.2.22.2; and Vol 2 , p 4-37."</p>	<p>The article titled ""The Great New Mexican Juniper Massacre"" states that only some of the trees are hundreds of years old, but it does not state how many. The data for the number of trees cut, the species, and the diameter of the remaining stumps provided to High Country News for that article came from data collected by the RPFO forester. Although the graph does display ages, those data were not provided by the RPFO. Diameter is not always highly correlated with age, which is especially true for juniper trees. Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting; however, alternatives that offer ample supply of legal woodcutting, such as Alternatives C (<a href="#">the Proposed RMP</a>) and D, can minimize the frequency and severity of illegal woodcutting. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</a></p> <p><a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide with the exception of wilderness areas, WSAs, and the Bluewater Creek segment that is suitable for inclusion in the NWSRS in an effort to meet public demand and benefit land health.</a></p> <p>In addition, budgeting and law enforcement are outside the scope of this RMP.</p>
87	2	Forestry	<p>"Alternative B, Table 2.24, Vol 1, p 2-62. Denying general vehicle access and stopping all petrified wood collection is by far the best management choice, but it must be for the whole ERMA [Extensive Recreation Area Management] not just the East and West Torreon and Ceja Pelon Zones. This is also the only way to get control of the illegal wood cutting problem and start managing these unique recreational areas on a sustainable basis. Denying vehicle access would be a de facto way of stopping both illegal wood cutting and petrified wood theft. But you still must go further and adopt Alternative B, Table 4.20, Vol 2, p 4-37: which says that all ERMA's should be closed to wood cutting. Again this seems like an obvious choice for any meaningful long-term recreational management plan."</p>	<p>Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting; however, alternatives that offer an ample supply of legal woodcutting, such as Alternatives C (<a href="#">the Proposed RMP</a>) and D, can minimize the frequency and severity of illegal woodcutting. Responsible forest management includes the use of silvicultural techniques to maintain or improve forest health. This often involves the cutting and removal of trees to maintain or improve spacing and reduce competition for resources. Often times, the most cost-effective way to implement these silvicultural prescriptions is through the issuance of commercial and personal use woodcutting permits. In addition, the BLM is required to provide timber and firewood resources to the public, in accordance with FLPMA. Under the Proposed RMP (Alternative <a href="#">CE</a>), the BLM would authorize forest product removal area-wide, with the exception of <a href="#">riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics</a><del>wilderness areas, WSAs, and the Bluewater Creek segment that is suitable for inclusion in the NWSRS</del>, in an effort to meet public demand and benefit land health.</p> <p>In addition, travel management (including road and traffic management) and law enforcement are outside the scope of this RMP.</p>



R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
88	6	Forestry	<p>"I have seen evidence on Mesa Chijuilla, Mesa de Cuba, Penistaja, and Ceja Pelon of undesignated or secondary (often called ""social"") roads leading to illegal woodcutting. Old growth juniper with green leaf still attached are cut with chain saws, and left. This is part of what the BLM calls ""casual [unpermitted] collection by individuals, such as for firewood, vigas, latillas, Christmas trees, and greenwood cutting."" (Vol 2, section 4.2.5) This illegal cutting of old growth juniper (average age is around 400 years, I have heard from both BLM and independent sources) impacts soil maintenance and erosion. New Mexico loses more topsoil than any other state, and much is due to erosion, poor storm-water management, and loss dues to floods after areas have been denuded of vegetation – whether naturally from drought die-off or fires, or caused by people altering the environment. The plan's stated goals allow BLM the opportunity to help NM preserve topsoil by imposing more stringent protections on areas where humans are creating erosion problems, one being the San Juan Basin Badlands proposed ERMA [Extensive Recreation Management Area]. This illegal cutting of old-growth junipers impacts the habitats in the San Juan Basin: Taking out any one species leads to a loss for others, including plants and animals. According to mojavedesert.net, ""denser stands [of juniper] are commonly associated with a grassy understory; whereas, a shrub understory is found where junipers are more open."" Grasses require more water than shrubs, so denser tree cover actually helps the bio-porosity of the soils, allowing it to hold more water for plants and soil and for natural erosion management. As the density of the juniper forests in the Badlands changes, so will the other vegetation. Loss of trees in NM is a huge problem right now(again we top the list), so any decrease in tree density is going to negatively impact the balance of habitats for other plants, and insects and animals, raise soil and air temperatures, and generally make our environment un-livable. BLM can protect the ecological balance in the San Juan Basin by putting a stop to this illegal cutting and putting more stringent protections--like limiting vehicle access--on the San Juan Badlands that receive ERMA designation by meeting it's goals, spelled out in Volume I Section 2.2.5: Identify, maintain, and restore forests with late-succession (old-growth) characteristics under direction provided by the Healthy Forest Restoration Act of 2003 [HFRA] or the most current applicable legislation. Reduce the incidence and impacts of timber trespass and tree theft. This includes, but is not limited to, collaborating with other agencies, increasing collection areas, and increasing the presence of law enforcement. Following the HFRA and implementing a more feasible enforcement plan (like closing the area completely to vehicles) can ensure a ""natural"" balance can be maintained in these areas, their productivity and ability to be resource lands and enhance our lives will last longer. If staffing enforcement is an issue, as it always is, it would certainly make sense to close the whole proposed ERMA area to vehicles - other than roads like Lovina Woods Road, which still allow pedestrian access and ""maintain recreation opportunities and protect resource values"" (Vol 1, 2.2.12.4.3)--so there would be no question about someone's reason for being in the area."</p>	<p>"Casual" is not defined as unpermitted (without a permit) in the Draft RMP/EIS; rather it is meant to convey a non-intensive action. The RPFO requires a permit for most-- harvesting of these wood products. The only instance a permit is not required is for "incidental" use, such as for a campfire.</p> <p>Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting; however, alternatives that offer an ample supply of legal woodcutting, such as Alternatives C (<a href="#">the Proposed RMP</a>) and D, can minimize the frequency and severity of illegal woodcutting. Responsible forest management includes the use of silvicultural techniques to maintain or improve forest health. This often involves the cutting and removal of trees to maintain or improve spacing and reduce competition for resources. Often times, the most cost-effective way to implement these silvicultural prescriptions is through the issuance of commercial and personal use woodcutting permits. In addition, the BLM is required to provide timber and firewood resources to the public, in accordance with FLPMA. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</a> <a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest-product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater-Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</a></p>
172	5	Forestry	<p>"We [The Wilderness Society et al.]support this management alternative [Alternative B's focus on dispersed recreation, paleontological research, and backcountry experience for the proposed San Juan Badlands Extensive Recreation Management Area (ERMA)], yet have several concerns with BLMs preferred Alternative C and Alternative D. Draft RMP, Section 2.2.12.4.4.1. 4 As summarized in the preferred alternative and Alternative D, BLM would continue to allow the collection of petrified wood in both the Torreon Fossil Fauna East and West Zones, and Ceja Pelon Zone. What makes these areas so desirable for outdoor recreation is the fact that they possess outstanding geological components, such as petrified wood and fossils. To altogether authorize and permit the collection of these rare resources is not only a mistake, but also an irresponsible management policy that could overwhelm the resource and ultimately degrade the values of the ERMA. Coming across a many hued petrified log or a landscape strewn with petrified wood chips is one of the unique characteristics of these badlands and cannot be replaced if destroyed or removed. Furthermore, the Draft RMP wholly omits any analysis of the impact of illegal tree-cutting and fails to offer prescriptions that address this growing problem. It is inadequate for BLM to ignore this issue entirely in the Draft RMP; for inaction on this matter will leave the many old-growth junipers and ponderosas, common throughout unit, at risk. We believe that the collection of fossils and petrified wood should be forbidden, and that motorized travel should be limited to existing primitive roads and trails, as outlined under Alternative B. Moreover, to help alleviate the problem of woodcutting within the proposed ERMA, we suggest that the Agency dedicate resources to proper signage that will notify users of which routes are closed to motorized travel, that woodcutting is not permitted, and that policies be enacted to guarantee the security of the distinctive old-growth junipers and ponderosas found in the area."</p>	<p>Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting; however, alternatives that offer an ample supply of legal woodcutting, such as Alternatives C (<a href="#">the Proposed RMP</a>) and D, can minimize the frequency and severity of illegal woodcutting. Responsible forest management includes the use of silvicultural techniques to maintain or improve forest health. This often involves the cutting and removal of trees to maintain or improve spacing and reduce competition for resources. Often times, the most cost-effective way to implement these silvicultural prescriptions is through the issuance of commercial and personal use woodcutting permits. In addition, the BLM is required to provide timber and firewood resources to the public, in accordance with FLPMA. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</a> <a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest-product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater-Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</a> The BLM is creating signs that would help protect the forestry/woodland resources.</p>
205	2	Forestry	<p>"We [Torreon/Star Lake Chapter, The Navajo Nation] are requesting for Bureau of Land Management Office to continue Wood Cutting available for the Torreon/Star Lake Chapter Community. Wood product is used for heating homes by our community members during the winter season. In addition, we appreciate your Wood Cutting presentation of October 16, 2012 for our community."</p>	<p>The BLM understands the importance of fuel wood to the Native American community and intends to continue with the woodcutting permit program. <a href="#">Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</a> <a href="#">Under the Proposed RMP (Alternative E), the BLM would authorize forest-product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater-Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</a></p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
65	4	Forestry	"2-27, -134. Alt. B would not treat woodland encroachment in grassland and sagebrush. That would be wrong. Treatment for the sake of livestock forage is unwelcome. Treatment for the sake of maintaining a balance of vegetation types is usually good. Tree invasion has been promoted by livestock grazing; that effect should be countered. We do not want to lose sagebrush because of cattle, nor, on the other hand, do we want to see an increase in sagebrush because of cattle."	Alternative <del>CE</del> is the Proposed RMP, and woodland encroachment would be treated under this alternative. <u>Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</u> <del>Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater-Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</del>
90	5	Forestry	Ceja Pelon, Mesa de Cuba, Mesa Penistaja, Mesa Chijuilla and Cejita Blanca are all areas that are now within the 70,000+ acre San Juan Basin Badlands ERMA as defined within your current RMP Draft. We [Uwe and Karen Schroeter] support with important exceptions noted below, the creation of a San Juan Badlands Extended Recreation Management Area (ERMA) as outlined in Vol I - section 2.2.12.4.4.1. We feel that the San Juan Basin Badlands are best served, not just in terms of ecological health, but also for recreational hikers, photographers and solitude-seekers like us, if all vehicles are kept out of the entire San Juan Basin Badlands ERMA (except for major access points and occasional authorized use). This would preserve a wilderness experience, prevent illegal woodcutting and stop the removal of petrified wood. And most of all, it would greatly simplify the enforcement. Presently you offer vehicle closure in the East and West Torreon and Ceja Pelon Zones as Alternative B in the table in Vol.I on page 2-62. We think this alternative should be expanded to include the entire ERMA.	Limiting of vehicular travel would be considered with the BLM's Travel and Transportation Management Plan, which is not a part of this RMP. Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting. <u>Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</u> <del>Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater-Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</del>
58	3	Forestry	We [The Wilderness Society et al.] support BLMs overall management goals under Alternative B for the Boca del Oso ERMA[Extensive Recreation Management Area], which focuses on the "protection of wilderness values and dispersed recreational activities." Draft RMP, Section 2.2.12.4.4.3. There are currently five WSAs [Wilderness Study Areas] within the proposed Boca del Oso ERMA, as well as several additional areas the BLM found to possess wilderness characteristics. The Chamisa E unit, as well as the Ignacio Chavez A, B, and C units all meet the wilderness characteristic criteria of naturalness because the scattered imprints of human activity, such as primitive vehicle routes and fences, are substantially unnoticeable due to the dense vegetation, rugged foothills, and steep slopes. Draft RMP, Section 3.9. Under Alternative B, the BLM would manage Chamisa E and all three Ignacio Chavez inventory units to protect their wilderness characteristics. Alternative C however, would have adverse consequences on the three Ignacio Chavez units by managing the areas to only minimize impacts and evaluating surface disturbing activities, including saleable minerals, on a case-by-case basis. Furthermore, Alternative C would allow forest product removal within the units, which could create an environment for surface disturbing activities.	Although Alternative B does offer the strictest restrictions on woodcutting, no range of reasonable alternatives can solve illegal woodcutting. Law enforcement is outside of the scope if the RMP process.  The BLM is required to provide timber and firewood resources to the public in accordance with the <u>FLPMA Federal Land Policy and Management Act</u> . The RPFO forester collected data on illegal woodcutting in 2010 and 2011; however, no data were collected on the age of these trees. Approximately 1,200 trees were found to have been cut illegally during this period, few of which were considered old-growth. <u>Under the Proposed RMP (Alternative C), the BLM would authorize forest product removal area-wide, with the exception of riparian areas, ACECs, Wilderness areas, WSAs, and lands with Wilderness characteristics managed to protect Wilderness characteristics, in an effort to meet public demand and benefit land health.</u> <del>Under the Proposed RMP (Alternative E), the BLM would authorize forest product removal area-wide, with the exception of wilderness areas, WSAs, and the Bluewater-Creek segment that is suitable for inclusion in the NWSRS, in an effort to meet public demand and benefit land health.</del>
5	1	Cultural	"1. In paragraph 3.16.2.5, request insert new sentence between "" . . . Oldest cities in the nation."" and ""Other communities . . ."" to read: The establishment of Placitas grew out of the 1765 settlement, San Jose de las Huertas."" 2. Rationale: Completeness and consistency with the New Mexico Office of the State Historian description. Recognition of the unique nature and historical significance of Placitas in the planning process. 3. Source: <a href="http://www.newmexicohistory.org/filedetails.php?fileID=390">http://www.newmexicohistory.org/filedetails.php?fileID=390</a> "	This text has been deleted from the Proposed RMP/Final EIS.
182	15	Cultural	"To give a reason for closing all secondary and ""social"" roads in the entire San Juan Basin Badlands to vehicles I would suggest that the archaeological features and petrified wood in those areas are at risk of illegal collecting and closing the area to vehicles would help in the enforcement of those paleontologic protection laws as well."	The BLM has deferred the Transportation Travel Management Plan development to be completed within 5 years of signing the Record of Decision. This is because travel management is outside the scope of this RMP.
90	1	Cultural	Since these [two BLM parcels located in T12N, R06E] parcels were found to possess cultural interest, [I request] that they remain in the public domain.	Under all alternatives, these areas are considered for disposal or exchange. Prior to any disposal or exchange, the BLM would conduct a site-specific analysis to identify any concerns to resources potentially leaving the public trust.
199	4	Cultural	Because these parcels [located in T12N, R06E] were found to possess cultural interest, they must remain in public domain.	Under all alternatives, these areas are considered for disposal or exchange. Prior to any disposal or exchange, the BLM would conduct a site-specific analysis to identify any concerns to resources potentially leaving the public trust.

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
74	2	Cultural	It is our understanding that the land [BLM Land Bordering T12N, R06E (City of Albuquerque Golden Open Space)] has "cultural interest". I'm sure that imposes some restrictions or considerations that BLM must weigh before disposing of the land for development.	Under all alternatives, these areas are considered for disposal or exchange. Prior to any disposal or exchange, the BLM would conduct site-specific analysis to identify any concerns to resources potentially leaving the public trust.
157	3	Cultural	<p>"The Mount Taylor TCP [Traditional Cultural Property] Warrants Discussion:</p> <p>As you may know, the U.S. Department of Agriculture Forest Service has determined that the Mount Taylor TCP is eligible for listing in the National Register of Historic Places. This determination in accordance with the National Historic Preservation Act ("NHPA") affects federal decision-making regarding land located within the TCP boundary. Moreover, the BLM has jurisdiction over lands located within the boundary of the Mount Taylor TCP. This includes land located within Township 11 North and Ranges 8 and 9 West. Unfortunately, Section 3.3 on Cultural Resources in the Draft RMP only discussed TCPs in passing in the introduction on page 3-7 and in very general, unspecified terms in Section 3.3.4.3 on page 3-14. The only reference to the Mount Taylor TCP that we have found in the Draft RMP is in Table 3.5 on page 3-13, regarding listing on the New Mexico State Register of Historic Properties. In addition, Section 4.2.3 also only generally discusses potential consequences regarding cultural resources from the Draft RMP and alternatives.</p> <p>These sections of the Draft RMP all improperly omit reference to and discussion of the Mount Taylor TCP in accordance with the NHPA. This oversight must be corrected, so that the proper framework for BLM decision-making is identified and addressed. Specifically, the Draft RMP should be revised to discuss the Mount Taylor TCP's effect on BLM land management."</p>	The BLM agrees that the determination of eligibility for listing on the <a href="#">National Register of Historic Places (NRHP)</a> of the Mount Taylor <a href="#">traditional cultural property (TCP)</a> affects federal decision-making within its boundaries; however, <a href="#">National Historic Preservation Act (NHPA)</a> Section 106 process applies to any undertakings that may affect an eligible property. The proper framework is Section 106 of the NHPA, and as a property of interest to tribes, consultation under all relevant authorities (NEPA, NHPA, <a href="#">AIRFAmerican Indian Religious Freedom Act</a> , <a href="#">ARPAArchaeological Resources Protection Act</a> , and executive orders) would be conducted. If the site is formally listed on the NRHP, the BLM would take into consideration the effects of its actions on it as a listed site, as required under the NHPA. Compliance with relevant cultural resources laws is a regulatory requirement and not a land-use planning decision
185	3	Cultural	<p>"Manulito Canyon:</p> <p>The lands identified for ACEC designation in the attached map [see ATT 1] were originally proposed as lands to be included in a National Historic Landmark Designation. Some of the sites within the proposed Landmark area are listed on the National Register. The BLM lands are part of significant prehistoric landscape that at one time was under consideration for designation by the National Park Service as a National Monument. A full accounting of the significance of this area can be found in the 1-987 "'Anasazi Monuments"' report submitted to Cultural Affairs Office of the State Historic Preservation Division by Andrew Fowler, John Stein and Roger Anyon. We [Archaeology Southwest] have a copy of this report that we can make available at your request. This report provides ample documentation to assess the Importance and Relevance criteria for ACEC designation."</p>	Manuelito Canyon lies on <a href="#">PLO-Public Land Order 2198</a> lands; they are not considered in this RMP because they are not managed by the BLM.
185	3	Cultural	<p>"Ojo Hallado ACEC:</p> <p>We [Archaeology Southwest] are unclear from the information presented in the draft Resource Management Plan of your rationale for not designating the areas around Ojo Pueblo and the Fort Site as ACECs [Areas of Critical Environmental Concern], two significant pueblo sites. While we support the proposed surface use restrictions under consideration, we believe that based on information presented in early surveys conducted by Nels Nelson for American Museum of Natural History and a later 1917 publication by Leslie Spier in the Anthropological Papers American Museum of Natural History Series 3-1, the area around Ojo Hallado wash includes several major ruin sites including Ojo Pueblo, Fort Site, and a cluster of sites designated as Ojo Hallado Nelson and Spier. Although few of the sites noted by Spier and Nelson have been formally recorded, the locations of several are shown on the Shoemaker Canyon 7.5-minute topo map. This area represents a significant prehistoric cultural landscape that holds the potential to offer a considerable amount of new archaeological information. The survey work conducted by Arizona State University around the Fort Site provides strong indications of the density of archaeological sites in the area and we are confident that more intensive survey efforts will provide strong justification for designating the BLM land identified on the attached Ojo Hallado ACEC proposal map [see ATT 1] as an ACEC in the Preferred Alternative Final EIS and Record of Decision."</p>	It was the professional opinion of the subject matter expert that existing protections under NHPA, NEPA, <a href="#">American Indian Religious Freedom Act</a> , <a href="#">Archaeological Resources Protection Act</a> , <a href="#">ARPA</a> , <a href="#">AIRFA</a> , and Sacred Sites were sufficient to protect the sites without increasing their visibility by designating an ACEC.

Letter Number	Comment Number	Category	Comment Text	Response
197	2	Cultural	<p>“Continental Divide Trail: The Continental Divide National Scenic Trail is the longest of three inter-continent trails in the United States, and offers users a high quality, scenic, primitive hiking and horseback-riding recreational experience. The Rio Puerco Field Office is fortunate to have long portions of the Continental Divide National Scenic Trail under its jurisdiction and the opportunity in this RMP to ensure the public experiences the trail as it was envisioned.</p> <p>In the Draft RMP, BLM is proposing a Special Recreation Management Area (SRMA) for the Trail. SRMAs are managed to protect and enhance a targeted set of activities, experiences, benefits, and desired recreation setting characteristics, such that recreation is to be the dominant use. IM 2011-004. Generally, SRMAs are intended for more intensive management, with an emphasis on detailed management prescriptions that promote the overall use and enjoyment of the area. The purposes of the Continental Divide National Scenic Trail are to “connect people and communities to the Continental Divide by providing scenic, high-quality, primitive hiking and horseback riding experiences, while preserving the significant natural, historic, and cultural resources along the Trail.” Draft RMP, Section 3.18.2.</p> <p>Under Alternative B of the Draft RMP, BLM proposes to designate the Continental Divide National Scenic Trail SRMA, totaling 38,808 acres, to provide a hiking and travel experience that also protects the historical and cultural significance of the trail. Key activities that the SRMA is managed to provide are hiking, horseback riding and mountain biking. Management would apply to a half-mile wide corridor around the trail in Alternative B (covering more than 38,808 acres), to a half-mile wide corridor where routes have not yet been determined and to a 2000-foot-wide corridor for the remainder in Alternative C, and to a 2000-foot-wide corridor in Alternative D (covering 11,474 acres) Table 2.23.</p> <p>Recommendation: Designation of the Continental Divide National Scenic Trail SRMA for a half-mile wide corridor in the RMP, as proposed in Alternative B, would best support a recreation experience consistent with the purpose for which the Trail was designated, and we encourage the BLM to do so.”</p>	Under the Proposed RMP/Final EIS (Alternative CE), the corridor for the Continental Divide National Scenic Trail would be 1,000 feet from the trail (a 2,000-foot-wide corridor).
243	2	Cultural	<p>“The Ceja Pelon &amp; Chijuilla meet ACEC [area of critical environmental concern] criteria of significant scenic value and rare geologic features. See, Draft RMP, Section 3.18.4. Unstable, loose soils and sheer cliff faces can be considered a natural hazard. Their unique hoodoos, colorful cliffs, iconic sculpted grandfather junipers and ponderosas, fragile biological soil crusts and prevalence of petrified wood logs and chips are quite unique and very vulnerable to the destructive effects of illegal woodcutting, off road vehicle incursions or mineral development. These areas should also be designated as ACECs.”</p>	The primary goal of the ACEC is a designation that highlights areas where special management attention is needed to protect certain resources. The management prescriptions that were developed for the various zones in the San Juan Basin Badlands ERMA protect the resources, based on the management objectives for the resources inventoried. Special management is not necessary for areas outside of the Torreon Fossil Fauna. The protection prescriptions proposed for each of the varying zones would achieve the level of protection commensurate with the type of use proposed.
90	7	GIS	<p>“Map 48 - Explain what this figure is supposed to be showing. The map title is Crest of Montezuma and in the List of Maps the file name is Recreation_Crest_of_Montezuma, yet the legend only indicates parcel “ownership”. The only additional information afforded by the “blow-up” insert is a more detailed boundary of the parcel. What and where is the information on recreation?”</p>	The interdisciplinary team identified the location of the Crest of Montezuma relative to the RPFO in Draft RMP/EIS Map 48. The map titled Crest of Montezuma identifies the surface ownership in that region. The file name includes recreation because it was also designated as an ERMA in the Draft RMP/EIS.
154	2	Realty	<p>Map 30 - It is very difficult to determine where the oil and gas potential exists on a map with such a large scale and without an overlay of BLM parcels. Also, it is unclear if this map covers all leaseables, both fluid and solid (as the title implies or if it only shows fluid potential as stated in Section 2.1.4)? If Map 30 only covers fluid leaseables, where are the areas shown within the Plan area that have solid leaseables potential?</p>	Map 30 in the Draft RMP/EIS is representative of fluid leaseable mineral potential for the RPFO. Map 32 in the Draft RMP/EIS is representative of locatable mineral potential for the RPFO. Map 33 in the Draft RMP/EIS is representative of the salable mineral potential for the RPFO.

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
7	2	Realty	<p>“Visual Resource Management [VRM]: VRM analysis has the potential to greatly limit the ability of utilities to maintain and expand infrastructure. The VRM goals (page 46) and overall visual resource analysis in the Draft Rio Puerco RMP/EIS are consistent with multiple use mandates and are written in such a way to allow the maintenance, upgrade, expansion, and development of future utility facilities. As PNM understands it, Class I areas are largely restricted to Wilderness Study Areas. ACECs [Areas of Critical Environmental Concern] managed for scenic values are Class II. BLM will make every effort to avoid siting new energy facilities within a Class II designation but the project could be constructed with special stipulations. As might be anticipated, Class II is greatly expanded in Alternative B and most restricted in Alternative D. Alternative C appears to be fairly balanced with existing energy corridors appearing to cross some Class III areas. PNM would appreciate clarification as to the implications of maintenance and of new construction in Class III areas which are managed to partially retain the existing character of the landscape with changes to the landscape characterized as moderate.”</p>	<p>Valid existing rights would be carried forward (Draft RMP/EIS Section 2.2.7.3.2). VRM Class III objective is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape. The implications for maintenance and new construction in VRM Class III areas would essentially mean that <a href="#">best-management practices (BMPs)</a> would have to be applied, depending on the project, to ensure that VRM Class III objectives are conformed with. These may include the following:</p> <ul style="list-style-type: none"> <li>• Repeating elements of form, line, color, and texture to blend facilities and access roads with the surrounding landscape</li> <li>• Painting all aboveground structures, production equipment, tanks, transformers, and insulators not subject to safety requirements to blend with the natural color of the landscape, using paint that is a nonreflective “standard environmental color” approved by the BLM’s <a href="#">visual resource management (VRM)</a> specialist</li> <li>• Performing final reclamation recontouring of all disturbed areas, including access roads, to the original contour or a contour that blends with the surrounding topography</li> <li>• Avoiding facility placement on steep slopes, ridgetops, and hilltops</li> <li>• Screening facilities from view</li> <li>• Following contours of the land to reduce unnecessary disturbance</li> <li>• Recontouring and revegetating disturbed areas to blend with the surround</li> <li>• Reclaiming unnecessary access roads as soon as possible to the original contour</li> <li>• Using gravel of a similar color to adjacent dominant soil and vegetation colors for road surfacing</li> <li>• Avoiding locating pads in areas visible from primary roads</li> <li>• Using subsurface or low-profile facilities to prevent protrusion above the horizon line when viewed from any primary road</li> <li>• Avoiding the routing of well access roads directly from state, county, or BLM roads</li> <li>• Collocating wells, when possible</li> <li>• Locating facilities far enough from the cut and fill slopes to facilitate recontouring for interim reclamation</li> <li>• Implementing other BMPs, as prescribed for the project by the BLM VRM Specialist</li> </ul>
145	11	Realty	<p>“Allowing additional gravel mining without addressing the traffic problems arising from the transportation of the gravel is unacceptable. Already the burden caused by current gravel transport is dangerous and costly, particularly at the Interstate 25/Highway 165 interchange.”</p>	<p>The BLM is not <a href="#">proposing to necessarily</a> allowing “additional” <a href="#">sand and gravel</a> mining on the BLM-administered tract near Placitas. Under the 1992 RMP (<a href="#">BLM 1992</a>), as amended, all federally owned minerals are open for permitting around and near the Placitas area. The <a href="#">proposed reduction by the BLM in Alternative C (the Proposed RMP)</a> is from the current (<a href="#">Alternative A</a>) level of over <del>14,000</del> <a href="#">7,500</a> acres open to <a href="#">salable mineral extraction</a> to a proposed level of <del>just over 750</del> <a href="#">800</a> acres <a href="#">open to salable mineral extraction</a>. If an application is received, <a href="#">then</a> NEPA requires that the proposed project be <a href="#">further</a> analyzed and the resulting impacts be disclosed to the public.</p> <p>In addition, the BLM has deferred the Transportation Travel Management Plan development to be completed within 5 years of signing the Record of Decision. This is because travel management is outside the scope of this RMP.</p>

Letter Number	Comment Number	Category	Comment Text	Response
162	3	Realty	<p>"TMP and Assertion of Valid Existing Rights I note that you are proposing to defer development of a Travel Management Plan and designation of routes until after the RMP/EIS is complete (Page 2-5, Page 3-110, Page 4-5). The first comment is that such a deferral appears to be an improper segmentation of these critical issues from this RMP/EIS which is a violation of NEPA. However, you have provided several maps (Nos. 89 to 92) which appear to show potential road closures and have indicated you will limit use to designated routes in the interim (Page 2-130). Isn't this some type of a Plan for Travel Management? What part of the Plan is being deferred here? In addition, the road and travel Maps 73-76 referenced on Page 2-130 appear to be missing from the published document. I am particularly concerned with the potential closure of roads shown on map 90, in such a way as to preclude my valid and existing use of designated roads, primitive roads and trails to access my property. I currently use a number of BLM roads, primitive roads, and trails to access my private property. I especially require the use of the eastern and southern routes to access the eastern and southern half of my property, which is my only access to these areas. These routes require that I traverse a BLM designated road 1102 (part of which crosses private property), and a primitive trail established from that road to the west and south traversing to 2 gates located on my private property. All of these roads and trails are located in sections 23, 24, 25, and 26, T.20N., R.2W., N.M.P.M. I also note for the record that portions of the public lands adjacent to and south of my private property were not inventoried for roads and trails as part of the inventory referenced on page 2-130. In Section 3.3.4 Trails, Roads, and Railroads, you mention the Bernalillo to La Ventana railroad (Table 3.4). However, this rail route, portions of the BLM road 1102, and other BLM roads comprise the only major historic route from Bernalillo to San Ysidro, thence to San Luis, thence to La Ventana, and finally to Cuba and beyond. This route has been used since Spanish settlement times and traveled by hand and ox carts, horse, wagon, and automobiles. Only relatively recently has the major travel route been shifted to Highway 550. But this old public road is the only major route connecting these communities on the west side of the Rio Puerco. Data substantiating this history is available from county and state highway maps, USGS topographic maps, and is discussed in the book, Antes Stories from the Past Rural Cuba, New Mexico 1769-1949 by Ester V. Cordova May. As you describe on Page 4-1, BLM will recognize valid existing rights for all resource actions and all alternatives considered. Moreover, your assumptions on Page 4-2 state that non-BLM lands would have minimal direct impacts from the RMP decisions and that "reasonable access across BLM lands" will be continued to private lands (see also Page 4-232). I am willing to meet with BLM staff so that my valid existing rights to roads and trails in these sections can be identified and properly designated in your Travel Management Plan."</p>	<p>The maps were corrected and are now part of the document (Maps <del>2-67 to 2-702-28 to 2-86</del> and Maps 3-16 to 3-19). All valid existing rights would be carried forward (Draft RMP/EIS Section 2.2.7.3.2). Furthermore, the BLM is very interested in ensuring that when the travel management planning process begins that all potentially affected users are part of the process in order to create a viable and useful transportation plan. Comments would be very useful when the BLM begins the travel management planning process. Committing to complete the travel management plan within 5 years of signing the Record of Decision is not segmenting of the process but rather in accordance with Travel and Transportation Management Manual 1626-.06B-B2 (Deferred Travel Management Planning).</p>
63	10	Realty	<p>"Utility Corridors and NEPA Analysis: The Utility Corridor discussion included in Section 3.8.2 makes it clear that the BLM recognizes that existing utility corridors must be protected in order to safeguard present and future electric service. The BLM has formally designated utility corridors, made attempts to group compatible facilities wherever possible, and refers de facto corridors established by existing linear facilities. The document also alludes to corridors designated by the Western Utility Group that cross BLM land. PNM [PNM Energy] understands that existing corridors are protected in each of the RMP alternatives, although the number of acres open for such rights-of ways is severely limited under alternative B (pg. 4.53). Discussion does not include reference to the 368 corridors analyzed in the West Wide Energy Corridor Final PEIS, although one of the corridors does not appear to pass through the RPRMP area. We do note that none of the previously established corridors are plotted on the Right-of-Way (Transmission Line) Maps 22-26. We would request that the original corridors included in the 1986 RMP, corridors designated by the Western Utility Group, and the 368 corridor are graphically presented in each of the transmission maps presented in Maps 24-26.</p> <p>We also note that large blocks coded for avoidance or exclusion in Maps 24-26 render siting through the area problematic. We were confused as we tried to understand the basis for avoidance areas on these maps. Whereas the exclusion areas (ACECs [Areas of Critical Environmental Concern] and WSAs [Wilderness Study Areas]) are clear, the avoidance areas along the corridors mentioned above did not appear to conform to identifiable resource concerns. We do understand that identified avoidance areas do not preclude the siting of new power line corridors or the maintenance of existing lines. We would, however, request clarification as to the nature of those avoidance areas as resulting stipulations affect not only new construction but the responsible operations and maintenance of existing lines."</p>	<p>The avoidance areas in Draft RMP/EIS Maps 24–26 were corrected to reflect what actually is an avoidance prescription. <a href="#">Proposed RMP/Final EIS Maps 2-432-11 through 2-472-14 in the Proposed RMP/Final EIS</a> show all the utility corridors that have been identified for the RPFO.</p>
104	49	Realty	<p>"Maps 15, 18 and 24 -- Alternative B, Rights-of-Way for pipelines, roads and transmission lines, respectively -- Clearly explain with appropriate detail, the basis and logic used to determine the boundary between areas designated as "exclude" and "avoid", as shown on these maps?"</p>	<p>The primary rationale for Alternative B, as presented on Draft RMP/EIS Maps 15, 18, 24 and the boundaries between closed and areas and avoid, is the closed areas associated with special designations for closed areas. Most of the areas to avoid are based on the sensitivity of the soils, as defined in Draft RMP/EIS Chapter 3, Section 3.17.</p>
10	2	Realty	<p>"Land Use - Transportation: Road closures are an area of particular concern for holders or right-of-ways. In an effort to minimize overall disturbance, PNM [PNM Energy] routinely uses established common access roads on public land to access specific facilities. The Draft Rio Puerco RMP/EIS indicates that travel management planning will be completed within the next 5 years. Road closures in the past have resulted in development of extraordinary access to facilities which were previously accessible. Again, close coordination with utilities on transportation planning to ensure utility access is efficient and appropriate is necessary and should be programmed into operations at the RMP level. PNM would request that should parts of our access be closed, that we would retain administrative access based upon a valid grant of right-of-way. Please note that it states on page 2-130 that preliminary inventory of existing roads is shown in Maps 73-76. This is not accurate. Road maps included in Maps 89-92 indicate alternative closures, limited and open areas by alternative but do not portray the road network."</p>	<p>The error in the maps was corrected. The road inventory maps are Maps 3-16 to 3-19 in the Proposed RMP/Final EIS. All valid existing rights would be carried forward, as described in Draft RMP/EIS Chapter 2, Section 2.2.7.3.2, Land Use Authorizations. When the transportation travel planning process begins, the BLM intends collaborate with as many stakeholders and users as possible.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
108	4	Realty	We [PNM] would request that the boundaries of the Ojito Wilderness do not intrude into our existing right-of-way for our WW345kV bulk power corridor which passes immediately west of the area. The recently established wilderness area is immediately adjacent to our existing authorization in several locations and the wilderness status could jeopardize our ability to properly maintain this critical infrastructure. We appreciate your recognition of the importance of this issue and your expressed intent to alter the wilderness boundary to a distance of at least 100ft outside of our existing right-of-way.	The wilderness boundary is 100 feet east of the transmission center line.
54	9	Realty	"Lands and Realty As noted in the DRMP/EIS (3.18.2), the location of the CDNST [Continental Divide National Scenic Trail] in the area south of Grants, where the trail is located on the shoulder of highways, is not in close correlation with the purposes of the Trail. There may be opportunities to relocate the Trail in T 10 N, R 10 W by negotiations involving existing sections there that are administered by BLM. These lands (along with sections in T 9 N, R 10 W) should not be identified as candidates for disposal (as they are so marked on Maps 012 and 013). Instead, the DRMP/EIS should disclose the desirability of a land adjustment in this area rather than leaving the matter solely to the site-specific analysis at the implementation stage as referenced in 4.2.7.2.1."	The BLM is working with Pueblo de Acoma in moving the Continental Divide National Scenic Trail from the Highway 117 ROW shoulder to pueblo lands for hiker safety, better and higher landscape scenic quality for the hikers.
119	8	Realty	The San Felipe Pueblo should be allowed to acquire Placitas BLM lands, Parcel A, sections 13 and 18, as was done in the Ball Ranch land transfer. This transfer would prevent the destruction of the wildlife corridor and degradation of water and air quality which would occur if mining and other development is allowed by BLM. The Pueblo has demonstrated its commitment to protection of these resources in its conservation of its current lands. It has in place detailed covenants to protect wildlife and allow public access.	The RMP does not make specific decisions regarding any resource; it simply prescribes an overall management strategy for the resources that are inventoried. The Placitas parcel would be <a href="#">available open</a> for disposal under the Proposed RMP (Alternative EC). As with any other parcel that is <a href="#">open available</a> for disposal, the appropriate process must be adhered to through the various mechanisms, which would include exchanges or purchasing.
14	28		I would like the BLM to allow the San Felipe pueblo to reacquire the Placitas BLM lands as they did in the "Phase II" <a href="http://www.lasplacitas.org/rio_puerco/data/San_Felipe_Land_Exchange_2001/SanFelipe_feis.pdf">http://www.lasplacitas.org/rio_puerco/data/San_Felipe_Land_Exchange_2001/SanFelipe_feis.pdf</a> , the previous (Ball Ranch) land transfer. This one-time transfer to the Pueblo of San Felipe would end all future destruction of the wildlife corridor and inhumane treatment of the free roaming horses. This transfer of ownership would also end the possibility of future land development and gravel mining (with their inherent noise/air/water quality degradation).	The RMP does not make specific decisions regarding any resource; it simply prescribes an overall management strategy for the resources that are inventoried. The Placitas parcel would be <a href="#">available open</a> for disposal under the Proposed RMP (Alternative CE). As with any other parcel that is <a href="#">available open</a> for disposal, the appropriate process must be adhered to through the various mechanisms, which would include exchanges or purchasing.
15	5	Wildlife	"Guidance with respect to lands and realty is addressed in Manual 6280 4.2.E.5. Comment: We have identified the need to improve the location of the CDNST [Continental Divide National Scenic Trail] south of Grants. To deal with this, the RMP/EIS should identify lands that might serve to connect trail segments and that might be obtained through easements acquisition, exchange, or purchase from a willing seller. In order to facilitate a relocation, the lands in T 10 N, R 10 W and T 9 N, R 10 W should be retained; these lands should not be marked as disposal areas on the relevant maps. Additional detail should be included in implementation plans that would include prioritized acquisition needs. (5.4.A.4.)"	Since the BLM does not control private land holdings, it would not identify private lands in an RMP for acquisition priority.
108	3	Wildlife	Vol. 3, F-2, 2nd paragraph, 4th line: The word should be relict in application to landscapes and vegetation, not relic.	The correction was made.
154	6	Wildlife	Vol 3, J-1, J-3, Zapus hudsonius luteus is listed with two different common names: New Mexico meadow jumping mouse and New Mexico jumping mouse.	The correct common name is New Mexico meadow jumping mouse.
53	2	Wildlife	"Vol 3, J-1 Gypsum phacelia is Phacelia integrifolia, see <a href="http://plants.usda.gov/java/profile?symbol=PHIN">http://plants.usda.gov/java/profile?symbol=PHIN</a> , 2 variants exist."	This species is no longer part of the special status species list. <i>Gypsum townsend daisy (Townsendia gypsophila)</i> is included.
53	4	Wildlife	"Vol 3, J-3 Sclerocactus is the preferred genus of Grama grass cactus, though Pediocactus is a synonym, see <a href="http://plants.usda.gov/java/profile?symbol=SCPA10">http://plants.usda.gov/java/profile?symbol=SCPA10</a> ."	The current name is Sclerocactus. This has been corrected in the Proposed RMP/Final EIS.
63	5	Wildlife	Vol 3, J-3 There are 5 subspecies of <i>Oenothera caespitosa</i> . Do you know which this is? See <a href="http://plants.usda.gov/java/profile?symbol=OECA10">http://plants.usda.gov/java/profile?symbol=OECA10</a> .	The plant, along with any subspecies, are no longer part of the special status species list.
71	7	Wildlife	WILDLIFE CORRIDORS: Emerging science demonstrates that wildlife migration corridors are essential to safeguard habitat connectivity, facilitate adaptation to climate change and ensure the resilience of a wide range of wildlife species. Reduction in habitat connectivity through increased fragmentation - due to roads, residential and commercial development, energy development, and off-road vehicles - substantially decreases the amount of ecologically intact core habitat available for many wildlife species. Ecologists have long recognized that the loss of core habitat and habitat connectivity pose the greatest threats to species persistence and overall biodiversity. [Footnote 2; Wilcove, D.S. et al. 1998. Quantifying threats to imperiled species in the United States. <i>Bioscience</i> 48(8): 607-615. ]BLM has the authority to implement protective management of wildlife corridors and the obligation to address threats to wildlife and wildlife habitat as stewards of the western public lands. Through resource management plans, BLM plans for the management of its lands at the landscape level, which gives the Agency the ability to designate and protect naturally occurring wildlife corridors. Using this authority is more feasible than ever due to the data generated through the various interagency state and regional Crucial Habitat Assessment Tool	No wildlife corridors have been officially designated by the New Mexico Department of Game and Fish that are within the RPFO's administrative boundary.

Letter Number	Comment Number	Category	Comment Text	Response
			<p>(CHAT) [Footnote 3: 3 <a href="http://www.westgov.org/index.php?option=com_content&amp;view=article&amp;id=380:chat&amp;catid=102">http://www.westgov.org/index.php?option=com_content&amp;view=article&amp;id=380:chat&amp;catid=102</a>] development processes, which will assist in identifying crucial habitat and wildlife corridors. In December 2011, BLM issued IM 2012-039 [Footnote 4: Available at <a href="http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2012/IM_2012-039.html">http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2012/IM_2012-039.html</a>], "Identification and Uniform Mapping of Wildlife Corridors and Crucial Habitat Pursuant to a Memorandum of Understanding with the Western Governors' Association." Per IM 2012-039, BLM is required to use prioritized wildlife and habitat information and data developed through state- and regional-level CHATs as a principal source to inform land use planning, as well as related natural resource decisions on public lands. The policy specifically directs that: 1. Federal agencies will seek to use wildlife-related information and data developed through CHAT, whenever they are adequate and at an appropriate scale, as a principal source to inform land use, land planning, and related natural resource decisions. 2. When information is not available through CHAT, but may be available from a State in other usable forms, the Federal agencies will explore the possibility of using such information. 3. When information is neither available through CHAT or in another usable form, the Federal agencies will explore the possibility of the States developing such information in a manner that meets the needs of the Federal agencies in terms of timeliness, cost, and quality of information. The Rio Puerco Draft RMP fails to include any meaningful discussion of identifying, managing or protecting wildlife corridors, and it does not indicate that BLM attempted to comply with IM 2012-039. While the Rio Puerco Field Office [RPFO] manages a patchwork of public land, and a minority of surface acres, the RPFO does manage potentially crucial public land connecting lands of high conservation value in and surrounding the field office boundary, such as the Cibola and Santa Fe National Forests, designated Wilderness, Wilderness Study Areas and unprotected wilderness-quality lands. The RMP should therefore include an analysis of habitat connectivity, identification of potential wildlife corridors, and management alternatives for protecting and/or restoring important corridors. In addition to the information and resources that will be provided by development of the CHATs, BLM already has tools at its disposal that can be applied to designation and protection of wildlife corridors and is already taking this approach in a number of plans. For example, in the Pinedale Record of Decision and RMP, the BLM specifically designated and protected an important wildlife corridor as an ACEC [Area of Critical Environmental Concern]. The BLM designated the Trapper's Point ACEC [Area of Critical Environmental Concern] with the specific goal to "preserve the viability of the big game migration bottleneck, cultural and historic resources, and important livestock trailing use." Pinedale ROD/RMP, 2008, p. 2-56. [Footnote 5: Available on-line at: <a href="http://www.blm.gov/pgdata/etc/medialib/blm/wy/programs/planning/rmps/pinedale/rod.Par.45058.File.dat/05_Record_of_Decision_and_Approved_Pinedale_RMP.pdf">http://www.blm.gov/pgdata/etc/medialib/blm/wy/programs/planning/rmps/pinedale/rod.Par.45058.File.dat/05_Record_of_Decision_and_Approved_Pinedale_RMP.pdf</a>]. The Wilderness Society recently developed a planning and policy brief entitled "Designating Wildlife Corridors on the Public Lands: Protection through BLM's Land Use Planning Process" (Attachment 2 [See ATT 2] to these comments, incorporated by reference). This brief describes the BLM's authority and obligation to designate and protect corridors that connect crucial habitat areas on the public lands for the benefit of wildlife and the scientific basis for the necessity of corridor management. It also details the Agency's existing management tools that can be applied to wildlife corridor protection and provides additional examples of corridor designation and/or management by BLM and other government agencies. We recommend the Rio Puerco Field Office utilize this brief, along with scientific data available through the CHATs or other reputable sources, to develop alternatives for wildlife corridor protection in the RMP and adopt a strategy for managing habitat connectivity. Recommendations: A top priority for BLM land use planning should be to incorporate wildlife corridor identification and management. To appropriately designate and protect wildlife corridors within the Rio Puerco Field Office, BLM should:</p> <ul style="list-style-type: none"> <li>- collaborate with other state and federal agencies and non-governmental groups to obtain current data regarding crucial wildlife habitat and corridors, including through use of the CHATs;</li> <li>- connect already designated wilderness areas and other reserves to ensure that wildlife populations have the ability to easily move between large areas of protected crucial habitat;</li> <li>- identify species that will act as focal species for identifying important wildlife corridors and will also act as indicators for how well the wildlife corridors are working;</li> <li>- use the best available science to decide upon the exact areas to be designated and protected;</li> <li>- ensure that all designations include specific provisions regarding management so that designated wildlife corridors are protected and can function as designed; and</li> <li>- constantly monitor the effectiveness of designated wildlife corridors and implement adaptive ecosystem management strategies. Additionally, BLM should incorporate data on core habitat, linkages and buffer areas, as well as wildlife corridors, to guide other management decisions and needed research.</li> </ul>	
71	9	Wildlife	<p>"While we [The Wilderness Society et al.] do not oppose public grazing, we strongly urge the BLM to look at a broader picture when considering lease renewals. Grazing cattle on public lands comes with a large financial burden on taxpayers due to subsidies, significant environmental degradation, and a loss of enjoyment on the part of other users of America's open spaces. Voluntary or gradual BLM retirement of these leases, gradual removal of cattle from Critical Habitats, ACECs [Areas of Critical Environmental Concern], WSAs [Wilderness Study Areas] and/or reducing the number of cattle allowed per allotment is a viable option for phasing out grazing where there are conflicts with or damage to other resources, and phasing in an era of greater environmental and fiscal responsibility"</p>	<p>The Proposed RMP/Final EIS adopts a prescriptive grazing management approach in which it uses site analysis to determine how grazing affects other resources. In addition, the BLM adheres to the Taylor Grazing Act.</p>



R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
71	26	Wildlife	<p>“Coordinated Management of Wildlands with Cibola National Forest: The lands managed by the Rio Puerco Field Office are distributed around 6 counties and are also adjacent to lands managed by other agencies. Notably, lands managed by the Cibola National Forest share boundaries with the Rio Puerco Field Office and provide an important opportunity for coordinated management. For instance, the BLM’s Chamisa WSA [Wilderness Study Area] is adjacent to the Forest Service Guadalupe Inventoried Roadless Area (IRA), creating a total area of more than 26,000 roadless acres. In addition, the BLM’s Ignacio Chavez WSA is adjacent to the Cibola’s Ignacio Chavez Contiguous IRA, creating a total of more than 35,000 roadless acres. Similar opportunities exist around lands with wilderness characteristics, ERMAs [Extensive Recreation Management Area], and ACECs [Areas of Critical Environmental Concern] in the Rio Puerco Field Office. We have created and attached a map (Attachment 3 [see ATT 3] to these comments, incorporated by reference) showing the relationship between lands of conservation value in the Rio Puerco Field Office and the adjacent areas managed by the Cibola National Forest. The Cibola has just begun the revision of its forest management plan and will be creating an assessment for public review in the upcoming months. [Footnote 24: See <a href="http://www.fs.usda.gov/detail/cibola/landmanagement/planning/?cid=fsbdev3_065627">http://www.fs.usda.gov/detail/cibola/landmanagement/planning/?cid=fsbdev3_065627</a>] Recommendation: This is an opportune moment to evaluate cooperative management of wildlands and wildlife that do not recognize the borders between the two agencies but could benefit from cooperative management across those borders, above and beyond addressing transfer of the Crest of Montezuma. We recommend that the BLM work with the Forest Service to maximize management that takes into account values managed by both agencies, and include this commitment in the Rio Puerco RMP in relation to lands with wilderness characteristics, WSAs, ERMAs, SRMAs [Special Recreation Management Areas], ACECs and wildlife corridors. “</p>	<p>The BLM worked with various cooperating agencies, the Forest Service included, to develop a reasonable range of alternatives designed to address and resolve key planning issues for both agencies.</p>
71	34	Wildlife	<p>“Habitat for the Jemez Mountain Salamander (JMS) is mis-identified as Riparian/Wetland. The JMS, in Table 4.78 on page 4-219, is identified as a BLM Sensitive Species occupying Riparian/Wetland habitat.</p> <p>Without putting too fine a point on it, the habitat of the JMS is most definitively not ““riparian/wetland”” as listed in the DEIS. The New Mexico Endemic Salamander Team, the group of represented agencies charged with its protection and recovery, describes its habitat thus: ““Jemez Mountains salamanders are primarily found in habitats between 7200- 9600 feet in specific microhabitat conditions. Preferred microhabitat is characterized by relatively high humidity and soils this contain deep, igneous, subsurface rock that is fractured vertically and horizontally to allow the species to retreat underground to below the frost line. . . The macrohabitat is coniferous forest dominated by Douglas fir, blue spruce, Engelmann spruce, ponderosa pine, or white fir.”” [Footnote 27: Cooperative Management Plan for the Jemez Mountain Salamander, New Mexico Endemic Salamander Team, Jan 2000.] Identify and document the proper habitat for the JMS species in the DEIS.”</p>	<p>Habitat type for the Jemez Mountain salamander has been updated in Chapter 4 to be ponderosa pine.</p>
58	35	Wildlife	<p>“The Plan doesn’t address the single hole in the entire Spine of the Nation Wildlife Corridor that spans from Canada to Mexico. The Placitas parcel lies squarely in that hole and should be left untouched to facilitate wildlife movement from the Sandias to the Jemez and the Otero Basin. The Sandia Mountains have become increasingly insularized from adjacent wildlands, creating a “choke point” in the string of mountainous wildlands east of the Rio Grande Valley. Without immediate conservation action this linkage may be permanently lost. The largest tracts of undeveloped land in the Placitas area (other than National Forest lands) are under the control of the BLM. It is a major omission that no consideration was given to the issue of wildlife corridors.</p> <p>Given the importance of both Parcel A and the Crest of Montezuma as part of the wildlife corridor connecting the Jemez, the Sandias, and the Ortiz and San Pedro Mountains. The BLM is obligated to conduct a landscape analysis to identify ““connectivity zones”” and use these analyses to guide potential outcomes in the DRMP. This was not done although studies and maps are available. The Sandias are extremely vulnerable to complete isolation. Mountain lions and black bears in the Sandias could become island populations and eventually lose all viability. The communities along Highway 165 through Placitas are now a maze of impediments to wildlife movement, especially for the larger species. Beyond Placitas is open desert grassland on a mix of private and tribally-owned land, a terrain radically different than the montane forests of the Sandias. The Sandias remain connected northeast to the Ortiz Mountains only via the xeric, sparsely-wooded Hagan Basin, which is primarily used for cattle grazing. While still mostly undeveloped, overgrazing and extensive fencing are problematic for wildlife in the Hagan Area.”</p>	<p>No information on this “Spine of the Nation Wildlife Corridor” was found. This is not a wildlife corridor that is recognized by the BLM. Furthermore, this area might constitute a connectivity zone for the Sandia and Jemez Mountains, if it were not for the interstate highway (I-40), <a href="#">New Mexico NM State Highway HWY 550</a>, the town of Bernalillo, the residential community of Placitas, casinos, mining operations, and a multitude of roads and fences that lie between these two mountain ranges and act as impediments to wildlife passage.</p>
90	41	Wildlife	<p>Due to the importance of Parcel A relative to wildlife corridors, its status should be open to further discussion, given the surrounding Pueblos’ interest in obtaining the parcel as a conservation easement. A successful wildlife corridor cannot include land crossings on an interstate with lane divider cables and boundary fences on both sides. Nor can it be successful if it is to share a small culvert with a gravel mining conveyor operating most daylight hours. A wildlife corridor needs to be unmined and provide cover and food. It needs to have easy access to the river from the Sandias and the San Felipe proposal does just that. Flyovers on I25 on pueblo land provide more than adequate space for large mammals to move from the Sandias to the divide and join the Spine of the Nation’s Wildlife Corridor.</p>	<p>This is not a wildlife corridor that is recognized by the BLM. Furthermore, this area might constitute a connectivity zone for the Sandia and Jemez Mountains, if it were not for the interstate highway (I-40), <a href="#">New Mexico State Highway NM State HWY 550</a>, the town of Bernalillo, the residential community of Placitas, casinos, mining operations, and a multitude of roads and fences that lie between these two mountain ranges and act as impediments to wildlife passage.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
90	53	Wildlife	<p>"2.0 Proposed Alternatives 2.2.14.4, Page 2-80</p> <p>The DEIS indicates that under Alternative C, measures to protect sensitive resources would be implemented, but they would be less restrictive than proposed management decisions under Alternative B. For example, under Alternative C, prescribed livestock grazing would be applied on BLM lands in the Planning Area, including special designations where protected resource values would be compatible with livestock grazing.</p> <p>Recommendation: The DEIS does not provide sufficient information to fully evaluate the risk or the level of the protection from surface disturbing activities and livestock grazing under Alternative C for riparian and wetland habitats. The BLM should clarify Alternative C as to what "restrictions" could be imposed and what would trigger their implementation. Please define the specific protective measures or actions being referred to in the "Riparian Site Standards of New Mexico Standards and Guidelines" (BLM 2000)."</p>	<p>The final EIS for Riparian and Aquatic Habitat Management in the Albuquerque Field Office and Riparian and Aquatic Habitat Management Plan would essentially set the management prescriptions for riparian areas. This document is incorporated by reference in the Draft RMP/EIS.</p>
90	18	Wildlife	<p>"Section 3.15 of the EIS accurately characterizes riparian zones as important for grazing. Riparian zones contain a source of water and forage of greater quality and quantity than adjacent uplands. The analysis of threats to riparian resources lists only the grazing of livestock and not wildlife as having an impact. Unmanaged grazing by both domestic and wild animals can have detrimental impacts to riparian vegetation. The impacts analysis for riparian resources is based on the assumption that complete removal of livestock grazing will lead to increased quality in these areas. Research has shown that riparian pasture systems, compared to complete exclusion of grazing, can improve ecological conditions of the riparian area (Baker et al. 2001). Managed riparian grazing should be included in all alternatives to ensure that riparian vegetative communities are achieving their potential."</p>	<p>Restrictions or other management activities that could be applied to riparian/aquatic habitats are discussed in detail in the 2000 Riparian EIS, which is incorporated by reference in the Draft RMP/EIS.</p>
90	37	Wildlife	<p>"Ranching on public land can also contribute to the problems of climate change, and makes adaptation to it by the BLM more difficult. While efforts are underway to reduce global emissions of greenhouse gases, it is fairly inevitable that humans will need to undertake measures to adapt to climate change and the resulting effects on natural systems, including changes in streamflow, wildfires, crop productivity, temperature, and sea level. The Western United States has an advantage in its vast, relatively well-connected holdings of federal lands that can buffer and mitigate impacts of climate change. The Secretaries of Interior and Agriculture have acknowledged these unique opportunities and directed their respective departments to address climate change. The Department of Interior ("DOI") has specified unequivocal actions towards science-based adaptation strategies to protect vital ecosystem services, including water quantity and quality, biological diversity, and fish and wildlife habitat. [Footnote 15 [USDI] U.S. Department of Interior 2009a. Empowering Natural Resource Managers to Adapt to Climate Change. U.S. Department of the Interior COP-15 Copenhagen, Dec. 7-18, 2009. <a href="http://www.doi.gov/archive/climatechange/">http://www.doi.gov/archive/climatechange/</a>. Accessed August 24, 2010.] Adaptation to the effects of climate change is an objective that fits with the mission of the BLM. In this era, grasslands will play an increasingly vital role in protecting the nation's watersheds.</p> <p>A recent review of climate change and the effects of livestock grazing in the West further highlights the importance of the issue in land management planning. The manuscript demonstrates unequivocally the single biggest factor compromising climate change resiliency on western landscapes is livestock production. [Footnote 16: Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild, and Feral Ungulates. Beschta, R.L. D.L. Donahue, D.A. DellaSala, J. J. Rhodes, J. R.Karr, M.H. O'Brien, T.L. Fleischner, and C.D. Williams. In Press.] The authors conclude, If effective adaptations to the adverse effects of climate change are to be accomplished on western public lands, large-scale reductions or cessation of ecosystem stressors associated with ungulate use are crucial. Federal and state land management agencies should seek and make wide use of opportunities to reduce significant ungulate impacts in order to facilitate ecosystem recovery and improve resiliency. Such actions represent the most effective and extensive means for helping maintain or improve the ecological integrity of western landscapes and for the continued provision of valuable ecosystem services during a changing climate. We strongly suggest the final RMP consider new climate science to be the best available science and incorporate it into the final EIS and decision."</p>	<p>Until the Administration mandates the BLM to modify grazing on a large scale, the BLM will continue to make grazing available, as long as the site-specific monitoring and analyses are consistent with rangeland health standards and guidelines.</p>
160	39	Wildlife	<p>"Section 2.2.22.3 requires that fences be built or modified to accommodate wildlife movement. Section 2.2.16.3.8.2 specifically states that fences modified for antelope passage should have a bottom wire 18 inches above ground level. New Mexico Statutes Annotated 1978 77-16-4 describes the specifications for a legal barbed wire fence in New Mexico as, "...four barbed wires to be strung firmly and securely fastened to said posts, the bottom wire to be placed approximately twelve inches from the ground, the second wire to be approximately twelve inches above the bottom wire, the third wire to be approximately twelve inches above the second wire and the fourth wire to be approximately twelve inches above the third wire ...". Has BLM considered the potential ramifications of requiring fence specifications that do not meet New Mexico's legal definition of a fence?"</p>	<p>The BLM works closely with the New Mexico Livestock Board and the New Mexico Department of Game and Fish. They are aware of the BLM's fence standard and have approved it in the past. The BLM will continue to work with these entities if this ever needs to change. This is also an implementation action that is outside the scope of the RMP.</p>
91	1	Wildlife	<p>"The Las Huertas Creek bed is marked as closed in some maps for locatable and extractable activity, but is at the southern end of the area in all alternatives open to saleables. The DRMP does not identify how that seasonal watershed will be protected."</p>	<p>Las Huertas Creek consists of 1 mile on BLM-administered lands. Currently the seasonal watershed is protected as a riparian area under the Rio Puerco Riparian EIS.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
4	8	Wildlife	<p>"How can mining almost 1 square mile, a third increase in gravel mining, in the Placitas parcel have ""minor"" impacts for residents and wildlife? That is what the Plan's conclusion says. It purports that the proposed actions pose a very minor and limited impact. That is erroneous and inappropriate. See Section 4.1.3, Assumptions and Methodology for Minerals Development Impacts, where the analysis of impacts of mineral development is determined by calculation the small acreage of the area affected compared to the entirety of acreage in the Plan area. Then based on the relatively small percent of acres affected out of the total, the BLM deems the affects to be minor. The mineral resource extraction will not be conducted everywhere in the Plan area; it will be conducted in 1/3 of the Placitas parcels. Removal of 1/3 of the soil base, 1/3 of the ground cover, 1/3 of the wildlife habitat is not a minor inconvenience and minor to those people and animals who use it.</p> <p>Your analysis of the effects or impacts needs to be assessed for the area in and around the proposed mineral development areas. Your assessment doesn't even address the potential impacts associated with development of transportation corridors/vehicular roadways, and affects on in-site soils, wildlife, surface and ground-water, air, etc., on Placitas. The BLM did not do a complete analysis."</p>	<p>The BLM considered the potential issues associated with mining near Placitas. If Parcel A were opened for mineral entry, site-specific environmental analysis would be done before authorization of any specific proposal; the analyses would include more. At this point the BLM has identified it as a potential area for mineral retrieval, but it is not the final decision as to whether mining would occur. Furthermore, the impacts of mining and roads on wildlife habitats have been analyzed in the Draft RMP/EIS; see Chapter 4.</p>
150	45	Wildlife	<p>My comments on the BLM's RMP are in support of the plans to protect forests and woodlands (Vol. 1, section 2.2.5), paleontological resources (Vol. 1, section 2.2.11) and wildlife (Vol. 1, section 2.2.22). My concern is one you brought up at the public meeting-enforcement. Limiting vehicular travel in the entire area to only authorized vehicles would seem the best way to accomplish maximum protection. For the sake of all of us, and future generations, I hope the BLM will be able to take and enforce strong measures to maintain the unique beauty of the resource.</p>	<p>Enforcement is an implementation is not addressed in a planning document. The Draft RMP/EIS sets the planning guidance for all BLM inventoried resources in the RPFO. Enforcement is an action that happens in the field as part of the BLM's general activities. In addition, travel management (including traffic management) is not within the scope of this RMP. A travel management plan is anticipated within 5 years of the publication of the Record of Decision.</p>
149	23	Wildlife	<p>Section 2.1.2 and Maps 90 - 92 - Based on "local" Placitas area input provided by the LPA [Las Placitas Association], ES-CA [Eastern Sandoval Citizens Association], Pathways [Pathways: Wildlife Corridors of NM], etc. in 2008 during the DRMP scoping process, LPA/ES-CA comments provided during the current public comment period (re: fragile soils, etc.), and the BLM's own determination that the entirety of Parcel C and portions of Parcels A and B as having highly erodible and poor reclamation soils determinations, explain the rationale for designating the currently undeveloped portion of Parcel A and the entirety of Parcels B and C as any Travel Designation other than "closed".</p>	<p>The erodibility and poor reclamation classification of a soil are not necessarily on their own justifying reasons for road closures. Most of the soils in the RPFO, or Central New Mexico for that fact, basically fall under those two categories. The BLM's comprehensive travel and transportation management process is the proactive management of public access and natural resources, in compliance with travel-related regulations and according to the best land use management principles. It involves a comprehensive approach that considers various aspects of road and trail system planning and management, specifically natural resource management; road and trail design and maintenance; and recreation and non-recreation uses of roads and trails. Within this context, travel activities are evaluated as a means of access to BLM-administered lands. They are also evaluated according to the effects that all forms of motorized and nonmotorized travel have on BLM-administered lands and resources and on the people who use them. The primary resources inventoried in the Placitas parcels are salable minerals and dispersed recreation. The designation of "limited to designated routes" for the Placitas area under the Proposed RMP (Alternative CE) (see Proposed RMP/Final EIS Map 2-862-68) would provide the most sensible and balanced travel management prescription for the area. It would allow access to all users, while ensuring that unnecessary roads are closed.</p>
91	2	Wildlife	<p>"Our [Hawks Aloft, inc] management request for the San Ysidro ERMA [Extensive Recreation Management Area] Vol 1, p 2-70 : Alternative B, Table 2.27, Vol 1, p. 2-70: Restrict motorized travel to the access. -OR- worst-case scenario, Alternative C, Table 2.27, Vol 1, p. 2-70: Restrict motorized travel to the access roads and limited play areas. Significant efforts to reduce off-trail damage to known riparian areas should be made to protect special-status species including Southwestern Willow Flycatcher habitat if Alternative C is selected."</p>	<p>The BLM will begin drafting a travel management plan within 5 years of completion of the Approved RMP that will consider this issue. Travel is already restricted to existing roads and limited play areas (San Ysidro Trials Area trails). A large portion of the Rio Salado, where southwestern willow flycatchers have been observed, has been closed to motorized travel for approximately a decade.</p>
118	11	Wildlife	<p>We [The Wilderness Society et al.] would like to see "identified augmented prairie dog areas" designated regardless of the success or failure of the project in El Malpais [National Conservation Area]. FLPMA [Federal Land Policy and Management Act] requires the BLM to "...consider present and potential uses of the public lands...[and] consider the relative scarcity of the values involved and the availability of alternative means ...and sites for realization of those values." 43 U.S.C. [section] 1712(a). The scarcity of available sites for conserving prairie dogs, which currently occupy less than 2 percent of their historic range, and the widespread availability of areas open to prairie dog shooting (including private lands) supports the prohibition of recreational shooting of prairie dogs on public lands. As well, we support shooting restrictions not only in colonies that are augmented by active relocation projects, but also in colonies supported by habitat restoration or other indirect means, and in colonies identified as having the potential to expand on their own if left undisturbed. Therefore we suggest changing the language to simply "identified prairie dog areas" or "identified prairie dog conservation areas."</p>	<p>The only "identified" prairie dog conservation area is in the El Malpais <a href="#">National Conservation Area</a> (NCA). Creating new designations is outside the scope of the RMP process. Various areas that are targeted for augmentation and management are found in Draft RMP/EIS Section 2.2.16, Special Designations. El Malpais is managed under its own RMP (BLM 2001, Record of Decision: El Malpais Plan, A Resource Management Plan. United States Department of the Interior, Bureau of Land Management, Albuquerque Field Office. BLM/NM/PL-01-007-1610. June 2001).</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
94	2	Wildlife	<p>"Hunting: The opportunity to experience backcountry recreation and hunting within the Rio Puerco Field Office district is not only exceptional and outstanding, but also abundant. From the proposed Petaca Pinta ERMA [Extensive Recreation Management Area] and San Juan Basin Badlands ERMA, to the recommended Continental Divide National Scenic Trail SRMA [Special Recreation Management Area], the possibilities for backcountry recreation and hunting are excellent, and help to contribute to the overall recreational qualities found throughout the district. According to a U.S. Fish and Wildlife Service report entitled: "2006 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation" for New Mexico, "state residents and nonresidents spent \$823 million on wildlife recreation in New Mexico. Of that total, trip-related expenditures were \$430 million and equipment purchases totaled \$283 million. The remaining \$110 million was spent on licenses, contributions, land ownership and leasing, and other items." The study went on to report that in 2006, there were 99,000 residents and nonresidents 16 years old and older who hunted in New Mexico. Resident hunters numbered 66 thousand, accounting for 67 percent of the hunters in New Mexico. The value of hunting on the Rio Puerco Field Office is not only a great benefit to the State of New Mexico in terms of expenditures, but also provides the public with important backcountry recreation opportunities. The protection of quality habitat for mule deer, elk and pronghorn is essential for ensuring a backcountry recreation experience that is exceptional for hunters. By designating special management areas such as ERMA and SRMA, the BLM will improve quality habitat on the district for the benefit of wildlife. Recommendations: BLM should actively support backcountry hunting opportunities in the Rio Puerco Field Office. It is vital that BLM work to establish year-round habitat and forage for mule deer, elk, and pronghorn. This type of non-fragmented habitat should include winter ranges for big game species, as well as for quail and potential reintroduction of wild turkey. In addition, we direct BLM's attention to the comments filed by the New Mexico Game and Fish Department and the agency's recommendations for managing wildlife in the Field Office."</p>	<p>Backcountry hunting is typically considered hunting in roadless areas. The designation of ERMA and SRMA does not necessarily close or limit roads in the area nor does it inherently improve wildlife habitat or hunting experiences. The BLM would begin drafting a travel management plan within 5 years of completion of the Approved RMP. At this time the commenter is encouraged to participate in the public scoping phase to weigh in on potential areas that may be suitable for backcountry hunting opportunities.</p>
150	22	Wildlife	<p>"Canon Jarido ACEC [Area of Critical Environmental Concern]: I support designation of the Canon Jarido ACEC under Alternative C. However, based on my 30 years of field experience with Mesa Portales, the boundaries proposed in the RMP are not adequate to protect all of the resource values of the important Mesa Portales ecosystem and wildlife habitat (Page 3-121 to 122). The ACEC should be expanded to include the following public lands to protect all of the mesa that forms this important ecosystem and to meet the objectives set out on pages 2-93 to 2-94: Legal description of lands that must be added to ACEC designation, all in T.20N. R.2W, N.M.P.M.: SW1/4 section 23; W1/2 section 26; W1/2 section 35 These lands embrace the entirety of the Mesa ecosystem and must be included in the designation to fully protect Mesa Portales for the wildlife, scenic, and cultural values enumerated in the Plan. After adding these lands to the proposed ACEC, other proposed resource classification designations will need to be changed as appropriate for these lands."</p>	<p>In the Proposed RMP/Final EIS, Table 2-21, Cañon Jarido ACEC Management Decisions by Alternative, describes the management alternatives considered for the Cañon Jarido ACEC. Under the Proposed RMP (Alternative CE), the BLM would manage Cañon Jarido as an ACEC and would expand the ACEC to include Mesa Portales, not manage this area as an ACEC; however, the ACEC would not include the referenced lands ("all in T.20N. R.2W, N.M.P.M.: SW1/4 section 23; W1/2 section 26; W1/2 section 35"); on those lands, the resource values that the commenter describes would be protected through existing policy and other resource-specific management.</p>
90	38	Wildlife	<p>"Riparian corridors provide important habitat for breeding birds in arid regions of the western United States (Knopf and Samson 1994). Although riparian areas cover less than one percent of the western landscape, many support more breeding bird species than surrounding upland habitats (Knopf et al. 1988, Gates and Giffen 1991, Powell and Steidl 2000). Because riparian areas are disproportionately important to a number of species, management decisions that maintain or improve their condition are imperative. This is especially true when riparian areas host rare or endangered species. We want the San Ysidro Trails Area ERMA [Extensive Recreation Management Area] to be deemed ACEC [Area of Critical Environmental Concern] status because we believe it is a necessary step to provide further protection for migrating Willow Flycatchers in the spring and potential Southwestern Willow Flycatcher breeding habitat (2.2.17.6, Vol 1, p. 2-127). The Southwestern Willow Flycatcher (Empidonax traillii extimus) is a federally endangered migrant songbird, which breeds locally in riparian areas of New Mexico. Hawks Aloft, Inc. has conducted Willow Flycatcher and Breeding Bird surveys at San Ysidro for 12 years. Throughout our years of surveying the San Ysidro (Perea Trails) site we have detected migrating Willow Flycatchers each year during the migration and once in the early breeding season (the first two official survey periods). Because Willow Flycatchers have been observed at our survey site, and territorial Southwestern Willow Flycatchers could occur in future years, we feel the BLM should improve conditions at the San Ysidro site by designating this site an ACEC."</p>	<p>Since the Draft EIS, four new SRMAs (Endurance Trails [formerly Oh-My-God 100], San Ysidro Trials Area, White Ridge Bike Trails, and Cimarron Mesa) were added to Alternatives B, C, and D to reflect BLM policy (BLM Handbook H-8320-1, Planning for Recreation and Visitor Services) that was issued in 2014 after the Draft EIS was published. This new policy required changing these four areas from ERMA zones in the Draft EIS to SRMAs in the Final EIS to meet the new policy's clarifying definitions for SRMAs. The management prescriptions of the corresponding ERMA zones in the Draft EIS and the SRMAs in the Final EIS are the same; therefore, on-the-ground management and effects are the same as those described in the Draft EIS. The Draft EIS analysis is unchanged.</p> <p>Proposed RMP/Final EIS Alternatives B, C, and D, and E propose the San Ysidro Trials Area SRMA.</p> <p>There is potential southwestern willow flycatcher habitat in the San Ysidro Trials Area SRMA and the Perea Nature Trail. These areas would continue to be protected and managed according to the Final Environmental Impact Statement for Riparian and Aquatic Habitat Management in the Albuquerque Field Office, New Mexico.</p>
90	2	Wildlife	<p>2-99, -100. It is not clear why the present date-restrictions on surface disturbance for this "crucial winter range" are given up. Unless there is a good reason, they should be kept. Other provisions of Alt. A are also good.</p>	<p>In the Proposed RMP/Final EIS, under Alternative CE, the BLM would designate the Elk Springs ACEC and Juana Lopez Research Natural Area (RNA) as crucial winter range for elk and mule deer and provide quality winter range for the Jemez elk and deer herds by providing optimal coverage and forage (see Table 2-24).</p>

**Commented [AB22]:** Angie: I updated this language based on Chapter 2 language – please review and confirm.

**Commented [AA23R22]:** Emailed Jenna on 11/2/21 to confirm in GIS if the ACEC in Alt C includes "All in T.20N. R.2W, N.M.P.M.: SW1/4 section 23; W1/2 section 26; W1/2 section 35"

Per Jenna in GIS task sheet, the ACEC does NOT include the exact Mesa Portales lands that the commenter describes, so retained the last portion of the BLM's original response.

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
163	3	VRM	<p>“The preferred Alternative seems to be missing any consideration of the many comments submitted by us, Placitas residents and organizations during the original 2008 scoping period. While those scoping comments may not have been as “substantive” as you now require, those comments were obviously unanimous in rejecting mining on the Placitas BLM parcels. Yet that is the preferred Alternative of the Plan. Explain the BLM’s rationale for any Management Class designations less than Class II under any alternative, but especially under Alternatives B and C, based on comments and input received by BLM from LPA [Las Placitas Association], ES-CA [Eastern Sandoval Citizens Association], and Pathways during the scoping process in 2008. This input could not possibly have been interpreted in any way that suggests that high or even moderate change to the characteristic landscape was acceptable.”</p>	<p>The VRM classifications are assigned through RMPs. The assignment of VRM classes is ultimately based on the management decisions made in the RMPs. The inventoried resources on the tract near Placitas are primarily salable minerals (high potential) and dispersed recreation. <a href="#">In general, the range has been highly affected due to trespass livestock overgrazing over many years. Based on the degradation of the range from trespass livestock, the area would not meet VRM Classes I, II or III. Based on the need to manage the above-mentioned resources, VRM Class IV-level protection would provide the appropriate level of visual resource protection.</a></p>
203	6	VRM	<p>“Section 2.1.7 and Maps 95 - 98 -- Map 95 shows no Management Class designation for Placitas Parcels B and C, and Management Class IV designation for Parcel A. Map 96 shows that Parcel C (the Crest) is designated Class II, and Parcels A and B as Class III, allowing for “low” and “moderate” changes to occur to the characteristic landscape, respectively. Alternatives C (the BLM’s “preferred” alternative) and D, shown on Maps 97 and 98, respectively, shows all 3 Placitas parcels as being designated Class IV (allowing for “high” changes). LPA [Las Placitas Association], ES-CA [Eastern Sandoval Citizens Alliance], Pathways [Pathways: Wildlife Corridors of NM], etc., spent significant time and effort in 2008 Scoping meetings with the BLM providing significant “local” views on the communities’ “acceptable” uses for the various Placitas parcels. Explain the BLM’s rationale for any Management Class designations less than Class II (meaning III or IV) under any alternative, but especially under Alternatives B and C, based on comments and input received by BLM from LPA, ES-CA, and Pathways during the scoping process in 2008. This “local” input could not possibly have been interpreted in any way, as suggesting that “high” or even “moderate” change to the characteristic landscape was acceptable. It is disingenuous that the BLM so completely and blatantly disregarded meaningful public input solicited and received during the scoping process of this Plan, especially after acknowledging that “The Public Scoping Report (BLM 2008) has identified that special attention (emphasis added) is needed to address mineral development within the Planning Area (i.e., leasable, salable, and locatable minerals) in consideration of other land and resource uses and values.” This blatant disregard for the public’s input into the process, without sufficiently detailed justification or explanation provided by the BLM in the Plan, is unacceptable under applicable regulatory laws.”</p>	<p>The driving force behind designing management prescriptions is based on the federal resources inventoried on BLM-administered lands. FLPMA, Section 201(a) states “The Secretary shall prepare and maintain on a continuing basis an inventory of all public lands and their resource . . . .” In the case of the BLM-administered lands near Placitas, the primary sources inventoried were salable minerals and dispersed recreation. The visual aspect of those lands was not at the levels of VRM Classes I, II, or possibly III. This is due to the overgrazing and range degradation that has been caused by the numerous trespass livestock over the years.</p>
77	6	VRM	<p>“We have examined the direction of Manual 6280 based upon the recognition of a CDNST [Continental Divide National Scenic Trail] right-of-way that extends one-half mile on either side of the route of travel and a CDNST management corridor that extends through the background as observed from the route of travel. The right-of-way width is based upon the Forest Service Manual guidance with respect to the boundary of a CDNST management area. FSM 2353.44b.7. The management corridor width is based upon the Manual direction to perform a viewshed analysis and documentation of the elements of the landscape that are seen, seldom seen, and not seen from the National Trail, including the foreground, middle ground, and background of the viewshed of the National Trail. Chapter 3.2.E.1.</p> <p>Guidance with respect to scenic and visual resources is addressed in Manual 6280 4.E.1. The land use plan and associated NEPA analysis should consider designating national scenic trails in VRM [Visual Resource Management] Class I or II, where not adversely impacted by existing cultural modifications. Where cultural modifications currently exist, the plan should consider whether the Corridor should be classified as VRM Class III or classes which are more visually protective, to retain or improve the existing visual setting. (Planning should include description of how activities managed to VRM Class III support the nature and purposes of the national trail and how uses are managed to avoid visual conflict - even where VRM Class III extends beyond the boundary of the Corridor.) “The influence that the visual setting has on the National Trail is not to be undervalued” Also, “VRM Class IV should not be considered for use within [the Corridor] as ‘The objective of Class IV is to provide for management activities which require major modifications of the existing character of the landscape.’” (We recognize that BLM may delineate a Corridor of lesser width than the viewshed. Even so, however, VRM IV should not be considered there because of the visual impacts associated with major modifications of the landscape; Class III would extend beyond the boundary of the Corridor in that case.)</p> <p>Comment: The DRMP/EIS needs to be revised to apply Manual 6280 management guidance on scenic and visual resources. As we indicated above, VRM Class I should be as proposed by BLM in Maps 96 and 97; VRM Class II should be applied (at least to the foreground-midleground) along the CDNST in the portion shown as VRM Class III on Map 97; VRM Class II should be applied (at least to the foreground-midleground) at Mesa Portales and from Jones Canyon Spring to Deadman Peaks; and the remainder of the viewshed should be designated as VRM Class III (or more protective).”</p>	<p>The language in the Proposed RMP/Final EIS was revised—from the Draft RMP/EIS to <a href="#">more clearly</a> state the BLM’s intent <a href="#">more clearly</a>. The Proposed RMP (Alternative <a href="#">CE</a>) for the Continental Divide National Scenic Trail reads “The corridor would be managed as VRM I within WSAs and Wilderness, VRM II and III in higher-quality viewshed areas, and VRM IV in areas that cannot be protected at a higher level, such as highway crossings. <a href="#">See Map 91.</a>”</p>

**Commented [AB24]:** Angie: I don't think this needs any edits but please confirm

**Commented [AA25R24]:** The preliminary PRMP/FEIS maps from July 2020 (and carried forward in the November 2021 preliminary PRMP/FEIS) show the Placitas areas as VRM Class III in Alternative B and VRM Class IV in Alternatives C and E. This original response is wrong where it says “. . . the area would not meet VRM Classes I, II, or III” (because Alternative B shows it as VRM Class III). Changed response to include similar text to a previous comment response about the same topic, and included that other response’s text in the last sentence here to include Class IV level protection so that Alternative C is covered. Need to verify Placitas VRM with Jenna.

**Commented [AA26R24]:** On 11/9/2021, Jenna provided GIS spreadsheet (RPFO\_GIS\_calcs\_V03\_20211115.xlsx) with VRM classes in Placitas area by alternative (see tab “alts\_VRM”). Based on that spreadsheet, Alt A is 3,000 acres VRM IV and 1,300 acres undesignated VRM; Alt B is 900 acres VRM II and 3,400 acres VRM III; Alts C, D, and E are 4,300 acres VRM IV. Based on this, changed the response to state Class IV because that is what Alt C (the Proposed RMP) would be.

Letter Number	Comment Number	Category	Comment Text	Response
187	12	VRM	<p>“Visual Resource Management</p> <p>The CDNST [Continental Divide National Scenic Trail] Comprehensive Plan (p.13) recognizes that BLM will use its Visual Resource Management (VRM) system, but specifies that scenery and visual resource management has the dual purposes (1) to manage the quality of the visual environment and (2) to reduce the visual impact of development activities while maintaining effectiveness in all agency resource programs.</p> <p>The first step in applying the VRM is to perform a visual resource inventory. The DRMP/EIS has a sketchy discussion of the inventory process. As required, BLM subdivided the planning area into scenic quality rating units (SQRU's) for rating purposes. No information as to the boundaries of these units is provided, either in text or map form. For each SQRU, scenic quality is to be evaluated as a measure of the visual appeal of the tract of land. The DRMP/EIS recognizes that special management areas generally contain areas of high scenic quality - and it lists many such special designations with landscapes of visual interest (DRMP/EIS 3.22); but it makes no reference to the CDNST. Based upon our familiarity with the landscape, we would expect that most, if not all, SQRU's that include the CDNST would have a Scenic Quality of A or B.”</p>	<p>The language in the Proposed RMP/Final EIS was revised from the Draft RMP/EIS to <a href="#">more clearly</a> state the BLM's intent <a href="#">more clearly</a>. The Proposed RMP (Alternative <a href="#">CE</a>) for the Continental Divide National Scenic Trail reads “The corridor would be managed as VRM I within WSAs and Wilderness, VRM II and III in higher-quality viewshed areas, and VRM IV in areas that cannot be protected at a higher level, such as highway crossings. <a href="#">See Map 91.</a>”</p>
15	9	VRM	<p>“A factor to be considered in carrying out the inventory [Visual Resource Inventory, or VRI] is viewer sensitivity. There is no mention in the DRMP/EIS that according to the Comprehensive Plan, the inventory on public lands administered by BLM “shall be conducted on the basis that the CDNST [Continental Divide National Scenic Trail] is a high sensitivity level travel route and will be performed as if the trail exists even in sections where it is proposed for construction or reconstruction.”” Section IV.B.4.c.(2).</p> <p>For high sensitivity routes in SQRU's [Scenic Quality Rating Units] having a Scenic Quality rating of B, a Visual Resource Inventory Class of II should be assigned for the foreground-midleground and Class III the background (and a VRI Class of II for both <i>f/m</i> [foreground-midleground] and background for SQRU's with a Scenic Quality rating of A). Handbook 8410, Illustration 11. For purposes of determining VRI classes, the distance would be based upon a viewshed analysis and may extend 10 miles or more from the CDNST (see Handbook 8410, illustration 10).</p> <p>The VRI inventory (2010) concluded with class ratings (in acres) of 96,460 for VRI I, 1,222 for VRI II, 24,748 for VRI III, and 621,957 for VRI IV. DRMP/EIS 4.2.13. As we understand it, portions of the CDNST would in fact be included in VRI I (because passing through WSAs [Wilderness Study Areas] or ACECs [Areas of Critical Environmental Concern]), but we have no documentation that would allow us to review whether the inventory was carried out in conformity with the principles outlined above. We have our doubts. Surely, more than 25,970 (1,222 + 24,748) acres within the foreground-midleground of the CDNST alone should be recognized as VRI Class II.”</p>	<p>Corrections were made to the VRM management prescriptions for the Continental Divide National Scenic Trail. VRM would be managed in accordance with BLM Manual 6280 to establish classes at the most protective level practicable and to meet national trail scenery management objectives. The Proposed RMP (Alternative <a href="#">CE</a>) for the Continental Divide National Scenic Trail reads “The corridor would be managed as VRM I within WSAs and Wilderness, VRM II and III in higher-quality viewshed areas, and VRM IV in areas that cannot be protected at a higher level, such as highway crossings. <a href="#">See Map 91.</a>”</p>
54	2	VRM	<p>“According to BLM policies, [Visual Resource] Inventory classes provide the basis for considering visual values, but do not establish management direction. Nevertheless, management decisions must reflect the value of visual resources; and, in fact, the value of the visual resource may be the driving force for some management decisions. (Handbook 8410 V.A.) This observation is especially apt in regard to an area that has been designated by Congress specifically to protect its scenic qualities. We believe that the proper approach to management should retain the existing character of the landscape, by assigning VRM [Visual Resource Management] Class I or II to the midleground as well as the foreground along the CDNST [Continental Divide National Scenic Trail], at least in SQRUs [Scenic Quality Rating Units] meriting Scenic Quality A or B. (The background should also be subject to VRM Class III limitations with respect to the CDNST.)</p> <p>We have reviewed the alternatives for VRM as depicted on Maps 95-98. We have focused our attention on Alternative B (Map 96) and preferred Alternative C (Map 97). We concur with the assignment of VRM Class I to the special management areas shown on both of these maps. We regard the areas within the midleground of the CDNST that are assigned Class III on Map 97 to have high scenic quality (Class B) along with high sensitivity and consider VRM II (as on Map 96) to be the more appropriate classification. The features in this area include splendid hiking opportunities near the edge of an elevated escarpment, excellent views of dramatic Cabezon Peak, and other landmarks such as Cerro Cuate and the Bear Mouth.</p> <p>The remainder of the planning area consists of essentially everything from Deadman Peaks north to Cuba. The preferred alternative reflects virtually no consideration of the visual quality values along the CDNST. So far as we can determine, the entire area (including the CDNST itself!) would lie within VRM Class IV, except for the section at Mesa Portales that is shown as Class III. The views from Mesa Portales, as well as the cliff face itself, merit greater protection and should be elevated to VRM Class II. In addition, we point out the attractiveness of the hike south from Jones Canyon to Deadman Peaks, largely along the top of an escarpment, and believe that here too the foreground-midleground should be placed in VRM Class II. Everywhere else should be protected to a standard of at least VRM Class III, which allows moderate change to the characteristic landscape.</p> <p>Alternative B assigns VRM Class II to lands in close proximity to the CDNST north of Deadman Peaks. This is better. Beyond this narrow corridor, the classes should be assigned as we have recommended for Alternative C.”</p>	<p>The language in the Proposed RMP/Final EIS was revised to <a href="#">more clearly</a> state the BLM's intent <a href="#">more clearly</a>. The Proposed RMP (Alternative <a href="#">CE</a>) for the Continental Divide National Scenic Trail reads “The corridor would be managed as VRM I within WSAs and Wilderness, VRM II and III in higher-quality viewshed areas, and VRM IV in areas that cannot be protected at a higher level, such as highway crossings. <a href="#">See Map 91.</a>”</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
53	7	VRM	<p>“Surface Disturbances [Footnote 2: As in 4.2.10.3.3, we include renewable energy and mineral development under this head. Travel was treated separately, above.]</p> <p>We agree with the exclusion of surface developments from a CDNST [Continental Divide National Scenic Trail] corridor (as depicted in the DRMP/EIS) for all alternatives (e.g., Tables 4.55 and 4.56). But, where lands surrounding this corridor are managed to a lesser standard, the nature and purposes of the CDNST may be compromised (just as the DRMP/EIS explains with respect to development activities seen from within a wilderness area, 4.2.10.3.1.) [Footnote 3: The analysis of direct and indirect impacts in 4.2.10.3 is intended to deal with all special designation areas, but omits any reference to the CDNST. The same is true of 4.2.10.4, which calls for management in accordance with the Wilderness Act, Wild and Scenic Rivers Act, etc., but does not cite the National Trails System Act as a guide for BLM’s decisions. These oversights should be corrected.]</p> <p>One way to deal with this issue is to revise the VRM [Visual Resources Management] classifications in accordance with the discussion above. We are not completely satisfied with this approach, however, because we understand that surface developments - including large-scale ones - would not necessarily be excluded even in an area with a VRM Class II rating. 2.2.20.2. To be sure, the avoidance provision would place a very substantial burden on any party seeking to proceed with projects that might be inconsistent with the nature and purposes of the national scenic trail. Nevertheless, we recommend that avoidance be the standard for VRM Class III, but that surface developments be excluded altogether if they do not conform to VRM II.”</p>	<p>Inventory classes are informational only and are assigned through the inventory process. Class I is assigned to those areas where a management decision has been made previously to maintain a natural landscape. This includes such areas as national wilderness, the wild section of national wild and scenic rivers, and other congressionally and administratively designated areas where decisions have been made to preserve a natural landscape. Class II, III, and IV are assigned based on a combination of scenic quality, sensitivity level, and distance zones. This is accomplished by combining the scenic quality, sensitivity levels, and distance zone maps, using a matrix to assign the proper inventory class (see BLM Handbook H-8410-1).</p> <p>Management classes are assigned through RMPs. The assignment of visual management classes is ultimately based on the management decisions made in the RMPs; however, visual values must be considered throughout the RMP process. All actions proposed during the RMP process that would result in surface disturbance must consider the importance of the visual values and the impacts that the project may have on these values. Management decisions in the RMP must reflect the value of visual resources. In fact, the value of the visual resource may be the driving force for some management decisions without having to specifically prohibit projects from certain areas.</p>
53	3	Air, Soil, Water	<p>“General comment about soils: Vol 3, I.1. Major soil mapping units and soil names are listed, but no source is cited. The names provided are incomplete. They do not identify whether these are complexes or associations, a distinction which has management implications. Moreover, only two of these particular soil map unit names/numbers are found in any USDA-NRCS [Natural Resource Conservation Service] data set. Data from 10 soil survey areas in the counties of the RP RMP/EIS are available through WebSoilSurvey and Soil Data Mart. At least one survey area has no digital information available. This map unit number format (s5xx) is not used in any of the published survey areas.”</p>	<p>Appendix I, Table I-1, has been removed. This information is outdated and is superseded by the Water Support Document (BLM 2019a) referenced in the Proposed RMP/Final EIS. This document is available online at <a href="https://www.blm.gov/sites/blm.gov/files/2019%20BLM%20NM%20Water%20Support%20Document_07122019_508.pdf">https://www.blm.gov/sites/blm.gov/files/2019%20BLM%20NM%20Water%20Support%20Document_07122019_508.pdf</a> <a href="https://www.blm.gov/sites/blm.gov/files/2019%20BLM%20NM%20Water%20Support%20Document_07122019_508.pdf">https://www.blm.gov/sites/blm.gov/files/2019%20BLM%20NM%20Water%20Support%20Document_07122019_508.pdf</a>.</p> <p>More detailed soil (US Department of Agriculture, Natural Resources Conservation Service) data were used in the discussion presented in Draft RMP/EIS Sections 3.17.1 and 4.2.9 and Appendix I regarding relevant soil properties.</p>
53	5	Air, Soil, Water	<p>“Vol I, p.2-80, 2.2.15.2, 3rd bullet. Minor point, but it is impossible to prevent erosion. BMPs are implemented as erosion control methods.”</p>	<p>This topic is discussed in Draft RMP/EIS Section 2.2.15.1; the goal for soil and water resources is “Protect and improve soil stability and soil productivity through the reduction of and prevention of accelerated erosion and sedimentation.”</p>
53	31	Air, Soil, Water	<p>“Pg. 2-81 In the development of watershed projects to protect surface water quality and meet BMP’s, require ranchers and project proponents to comply with the clean water act by obtaining section 404 permits before they dredge and fill in tributaries, especially to the Rio Puerco.”</p>	<p>Clean Water Act Section 404 permitting is authorized and managed by the US Army Corps of Engineers, and not the BLM.</p>
53	2	Air, Soil, Water	<p>“2-165. Sensitive soils and steep slopes should be protected. Surely Alt. B’s protection of 5,267 a. of slopes from surface occupancy is right; Alt. C’s CSU [controlled surface use] is not sufficient”</p>	<p>As described in the Proposed RMP/Final EIS (Section 4.2.10.2.8), Alternatives B and C would implement CSU on steep slopes between 15 percent and 30 percent and CSU on soils with low reclamation potential. Alternatives B, C, and D, and E would implement NSO on steep slopes over 30 percent.</p>
63	3	Air, Soil, Water	<p>“2-122. Sam Miguel Dome ACEC [Area of Critical Environmental Concern]. Closure to grazing is the only protection for soil crusts.”</p>	<p>The BLM considered an alternative of managing the San Miguel Dome ACEC as unavailable to grazing in the Draft RMP/EIS under Alternative B in Draft RMP/EIS (see Table 2.49). BLM-authorized grazing has existed on this allotment since the 1930s. Furthermore, livestock typically avoid areas where soil crust exists; this is because there is little to no grass available.</p>
71	1	Air, Soil, Water	<p>“Vol I, p.2-80, 2.2.15.2, 3rd bullet. Minor point, but it is impossible to prevent erosion. BMPs are implemented as erosion control methods.”</p>	<p>This topic is discussed in Draft RMP/EIS Section 2.2.15.1; the goal for soil and water resources is “Protect and improve soil stability and soil productivity through the reduction of and prevention of accelerated erosion and sedimentation.”</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
71	30	Air, Soil, Water	"Maps 66 and 67 -- These maps show sensitive soils, poor reclamation potential and highly erodible soils in the BLM parcels near Placitas. Nowhere in the document are the other soil designations provided. Development of a map or figure is needed that shows all reclamation-sensitive and erodible soils designations, since currently only the "highly" erodible designated soils are included in the Plan. Also, explain how the reclamation-sensitive and erodible soil designations were determined, and why the BLM is only concerned with, and utilizes the "poor" reclamation and "highly" erodible soils designations in its subsequent decisions and analyses. Were these designations determined using qualitative or quantitative methodologies? If qualitative, what are the qualifications of the individual determining the designations? Also, if determined using qualitative methods, what quantitative assessment methodologies exist and explain why these methods were not employed in this Plan? If quantitative methods were used, provide the details of the analyses."	Draft RMP/EIS page 3-90, Section 3.17.1, paragraph 4 states that these designations are made by the US Department of Agriculture, Natural Resources Conservation Service in soil surveys. (The descriptions of these designations can be found in Web Soil Survey at <a href="http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm">http://websoilsurvey.nrcs.usda.gov/app/HomePage.htm</a> ). The "high" and "very high" designations for both wind and water erosion potential and the "poor" designation for reclamation potential were chosen from the numerous soil properties and interpretations to illustrate the most relevant sensitivity of soil resources related to potential land uses contemplated in this plan. The key idea for having selected these soil properties was to address the protection of soil stability and productivity.  Both qualitative and quantitative methods were used in the analysis.
18	2	Air, Soil, Water	"General comment about soils: The published soil survey for these areas is an Order III survey, on which the base map scale is 1:24,000 (2.64 inch/mile) and possibly ranges up to 1:63,360 (1 inch/mile). The smallest map unit that can be shown on a map with the former is about 6 acres, and with the latter, 40 acres. As such, these soil maps provide only basic information for broad scale management decisions. This is implied in the second paragraph, Vol 1, 3-90. The data in these published surveys is insufficient for the site-specific management decisions (implementing BMPs) addressed in the management plan. Vol 1, 2-81, 2.2.15.3, Bullet 1 notes the RPFO [Rio Puerco Field Office] would work with the USDA-NRCS [Natural Resource Conservation Service] to update soil surveys and ecological site descriptions. While this would likely work for site descriptions, updating the soil surveys with NRCS personnel would be more challenging. Since the completion of the NM state soil survey, NRCS has decreased the number of soil scientists in the state who are capable of updating soil surveys. Development of soil surveys for site-specific management plans might need to be subcontracted to the private sector."	The requisite level of information necessary to make a reasoned choice among the alternatives in an EIS is based on the scope and nature of the proposed decisions. As the EIS analyzes land use planning-level decisions, which by their nature are broad in scope, the requisite level of data and information is more generalized. This is done so as to apply to a wide-ranging landscape perspective. Although the BLM realizes that more data, and more site-specific data, could always be gathered, the data and analysis methods used in the EIS provide the necessary basis to make informed land use planning-level decisions. Understanding a broad scale basically informs a project proponent of potential soil issues that may have to be analyzed further in depth at the time of application. Determining more specific BMPs is done at the time of project development and may be conducted by the BLM or another party for inclusion in the plans as projects are proposed.
58	27	Air, Soil, Water	"General comment about soils: Vol 3, 1.1. Major soil mapping units and soil names are listed, but no source is cited. The names provided are incomplete. They do not identify whether these are complexes or associations, a distinction which has management implications. Moreover, only two of these particular soil map unit names/numbers are found in any USDA-NRCS [Natural Resource Conservation Service] data set. Data from 10 soil survey areas in the counties of the RP RMP/EIS are available through WebSoilSurvey and Soil Data Mart. At least one survey area has no digital information available. This map unit number format (s5xx) is not used in any of the published survey areas."	Appendix I, Table I-1, has been removed. This information is outdated and is superseded by the Water Support Document (BLM 2019a) referenced in the Proposed RMP/Final EIS. This document is available online at <a href="https://www.blm.gov/sites/blm.gov/files/2019%20BLM%20NM%20Water%20Support%20Document_07122019_508.pdf">https://www.blm.gov/sites/blm.gov/files/2019%20BLM%20NM%20Water%20Support%20Document_07122019_508.pdf</a>  More detailed <a href="https://www.blm.gov/sites/blm.gov/files/2019%20BLM%20NM%20Water%20Support%20Document_07122019_508.pdf">US Department of Agriculture</a> , Natural Resources Conservation Service soil data were used in the discussion presented in Draft RMP/EIS, Sections 3.17.1 and 4.2.9 and Appendix I, regarding relevant soil properties.
58	20	Air, Soil, Water	"Pg. 2-81 [For] the development of watershed projects to protect surface water quality and meet BMPs, require ranchers and project proponents to comply with the Clean Water Act by obtaining section 404 permits before they dredge and fill in tributaries, especially to the Rio Puerco."	Clean Water Act Section 404 permitting requirements are enforced by the <a href="https://www.army.mil">US Army Corps of Engineers</a> and not the BLM.
162	2	Air, Soil, Water	"I strongly recommend Alternative B, the conservation option, for the three Placitas area parcels for the following reasons: The Placitas area is already an area with a limited water supply. Oil and gas extraction can cause leaks into the water supply and these processes also use lots of water as does gravel mining. The Placitas area residents don't need any additional competition for water or endangerment of the water supply."	Proposed RMP/Final EIS Section 2.2.10.5 states, "All spills or leakages of oil, gas, produced water, toxic liquids, or waste materials, blowouts, fires, personal injuries, and fatalities will be reported to BLM by the operator in accordance with regulations outlined in 43 CFR 3162.5-1(c) and as prescribed in applicable orders or notices." Additionally, Proposed RMP/Final EIS Section 4.2.6.2 states, "The companies installing and operating pipelines in the Planning Area are responsible for understanding and abiding by the applicable laws and regulations. The RPFO would be responsible for inspecting and monitoring these operations to ensure that these companies are in compliance with all applicable laws and regulations."



Letter Number	Comment Number	Category	Comment Text	Response
71	3	Air, Soil, Water	<p>“Document 5 [see ATT 5] is entitled ““As Farms Bite the Dust, ““Megadrought May be the New Normal in the Southwest.”” It speaks to the water drying up in Placitas in particular and other areas of the state as well. On page 2, in reference to Lynn Montgomery’s 40 year old farm, the article states:</p> <p>The farm was part of a thriving community in the ‘60s and ‘70s. Most of the inhabitants drifted away, or ran away, or got dragged away by the police. Montgomery was the last man standing. He sold the farm to the local Pueblo Indian tribe, on the condition that they assume ownership after his death, and spent the proceeds paying lawyers to enforce water law around Placitas. He managed to stop several developments that would have illegally taxed the fragile aquifer. Despite his successes, which included a victory at the New Mexico Supreme Court, many wells were drilled, especially in the 1980s and 1990s, dropping the water table to the point at which many springs in Placitas began running dry, along with the acequias they feed. Montgomery’s neighbors, with the turn of a tap, can water their grass and wash their cars thanks to the wells that killed the spring that feeds his acequia. But it’s only a matter of time, he told me, until they feel his pain.</p> <p>““At that point all the bedroom community types realize real estate people have bamboozled them, and most of us too,”” he said, referring to the Placitas real estate boom of the late 20th century.</p> <p>Document 7 [see ATT 7] is a story from KOB.com entitled ““Rio Grande runs dry in Valencia County.”” This was at Los Lunas on 9/10/2012. Just further confirmation of the drought that still grips the entire state. Document 10 [see ATT 10] is from Reuters, dated July 30, 2012, ““A dry-eyed view on investing in water resources.”” The water, as a commodity, will prove to be more valuable than any gravel, oil, gas or mineral. In a couple from this piece, the author states the following facts:</p> <p>According to the United Nations (UNESCO), not only is water being wasted around the world, the infrastructure for producing and recycling it lags the demand. Nearly 1 billion people do not have access to clean water while another 3 billion are expected to join the world’s population in the next 40 years. China alone is planning to add some 500 new cities, each housing 100,000 or more people. Also consider the big industries that are major water consumers: electric power, metals, petroleum and food production. Some 70 percent of all fresh water is used by agriculture. Where will the water come from to quench the thirst and feed some 10 billion souls? The ocean is one answer, since it covers most of the planet as freshwater sources are being rapidly depleted. Yet that calls for quantum leaps in technology since desalination requires tremendous amounts of energy to take the salt out of seawater. Currently there are more than 7,500 desalination plants in use globally-a number that is expected to double by 2025, estimates the United Nations... Water has often been called the new gold or oil. That is not an appropriate comparison, though, because our bodies are mostly water and we cannot live without it. Still, water demand will create new business and technological challenges to produce, store and recycle it. Conservation will become even more important to protect run-off and topsoil. Agricultural productivity will also need to improve. We will probably see even more ““vertical farms”” that employ skyscrapers and solar power to grow food in cities.</p> <p>Water, not gravel, is the resource we need to preserve. I don’t believe is any worldwide gravel shortage. Considering this data and water shortages, what is the BLM doing to improve agricultural practices in the RMP to reduce waste?”</p>	<p>The requirement for water quality protection is discussed in Draft RMP/EIS Section 2.2.15. Furthermore, FLPMA, Section 202 (Land Use Planning) requires compliance with applicable pollution control laws, including state and federal air, water, noise, or other pollution standards.</p>
71	1	Air, Soil, Water	<p>“Aquifer Impact/Water Usage: Any further mining activity on Parcel A would have negative impacts on both the quantity and quality of the Santa Fe aquifer, which supplies the water to the Town of Bernalillo, Algodones, a large portion of Placitas, the neighboring pueblos, and other communities. Water is the most challenged resource in the area, and any potential economic benefit from increased mining activity is far outweighed by putting this resource in jeopardy. This crucial resource issue is not analyzed in the DRMP”</p>	<p>The BLM understands the issue of competition for water resources. The requirement for water quality protection is discussed in Draft RMP/EIS Section 2.2.15; trends and potential concerns regarding groundwater withdrawals are discussed in Draft RMP/EIS Section 3.17.2.3. Ultimately, water resources are managed and allocated by the New Mexico Office of the State Engineer. The BLM generally addresses the concerns regarding groundwater withdrawals in Draft RMP/EIS Section 3.17.2.3, but any proponent would have to receive a water allocation from the State Engineer.</p>
157	13	Air, Soil, Water	<p>“Section 3.15 of the EIS accurately characterizes riparian zones as important for grazing. Riparian zones contain a source of water and forage of greater quality and quantity than adjacent uplands. The analysis of threats to riparian resources lists only the grazing of livestock and not wildlife as having an impact. Unmanaged grazing by both domestic and wild animals can have detrimental impacts to riparian vegetation. The impacts analysis for riparian resources is based on the assumption that complete removal of livestock grazing will lead to increased quality in these areas. Research has shown that riparian pasture systems, compared to complete exclusion of grazing, can improve ecological conditions of the riparian area (Baker et al. 2001). Managed riparian grazing should be included in all alternatives to ensure that riparian vegetative communities are achieving their potential.”</p>	<p>Draft RMP/EIS Section 2.2.14.3: The BLM would carry forward adaptive management strategies and permit conditions developed in accordance with the 2000 EIS for riparian and Aquatic Habitat Management in the Albuquerque Field Office.</p> <p>The adaptive management alternative that was selected, in accordance with the Proposed RMP/Final EIS, assigns high priority to implementing those managed practices identified in current BLM management guidance for restoring and protecting all riparian habitats under the BLM’s jurisdiction. By using the adaptive management approach and specific field activity and guidance, the habitat management plan derived from the 2000 EIS provides a road map for achieving specific desired future conditions for all riparian habitat that occur in the <a href="#">Rio Puerco Field Office RPFQ</a>.</p>

Letter Number	Comment Number	Category	Comment Text	Response
10	1	Air, Soil, Water	<p>“Ranching on public land can also contribute to the problems of climate change, and makes adaptation to it by the BLM more difficult. While efforts are underway to reduce global emissions of greenhouse gases, it is fairly inevitable that humans will need to undertake measures to adapt to climate change and the resulting effects on natural systems, including changes in streamflow, wildfires, crop productivity, temperature, and sea level. The Western United States has an advantage in its vast, relatively well-connected holdings of federal lands that can buffer and mitigate impacts of climate change. The Secretaries of Interior and Agriculture have acknowledged these unique opportunities and directed their respective departments to address climate change. The Department of Interior (“DOI”) has specified unequivocal actions towards science-based adaptation strategies to protect vital ecosystem services, including water quantity and quality, biological diversity, and fish and wildlife habitat. [Footnote 15 [USD] U.S. Department of Interior 2009a. Empowering Natural Resource Managers to Adapt to Climate Change. U.S. Department of the Interior COP-15 Copenhagen, Dec. 7-18, 2009. <a href="http://www.doi.gov/archive/climatechange/">http://www.doi.gov/archive/climatechange/</a>. Accessed August 24, 2010.] Adaptation to the effects of climate change is an objective that fits with the mission of the BLM. In this era, grasslands will play an increasingly vital role in protecting the nation’s watersheds. A recent review of climate change and the effects of livestock grazing in the West further highlights the importance of the issue in land management planning. The manuscript demonstrates unequivocally the single biggest factor compromising climate change resiliency on western landscapes is livestock production. [Footnote 16: Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild, and Feral Ungulates. Beschta, R.L. D.L. Donahue, D.A. DellaSala, J. J. Rhodes, J. R. Karr, M.H. O'Brien, T.L. Fleischner, and C.D. Williams. In Press.] The authors conclude, If effective adaptations to the adverse effects of climate change are to be accomplished on western public lands, large-scale reductions or cessation of ecosystem stressors associated with ungulate use are crucial. Federal and state land management agencies should seek and make wide use of opportunities to reduce significant ungulate impacts in order to facilitate ecosystem recovery and improve resiliency. Such actions represent the most effective and extensive means for helping maintain or improve the ecological integrity of western landscapes and for the continued provision of valuable ecosystem services during a changing climate. We strongly suggest the final RMP consider new climate science to be the best available science and incorporate it into the final EIS and decision.”</p>	<p>Until the Administration mandates the BLM to modify grazing on a large scale, the BLM will continue to make grazing available, as long as the site-specific monitoring and analyses are consistent with rangeland health standards and guidelines.</p>
154	36	Air, Soil, Water	<p>“As a New Mexico caver for over 50 years I would like to state that BLM has made a good effort to describe the known cave and karst resources within the lands managed by the Rio Puerco Field Office and to outline alternative strategies to protect those resources. Regarding the Pronoun Cave Complex mentioned throughout the RMP, there does not seem to be mention of material published by the Karst Waters Institute, 1994 symposium, Breakthroughs in Karst Geomicrobiology and Redox Geochemistry, “Caves of the Mesa Del Oro Travertine, New Mexico, U.S.A””, written by Jeffrey Forbes. This article describes an additional cave and karst resource at greater depth and extent than the Mesa del Oro travertine caves noted in the RMP. In addition to describing the travertine caves, Mr. Forbes describes a potential “mother cave” developed in the upper part of the San Andres limestone which is underneath the surface travertine and underlying Chinle formation. If Mr. Forbes is correct, then a very extensive cave system and related hydrologic features may be present in this area, although its actual extent is unknown. Such a resource should be considered for protection from drilling and other impacts. A portion of Mr. Forbes article is shown below where he describes the evidence for this possible resource which could be the largest volume cave system in New Mexico even though there are no known entrances through which this could be easily verified. ““Studies of the geology and paleohydrology of the Mesa del Oro travertine and associated caves are just beginning, and many questions remain to be answered. Perhaps one of the most intriguing regards the nature of the “mother cave” that may have developed in the San Andres Limestone some thousand feet beneath the travertine, and from which the calcium carbonate was derived. A nearby abandoned water well may hold clues to this hypothetical cavern. The well is 623 feet deep, the depth to water is about 620 feet, and the well alternately inhales and exhales large volumes of air, suggesting a large subsurface void. Monitoring of air flow velocities into and out of the well over a 2-day period using a pitot tube indicates volumetric air flow rates of up to 7000 liters/min (250 cfm), with approximately 6000 m3 (210, 000 ft3) of air being exhaled over a 24-hour period. In all likelihood, the breathing well intersects an extensive cave system developed in the upper San Andres. Give the total mass of travertine (=109 metric tons) and assuming a travertine density of 2.5g/cm3, at least 4 x 108 m3 of limestone would have to have been dissolved to produce the travertine deposit. It is entirely possible that a cave of similar volume exists within the San Andres Limestone in the subsurface. Assuming a cave passage of relatively large cross-sectional area, say 100 m2, the total length of the hypothetical cave passages would be on the order of 4000 km! A videolog survey of the breathing well is planned.”””</p>	<p>The inventory of the cave and karst system in the Draft RMP/EIS is based on BLM internally funded efforts. The BLM understands that other private efforts that study various resources on BLM-administered lands may have scientific and technical information that is not presented in the Draft RMP/EIS. Collaborative public and private efforts are very important in advancing the scientific understanding of certain resources the BLM is tasked with protecting and managing. While this comment does not change any of the presented prescriptions for caves and karst, the information will be retained for future review and consideration.</p>

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
158	5	Air, Soil, Water	<p>"Parcel A lies immediately above the Santa Fe aquifer, which supplies water to the Town of Bernalillo, Algodones, a large portion of Placitas, the Santa Ana and San Felipe Pueblos, as well as a number of other communities. Certainly exploration and extraction of liquid substances, such as oil and gas, would have the significant potential of polluting this aquifer that is vital to a large local community (see 9.2 and 9.3 below). But other mining activities, if not highly controlled, can also contribute to pollution of the aquifer (see 9.5 below). While the goal of BLM and our country is to become energy independent, energy independence must certainly be considered secondary to health, safety and sufficient clean water. Hydraulic fracturing ("fracking") has increased significantly over the last decade and accordingly so has our country's production of oil and natural gas. Yet the benefits of fracking have been shadowed by some very significant, potentially attributable health, safety and welfare disasters. Fracking is not yet a fully precise science, especially relative to preserving our precious water resources. BLM itself has proposed rules governing "fracking". Officials at EPA report that conducting inspection and enforcement activities for oil and gas development from unconventional reservoirs is challenging due to limited information, as well as the dispersed nature of the industry and the rapid pace of development. They have also complained of the difficulty of investigating water contamination cases, partly because there is often no information on the quality of water prior to modern drilling. Gravel Mining Effects on Water Quantity – Gravel mining uses great quantities of water for various purposes. Decreasing water supplies are becoming an escalating problem in this region of the world, and in the Placitas area in particular. Gravel Mining Effects on Water Quality – As aquifer water nearer to the surface is depleted by large amounts of water use, the concentration of harmful substances increases in the remaining water supply, with substances that were deeper in the aquifer rising closer to the surface. This area already has significant challenges regarding arsenic abatement in drinking water, which has been very costly to the Town of Bernalillo, Algodones, and various parts of Placitas. Increasing mining activity by one third or more will only exacerbate this critical problem. Communities surrounding the Placitas BLM lands may soon be at a tipping point where painful choices will have to be made as to who can have water, and how much. Without highly compelling reasons for any type of extraction activity, Placitas BLM parcels should be closed to all future mining activity. The Placitas BLM parcels should be removed from potential leaseable activities due to the relatively high potential for ground-water contamination and likely aquifer depletion, coupled with the low potential of finding oil and gas in the Placitas area. Furthermore, since gravel mining also depletes available water from an area that already has challenged water quantity and quality, these activities should be excluded as well."</p>	<p>The Draft RMP/EIS discusses groundwater quality and quantity in Draft RMP/EIS Sections 2.2.15, 3.17.2, and 4.2.9. Authorizations for mineral extraction on BLM-administered land would require site-specific analysis and compliance with applicable environmental laws and regulations. Groundwater allocations are not controlled or regulated by the BLM but by the New Mexico Office of the State Engineer. Any proponent of a mining project would have to apply to the Office of the State Engineer for any water allocations.</p>
94	17	Air, Soil, Water	<p>"Volume II, Chapter 4, Pages 4-4 to 4-20, Para 4.2.2.1.6. Water. Adequate supply of clean, potable water is vital for survival and quality of life to Placitas area residents. An unanticipated mining/drilling accident that pollutes the ground water supply would be catastrophic for Placitas residents. Additionally, ground water is rationed to Placitas residents. Heavy use during mining or any high use activity could seriously impact adequate/rationed water supply. Recommend: A thorough review of water resources before approval is adopted for any mining activities in the proposed alternatives."</p>	<p>The Draft RMP/EIS discusses groundwater quality and quantity in Draft RMP/EIS Sections 2.2.15, 3.17.2, and 4.2.9. Authorizations for mineral extraction on BLM-administered land would require a site-specific analysis and compliance with applicable environmental laws and regulations. Groundwater resources are not managed by the BLM. The availability of water and making water appropriations falls under the jurisdiction of the Office of the State Engineer.</p>
54	1	Air, Soil, Water	<p>"Mining and drilling, especially the practice of fracking, are extremely water consumptive. The RMP has failed completely to take these problems into account, including, most of all, the residents of the state of New Mexico. This area of Placitas will become uninhabitable if this mining is allowed to go forward. The rest of New Mexico will soon follow."</p>	<p>The analysis of effects on water resources is included in Draft RMP/EIS Sections 2.2.15, 3.17.2, and 4.2.9.</p>
77	1	Air, Soil, Water	<p>Natural gas would require fracking. Placitas lies on some fault lines. Fracking has been linked to increased seismic activity in the Midwest. Increased seismic activity around known fault lines makes no sense.</p>	<p>The effects of the type of leasable mineral extraction method—requested in the <a href="#">application for permit to drill (APD)</a>, such as <a href="#">hydraulic fracturing (fracking)</a> and directional, would be considered when doing site-specific NEPA analyses.</p>

Letter Number	Comment Number	Category	Comment Text	Response
14	23	Air, Soil, Water	<p>“The reclamation record for mining and pipeline sites has been dismal in the Placitas area. Mining sites and existing pipeline easements have not been properly reclaimed in this area in either the short or long term. Nothing is growing in areas that once provided a rich habitat for birds and wildlife. Erosion is not controlled, as the following photos, Figures 4 [see ATT 4] and 5 [see ATT 5], illustrate.</p> <p>Sufficient reclamation from the 1996 or the 2007 pipelines has yet to be completed. Mature Juniper and Pinon habitat destroyed during the pipeline installations have not been replanted and the barren strip demarking the location of the both pipelines is clearly visible from Highways 165 and 125.</p> <p>Irretrievable Loss of Resources - The large-scale surface mining operations to be permitted under Alternatives A, C and D are literally the most devastating of all mining options, especially if appropriate and adequate reclamation activities are not properly undertaken. Such operations would obliterate the preexisting landforms of juniper-pinon flats dissected by small and medium-sized arroyos. Millions of tons of aggregate material would be physically removed from the site. If not properly restored, mining will leave behind a 3-square mile hole 100 or more feet deep, with steep, highly-erodible walls.</p> <p>Most reclamation efforts at existing local pit mines have met with failure due to friable, low-nutrient and highly-erodible soils, steep slopes, high winds and low annual rainfall. For example, in the “played out” mine at the extreme west end of Parcel A, BLM has yet to stabilize soils and establish appropriate cover vegetation. As such, the BLM has effectively overseen the creation of non-vegetated “dust bowls”.</p> <p>Based on this example, it is reasonable to assume that the 3-square mile pit contemplated in Parcel A would not be satisfactorily reclaimed at anywhere near reasonable cost, especially when both private and public ownership is involved.</p> <p>Such a large pit with its stark, post-removal surface profile and lack of soil stabilization and vegetation is completely unusable by any terrestrial or avian wildlife as any type of habitat, be it foraging, migration/passage, or cover. Current public recreation resources including hiking, orienteering, and bird watching in the area to be mined, would be eliminated forever. The impact of mining on Placitas BLM parcels extends far beyond the period of active mining, if the land is not fully reclaimed afterwards. Yet in Parcel A there is clear evidence of past mining for which there has been no adequate reclamation. BLM has demonstrated an inability to manage this crucial aspect of mining leases in this particular parcel. It is not likely that the agency will do significantly better in an era of governmental belt tightening, during which the presently strained resources of the BLM and other agencies will likely become even more reduced. This would leave a permanently blighted landscape where there is presently an urban interface that should be sustained for recreational uses. Additionally, the Placitas BLM parcels are recognized as important wildlife corridors (see above, “7. Wildlife Corridors”), and as habitats for various animals and plants. The continued lack of adequate management/restoration of mined lands could be permanently disastrous to these crucial functions.”</p>	<p>The Draft RMP/EIS discusses the management and protection of soil and water in Draft RMP/EIS Sections 2.2.15, 3.17, and 4.2.9. The cost of reclamation is paid by the proponent or authorized user. Reclamation is always required on any mineral extraction projects and a bond is retained by the federal government until reclamation is either completed or reached a satisfactory level. Reclamation is a process that is dependent on many factors to include climate impacts. Reclamation in large areas is typically a long process and would not achieve acceptable levels for many years.</p>
16	9	Air, Soil, Water	<p>“The words “self-supplied” obviously do not mean that La Farge brought in an average of 217.57 acre feet of water from 1994 to 2001. Our community well allows each household 1/2 acre feet of water per year. That’s 162,000 gallons per household per year. So an acre foot is double that, actually 325,851 gallons. So from 1994 to 2001, La Farge alone, according to the DelAgua study attached above dated December 2002, and which references Peggy Johnson’s 2000 study many times, used approximately 325,000 X 217= 70, 525,000 gallons per year. And the BLM wants to allow even more gravel mining on the land next to Placitas? Do you even realize what you are doing by leasing this land to LaFarge North America in the first place? LaFarge is a French conglomerate--they are taking our gravel, our natural resource, turning it into cement at their mercury-spewing cement plants in this country, selling it back to us and exporting it. The profits go back to France. And they have already settled with the EPA in the past for violations of the Clean Air and Water Acts:</p> <p>Lafarge Violation Settlements <a href="http://www.epa.gov/compliance/resources/cases/civil/caa/lafarge.html">http://www.epa.gov/compliance/resources/cases/civil/caa/lafarge.html</a></p> <p><a href="http://www.epa.gov/compliance/resources/cases/civil/cwa/lafargenorthameric a.html">http://www.epa.gov/compliance/resources/cases/civil/cwa/lafargenorthameric a.html</a></p> <p>Of course they will do it again until they get caught again.</p> <p>The threat of contamination and the diminished supply of water available to our community from expanded gravel mining and/or drilling for non-existent fossil fuels should be enough to curtail such foolishness. The land should remain as it is, the status quo, because it belongs to the American people, not the BLM, as stated in the Federal Land Policy and Management Act of 1976 [FLPMA]:</p> <p>“Congress recognized the value of the public lands, declaring that these lands would remain in public ownership. The National Forest Service, National Park Service, and now, the Bureau of Land Management, are commissioned in FLPMA to allow a variety of uses on their land (of greater concern for the BLM, who is the least restrictive in terms of uses) while simultaneously trying to preserve the natural resources in them.”</p>	<p>In accordance with FLPMA, Section 102, the BLM may identify sources of minerals available for public use within their planning documents. Whether these sources are ultimately used is a discretionary action that depends on the results of analyzing site-specific proposals. In the case of water use, an applicant for a project must apply for a water appropriation through the Office of the State Engineer in New Mexico. The BLM does not have the authority to allocate water nor the data to be able to monitor water use, the health, or the size of the aquifer. As for air and water quality standards, in accordance with FLPMA Section 302 (c), the BLM does have the authority to revoke or suspend land use authorizations, if violations of applicable state or federal air or water quality standards or implementation plans occur.</p>

Letter Number	Comment Number	Category	Comment Text	Response
157	10	Air, Soil, Water	<p>"Placitas is presently surrounded by 2713 acres of gravel mines (see Figure 3 above), that are operating without sufficient community evidence of their compliance to state and county ordinances, or EPA protection guidelines. The DRMP preferred alternative for Parcel A proposes an additional 769 acres of gravel mining be added, which is an almost one third increase in mining just on BLM land. Yet the DRMP does not identify how the BLM plans to mitigate the expected contribution of one third more air and light pollution, noise and fugitive dust to the surrounding community of over 5000 residents. The DRMP states that quantitative air quality analysis methods to analyze impacts of proposed actions on air quality will be developed when appropriate, as determined by the BLM. Furthermore, the DRMP does not specify how the BLM plans to mitigate one third more noise and light pollution to the surrounding community. Currently existing operations can be heard in homes more than a mile away beginning early in the morning. Bright lights shine in homes at night. There is little evidence that BLM mitigation of such negative impacts from mining in this area has been successful in the past."</p>	<p>The Draft RMP/EIS discusses air resources and quality in Draft RMP/EIS Sections 2.2.1, 3.1, 4.2.1. The Draft RMP/EIS discusses ground water quality and quantity in Draft RMP/EIS Sections 2.2.15, 3.17.2, and 4.2.9. Authorizations for mineral extraction activities on BLM would require site specific analysis and would require compliance with applicable environmental laws and regulations which would include Sandoval County Noise and Lighting Standards for Mining operations. Furthermore, currently under the 1986 RMP, all salable minerals administered by the BLM are open for mining. Finally, mining is a discretionary action that must be authorized by the BLM even though a small area is open for potential salable mineral extraction. Authorizations must weigh all issues to include public comment.</p>
94	1	Air, Soil, Water	<p>"Missing Information in DRMP - It is unclear within the DRMP as to how the specific 769 acres for gravel mining within Parcel A (labeled as "New BLM Mine" in Figure 3 above) was selected. No justifying reasons are given within the DRMP for that particular location, only a specification of the location. Issues such as the following are simply not discussed regarding selection of this location in the preferred alternative: 1) Buffering from existing private properties so as to preserve quality of life and property value; 2) The extreme friability of the soil in the Placitas area; 3) The cumulative effects on traffic, air quality, and depletion of aquifers; 4) How mining on this particular location would affect habitat for plants and animal life, and wildlife corridors."</p>	<p>Approval of any site specific mining activities require compliance with NEPA, the Clean Air Act and Clean Water Act. Standards for emissions and water pollution are enforced by other agencies outside the authority of the BLM. However, site specific NEPA analyses ensure the disclosure of any potential environmental impacts along with proving for public involvement in the process.</p> <p>The BLM makes management decisions based on the existence of a resource on BLM-administered land. This concept applies to all resources to include wilderness, culturally significant sites, geologic features, and mining. The mineral potential report shows that the potential for salable minerals (sand and gravel) in the entire area near Placitas is very high. Thus, under the 1986 RMP, 100 percent of all federally owned salable minerals is available for mining. The selected area is based on it having one of the highest potentials for sand and gravel based on past bore testing conducted.</p>
143	30	Air, Soil, Water	<p>"The RMP fails to provide management directives that account for finite water resources in the Rio Puerco planning area. Please consider the DelAgua study [see ATT 1] at page 24 discussing the increasing trend in mining in Placitas with the need to protect the water resource due to the projected 85 percent population expansion by 2050. The RMP is in error at section 4.2.9.1.3 because the mineral resources decisions framework does not take water conservation into account or provide any sort of management framework for water conservation. From the study, page 24: "One self-supplied mine was identified in the Placitas area, that of M. T. Industries (LaFarge). LaFarge's most complete meter records were from 1994 to 2001. Therefore, annual average CU [consumptive use] values were determined from this eight-year period of record. The annual average CU for the period of record is 217.57 af. A data summary table of self-supplied mining reported withdrawals and CU is presented in Appendix D. Figure 6 presents annual CU values for combined self-supplied industrial and mining operations in the study area (dashed line represents missing or incomplete data). The average annual CU for both self-supplied commercial and mining for 1994 through 2001 is 416.93 af." Our community well allows each household 1/2 acre feet of water per year.</p> <p>That's 162,000 gallons per household per year. An acre foot is double that, actually 325,851 gallons. So from 1994 to 2001, alone, according to the DelAgua study attached above dated December 2002, and which references Peggy Johnson's 2000 study many times, used approximately 325,000 X 217= 70, 525,000 gallons per year. And the BLM wants to allow even more gravel mining on the land next to Placitas? How soon before our wells run dry and the land becomes worthless, destroying the community? As document 2 [see ATT 2] and 3 [see ATT 3] will show, the water needs of the community have greatly increased since 2001, while the mining operation has also continued to grow. The RMP is inadequate because it doesn't take into account the Del Agua Institute study, and the BLM has failed to analyze increased domestic water demand both now and in the future, wells and acequias that have already run dry, and the water demands of future mining as discussed in the Del Agua Institute study and other accompanying documents.</p> <p>Document 2 states the population of Placitas, according to Sandoval County's Placitas Area Plan as being 3,452 persons in 2000. Document 3 is a copy of the 2010 US Census findings for the area, stating that were 4,977 persons. That's approximately 44% population growth over ten years, leading to even more wells and a greater demand for water. Without adequate planning, there is no surety that New Mexico's water resources can be developed, preserved, or protected (NMOSE/ISC, 2001 ). Recent population projections indicate that by 2050 New Mexico's current population of 1.8 million will grow to 3.3 million people, an increase of 85% (OSE/ISC 2001). "The Placitas area has relied primarily on ground water for a domestic water supply." Document 2 also speaks to some of the water issues facing our community and references the study by Peggy Johnson, which is also referenced in document 1. The entire Placitas Area Plan and various water studies, including Ms. Johnson's, can be found [online].</p> <p>Document 4 [see ATT 4] is Peggy S. Johnson's study entitled "HYDROGEOLOGY AND WATER RESOURCES OF THE PLACITAS AREA SANDOVAL COUNTY, NEW MEXICO". I've included it here but the graphics and maps are clearer [online]."</p>	<p>The Draft RMP/EIS discusses ground water quality and quantity in Draft RMP/EIS Sections 2.2.15, 3.17.2, and 4.2.9. Authorizations for mineral extraction activities on BLM would require site specific analysis and would require compliance with applicable environmental laws and regulations. Sufficient data do not exist at this time to quantify the relationship between mining activity on Parcel A and impacts on the Santa Fe aquifer. Water usage associated with authorized mining activities would require permitting through the New Mexico Office of State Engineer, who would assess the application for water use for the proposed mining activity in accordance with the New Mexico water rights statutes. The BLM would have no authority to prevent authorizations made by the Office of the State Engineer.</p>

R. Substantive Comments (Table R-I. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
157	35	Air, Soil, Water	“Document 6 [see ATT 6] is entitled ““Drought Strains US Oil Production””, and spells out the fight between farmers and frackers in Kansas. This same argument can be applied to the need in Placitas for domestic household water and what farming is left versus the huge amount that will be in further gravel mining operations.”	The Draft RMP/EIS discusses ground water quality and quantity in Draft RMP/EIS Sections 2.2.15, 3.17.2, and 4.2.9. Authorizations for mineral extraction activities on BLM would require site specific analysis and would require compliance with applicable environmental laws and regulations. Water usage associated with authorized mining activities would require permitting through the New Mexico Office of State Engineer, who would assess the application for water use for the proposed mining activity in accordance with the New Mexico water rights statutes.
157	4	Air, Soil, Water	“From the 9/2012 issue of our local paper entitled ““2012 PLACITAS BEANFIELD WAR.”” [see ATT 11] A quote: ““If the drought persists, or becomes a permanent result of climate change, the surface water shortages could move deeper underground as the aquifer is depleted and not recharged. This would be everybody’s problem. These issues are by no means unique to Placitas. Conservation measures might prove to be a drop in the bucket, but it’s worth a try. What is really needed is recharge from more precipitation. Maybe a return to a wetter El Niño weather pattern predicted for this winter will keep this year’s shortage from escalating into a full-fledged beanfield war.”” The current assessment by The National Weather Bureau sees a similar pattern emerging for this winter as last year, not a full-fledged El Niño. These water problems in our community will only be exacerbated by further development of BLM land for anything as water intensive as gravel mining. Phase 2 of my comments will arrive shortly and cover the environmental impacts of any proposed gravel or hardrock mining adjacent to Placitas, including other effects such as contamination or complete destruction of the aquifer that supplies our wells.”	Water usage associated with authorized mining activities would require permitting through the New Mexico Office of State Engineer, who would assess the application for water use for the proposed mining activity in accordance with the New Mexico water rights statutes.
91	4	Air, Soil, Water	“Document 8 [see ATT 8] updates the severity of the Kirtland AFB jet fuel spill, entitled NM fuel spill threatens Albuquerque water supply” dated 7/21/2012. Here’s a quote from that article: ““But more than 12 years after the toxin-laden plume from a 40-year underground pipe leak was discovered at Kirtland Air Force Base, estimates of its size and its threat to the water supply of New Mexico’s largest city keep growing, less than half a million gallons have been pumped out of the ground, the Air Force is two years away from finalizing a cleanup plan and local officials are still arguing about whether the spill is something they need to get involved with. ““We’re pretty soon going to be swimming in this stuff,”” Albuquerque Bernalillo County Water Utility Board member Rey Garduno said at a recent hearing held shortly after the New Mexico Department of Environment acknowledged the size of the spill could be as much as 24 million gallons, or three times previous estimates. He called the spill a ““traveling tsunami.”” The article goes on to say that the fuel is already in the aquifer and only 2/3 of a mile from the wells that supply Southeast Albuquerque. Is it therefore unreasonable to not just ask, but demand that the BLM not risk the harm to Placitas’ water wells by draining our water away for gravel mining? Is there a huge shortage of gravel? The BLM must analyze in the RMP the cumulative impacts of permitted gravel mining on the long term viability of aquifers and surface water resources.”	Draft RMP/EIS Chapter 4 Section 4.2.9 acknowledges that, ““Surface disturbance can affect surface water quality mainly by increasing sediment delivery to drainages, which is ultimately transported to streams during runoff events. Surface disturbance of highly erodible soils is the most likely disturbance to increase sedimentation in streams. Impacts to water resources also would occur when activities or projects take place within riparian areas and floodplains, or when an upstream increase in runoff or erosion results in damaging levels of stream energy or sedimentation within stream/riparian/floodplain areas.”” How a specific project affects water resources cannot be analyzed until a project application is submitted to the BLM. The BLM would analyze and release for public input the results of any such proposals prior to authorization, and would work with the Office of the State Engineer who is the water use permitting authority in the State of New Mexico.
14	5	Air, Soil, Water	“Section 2.1.2 and Maps 90 - 92 - Based on ““local”” Placitas area input provided by the LPA [Las Placitas Association], ES-CA [Eastern Sandoval Citizens Association], Pathways [Pathways: Wildlife Corridors of NM], etc. in 2008 during the DRMP scoping process, LPA/ES-CA comments provided during the current public comment period (re: fragile soils, etc.), and the BLM’s own determination that the entirety of Parcel C and portions of Parcels A and B as having highly erodible and poor reclamation soils determinations, explain the rationale for designating the currently undeveloped portion of Parcel A and the entirety of Parcels B and C as any Travel Designation other than ““closed””.”	The erodibility and poor reclamation classification of a soil are not necessarily on their own justifying reasons for road closures. Most of the soils in the RPF0 or central New Mexico basically fall under those two categories. BLM’s Comprehensive Travel and Transportation Management program is the proactive management of public access and natural resources in compliance with travel-related regulations and according to the best land use management principles. It involves a comprehensive approach that considers various aspects of road and trail system planning and management, specifically natural resource management; road and trail design and maintenance; and recreation and non-recreation uses of roads and trails. Within this context, travel activities are evaluated as a means of access to BLM-administered lands. They are also evaluated according to the effects all forms of motorized and non-motorized travel have on BLM-administered lands and resources and on the people who use them. The primary resources inventoried in the Placitas parcels are salable minerals and dispersed recreation. Managing the Placitas parcels as limited to designated routes under the Proposed RMP (Alternative CE) would provide the most sensible and balance travel management prescription for the area, which would allow access to all users, while ensuring that unnecessary roads are closed. The BLM would determine route designations through the travel management plan, which is anticipated to be completed within 5 years of the signing of the Approved RMP/ROD.

R. Substantive Comments (Table R-1. Substantive Comments by Resource Category)

Letter Number	Comment Number	Category	Comment Text	Response
14	4	Air, Soil, Water	<p>“The DEIS singles out OHV use, from all the myriad forms of recreation, in many of its ““impact”” assessments in the Environmental Assessment section. Why is OHV singled out? We are gravely concerned that it is indicative of institutional bias against certain forms of use of the Planning Area. A few of the numerous examples contained in this document: - ““The more surface disturbance that occurs on steep slopes or on highly erosive soils, the greater the potential for adverse impacts to wildlife habitats. - The more area used by OHVs and the higher the density of OHV use, the more adverse impacts are anticipated to wildlife habitats.”” [Footnote 25: DEIS, page 4-261] Is not ““OHV use”” (the 2nd bullet) already contained within ““surface disturbance”” (the first bullet)? Why is OHV use, of all the myriad of potential causes of surface disturbance, called out separately? Surely energy extraction/transmission or livestock grazing have a greater potential to cause landscape level surface disturbance. ““OHV use and other disturbances to soils from unauthorized travel increase soil loss from wind and water erosion, which can further degrade habitat quality.”” [Footnote 26: DEIS, page 4-270] Again, why is OHV use singled out from the numerous potential uses, both authorized and unauthorized, that can disturb soil or cause impacts to wildlife, vegetation, and soils?”</p>	<p>It is the BLM’s responsibility, through the environmental impact analysis process, to disclose these impacts. OHV use is not the only example of surface disturbance described; impacts from livestock grazing and mineral extraction, among other resource uses, are also disclosed. The Draft EIS discusses impacts from mineral extraction on wildlife in Section 4.2.14.2.7, Mineral Resources Decisions, on vegetation in Section 4.2.12.1.5, Mineral Resources Decisions, and soils in Section 4.2.9.1.3, Mineral Resources Decisions.</p>
95	16	Air, Soil, Water	<p>Placitas Area: For the Placitas areas discussed in the drafts, I am totally against efforts by developers and others to increase the size of the roads and highways supporting new housing in an area that is so very dry, especially in the past couple of years. So far it seems to me that EIS data is lacking on effects of the plans presented in sales of land, and anything related to building more housing and therefore requiring more of our limited water resources. You just can NOT propose closing off wildlife access between wild areas, or propose to sell lands to un-named parties without being more aware of the impact on limited water resources, or the effect on wildlife itself. Just go take a look now and compare what you see today with 3-4 years ago at the Bosque del Apache wildlife area: it’s mostly dried up at a time when the birds need winter shelter. Water quality, quantity, and lack thereof should factor into all the RPF0 [Rio Puerco Field Office] areas whether you let the desert land sit, sell it, trade it, develop it, etc. Today streams, springs, the Rio Grande, etc., are going dry, or are already dry, and all wildlife is suffering.</p>	<p>The BLM does not make decisions about real estate markets or local community planning issues. Several other organizations such as County and City governments or the Metropolitan Planning Officer are more directly involved in local community planning than the BLM. The Draft RMP/EIS discusses air resources and quality in Draft RMP/EIS Sections 2.2.1, 3.1, 4.2.1. The Draft RMP/EIS discusses soils and water quality and quantity in Draft RMP/EIS Sections 2.2.15, 3.17, and 4.2.9. Authorizations for mineral extraction activities on BLM would require site specific analysis and would require compliance with applicable environmental laws and regulations.</p>
162	6		<p>“Cattle grazing can compromise riparian areas and impair water quality. Riparian and stream ecosystems represent only 0.5 to 1 percent of the surface area of arid lands in the eleven western United States [Footnote 7: U.S. General Accounting Office (“GAO”). 1988. Public rangelands: some riparian areas restored by widespread improvement will be slow. GAO/RCED- 88-105; see also Belsky, A.J., A. Matzke, and S. Uselman. 1999. Survey of livestock influences on stream and riparian ecosystems in the Western United States. Journal of Soil and Water Conservation 54: 419-431.], yet support an estimated 60 to 70 percent of Western bird species [Footnote 8: Omart, R.D. 1996. Historical and present impacts of livestock grazing on fish and wildlife resources in western riparian habitats. Pp. 245-279. In: P.R. Krausman (ed.), Rangeland wildlife. Society for Range Management: Denver, CO; see also Belsky et al. (1999).] and as many as 80 percent of wildlife species in New Mexico. [Footnote 9 Chaney, E., W. Elmore, and W.S. Platts. 1990. Livestock grazing on Western riparian areas. Northwest Resource Information Center, Inc.: Eagle, ID; see also Belsky et al. (1999).] Despite the immense ecological importance of these areas, studies concluded in the 1990s found that grazing was undermining the ecological integrity of these lands and their ability to support other species. For instance, the BLM found that grazing by livestock has historically damaged 80 percent of the streams and riparian ecosystems in arid regions of the western United States [Footnote 10 U.S. Department of Interior. 1994. Rangeland reform ‘94, draft environmental impact statement. Bureau of Land Management: Washington D.C.; see also Belsky et al. (1999).]. In 1990, the U.S. Environmental Protection Agency reported that, ““extensive field observations suggest that riparian areas throughout much of the West are in their worst conditions in history.”” [Footnote 11: Chaney et al. (1990).] In addition, a 1994 joint Bureau of Land Management and Forest Service report concluded that ““riparian areas have continued to decline”” since grazing reforms in the 1930’s.”” [Footnote 12: U.S. Department of Interior (1994).]”</p>	<p>The Draft RMP/EIS discusses air resources and quality in Draft RMP/EIS Sections 2.2.1, 3.1, 4.2.1. The Draft RMP/EIS discusses soils and water quality and quantity in Draft RMP/EIS Sections 2.2.15, 3.17, and 4.2.9. Authorizations for mineral extraction and other activities on BLM would require site specific analysis and would require compliance with applicable environmental laws and regulations.</p>

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