May 23, 2024

Bureau of Land Management
Taos Field Office
Attn: Brad Higdon
1024 Paseo del Pueblo Sur
Taos, NM 87571

Submitted via eplanning website: https://eplanning.blm.gov/eplanning-ui/project/2024165/510

Re: Comments on Draft Resource Management Plan Amendment and Environmental Assessment for Río Grande del Norte National Monument

Dear Mr. Higdon:

The undersigned organizations appreciate this opportunity to provide comments to the Bureau of Land Management (BLM) regarding the draft resource management plan amendment and environmental assessment (RMPA/EA) for the management of the Río Grande del Norte National Monument (RGDN or Monument).[1] Once finalized, the RMPA will amend the existing 2012 Taos Resource Management Plan (RMP).[2] These comments are timely submitted by May 23, 2024.

The Monument was designated on March 25, 2013, by Presidential Proclamation 8946,[3] which directs the BLM to manage the Monument as part of the National Landscape Conservation System (NLCS). In accordance with Proclamation 8946, federal law,[4] and BLM policy, the BLM must develop a Monument Management Plan (Monument Plan) specific to RGDN. The BLM has chosen a streamlined process to adopt a plan through an amendment to the existing RMP and an environmental assessment, while ensuring multiple opportunities for public input, comments, and meetings. We support this approach, noting that most of the important work that needs to be done in the Monument can be accomplished through implementation or project level actions, such as addressing visitor access issues, conducting trail and infrastructure projects, improving travel management plans, conducting habitat improvement projects, and increasing patrols and enforcement. For such future project-level implementation, the BLM should conduct appropriate

[1] U.S. Dep't of Interior, BLM, Draft Taos Resource Management Plan Amendment and Environmental Assessment for the Río Grande del Norte National Monument Management Plan (Apr. 2024), *available at* https://eplanning.blm.gov/public_projects/2024165/200560834/20108793/251008793/_RGdN_Draft%20RMPA_EA_2024_0423_ADA.pdf [hereinafter Draft RMPA/EA].
[2] U.S. Dep't of Interior, BLM, Taos Resource Management Plan (May 2012), *available at* https://eplanning.blm.gov/public_projects/lup/68121/86167/103325/Approved_Taos_RMP_-_5.16.12_(print_version).pdf [hereinafter "2012 Taos RMP"].
[3] Presidential Proclamation 8946, Establishment of the Río Grande del Norte National Monument (Mar. 25, 2013), *available at* https://www.govinfo.gov/content/pkg/DCPD-201300186/pdf/DCPD-201300186.pdf [hereinafter Proclamation 8946].
[4] See Federal Land Policy and Management Act of 1976 (FLPMA), 43 U.S.C. § 1712.

site-specific environmental analysis under NEPA to ensure a full evaluation of potential impacts. The BLM should likewise take effective measures to make clear to the public the new, more protective standards for monument management.

In general, we commend the BLM for proposing a draft Monument Plan that prioritizes the protection and restoration of Monument objects and values, as described in Proclamation 8946. We urge the BLM to choose a modified version of Alternative B1, by designating the Cerro de la Olla area as a Wilderness Study Area (WSA) under Section 202 of the Federal Lands Policy and Management Act (FLPMA) and expanding the proposed size of the WSA from 5,120 acres to approximately 13,000 acres. We have significant concerns about the BLM's proposal to designate new and expanded rights of way (ROWs) within the Monument, including a 600' corridor across the Río Grande gorge. We strongly encourage the BLM to reconsider the proposed ROWs to avoid significant impacts on the Wild and Scenic River Corridor and the objects and values the Monument was established to protect. We offer additional recommendations below to strengthen the plan and ensure consistency with the proclamation.

A. Cultural Resources

As reflected in Proclamation 8946, New Mexico's land-based cultures have a millennia-old relationship with Monument lands, and the Monument was designated in large part to protect RGDN's diverse array of cultural, archaeological, and historical resources. We appreciate the BLM's recognition that RGDN encompasses cultural landscapes important to sovereign Pueblos and Tribal Nations, and commitment to identifying and maintaining these landscapes as cultural resources.[5] We strongly support the BLM's proposal to protect all cultural resources, including those associated with playas, and to seek opportunities for co-stewardship of public lands and waters with Tribal Nations,[6] consistent with federal guidance.[7] And we encourage the BLM to move forward with its plan to sponsor the completion of a comprehensive ethnographic study to identify traditional cultural properties within the Monument.[8]

In general, it is vital that the BLM maintain ongoing consultation and partnership with sovereign Pueblos and Tribes, as well as other traditional communities, throughout the completion and implementation of both the Monument Plan and future projects within RGDN. Virtually all management actions affect cultural and archaeological resources within the Monument, and both the BLM and the non-pueblo archaeological community should defer to the concerns and management priorities of interested Tribal and traditional use parties when considering management alternatives. Where appropriate, we also encourage the BLM to work with local

[5] Draft RMPA/EA at p. 29; Appendix C, p. C-9.
[6] *Id.* at 29; Appendix C, pp. C-8 to -12.
[7] Dep't of Interior, BLM, Permanent Instructional Memorandum (PIM) No. 2022-011, Co-Stewardship with Federally Recognized Indian and Alaska Native Tribes Pursuant to Secretary's Order 3403, *available at* https://www.blm.gov/policy/pim-2022-011
[8] Draft RMPA/EA at Appendix C, p. C-10.

groups, non-governmental organizations, and volunteers to help identify and protect sensitive archaeological sites, promote site stewardship, conduct public outreach, and provide interpretive guides to educate the greater public on the Monument's heritage.

B. Traditional Uses

Proclamation 8946 requires the BLM to manage the Monument in a manner consistent with the maintenance of traditional and customary uses. The proclamation expressly protects "the traditional collection of firewood and pinon nuts in the monument for personal non-commercial use."[9] Consistent with the proclamation, the Draft Monument Plan appropriately recognizes the traditional and cultural Hispanic and Tribal land uses within RGDN and would ensure access remains available to religious and cultural sites by Tribal members and Hispanic communities for non-commercial traditional cultural and customary uses.[10] The BLM has included provisions in the Draft RMPA/EA that are intended to preserve and balance these uses within the management framework, for example by maintaining motorized access at the base of Cerro de la Olla for firewood collection and by retaining vacant grazing allotments to ensure flexibility for traditional grazing permittees who could suffer significant impacts from future events such as wildfire. We commend the BLM for considering and accommodating religious and ceremonial practices; the gathering of firewood, piñon nut, and herbs; hunting and fishing; and sustainable grazing, as long as these activities are conducted in a manner consistent with the paramount goal of caring for and protecting the Monument.

C. Fish and Wildlife

As highlighted in Proclamation 8946, the Monument protects an array of ecological resources, an abundant diversity of wildlife, and crucial wildlife corridors and habitat. The Draft Monument Plan reflects that RGDN supports many species of native fish, encompasses a portion of the Central Migratory Flyway essential to bird migration, supports important winter and summer range for big game, provides cliff habitat for an array of raptor and bat species, and contains plants relied on by a diverse group of pollinators, including butterflies and hundreds of bee species.[11] The Taos Plateau area contains big-game migration corridors used by mule deer, elk, and pronghorn, and provides one of the most significant winter habitats for migrating elk.[12]

The Draft RMPA/EA would continue existing management from the 2012 Taos RMP with additional management actions intended to restore, maintain, or enhance priority species and their habitats. Specifically, under the Monument Plan, the BLM would leave large woody debris in larger waterways where this can be done without posing hazards to rafters; work to restore and maintain

[9] Proclamation 8946 at p. 4.
[10] *Id.* at p. 32, Appendix C, p. C-12.
[11] *Id.* at pp. 34-36.
[12] *Id.* at p. 35.

playas, seeps, and springs to benefit aquatic wildlife and habitat; and apply best management practices and restrictions to minimize impacts on habitat and nest sites.[13] We strongly support all of these strengthened wildlife management rules.

We encourage the BLM to go one step farther by seeking proactive solutions to mitigate negative impacts of climate change and increased recreation on fish and wildlife habitat. Projects such as instream habitat improvements for fish, riparian rehabilitation, and wildlife drinkers are paramount for the resilience of wildlife on the Monument.

We especially appreciate the BLM's recognition of the need to manage wildlife habitat for connectivity on a landscape scale, consistent with current habitat connectivity guidance.[14] The proposed WL Objective 5, set forth in Appendix C, would provide a far more beneficial and comprehensive alternative than the current management on the Taos Plateau.[15] It directs the BLM to work with partners and stakeholders to assess and manage habitat connectivity, manage big game winter range by ensuring low road density in transportation plans, and minimize impacts of recreational uses. WL Objective 5 further directs BLM to support state efforts to implement recommendations and wildlife corridor projects identified in the State Action Plan, and it promotes consultation and collaboration with Tribal entities, landowners, universities, agencies, and conservation partners to "improve wildlife habitat and wildlife habitat connectivity," to "improve water availability and wildlife movement," and to remove non-wildlife friendly fencing and replace it with wildlife friendly fence or virtual fence as needed.[16] We urge the BLM to continue its work on this last item until the Monument's fencing is 100% wildlife friendly.

We are also pleased that new WL Objectives 15 through 21, as proposed under Alternative B, would provide much more specificity than current guidance and would further address the needs of wildlife, including both listed and non-listed special status species.[17] These objectives direct the BLM to identify and preserve priority habitat and connectivity, prevent disturbance to nesting migratory birds, and monitor nesting sites and habitat of special status species that could be affected by implementation of projects and activities under the RMPA.

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[13] *Id.* at p. 37.
[14] *See, e.g.*, Council on Env't Quality (CEQ), Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors (Mar. 21, 2023), *available at* https://www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final-draft-formatted.pdf; Dep't of Interior, BLM, Instruction Memorandum (IM) 2023-005, Change 1, Habitat Connectivity on Public Lands (Nov. 18, 2022), *available at* https://www.blm.gov/policy/im-2023-005-change-1; Dep't of Interior, Secretarial Order 3362, Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors (Feb. 9, 2018), *available at* https://www.blm.gov/sites/blm.gov/files/Final-SO3362-report-081120.pdf ; N.M. Dep't of Transp. & N.M. Dep't of Game and Fish, New Mexico Wildlife Corridors Action Plan (June 2022), *available at* https://wildlifeactionplan.nmdotprojects.org/wp-content/uploads/sites/39/2022/07/Wildlife-Corridors-Action-Plan_June-2022_FINAL-reduced.pdf.
[15] Draft RMPA/EA at Appendix C, p. C-20, WL Objective 5.
[16] *Id.*
[17] *Id.* at p. C-22, WL Objectives 15 through 21.

We also approve of WL Management Action 1, which would direct the BLM to consider areas within the Monument for introduction, augmentation, or reestablishment of fish and wildlife species and to work with the New Mexico Department of Game and Fish and U.S. Fish and Wildlife Service to support monitoring, augmentation and reintroduction efforts.[18] As part of implementing this action, we encourage the BLM to consider restoring American bison to the Monument's landscape, and to study the possibility of reintroducing an additional population of native Río Grande cutthroat trout to the Agua Caliente.

Additionally, we support the inclusion in the Draft RMPA/EA of Best Management Practices (BMPs) for wildlife and riparian habitat, as set forth in Appendix D. We are pleased that these BMPs require wildlife-friendly fencing; protection for bats and raptors; avoidance of surface-disturbing activities in wintering ranges and in crucial calving, lambing, kidding, and fawning areas; and buffers around floodplains, playas, water developments, and riparian habitat.[19] We also appreciate the requirement for all new transmission lines to meet the most recent design standards for protecting raptors and wildlife, and the requirement to follow pollinator friendly BMPs.[20]

The BMPs include spatial and temporal buffers for active bird nests and prairie dog towns.[21] Regarding migratory birds, the BLM notes that the primary nesting season is from May through July, except for pinyon jay, which may start breeding as early as March.[22] But the Appendix does not include the distance by which surface-disturbing activities must avoid active migratory bird nests. We recommend that the BLM incorporate appropriate provisions to ensure protections for active migratory bird nests during the breeding and nesting season.

Finally, although the plan includes multiple provisions that will likely benefit wildlife, there are a couple aspects of the plan that could have negative impacts on wildlife and warrant further consideration. First, as further described in Part J below, we are concerned about potential impacts that the proposed new ROW corridors could have on wildlife.[23] In particular, the proposed 600-foot Powerline Falls ROW corridor would create a barrier to wildlife movement along the Río Grande gorge and pose significant risks to birds. Additionally, high voltage overhead transmission lines produce a low frequency hum that can act as an audible barrier for wildlife, which might avoid the ROW and expend additional time and energy to navigate outside the ancient migration route along the Río Grande corridor. Second, we are concerned about the proposal to use livestock grazing as a vegetation management/maintenance tool "to restore and maintain wildlife habitat." We are skeptical about the purported benefits of prescriptive grazing to wildlife and believe this practice could have unintended negative impacts on wildlife and ecological health.

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[18] *Id.* at p. C-23, WL Management Action 1.
[19] *Id.* at Appendix D, pp. D-11 to -12.
[20] *Id.* at p. D-12, ¶¶ d, k; see also id. p. D-67, ¶ 6 (requiring electrical facility and transmission development to incorporate best practices for raptor and avian protection).
[21] *Id.* at Appendix D, pp. D-10 to -11.
[22] *Id.* at p. D-11.
[23] *Id.* at p. 38.

D. Special Status Species

The Draft RMPA/EA sets forth a list of federally listed, proposed, and candidate species, as well as designated critical habitat, that occurs or has the potential to occur within the Monument.[24] These include the Southwestern willow flycatcher (endangered with critical habitat), yellow-billed cuckoo (threatened), Río Grande cutthroat trout (candidate), monarch butterfly (candidate), and silverspot butterfly (threatened).[25] However, the list in the Draft RMPA/EA appears to omit several species that occur or have the potential to occur within the planning area, including New Mexico meadow jumping mouse (endangered), tricolored bat (proposed endangered), Mexican spotted owl (threatened), Río Grande cutthroat trout (candidate).[26] Although the list of special status species is dynamic and subject to change over the life of the Monument Plan, we recommend that the BLM review and update its list of species to ensure a current comprehensive list is included in the final Monument Plan.

While the BLM's management of special status species would remain similar to the prescriptions set forth in the 2012 Taos RMP, we appreciate the expansion of SSS Management Action 10 to include consideration of Western burrowing owls, and the expansion of SSS Management Action 11 to incorporate all special status plant species.[27]

We encourage the BLM to adopt additional management prescriptions for the pinyon jay (*Gymnorhinus cyanocephalus*), which is a BLM Sensitive Species and is identified as a Migratory Bird of Conservation Concern in the 2012 Taos RMP. In 2023, the U.S. Fish and Wildlife Service (USFWS) found that a petition to list the pinyon jay as endangered presented substantial scientific information to indicate that an ESA listing may be warranted; the final listing decision has not yet been made.[28] We appreciate that the BLM has added the pinyon jay (which was not included in the scoping documents) to the list of sensitive species, and that the BLM has recognized the species' decline and management needs. Specifically, the Draft RMPA/EA provides that "[p]roject-related surveys for this species will allow for appropriate management decisions and conservation of this species."[29] We recommend that the BLM incorporate more specific management provisions or BMPs for piñon-juniper woodlands, pinyon jay nesting colonies, and other closely associated bird species. When designing management prescriptions and implementation actions, the BLM should reference the evolving science and research, including new information being published on the

[24] *Id.* at p. 40, Table 3-2.
[25] *Id.*
[26] *See* Exhibit A, Report from U.S. Fish & Wildlife Serv., IPaC Information for Planning and Consultation, *available at* https://ipac.ecosphere.fws.gov/ (attached report generated Apr. 24, 2024).
[27] Draft RMPA/EA Appendix C, at p. C-37.
[28] U.S. Fish and Wildlife Service, Endangered and Threatened Wildlife and Plants; 90-Day Findings for Five Species, 88 Fed. Reg. 55991 (Aug. 17, 2023).
[29] Draft RMPA/EA, Appendix E, at E-3.

New Mexico Avian Conservation Partners (NMACP) website[30] and the Conservation Strategy for Pinyon Jay published by the Partners in Flight, Pinyon Jay Multi-State Working Group.[31]

E. Geology & Soils

Regarding geology, Proclamation 8946 describes the Monument's extraordinary geological resources as objects to be protected. The identified features include the Río Grande rift valley and Río Grande gorge, which contains the Río Grande Wild and Scenic River and watershed; the Río San Antonio gorge; volcanic cones including Cerro del Yuta, Cerro de la Olla, and Cerro San Antonio; Taos Plateau; hot springs; and freshwater springs within the Río Grande gorge.[32] We appreciate the BLM's proposal to prioritize the protection of geologic objects when considering surface-disturbing activities, and we support the inclusion of management direction for geological resources Draft RMPA/EA, including provisions for mapping and monitoring hot springs, lava tubes, springs, and playas.[33]

Regarding soils, we appreciate the acknowledgement in the RMPA/EA that soil is a key resource for maintaining public land health and the commitment to preserving topsoil as high priority.[34] To improve soil resource management, the BLM should pursue the necessary research, surveys, mapping, and modeling of soils and biological soil crusts within the Monument, as described in the 2019 Río Grande del Norte National Monument Science Plan and set forth in Alternative B.[35] As noted elsewhere in these comments, we are concerned that the proposed designation of new ROW corridors and the proposed use of livestock grazing for vegetation management under Alternative B could have significant impacts on soil health and productivity. Given the importance of soil health to climate stability, air and water quality, and plant and animal communities, the BLM should reconsider these proposals and ensure that all project level decisions minimize the potential for erosion and soil damage.

F. Vegetative Communities & Invasive Species/Noxious Weeds

We commend the BLM for crafting a Draft RMPA/EA that reflects the importance of riparian areas within the Monument. Comprising less than 1% of the vegetation, riparian ecosystems support high species diversity, quality wildlife habitat, water quality, soil stabilization, and recreational

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[30] N.M. Avian Conservation Partners, Incorporating Bird Needs When Thinning Piñon-Juniper Woodlands (2022), *available at* http://avianconservationpartners-nm.org/wp-content/uploads/2022/02/Incorporating-Bird-Needs-When-Thinning-Pinon-Juniper-Woodlands.pdf.

[31] Partners in Flight & USFWS, Conservation Strategy for the Pinyon Jay (*Gymnorhinus cyanocephalus*) (Feb. 2020), available at https://partnersinflight.org/wp-content/uploads/2019/10/Conservation-Strategy-for-Pinyon-Jay_Version-1_February-2020_LowRes.pdf.

[32] Proclamation 8946 at pp. 1-2.

[33] Draft RMPA/EA at p. 43-44; Appendix C, p. C-38.

[34] *Id.* at p. 44.

[35] *Id.* at p. 45.

activities.[36] We support the new management provisions in Alternative B intended to prioritize the restoration and protection of riparian areas.[37]

We also support the terrestrial vegetation provisions designed to promote the inventory and maintenance of old-growth trees and forests, which is consistent with President Biden's executive order to conserve and restore America's mature and old growth forests,[38] and to provide for sustainable collection and use of traditional forest products, including firewood, piñon nuts, and herbal plants for personal non-commercial use, consistent with Proclamation 8946. We support the BLM's commitment to controlling noxious weeds and invasive nonnative plants to prevent them from disrupting the function, composition, and diversity of the ecosystem in areas where they become established.[39] We are concerned, however, that the BLM's proposals to use prescription grazing and herbicides to meet terrestrial vegetation management goals may have negative impacts on the ecosystem.[40] We believe these aspects of the draft plan warrant further consideration and refinement by the BLM.

G. Visual Resources

The first sentence of Proclamation 8946 sets the stage for the establishment of RGDN as follows: "In far northern New Mexico, the Río Grande Wild and Scenic River flows through a deep gorge at the edge of the stark and sweeping expanse of the Taos Plateau."[41] The proclamation proceeds to describe the many stunning visual features found across this "extraordinary landscape of extreme beauty."[42] The proclamation reflects that scenery and viewsheds are important objects to be protected by the Monument designation, and accordingly, the Monument Plan must prioritize visual resource protection and management.

In 1968, long before the establishment of the Monument, Congress likewise recognized the value of the RGDN's visual resources when it passed the Wild and Scenic Rivers Act, which designated 74 miles of the Río Grande as a Wild and Scenic River to protect its scenic character, among other outstandingly remarkable values.[43] The Wild and Scenic Rivers Act requires the BLM to "protect and enhance" the designated portion of the Río Grande for the benefit of present and future

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[36] *Id.* at p. 47.
[37] *Id.* at Appendix C, pp. C-42 to -46.
[38] Executive Order 14072, Strengthening the Nation's Forests, Communities, and Local Economies (Apr. 22, 2022), *available at* https://www.whitehouse.gov/briefing-room/presidential-actions/2022/04/22/executive-order-on-strengthening-the-nations-forests-communities-and-local-economies/; *see also* USDA Forest Service, Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management (Apr. 2023), *available at* https://www.fs.usda.gov/sites/default/files/mature-and-old-growth-forests-tech.pdf.
[39] Draft RMPA/EA at 64-68; Appendix C, pp. C-66 to -69.
[40] *Id.* EA at p. 50; Appendix C, pp. C-47, C-50.
[41] Proclamation 8946, p. 1.
[42] *Id.*
[43] Draft RMPA/EA at p. 85; Wild and Scenic Rivers Act of 1968, 16 U.S.C. § 1274(a)(4).

generations by preserving its outstandingly remarkable values, including its scenery and visual resources.[44]

Consistent with these executive and legislative actions, the BLM currently classifies the Wild and Scenic River corridor along the Río Grande as "Visual Resource Management Class I."[45] The objective of Class I "is to preserve the existing character of the landscape."[46] Although Class I management "does not preclude very limited management activity," the "level of change to the characteristic landscape should be very low and should not attract attention."[47]

Contrary to the proclamation and the Wild and Scenic Rivers Act, the RMPA/EA proposes to designate a 600' right of way (ROW) across the gorge, and to change the Visual Resource Management classification within the ROW corridor to Class III. As discussed further in Part J below, this proposal will significantly enlarge the existing ROW (600' is more than triple the size of the current 190' ROW) and would have a significant impact on the undisturbed original landscape of the Río Grande gorge. Although the colossal breadth of the proposed ROW is intended to accommodate multiple future uses and facilities, the ultimate visual impact of this proposed ROW is unknown at this time because the BLM is not currently evaluating any specific project proposals.

We urge the BLM to reconsider its proposal to designate a 600' ROW corridor across the gorge. This aspect of the Draft RMPA/EA runs contrary to Proclamation 8946, the Wild and Scenic Rivers Act, and to the spirit of community stakeholders who clearly stated that the Monument should be designated in part to prevent new development. It is of greater importance to preserve the renowned ancient landscapes of the Río Grande gorge than it is to select this ROW as the cheapest route for a hypothetical transmission line. If a specific transmission project is proposed in the future, the BLM should share the details of the project with the public, invite public input, and consider other transmission routes and options for reconductoring or adding upgraded lines to existing towers before designating a new or expanded ROW through a subsequent RMPA.

H. Water Resources

We are pleased that the Draft Monument Plan requires the BLM to detect, address, and prevent water quality degradation of Outstanding National Resource Waters (ONRWs), springs, and playas within the RGDN; and emphasizes the need for functioning surface and groundwater resources, and for environmental flows that sustain and reestablish floodplains and wetlands.

[44] Wild and Scenic Rivers Act of 1968, 16 U.S.C. §§ 1271, 1281.
[45] Draft RMPA/EA, Appendix B, at p. B-5.
[46] *Id.* at p. 52, Table 3-4.
[47] *Id.*

1. Outstanding National Resource Waters

On July 12, 2022, after years of intensive stakeholder collaboration and exhaustive community outreach, the New Mexico Water Quality Control Commission unanimously voted to designate 52.2 miles of the Upper Río Grande in the Monument, from the state line down to the Río Pueblo, as an Outstanding National Resource Water ("ONRW" or "Outstanding Waters").[48] On February 8, 2023, the United States Environmental Protection Agency certified and approved the designation.[49] To implement these state and federal actions, BLM must provide this segment of the Río Grande with enhanced protection against degradation under the State of New Mexico's Standards for Interstate and Intrastate Surface Waters ("Water Quality Standards")[50] and the federal Clean Water Act ("CWA").[51]

We greatly appreciate the BLM's inclusion in the Draft RMPA/EA of new management prescriptions to implement the ONRW designation. Specifically, WR Goals 1 and 6 reflect the need to detect, address, and prevent degradation of ONRWs, "to address long-term anthropogenic and climatic risk" to freshwater resources, and to "[m]anage designated ONRWs in the Monument to ensure there is no new increased water quality degradation and that the values or special uses for which those waters were designated are maintained and protected."[52] We likewise thank the BLM for including WSR Objective 7 and WR Management Action 6 in the Draft RMPA/EA, which are intended to implement the ONRW designation and to protect, maintain, and restore water quality.[53] And we are pleased that the BLM intends to coordinate with the New Mexico Environmental Department to develop shared protocols to further implement the ONRW designation, as set forth in WR Management Action 1.[54]

The proposed Monument Plan reflects the BLM's recognition that the ONRW designation imposes a responsibility to ensure that the water quality of the Río Grande running through the Monument remains consistent for the needs of both nature and for current and future generations of New Mexicans. The need for thoughtful, diligent management of this resource will continue to grow as the pressures of climate change and visitation increase. We urge the Taos Field Office to apply the new management prescriptions to prevent erosion and increased turbidity, to address other potential threats to our Outstanding Waters, including from illegal OHV activity, and to take great care and consider water quality when planning any infrastructure projects, trail building, or restoration efforts implemented pursuant to the final RMPA.

[48] 20.6.4.9.D(5) NMAC.
[49] Exhibit B, Letter from U.S. Environmental Protection Agency, Region 6 to N.M. Environment Dep't, Surface Water Quality Bureau regarding Designation of ONRWs (Feb. 8, 2023).
[50] 20.6.4.8.A(3) NMAC.
[51] 40 C.F.R. §.131.12(a)(3).
[52] Draft RMPA/EA at Appendix C, pp. C-54 to -55.
[53] *Id.* at pp. C-56, C-59.
[54] *Id.* at p. C-57.

2. Playas

The Draft RMPA/EA reflects that the Monument contains a total of 51 playa lakes.[55] These playas recharge groundwater supplies, offer critical migration habitat for a wide variety of birdlife, provide habitat for the Monument's amphibians including spadefoot toads and tiger salamanders, and supply seasonal water sources to many wildlife species. Additionally, playas are often rich in cultural resources. Despite their importance and sensitivity, the playas within the Monument have long suffered damage from various activities including unmanaged grazing and OHV use. For these reasons, we support all efforts by the Taos Field Office to protect and conserve these special areas to the highest degree possible.

We are pleased that the proposed Management Plan includes additional protections for playas, including the prioritization of restoration projects,[56] a prohibition on modifications in and around playas,[57] the protection of cultural and aquatic resources associated with playas, and a proposal to work cooperatively with livestock permittees to assess grazing impacts on playas.[58] We urge the BLM to take appropriate steps to construct livestock exclosures in these areas as needed and to address the impacts of illegal OHV activity, which causes a great deal of permanent harm and must be monitored and enforced.

I. Lands with Wilderness Characteristics

As recognized in the Draft RMPA/EA, Section 201 of FLPMA imposes an obligation on the BLM to maintain on a continuing basis an inventory of all public lands and their resources and other values, including lands with wilderness characteristics (LWCs).[59] The BLM updated its inventory of wilderness characteristics in 2006, prior to the implementation of the 2012 Taos RMP. Under the current RMP, the BLM manages only the San Antonio East unit (9,855 acres) to protect wilderness characteristics.[60] After the establishment of the Monument, the BLM conducted additional LWC inventory in 2017.[61] The BLM's 2017 inventory identified 166,106 acres of LWCs within eleven units, which are set forth in Table 3-6 of the Draft RMPA/EA.[62] Congress subsequently designated the Ute Mountain LWC unit as the Cerro del Yuta Wilderness.

Under the BLM's preferred Alternative B, the BLM would continue to manage San Antonio East (9,855 acres) to maintain its wilderness characteristics and would also manage Cerro de la Olla above the 8,200' in elevation (5,120 acres) to maintain its wilderness characteristics. Under

[55] *Id.* at p. 56.
[56] *Id.* at pp. 37, 57; Appendix C, p. C-17.
[57] *Id.*
[58] *Id.* at p. 19; Appendix C, p. C-12.
[59] *Id.* at p. 57.
[60] *Id.* at p. 58.
[61] *Id.*
[62] *Id.* at p. 58, Table 3-6.

Alternative B1, the BLM would continue its current approach, managing only San Antonio East as LWCs, while designating Cerro de la Olla as a Wilderness Study Area. As explained in Part N below, we strongly support Alternative B1, while encouraging the BLM to expand the size of the proposed Cerro de la Olla to include nearly 13,000 acres.

Additionally, we strongly urge the BLM to implement its 2017 Inventory for Lands with Wilderness Characteristics by managing all of the qualifying LWC units to maintain the wilderness characteristics of those lands.[63] These units include the Central Playas, Guadalupe Mountains, La Junta Rim, Llano, North Chiflo, Plover Prairie, and Punche Valley.[64] In particular, the North Chiflo unit (34,452 acres) should be prioritized for LWC management. Based on the LWC inventory and our knowledge of this landscape, we also encourage the BLM to manage as LWCs the entire width of the Río Grande gorge to the top of the rim on the East side from the confluence of the Red River north to the Colorado state line, as well as the portion of the Red River canyon within the Monument.

The BLM's 2017 LWC inventory reflects that the BLM intended to use this Monument planning process to evaluate and decide how to manage these LWC units, with several possible outcomes: (1) emphasize other multiple uses as a priority over protecting wilderness characteristics; (2) emphasize other multiple uses while applying management restrictions to reduce impacts to wilderness characteristics; or (3) protect wilderness characteristics as a priority over other multiple uses.[65] Now that RGDN has been designated as a National Monument, default multiple-use management no longer applies, and the RMPA must prioritize the protection and restoration of Monument objects and values, as described in Proclamation 8946. The BLM cannot authorize new development or discretionary uses of RGDN that conflict with the directives of the proclamation. Managing all eligible LWC units to maintain their wilderness character is consistent with the proclamation and would provide protection to Monument objects and values.

As the Monument Plan is implemented and amendments or revisions to the Taos 2012 RMP are considered in the future, the BLM should continue to update its inventory of other wilderness-quality lands within RGDN and should prioritize the management of lands with wilderness characteristics to protect the RGDN's wide range of natural and cultural resources and to mitigate the effects of climate change and biodiversity loss.

J. Land Use Authorizations

Although Proclamation 8946 reflects the need for utility line ROWs within the Monument, the proclamation acknowledges the potential damage that new utility line rights-of-way (ROWs) could

[63] Exhibit C, National Conservation Lands, New Mexico, Rio Grande del Norte National Monument, Inventory for Lands with Wilderness Characteristics (Jan 2017).
[64] *Id.*
[65] *Id.* at 7.

inflict on Monument objects and values, and places limitations on their expansion and designation.[66] The proclamation states,

> Nothing in this proclamation shall be construed to preclude the Secretary from renewing or authorizing the upgrading of existing utility line rights-of-way within the physical scope of each such right-of-way that exists on the date of this proclamation. *Additional utility line rights-of-way or upgrades outside the existing utility line rights-of-way may only be authorized if consistent with the care and management of the objects identified above*."[67]

Despite the proclamation's express limitation on new ROWs or expanded ROWs outside existing corridors, the Draft Monument Plan proposes the designation of a significant amount of new ROW. Specifically, the BLM proposes to widen the existing Powerline Falls ROW corridor, which spans over the Río Grande gorge, from 190 feet to 600 feet (47 acres). The BLM also proposes to designate a new ROW corridor following an existing 115-kilovolt transmission line within Horsethief Mesa and the Arroyo Hondo Land Grant. The new corridor would be approximately 2.5 miles long and have a width of 450 feet (136 acres).

As described above, infrastructure additions within these enormous ROW corridors could severely disrupt the Monument's viewshed and visual resources, especially across the Wild and Scenic River corridor, which protects scenery as an outstandingly remarkable value. New infrastructure would also have significant negative impacts on the wildlife that uses the gorge as a connected wildlife migratory corridor, and on the locals and visitors who use the gorge as a unique recreation waterway. Additionally, the construction of new transmission lines and utility infrastructure would impact soil health and vegetation, and would cause erosion and water quality degradation.

Moreover, the construction and maintenance of new transmission lines, facilities, and utility infrastructure will necessitate road upgrades. These upgrades, in turn, would create unintended access for irresponsible visitors, exacerbating the existing problem of illegal and unmanaged motorized activity and associated impacts to natural and cultural resources.

Given the limitations in Proclamation 8946, it is especially problematic that the BLM proposes to designate enormous ROWs through this RMPA process without having one or more concrete project proposals. Designated ROW corridors are intended to provide "a preferred location for existing and future linear rights-of-way and facilities. The corridor may be suitable to accommodate more than one right-of-way use or facility, provided that they are compatible with one another and

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[66] *See* 43 C.F.R. § 2801.5(b) ("Designated right-of-way corridor means a parcel of land with specific boundaries identified by law, Secretarial order, the land use planning process, or other management decision, as being a preferred location for existing and future linear rights-of-way and facilities. The corridor may be suitable to accommodate more than one right-of-way use or facility, provided that they are compatible with one another and the corridor designation.").

[67] Proclamation 8946 at pp. 3-4

the corridor designation."[68] Without knowing what transmission line or infrastructure projects might be proposed within these enormous new ROWs,[69] neither the BLM nor the public can meaningfully evaluate whether the project violates Proclamation 8946, which prohibits any new or expanded ROWs that are inconsistent with the care and management of Monument objects, including visual and wildlife resources.

At the public meeting on May 7, 2024, the BLM explained that ROW designation is a plan-level decision, i.e., new ROWs must be designated through an RMP revision or amendment. The BLM also acknowledged that, even if a new or expanded ROW is designated through this RMPA process, any future transmission line projects will require additional NEPA review, likely through an environmental impact statement.

We are concerned, however, that by designating ROWs through this RMPA process, the BLM might unintentionally pave the way for expedited review and approval of future transmission lines, infrastructure, and facilities without adequate review of Monument impacts or sufficient opportunities for public participation. The BLM recently updated its regulations addressing ROWs, leasing, and operations for renewable energy to promote solar and wind development and maximize "commercial interest" in lease sales and ROW grants.[70] The BLM is also working to finalize an updated Western Solar Plan to expedite implementation of national clean energy goals.[71] In the future, we anticipate that the BLM and federal public lands will continue to play an important role in the renewable energy transition, and the agency will likely enact more regulations and policies to facilitate and expedite siting and approval decisions. The agency may face pressure to adopt regulations that decrease environmental review and public participation for projects that occur in designated ROWs. The development of public lands for renewable energy is important to meeting our nation's goals, but within the RGDN National Monument and the Wild and Scenic River corridor, the BLM must give more weight to the conservation of Monument objects and outstandingly remarkable values. Without a specific project proposal, the BLM cannot evaluate whether it is striking an appropriate balance.

We strongly urge the BLM to reconsider its proposal to establish new and expanded ROW corridors through this RMPA process and to ensure that any future project proposals and associated impacts on the Monument are evaluated through a critical lens with a full and transparent public process.

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[68] 43 C.F.R. § 2801.5(b).

[69] Under the BLM's recently released final rule for renewable energy ROWs, leasing, and operations, the BLM may issue a ROW grant or lease for energy generation facilities, energy storage facilities, or electric transmission lines for up to 50 years. Dep't of Interior, BLM, Rights-of-Way, Leasing, and Operations for Renewable Energy, Final Rule, 89 Fed. Reg. 35,634, 35,677 (May 1, 2024) (eff. July 1, 2024) (to be codified at 43 C.F.R. § 2801.9(d)(3), (4), (6)).

[70] Dep't of Interior, BLM, Rights-of-Way, Leasing, and Operations for Renewable Energy, Final Rule, 89 Fed. Reg. 35634 (May 1, 2024) (eff. July 1, 2024).

[71] U.S. Dep't of Interior, BLM, Draft Programmatic Environmental Impact Statement for Utility-Scale Solar Energy Development, Doc. #DOI-BLM-HQ-3000-2023-0001-RMP-EIS (Jan. 2024), *available at* https://eplanning.blm.gov/eplanning-ui/project/2022371/570.

Once a specific transmission project proposal is received, the BLM can effectively analyze and consider both the transmission project and the needed RMP amendment as connected actions, through a consolidated NEPA process.[72]

K. Livestock Grazing

During the scoping process, we supported the BLM's proposal to make ten vacant allotments unavailable to grazing because those allotments lack necessary range infrastructure and have not been applied for in over a decade.[73] In the Draft RMPA/EA, the BLM now proposes to close only two of the grazing allotments (#621 East Río Grande and #628 Arroyo Hondo, totaling 1772 acres).[74] The draft explains that this change responds to public scoping comments as well as an explanatory statement from the House and Senate Appropriations Committees that accompanied the Fiscal Year 2022 (FY22) Consolidated Appropriations Act.[75] The explanatory statement, which relates to the expenditure of appropriations in FY22, encourages the BLM, "to the greatest extent practicable, to make vacant grazing allotments available to a holder of a grazing permit or lease when lands covered by the holder of the permit or lease are unusable because of drought or wildfire."[76] The FY22 explanatory statement is legally inapplicable to the BLM's development of this RMPA, and we believe the statement is irrelevant to the BLM's decision of whether to retain vacant grazing allotments on the Monument.

Given the Monument's already-arid environment and the drying climate, we are concerned that unsustainable grazing practices and insufficient monitoring and management of rangeland health could have adverse impacts on Monument objects, wildlife, soils, vegetation, and riparian resources. Under the circumstances, it appears that the retention of the eight allotments is unnecessary, especially given the lack of range fencing and water infrastructure. We do, however, recognize livestock grazing as a traditional use, and appreciate its cultural significance to the local community.

Many of our concerns around rangeland and ecological health would be significantly alleviated through the BLM's strict adherence to the BLM's fundamentals of rangeland health[77] and the New Mexico Statewide RMPA/Environmental Impact Statement (EIS),[78] which adopted statewide

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[72] *See* 40 C.F.R. § 1501.9(e)(1); see also CEQ, National Environmental Policy Act Implementing Regulations Revisions Phase 2, Final Rule, 89 Fed. Reg. 35442, 35556 (May 1, 2024) (eff. July 1, 2024) (to be codified at 40 C.F.R. 1501.3(b)(1)-(3)).
[73] Draft RMPA/EA at p. 22.
[74] Id. at p. 50.
[75] Fiscal Year 2022 Consolidated Appropriations Act, Explanatory Statement, Division G (accompanying Pub. L. 117-103).
[76] Draft RMPA/EA at p. 22.
[77] 43 C.F.R. § 4180.1
[78] Dep't of Interior, BLM, New Mexico Standards for Public Land Health and Guidelines for Livestock Grazing Management (Jan. 2001), *available at*

standards for public land health and guidelines for livestock grazing management. Proclamation 8946 provides that the "[l]aws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on lands under its jurisdiction shall continue to apply with regard to the lands in the monument."[79] We urge the BLM to ensure that land health evaluations, NEPA analyses, and permit adjustments are conducted on a regular basis to timely address and prevent adverse impacts to Monument objects.

We are also concerned about the proposal to allow new livestock grazing in the area north of the Cerro del Yuta Wilderness boundary for the stated purpose of achieving vegetation management objectives. The BLM asserts that this grazing would "promote seed propagation, reduce undesired grasses, and promote new growth for wildlife utilization. This would provide long term benefits to the livestock-grazing program by allowing grazing north of the Cerro del Yuta Wilderness and to wildlife by reducing caespitose grasses."[80] The use of grazing to manage vegetation is controversial, and we are concerned that this proposal may decrease overall soil, vegetation, and landscape health in this area, to the detriment of wildlife and the ecosystem. If the BLM proceeds with this aspect of its proposal, the BLM should commit to monitoring the success of prescriptive grazing practices, to promptly changing this approach if unsuccessful, and to maintaining and implementing additional livestock exclosures along streams, wetlands, and riparian areas to protect watershed health and sensitive wildlife habitat.

Finally, as explained above, we support Alternative B1, which would include the designation of Cerro de la Olla as a Wilderness Study Area under Section 202 of FLPMA, while urging the BLM to expand the acreage of the area. Although this designation would prohibit new range improvements within the Cerro de la Olla unit, the designation would allow maintenance of existing grazing infrastructure as long as the maintenance activities do not impair the existing wilderness characteristics.

L. Recreation

Proclamation 8946 reflects that RGDN was not designated for the express purpose of promoting outdoor recreation. Yet, outdoor recreation is of critical importance to locals and visitors alike, and as BLM is aware, increased visitation is putting increased pressure on recreation facilities and infrastructure within the Monument.

To strike an appropriate balance, the BLM proposes to continue its management to maintain recreation sites and facilities for quality experiences and enjoyment while incorporating new management prescriptions aimed at avoiding and mitigating damage to monument objects and

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https://www.blm.gov/sites/blm.gov/files/Standards%20for%20Public%20Land%20Health%20and%20Guidelines%20for%20Livestock%20Grazing%20in%20New%20Mexico.pdf.

[79] Proclamation 8946, at p. 4.

[80] Draft RMPA/EA at p. 72.

values, and sensitive resources and habitats.[81] The proposed Monument Plan would take steps to better align recreation management with current conditions and increased visitation trends within RGDN. We support the increased emphasis on the stewardship of Monument objects and values as well as the BLM's proposal to expand recreational infrastructure within Special Recreation Management Areas (SRMAs) by adding trails, trailheads, parking, and facilities.[82] We ask the BLM to uphold its commitment to monitoring the impacts of recreational shooting on public safety, other uses, and Monument objects and values.[83]

We urge the BLM to continue efforts to improve the sustainable recreational experience on the monument and improve access for all user groups, stakeholders, and communities, so long as the values and objects of the Monument are protected. We understand that boating has long been the BLM's highest priority for recreational resources due to its popularity. However, other uses of the landscape, such as hunting, fishing, wildlife viewing, and hiking, should also be priorities for the BLM. Along these lines we appreciate the BLM's recognition in the Draft RMPA that the monument supports a wide diversity of recreational activities, including rafting, boating, hunting, fishing, camping in developed campgrounds, exploring remote hiking locations in wildernesses areas, picnicking, scenic drives, stargazing, rock climbing, hiking, heritage tourism (i.e., petroglyphs), horseback riding, wildlife viewing, mountain biking, cross-country skiing, and hot spring soaking.[84]

M. Transportation and Access

Proclamation 8946 provides that, "[e]xcept for emergency or authorized administrative purposes, motorized vehicle use in the monument shall be permitted only on designated roads and non-motorized mechanized vehicle use shall be permitted only on designated roads and trails." Accordingly, all lands within the Monument are designated as either "motorized travel limited to designated routes" or as "closed to motorized use."[85] Under current management, the Monument encompasses two Travel Management Areas (TMAs), the Taos Plateau TMA and the Lower Río Gorge/Copper Hill TMA, plus one Travel Management Plan (TMP) for the Horsethief Mesa area.[86] The TMAs include approximately 538 miles of BLM roads within the Monument, and the vast majority (533 miles) consist of unpaved off-highway vehicle (OHV) roads.[87]

RGDN currently suffers negative impacts from illegal and unmanaged motorized activities. The Draft RMPA/EA reflects that increased off-highway vehicle (OHV) use within the Monument can negatively impact cultural resources,[88] traditional resource use by Tribal and Hispanic

[81] Draft RMPA/EA at Appendix C, pp. C-79 to -83.
[82] *Id.* at p. 79.
[83] *Id.* at p. 21.
[84] *Id.* at p. 73; Appendix F, p. F-3.
[85] *Id.* at p. 80.
[86] *Id.*
[87] *Id.*
[88] *Id.* at p. 29.

communities,[89] wildlife and habitat,[90] geologic resources,[91] and visual resources including dark night skies.[92] Unmanaged and illegal OHV use within the Monument also disturbs soils, accelerates erosion and water quality degradation, and increases wildfire risk.[93]

Given these concerns, we strongly support the BLM's proposal to develop a Travel Management Plan (TMP) to provide appropriate access to RGDN while minimizing conflicts among users and impacts to resources, including wildlife habitat, riparian area, wetlands, and cultural resources.[94] To minimize the ongoing degradation of resources, the BLM should work to obtain the funding and resources needed to complete the TMP project as soon as possible.

We also urge the BLM to take immediate steps to enforce existing regulations and limitations, and to address the significant consequences of unmanaged and illegal motorized use within the Monument. Increased signage and regular, coordinated law enforcement efforts in conjunction with the New Mexico Game and Fish Department would go a long way in dissuading illegal OHV activity. We encourage the Taos Field Office to work with organizations like Friends of RGDN and Backcountry Hunters & Anglers for volunteer sign placement and illegal road decommissioning projects.

N. Special Designations

1. Areas of Critical Environmental Concern

The 2012 Taos RMP established two Areas of Critical Environmental Concern (ACECs), the Taos Plateau ACEC (222,500 acres) and the Lower Gorge ACEC (21,190 acres), which overlap the entirety of the Monument.[95] Under the proposed Monument Plan, the BLM proposes to no longer manage these areas as ACECs because Proclamation 8946 and the proposed Monument Plan provide similar or heightened protections for the associated resources and values.[96] We support the BLM's proposal to simplify management by removing the ACEC designations, once the Monument has special management under Proclamation 8946 and a Monument Plan.

[89] *Id.* at pp. 31-32.
[90] *Id.* at p. 37.
[91] *Id.* at p. 44.
[92] *Id.* at p. 53; Appendix C, p. C-84.
[93] Dep't of Interior, BLM, Taos RMP Final Environmental Impact Statement, Vol. I, p. 205 (Nov. 2011), *available at* https://eplanning.blm.gov/eplanning-ui/project/68121/570.
[94] Draft RMPA/EA at pp. 81-82.
[95] *Id.* at p. 84.
[96] *Id.* at pp. 87-88; Appendix C, pp. C-87 to -94.

2. Wilderness Areas

We support the provisions in the Draft RMPA/EA that would establish appropriate management for the newly designated Cerro del Yuta Wilderness (13,420 acres) and Río San Antonio Wilderness (8,120 acres), in accordance with the Wilderness Act of 1964.[97]

3. Cerro de la Olla - Wilderness Study Area

We strongly support the BLM's proposal to manage Cerro de la Olla as a Wilderness Study Area. The area covers approximately 13,000 acres,[98] with the main feature being the Cerro de la Olla ("Pot Mountain"), an extinct shield volcano that rises to an elevation of 9,475 feet. The upper elevations of the volcano offer solitude and expansive views of the Sangre de Cristo and San Juan Mountains, and the dramatic Río Grande gorge. The area also provides recreational opportunities such as hiking, camping, and hunting; contains important habitat for a wide range of wildlife species including elk, mule deer, black bears, and mountain lions; and supports traditional uses such as grazing and the collection of herbs, firewood, and piñon nuts.

Since 2020, members of New Mexico's congressional delegation have been seeking permanent protection for this special place.[99] The current legislation was introduced in both the Senate and House of Representatives in 2023 and would protect 12,898 acres as the Cerro de la Olla Wilderness.[100] The boundaries of the proposed wilderness area were developed through a careful on-the-ground inventory of roads that are open to motorized travel, dispersed camping sites adjacent to them, and reasonable access to traditional uses such as wood cutting and hunting. The Bureau of Land Management formally supported designating the 12,898 acres as Wilderness in a hearing before the Senate Energy and Natural Resources Committee on June 16, 2021.[101] Last July, the Committee reported the bill with a recommendation that the Senate pass it, as it did in the 117th Congress.[102] The legislation has widespread local support from a wide range of community members, as well as the Taos County Commission and Taos Pueblo. In December 2023, New Mexico's full congressional delegation transmitted a letter to New Mexico State BLM Director, emphasizing the values of the area and urging the BLM to designate Cerro de la Olla as a Wilderness Study Area (WSA).[103]

We are pleased that both of the action alternatives in the Draft RMPA/EA would direct the BLM to manage Cerro de la Olla to protect its wilderness qualities. Under Alternative B, the BLM would

[97] Wilderness Act of 1964, 16 U.S.C. §§ 1131 et seq.
[98] Draft RMPA/EA, Table 3-6 (identifying 12,236 acres as having wilderness characteristics).
[99] *See* S. 3241, H.R. 8564 (116th Cong. 2000); S.117; H.R. 2522 (117th Cong. 2022).
[100] *See* Cerro de la Olla Wilderness Establishment Act, S. 593; H.R. 1313 (118th Cong. 2023).
[101] *See* S. Rept. 118-54, Cerro de la Olla Wilderness Designation (July 11, 2023).
[102] *Id*.
[103] Exhibit D, Letter to State Director Melanie Barnes from Senator Martin Heinrich, Senator Ben Ray Luján, Representative Melanie Stansbury, Representative Teresa Leger Fernández, and Representative Gabe Vasquez (Dec. 14, 2023).

manage 5,120 acres in the Cerro de la Olla area "to minimize impacts on wilderness characteristics, while allowing compatible uses that are consistent with the protection of Monument objects."[104] Under Alternative B1, the BLM would designate the area as a new WSA under the authority of Section 202 of FLPMA.[105] Under either alternative, Cerro de la Olla would be closed to new ROWs and motorized travel.[106] Alternative B1 would provide additional protection by applying Visual Resource Management (VRM) Class I objectives and the management prescriptions set forth in BLM Manual 6330, Management of Wilderness Study Areas, which provides policy guidance on the non-impairment standard and prolonged stewardship.

We applaud the BLM asserting its longstanding authority to designate Cerro de la Olla as a WSA under Section 202 of FLPMA, and we urge the BLM to designate the full 12,898 acres recommended by the Senate Energy and Natural Resources Committee and supported by the New Mexico congressional delegation, an enlargement of 5,120 acres proposed in Alternative B1. Under this alternative, the BLM would manage and protect all of the lands with wilderness characteristics at Cerro de la Olla so as not to impair the suitability of the area for designation by Congress as wilderness. This larger area would also substantially improve the protection and proper management of Monument objects, including protecting habitat for the wildlife that frequently use the lower elevations and by "reducing the potential for adverse effects from illegal artifact collection, vandalism, and trampling of cultural resources", as the draft recognizes.[107]

We understand that the BLM has proposed to manage only 5,120 acres as a WSA (above 8200' in elevation) "to account for existing access, wildlife-habitat improvements, and other resource uses."[108] However, existing access, wildlife-habitat improvements, and other appropriate resource uses already are fully accounted for by the congressional proposal through the applicable wilderness management standards and the carefully-delineated boundaries of that proposal. The Draft RMPA/EA ignores those boundaries and standards, instead using the very coarse approach of a standard elevation for a boundary. Once the Monument Plan is finalized, we recommend that the BLM implement the non-impairment standard by taking steps to prevent unlawful motorized incursions around the existing gate at the bottom of the old road.

Furthermore, the non-impairment standard in BLM Manual 6330 includes exceptions that allow the continuation of certain legacy uses and of actions that protect or enhance wilderness values. The BLM could apply these exceptions to the non-impairment standard in a manner that allows the BLM to coordinate with the New Mexico Department of Game and Fish to conduct ongoing

[104] Draft RMPA/EA at p. 20.
[105] FLPMA, 43 U.S.C. § 1712.
[106] Based on our participation in the public meeting that BLM conducted on May 7, 2024, our understanding is that the Cerro de la Olla area is currently open to motorized travel on designated routes only, and that the old road that travels up the mountain from the south side is not a designated route. It thus appears that closing the area to motorized travel (with a possible exception for administrative use by the BLM to maintain wildlife guzzlers) will not change management on the ground.
[107] Draft RMPA/EA at p. 30.
[108] *Id.* at p. 60.

maintenance of existing structures or facilities for wildlife water development projects (e.g. guzzlers) in the WSA. The pending Wilderness legislation would permit this type of maintenance if the structure or facility would enhance wilderness values by promoting healthy, viable, and more naturally distributed wildlife populations; and the visual impacts of the structure or facility on the wilderness can reasonably be minimized. Pending permanent protection by Congress, the BLM could adopt and implement management direction consistent with language in the pending Wilderness legislation.[109]

4. Wild and Scenic Rivers

As further discussed in Part G (Visual Resources) above, we have significant concerns that the BLM's proposal to designate a 600' ROW corridor across the Río Grande gorge will negatively impact the outstandingly remarkable values that led Congress to designate the Río Grande as a Wild and Scenic River. Under the Wild and Scenic Rivers Act, the BLM must manage the Wild and Scenic River corridor to preserve the river's natural and primitive conditions. The BLM should reconsider the ROW proposal.

We strongly support the BLM's proposal to apply interim protective management guidelines for eligible Wild and Scenic River segments, including portions of Arroyo Hondo (1.3 miles), Red River (1 mile), and Río San Antonio (4.5 miles), as well as the suitable segment of the Río Pueblo de Taos (1.1 miles).[110] Given the anticipated future impacts from climate change and increased human pressure, it is critical that the BLM adopt interim protective-management guidelines to clarify how these river segments will be protected and to provide more comprehensive management, maintenance, and protections of free-flowing conditions, outstandingly remarkable values, and water quality.[111]

5. Old Spanish National Historic Trail

A portion of the Old Spanish National Historic Trail (OSNHT), designated by Congress in 2002, traverses the Monument. This trail connects landscapes important to affiliated groups. The 2012

[109] The pending Cerro de la Olla Wilderness Establishment Act provides as follows:

"The Department of the Interior must enter into a cooperative agreement with New Mexico that specifies, subject to certain prohibition provisions under the Wilderness Act, the terms and conditions under which wildlife management activities in the wilderness may be carried out.
Subject to such agreement and such prohibition provisions, Interior may authorize the maintenance of any existing structure or facility for wildlife water development projects (including guzzlers) in the wilderness, if

- the structure or facility would enhance wilderness values by promoting healthy, viable, and more naturally distributed wildlife populations; and
- the visual impacts of the structure or facility on the wilderness can reasonably be minimized."

[110] Draft RMPA/EA at p. 85.
[111] *Id.* at p. 88.

Taos RMP directs the BLM to develop a comprehensive management plan for the historic trail and complete an archaeological inventory.[112] It appears that the BLM has not completed these steps. The BLM should work to implement the provisions in the 2012 Taos RMP, including the acquisition of available private lands with trail resources by purchase or exchange, and State trust lands containing trail resources by exchange, provided that the BLM should retain all lands currently within the Monument boundary.

Additionally, we encourage the BLM to take additional steps aimed at increasing coordination with the National Park Service and management consistency for the OSNHT. The BLM should ensure that the trail is well identified on the landscape, and interpretive signs should be placed where the trail crosses high use areas for the education and awareness of the public. Finally, we support the BLM's proposal to conduct archaeological inventories, as described in NHT Management Action 3.[113]

CONCLUSION

We thank the BLM for the obvious hard work and dedication that went into drafting the RMPA/EA. We know that the entire agency, from headquarters to the Taos Field Office, is working with limited resources and capacity to manage a vast amount of public land, and we appreciate the prioritization of ensuring appropriate management for the incredible landscape encompassed by the RGDN National Monument.

Given the relative recency of the 2012 Taos RMP and the existing management provisions for the Monument, we support the BLM's use of a streamlined environmental assessment approach to adopt a Monument Plan through an RMPA. Once this management framework is in place, the BLM can turn its energy and focus to the much-needed work at the project implementation level, such as addressing visitor access issues, conducting trail and infrastructure projects, improving signage and interpretation, completing travel management planning, organizing fish and wildlife habitat improvement projects, leading ethnographic and archaeological studies, and increasing enforcement and patrols.

Overall, the proposed Monument Plan would provide for better management of RGDN and its objects and values, including cultural, wildlife, and ecological resources. We strongly urge the BLM to adopt Alternative B1 (modified to include expanded acreage), which would designate Cerro de la Olla as a Wilderness Study Area under Section 202 of FLPMA. We also ask the BLM to reject its proposal to designate new and expanded ROW corridors through this RMPA process, which could result in future transmission and utility projects that are inconsistent with the care and protection of Monument objects and the Wild and Scenic River corridor and values. With the exception of the proposed ROWs, we support the BLM's proposal to issue a Finding of No Significant Impact (FONSI) for the proposed RMPA/EA, and we urge the BLM to promptly incorporate public input and finalize the Monument Plan.

[112] 2012 Taos RMP at Appendix A, pp. 114-15.
[113] Draft RMPA/EA at Appendix C, p. C-98.

Thank you for the opportunity to provide these comments. Please include them in the official record.

Sincerely,

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Encl:
Ex. A: Report from U.S. Fish & Wildlife Serv., IPaC Information for Planning and Consultation
Ex. B: Letter from U.S. EPA Region 6 to N.M. Environment Dep't regarding ONRW Designation
Ex. C: Rio Grande del Norte National Monument Inventory for Lands with Wilderness Characteristics
Ex. D: Letter from N.M. Congressional Delegation in Support of WSA for Cerro de la Olla

Exhibit A

U.S. Fish & Wildlife Service

IPaC Resource List

Report Generated April 24, 2024

IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Rio Arriba and Taos counties, New Mexico

Local office

New Mexico Ecological Services Field Office

(505) 346-2525
(505) 346-2542

2105 Osuna Road Ne
Albuquerque, NM 87113-1001

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

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1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).

2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS
Canada Lynx Lynx canadensis There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/3652	Threatened
New Mexico Meadow Jumping Mouse Zapus hudsonius luteus Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/7965	Endangered
Tricolored Bat Perimyotis subflavus Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/10515	Proposed Endangered

Birds

NAME	STATUS
Mexican Spotted Owl Strix occidentalis lucida Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8196	Threatened
Southwestern Willow Flycatcher Empidonax traillii extimus Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/6749	Endangered

Yellow-billed Cuckoo Coccyzus americanus — Threatened

There is **final** critical habitat for this species. Your location does not overlap the critical habitat.
https://ecos.fws.gov/ecp/species/3911

Fishes

NAME	STATUS
Rio Grande Cutthroat Trout Oncorhynchus clarkii virginalis Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/920	Candidate

Insects

NAME	STATUS
Monarch Butterfly Danaus plexippus Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/9743	Candidate
Silverspot Speyeria nokomis nokomis Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/2813	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and golden eagles are protected under the Bald and Golden Eagle Protection Act[1] and the Migratory Bird Treaty Act[2].

Any person or organization who plans or conducts activities that may result in impacts to bald or golden eagles, or their habitats[3], should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

There are likely bald eagles present in your project area. For additional information on bald eagles, refer to Bald Eagle Nesting and Sensitivity to Human Activity

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31
Golden Eagle *Aquila chrysaetos* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Dec 1 to Aug 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

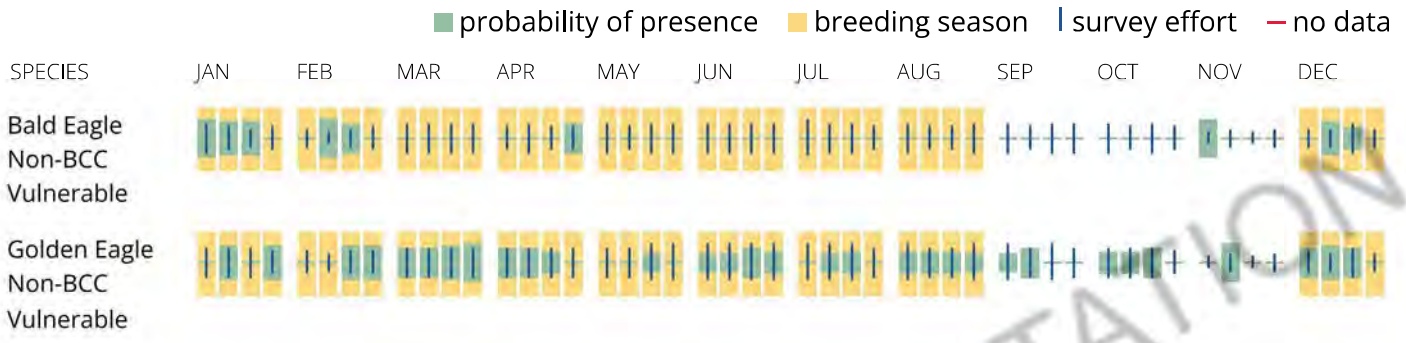
Breeding Season (■)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply). To see a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What does IPaC use to generate the probability of presence graphs of bald and golden eagles in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur. Please contact your local Fish and Wildlife Service Field Office if you have questions.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats[3] should follow appropriate regulations and consider implementing appropriate conservation measures, as described in the links below. Specifically, please review the "Supplemental Information on Migratory Birds and Eagles".

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide conservation measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the PROBABILITY OF PRESENCE SUMMARY below to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Dec 1 to Aug 31
Black Rosy-finch *Leucosticte atrata* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9460	Breeds Jun 15 to Aug 31
Black-chinned Sparrow *Spizella atrogularis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9447	Breeds Apr 15 to Jul 31
Brown-capped Rosy-finch *Leucosticte australis* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Jun 15 to Sep 15
Cassin's Finch *Haemorhous cassinii* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9462	Breeds May 15 to Jul 15
Clark's Nutcracker *Nucifraga columbiana* This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Jan 15 to Jul 15
Evening Grosbeak *Coccothraustes vespertinus* This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds May 15 to Aug 10

Flammulated Owl Psiloscops flammeolus — Breeds May 10 to Aug 15
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/7728

Golden Eagle Aquila chrysaetos — Breeds Dec 1 to Aug 31
This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities.
https://ecos.fws.gov/ecp/species/1680

Grace's Warbler Setophaga graciae — Breeds May 20 to Jul 20
This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA

Lesser Yellowlegs Tringa flavipes — Breeds elsewhere
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9679

Lewis's Woodpecker Melanerpes lewis — Breeds Apr 20 to Sep 30
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9408

Mountain Plover Charadrius montanus — Breeds Apr 15 to Aug 15
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/3638

Olive-sided Flycatcher Contopus cooperi — Breeds May 20 to Aug 31
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/3914

Pinyon Jay Gymnorhinus cyanocephalus — Breeds Feb 15 to Jul 15
This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9420

Virginia's Warbler Leiothlypis virginiae — Breeds May 1 to Jul 31

This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.
https://ecos.fws.gov/ecp/species/9441

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

Breeding Season (■)

Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)

Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

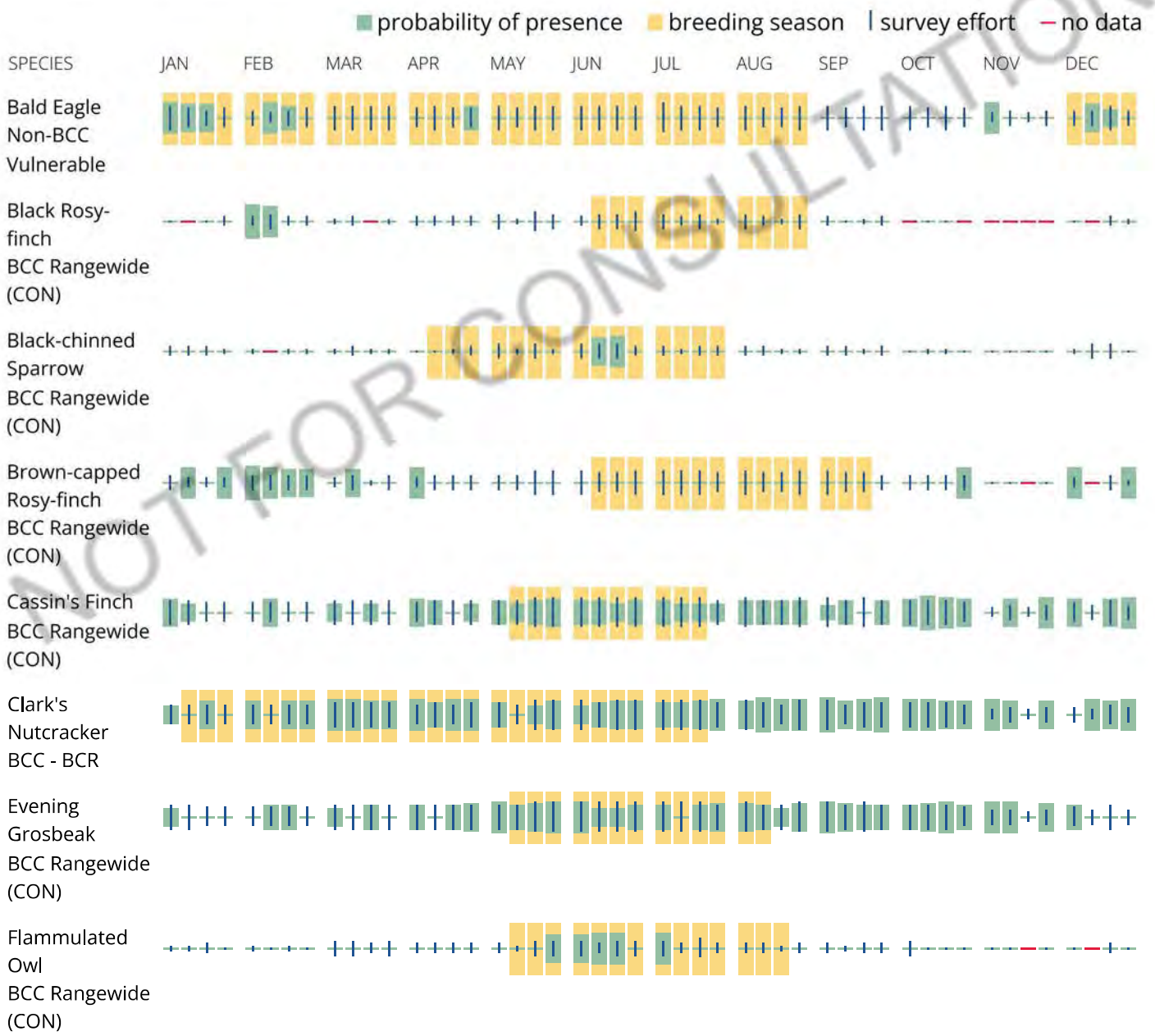
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)

A week is marked as having no data if there were no survey events for that week.

Survey Timeframe

Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the Rapid Avian Information Locator (RAIL) Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may query your location using the RAIL Tool and look at the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Wetland information is not available at this time

This can happen when the National Wetlands Inventory (NWI) map service is unavailable, or for very large projects that intersect many wetland areas. Try again, or visit the NWI map to view wetlands at this location.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also

been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

Exhibit B

Letter from U.S. Environmental Protection Agency

Region 6

to N.M. Environment Department

Surface Water Quality Bureau

Re: Designation of ONRWs in the State of NM's
Standards for Interstate and Intrastate Surface Waters
(20.6.4 NMAC)

Feb. 8, 2023

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

February 8, 2023

Shelly Lemon, Chief
Surface Water Quality Bureau
New Mexico Environment Department
1190 Saint Francis Drive, Suite N4050
Santa Fe, New Mexico 87505

RE: Designation of Outstanding National Resource Waters in the State of New Mexico's *Standards for Interstate and Intrastate Surface Waters* (20.6.4 NMAC)

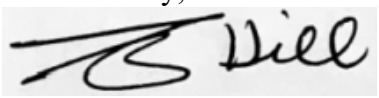
Dear Ms. Lemon:

I am writing in response to your letter of October 24, 2022, requesting review and action on revisions to New Mexico's *Standards for Interstate and Intrastate Surface Waters* 20.6.4 New Mexico Administrative Code (NMAC). These revisions designating Outstanding National Resource Waters (ONRW) were submitted to the U.S. Environmental Protection Agency (EPA) as required under federal regulations at 40 CFR § 131.5. The revised water quality standards were certified by Christal Weatherly, Special Assistant Attorney General for the State of New Mexico, as having been adopted pursuant to the laws of the state of New Mexico and became effective as state law on September 24, 2022. The EPA received the submission under New Mexico Environment Department (NMED) Cabinet Secretary delegated signatory authority on October 24, 2022.

I am pleased to inform you that in today's action, the EPA is approving the results of two independent public Water Quality Control Commission (Commission) hearings to designate waters in New Mexico as ONRWs within its discretionary authority pursuant to CWA § 303(c) and its implementing regulations at 40 CFR Part 131. The EPA's approval is specific to all waters of the state within the "upper Pecos watershed" upstream of the Dalton Canyon Creek Day Use Area to the U.S. Forest Service Wilderness Boundary ("Pecos ONRW") [Commission Docketed Matter 21-51(R)] and the Rio Grande from directly upstream of the Rio Pueblo de Taos to the New Mexico-Colorado state border, the Rio Hondo from the Carson National Forest boundary to its headwaters, Lake Fork Creek from the Rio Hondo to its headwaters, the East Fork Jemez River from San Antonio Creek to its headwaters, San Antonio Creek from the East Fork Jemez River to its headwaters, and Redondo creek from Sulphur Creek to its headwaters ("Rio Grande-Hondo-Jemez ONRW") [Commission Docketed Matter 21-62(R)]. The EPA is not approving the New Mexico water quality standards for those waters or portions of waters located in Indian Country, as defined in 18 U.S.C. § 1151.

I would like to thank the Commission, the NMED and the Surface Water Quality Bureau for their commitment and hard work with citizens of New Mexico in revising the state's water quality standards to designate these waters as ONRWs. If you have any questions or concerns, please contact me at (214) 665-7101, or have your staff contact Russell Nelson at (214) 665-6646 or Jasmin Diaz-Lopez at (214) 665-2733.

Sincerely,



Troy C. Hill
Acting Director
Water Division

cc: James C. Kenney, Cabinet Secretary (James.Kenney@env.nm.gov)
David Sypher, Municipal and County Representative, WQCC Vice Chair (Acting Chair) dsypher@fmtn.org
Robert Sanchez, Counsel, WQCC (rfsanchez@nmag.gov)
Pamela Jones, Administrator, WQCC (Pamela.Jones@state.nm.us)
John Rhoderick, NMED Acting Director, Water Protection Division (John.Rhoderick@state.nm.us)
Christal Weatherly, NMED Office of General Counsel (christal.weatherly@env.nm.gov)
Jennifer Fullam, NMED-SWQB, Standards Planning and Reporting (Jennifer.Fullum@state.nm.us)

Exhibit C

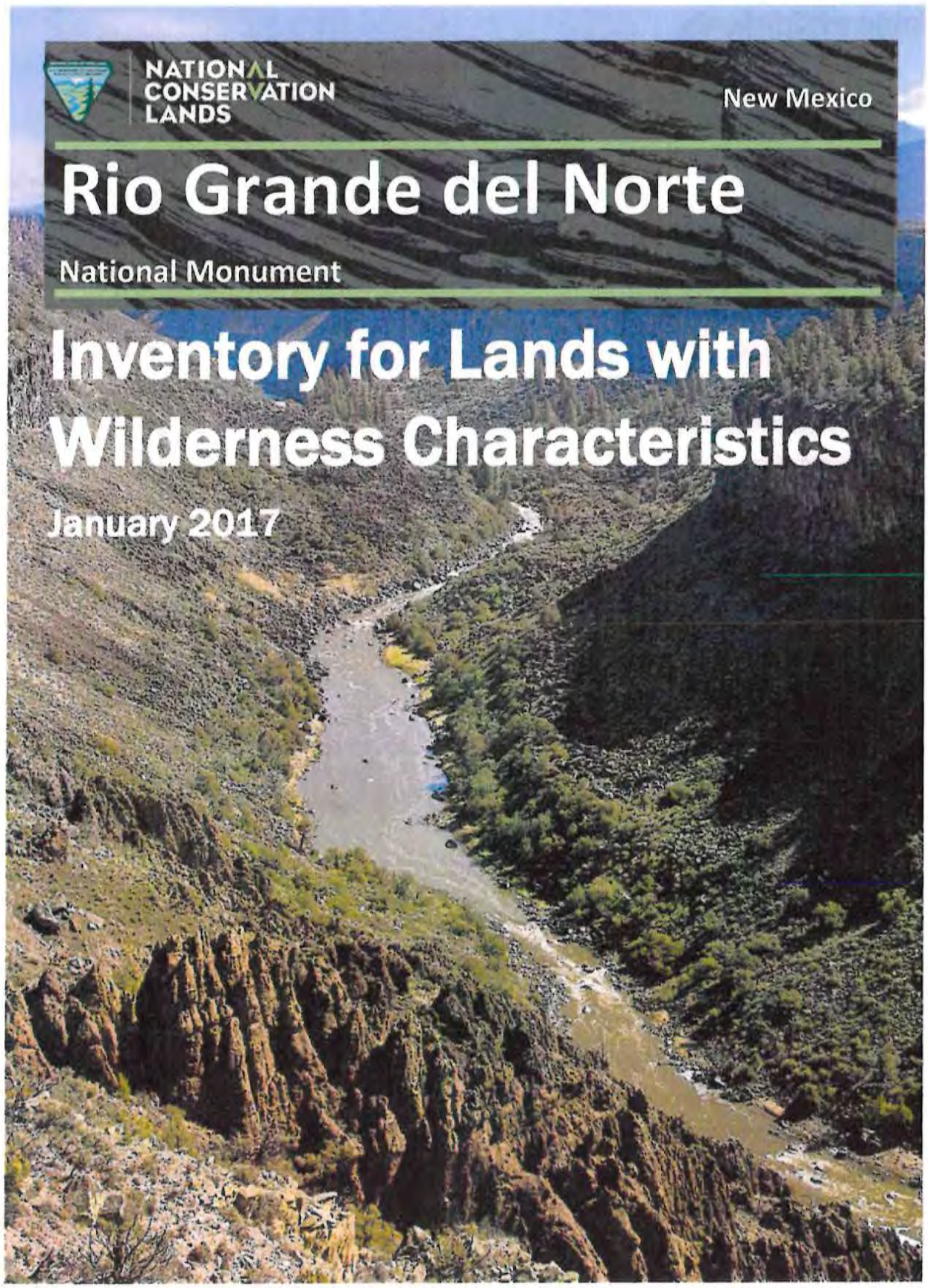
Bureau of Land Management

National Conservation Lands New Mexico

Rio Grande del Norte National Monument

Inventory for Lands with Wilderness Characteristics

January 2017


NATIONAL CONSERVATION LANDS
New Mexico
Rio Grande del Norte
National Monument
Inventory for Lands with Wilderness Characteristics
January 2017

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Rio Grande del Norte National Monument

Inventory for Wilderness Characteristics

Summary

Introduction

The Federal Land Policy and Management Act (FLPMA) requires the BLM to prepare and maintain on a continuing basis an inventory of all public lands, their resources, and other values. Wilderness characteristics is one of these resources. Current guidance for inventorying lands with wilderness characteristics is found in BLM Manual 6301 – Wilderness Characteristics Inventory (February 25, 2011). For an area to be classified as a 'land with wilderness character,' 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.

Size: roadless areas with over 5,000 acres of contiguous BLM lands. In the Monument, smaller areas may be considered if they are adjacent to BLM lands managed by another office that also have wilderness character, or adjacent to Forest Service lands which have been designated wilderness, are a Forest Service wilderness study area, or is an area of recommended wilderness.

Naturalness: the area is affected primarily by the forces of nature, and any work of humans, such as trails, trail signs, fire rings, fencing, spring developments, and stock ponds, must be substantially unnoticeable.

Outstanding opportunities for solitude or a primitive and unconfined type of recreation: an area only needs to possess one or the other of these opportunities, and opportunities do not have to be present on every acre.

The first inventory for wilderness characteristics on lands now in the Monument was conducted in the late 1970s, and resulted in the designation of the Rio San Antonio Wilderness Study Area. When the BLM began to prepare its most recent Resource Management Plan in 2006, the lands managed by the Taos Field Office were re-inventoried, and six roadless areas in what is now the Monument were found to meet the three criteria:

East of San Antonio,
Cerro de la Olla,
Chiflo/North of Chiflo, and Windmill (a subunit of Chiflo/North of Chiflo),
Rio Costilla, and
Ute Mountain.

When the RMP was completed in 2012, the units East of San Antonio and Ute Mountain were identified for management which would retain wilderness character, through restrictions on surface use, including closure to motorized vehicles or strict limits on their use.

Upon initiating the Monument planning process in 2014, the BLM recognized that it would be timely to update our inventory of wilderness character. In particular, new guidance for inventorying for wilderness characteristics had been issued (Manual 6301 – Wilderness Characteristics Inventory, February 25, 2011). This was much more detailed than what had been available to us in 2006. Also, it was known that conditions on the land were changing, either as a result of earlier decisions (for example, to close certain roads in the area in the early 1990s), changes in land use, or the work of natural processes.

The update of our inventory for lands with wilderness characteristics was started in August, 2014. A map of the Monument was prepared that showed areas previously inventoried and found to have wilderness character, all known roads constructed or maintained with the use of heavy equipment, and several other routes that were known to receive high use. BLM staff who knew the area best (range, maintenance and engineering, and wildlife expertise) were asked to identify routes on the map known to have been constructed or maintained by mechanical means – these lines created a series of polygons that were tentatively deemed to be 'roadless.' The next step was to use GIS tools to determine which of these polygons enclosed at least 5,000 acres of contiguous public land. The eleven areas that were left were then field reviewed by a team of four – John Bailey, Valerie Williams, Chris Hitsman and Mark Sundin - to determine if these areas were indeed free of mechanically constructed or maintained roads. As part of their field review, all man-made intrusions were identified and mapped, including fences, primitive routes, trails, water developments such as wells or impoundments, and pipelines. Through this process the polygons have been modified to include only those lands found to at least minimally meet these criteria. The field review team then spent a significant amount of time in each polygon to determine whether they met the two remaining criteria (the area appears to be in a natural condition, and has outstanding opportunities for solitude *or* a primitive or unconfined type of recreation).

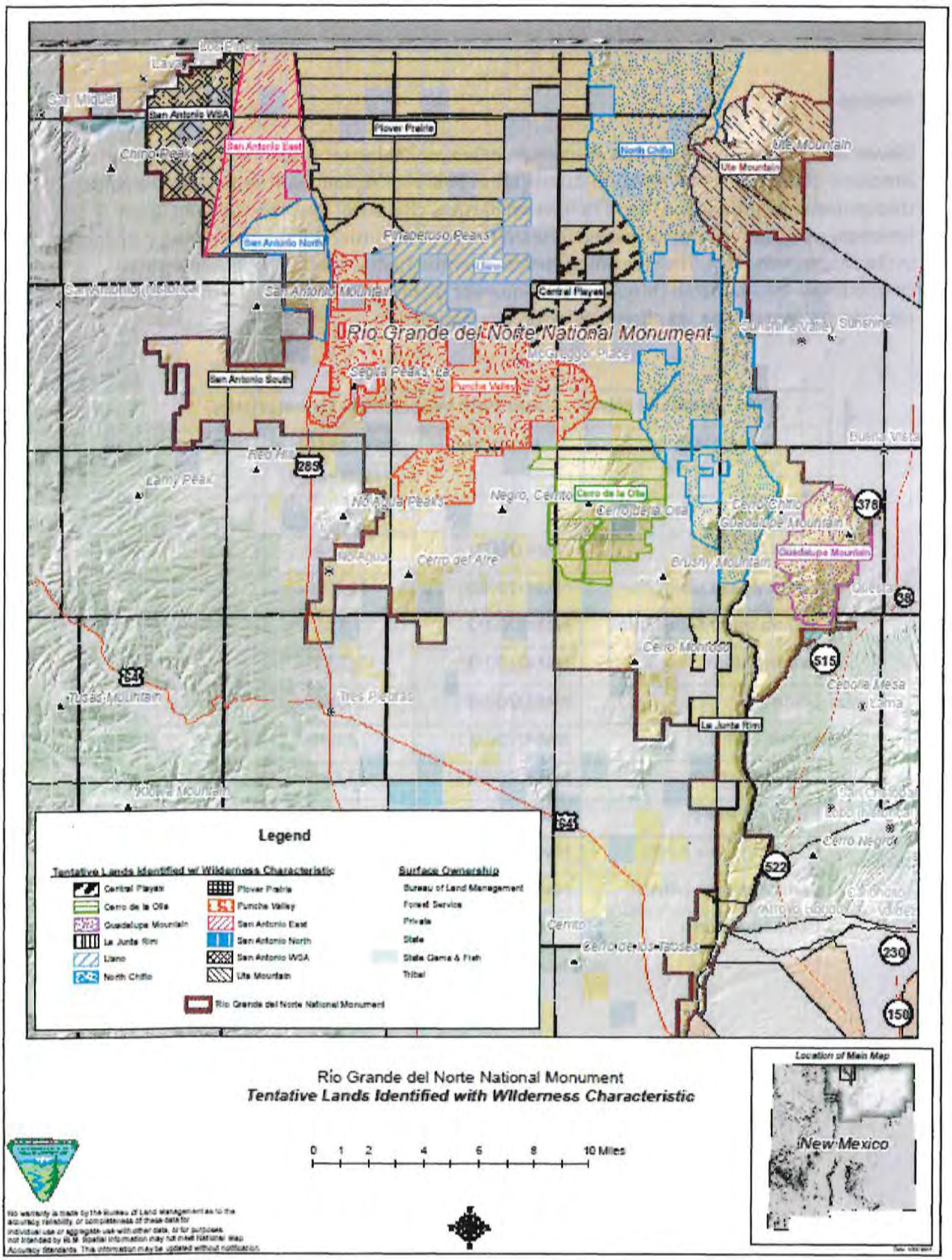
Two meetings were held with livestock permittees in September 2015 to review our draft maps and provide information on additional roads they have maintained mechanically, or to identify range improvements that we did not show on the maps. As a result, the Plover Prairie inventory unit was divided in two, creating a new area, Llano.

The BLM also reviewed information prepared by the Friends of the Rio Grande del Norte. They identified four areas that they felt met the three criteria, and therefore had wilderness character. All of the areas they identified are within an area also found by the BLM to have wilderness character. No other citizen proposals were provided to the BLM.

Findings

Eleven areas have been identified as having wilderness character; a twelfth inventory unit, San Antonio – South, does not meet the size criterion but is contiguous with Forest Service lands that at some point might be found to have wilderness character. It will be retained as an inventory unit, but will not be carried forward for further consideration of wilderness character in the Monument Plan. The remaining eleven inventory units found to have wilderness character will be evaluated through the Monument planning process to determine the most appropriate way to manage their wilderness characteristics:

Rio Grande del Norte – Lands with Wilderness Characteristics			
Unit Name	**Identifier**	**Acreage (BLM lands only)**	**Map No.**
Overview Map			**1**
Central Playas	NM-020-01	8,339	**2**
Cerro de la Olla	NM-010-36	12,236	**3**
Guadalupe Mountains	NM-020-02	7,131	**4**
La Junta Rim	NM-020-03	9,335	**5**
Llano	NM-020-04	6,588	**6**
North Chiflo	NM-010-33	34,452	**7**
Plover Prairie	NM-020-05	32,636	**8**
Punche Valley	NM-020-06	25,772	**9**
San Antonio – East	NM-020-07	9,855	**10**
San Antonio – North	NM-020-08	5,841	**11**
Ute Mountain	NM-020-10	13,425	**12**



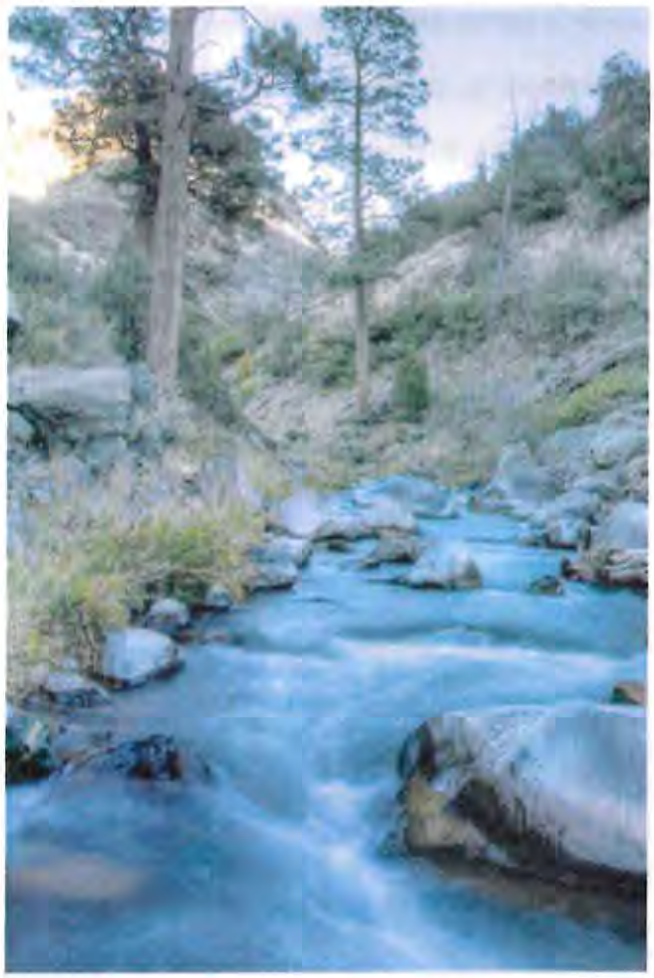
Map 1 - Overview

Management Options

The Presidential Proclamation that established the Rio Grande del Norte National Monument in March 2013 specifically called on the BLM to prepare a new management plan for purposes of protecting and restoring the new Monument's objects of value. BLM management plans are prepared in compliance with the National Environmental Policy Act of 1969 (NEPA), which requires federal agencies to assess the potential impacts of its decisions and to consider other options, or alternatives, which might result in lesser impacts.

As part of its management planning for the Monument, the BLM must decide the most appropriate means of managing all resources, including wilderness character; and resource uses. The BLM must consider and analyze a full range of alternatives for such lands through its Monument planning effort. Considering wilderness character in the planning process may result in several outcomes, including, but not limited to:

1. emphasizing other multiple uses as a priority over protecting wilderness characteristics;
2. emphasizing other multiple uses while applying management restrictions (conditions of use, mitigation measures) to reduce impacts to wilderness characteristics; and
3. protection of wilderness characteristics as a priority over other multiple uses.



Central Playas [NM-020-01]

Acreage: **8,339**

(1) Is the area of sufficient size?

Yes. See Maps 1 and 2 for location and boundary information. The northern boundary is the New Mexico-Colorado state line; the other boundaries are roads or state/private property boundaries. Because of land ownership patterns, the unit is only two to three miles wide.

(2) Does the area appear to be natural?

Yes. Human intrusions are related to livestock management; most boundaries are accompanied by fence lines. There are 11 range fences totaling 6.4 miles, and eight water improvements (four troughs, one well/tank, one wildlife drinker, and two earthen reservoirs). A 2010 route inventory identified 12.8 miles inside this inventory unit; none showed signs of maintenance or construction.

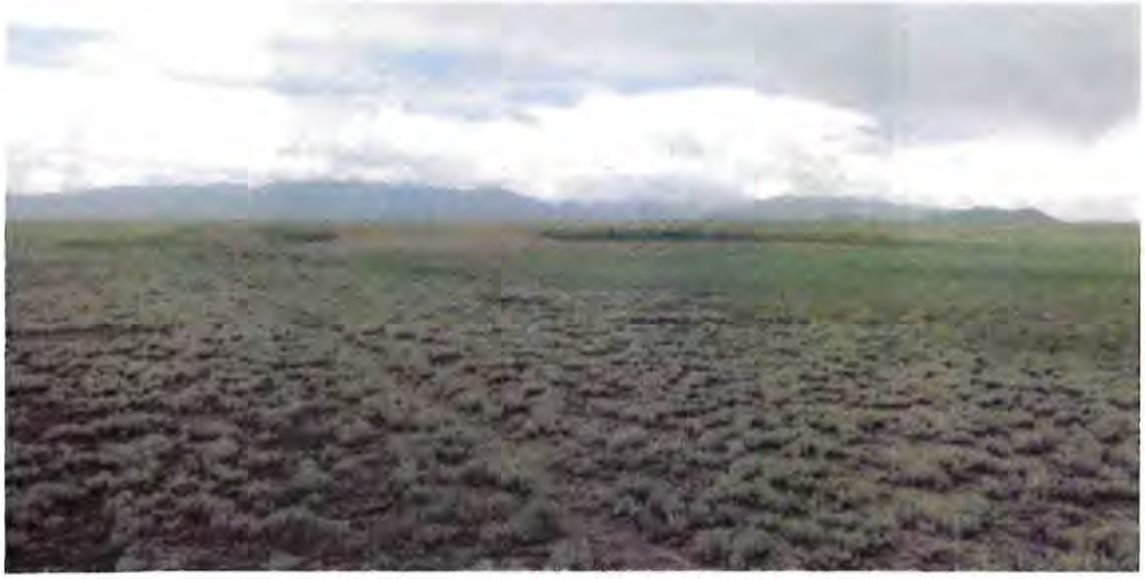
The Central Playas roadless area is all BLM-managed land. Appearance is natural, but with more chance in this inventory unit to have a fence line within view than in other units. The landscape is characterized by gently rolling hills, with limited topographic relief. Vegetation cover is comprised of low growing shrubs, grasses and forbs.

(3) Does the area have outstanding opportunities for solitude?

Yes. Human activity is low, providing an outstanding opportunity for solitude.

(4) Does the area have outstanding opportunities for primitive and unconfined recreation?

Yes. The area is relatively flat, so is easy to move around in. Opportunities related to primitive or unconfined recreation include hiking, horseback riding, hunting, bird watching, photography and sightseeing.



(5) Does the area have supplemental values (ecological, geological, or other features of scientific, educational, scenic or historical value)?

Yes. The area contains significant ecological diversity in a remote area with relatively low human disturbance. A number of focal species occur here due to the presence of high elevation short grass prairie habitat that is in very good condition. Playa lakes are in the inventory unit, and provide habitat for amphibians and other invertebrates.

Big game, including antelope, Rocky Mountain elk, and mule deer use the area as critical winter range and can be found in large herds in this unit during that time. The Heritage Program New Mexico, in coordination with the University of New Mexico, recently released a report describing areas of opportunity for interagency coordination to promote and protect wildlife connectivity across the landscape. Using a variety of data sources, including the New Mexico Critical Habitat Assessment Tool (CHAT), they developed an initial assessment of Wildlife Movement Focal Areas that includes this inventory unit.

Colonies of Gunnison prairie dogs, a BLM Sensitive Species, exist throughout the unit. Thirteen known prairie dog colonies have been assessed in this unit between 2003 and 2010. This keystone species provides a prey base for raptors, carnivores, and nesting habitat for western burrowing owl, another BLM Sensitive Species. Of the prairie dog colonies measured in 2010, approximately 115 acres of active towns were located in this inventory unit, with one town comprising 50 acres. Due to the number and extent of prairie dog colonies in this unit, it is likely western burrowing owl occurs here regularly.

Breeding of western burrowing owl was confirmed in this unit in 2010 (Hawks Aloft 2010). In 2014 and 2016 an NLCS Science Grant was awarded to study the status of the Gunnison prairie dog within the Monument to determine feasibility of potential reintroduction of black-footed ferret. Surveys and monitoring for prairie dogs and burrowing owls occur as funding allows.

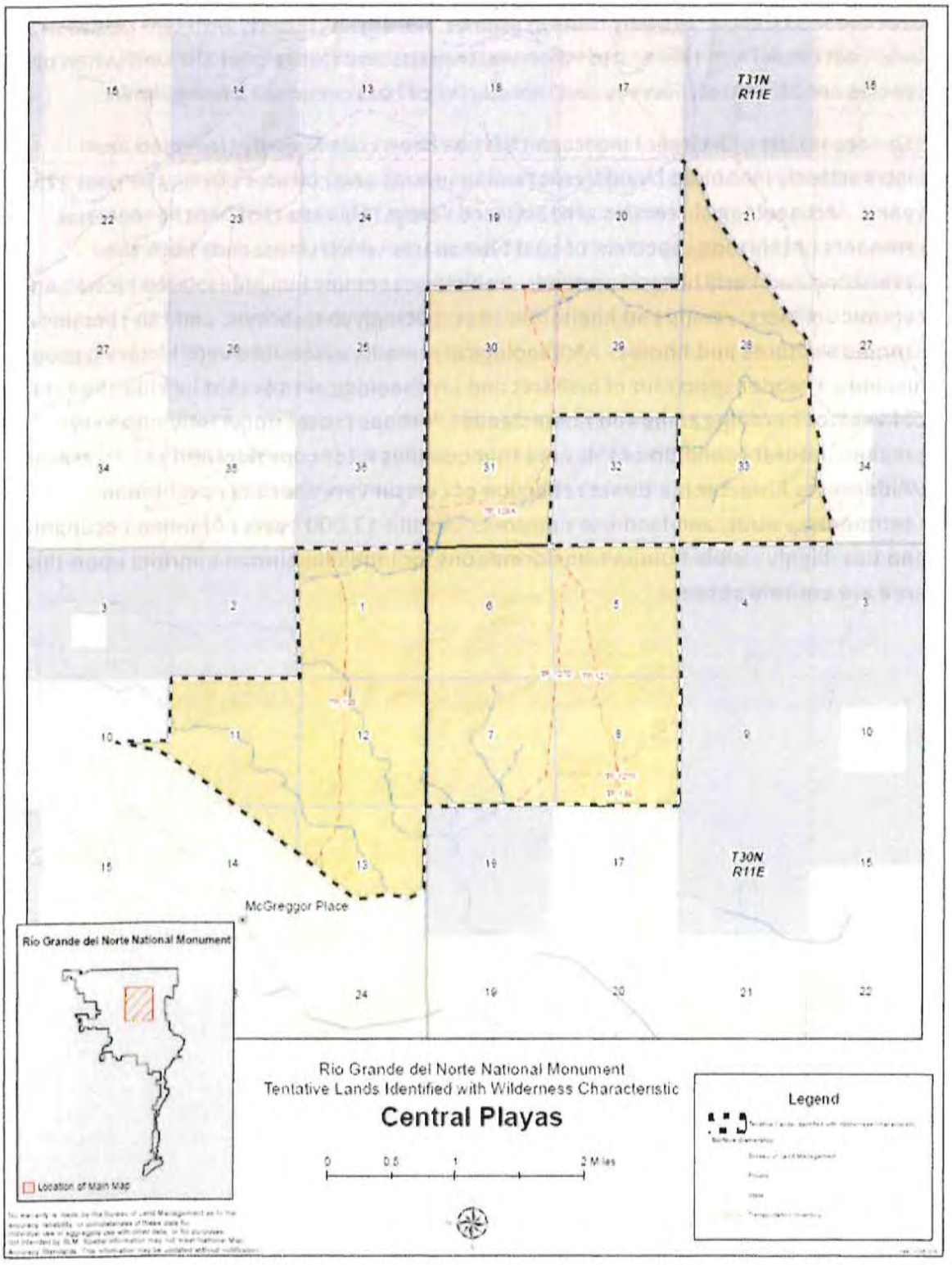
Mountain plover, a ground nesting bird and formerly federally proposed listed species, is known to breed in this inventory unit. This unit represents the southern extent of the known metapopulation of the species in the Monument. It is believed that the breeding population in this region represents the largest known in New Mexico, and is itself adjacent to other significant populations in southern Colorado (South Park). This metapopulation represents a connection of species habitat and reproductive sites and renders scientific and academic opportunities. Surveys and monitoring for mountain plover occur as funding allows.

Seven different raptor species, including golden eagle, nest nearby in the cliff habitat of the Rio Grande, all of which would rest, hide, and forage inside the inventory unit and surrounding area. Additional species that could travel through or forage in the unit include sharp-shinned hawk, Cooper's hawk, northern harrier), Swainson's hawk, rough-legged hawk, zone-tailed hawk, common black-hawk, Harris's hawk, American kestrel, or owls. Bald eagles, a BLM Sensitive Species, is in the inventory unit during winter months. Surveys and monitoring for raptors occur as funding allows.

The area is included within the Central Flyway. Migratory birds of grassland and shrubland guilds can be found throughout the unit and it represents important breeding, resting, hiding and foraging habitat, while resident avian species live and breed here year-round. Waterfowl and shorebirds fly directly over the unit as they move north/south, most likely from Alamosa and/or Monte Vista Wildlife Refuges in Colorado north of the unit and the Bosque del Apache Wildlife Refuge to the south, during spring and fall migration. Two playas are found in the unit and represent important stopover habitat for many species of birds.

Bats, including Townsend's big eared bat, a BLM Sensitive Species, forage for insects over the Rio Grande regularly during summer months. It is likely, with two playas in the unit, bats drink from these sites when water exists and forage over the unit when prey species are abundant. Surveys and monitoring of bats occur as funding allows.

The area is part of a larger landscape that has been continuously traversed and intermittently inhabited by different human groups and cultures during the past 12,000 years. Archaeological remains are scattered across this area that are the material remnants of this long spectrum of past human use which transcends both the prehistoric and early historic periods. Prehistoric remains include isolated stone and ceramic artifacts, camps and habitation sites, petroglyphs, shrines, and the remains of simple structures and homes. Archaeological remains associated with historic groups include a broader spectrum of artifacts and archaeological sites that include the remains of livestock herding camps and homesteads. Perhaps most importantly, the very pristine, natural condition of this area that qualifies it for consideration as an area with Wilderness Character is a direct reflection of certain very specific, past human sentiments, values, and land-use patterns. Despite 12,000 years of human occupation and use, highly visible human transformations, or indelible human imprints upon this area are entirely absent.



Map 2 – Central Playas

Summary of Analysis*

Area / Identifier: Central Playas [NM-020-01]

Summary

Results of Analysis:

1. Does the area meet size requirements? **Yes**
2. Does the area appear to be natural? **Yes**
3. Does the area offer outstanding opportunities for solitude OR a primitive and unconfined type of recreation? **Yes**
4. Does the area have supplemental values? **Yes**

Check One:

■ The entire area has wilderness characteristics and is identified as lands with wilderness characteristics.

☐ The area does not have wilderness characteristics.

Prepared by:

John Bailey	Monument Manager
Christopher Hitsman	Rangeland Management Assistant
Mark Sundin	River Manager
Valerie Williams	Wildlife Biologist

Reviewed by Sarah Schlanger, Taos Field Manager 1-27-2017: Sarah Schlanger

*This form documents information that constitutes an inventory finding on wilderness characteristics. It does not represent a formal land use allocation or a final agency decision subject to administrative remedies under either 43 CFR parts 4 or 1610.5-3.

Cerro de la Olla [NM-010-36]

Acreage: **12,236**

(1) Is the area of sufficient size?

Yes. See Maps 1and 3 for location and boundary information. This area covers 12,236 acres of BLM-managed land; two sections of State lands are located within the boundary of the area, but the 1,311 acres are not included in the total above. When reevaluated in 2015, the roadless area boundary was adjusted to follow a right-of-way line along the south boundary which was missed in an earlier (2007-2008) inventory.

(2) Does the area appear to be natural?

Yes. The main feature is the Cerro de la Olla, an extinct shield volcano. In the 1970s, this area was identified as roadless, but failed to meet the naturalness criterion due to the physical appearance of wood cutting areas around the base of the volcano, access roads, and the presence of several grazing or wildlife improvements such as guzzlers or water catchments and fences. Recent fires and controlled burns have re-established a more natural-appearing mosaic pattern to the vegetation.

Human intrusions are limited: range fences totaling 17.9 miles, and six water improvements. A 2010 route inventory identified 40 primitive routes totaling 16.6 miles in this inventory unit. One route, TP185, was cherry-stemmed since it shows signs of maintenance/construction with mechanized equipment.

(3) Does the area have outstanding opportunities for solitude?

Yes. Human activity is low, providing excellent opportunities for solitude and primitive recreation. The tree cover and ridges provide good screening for anyone accessing the area. Since parts of the lower slopes are available for wood cutting, sounds of chainsaws could preclude a sense of solitude during the warmer times of year, particularly in the fall.

(4) Does the area have outstanding opportunities for primitive and unconfined recreation?

Yes. Cerro de la Olla provides outstanding opportunities for hiking, primitive camping, wildlife viewing, hunting, and exploration. There are few well-hidden fences within the roadless area to take away from the primitive experience.

(5) Does the area have supplemental values (ecological, geological, or other features of scientific, educational, scenic or historical value)?

Yes. The area is ecologically diverse due to an elevation gradient from the plateau with shortgrass and sagebrush habitat types, to the top of the volcano with pinyon-juniper woodlands transitioning to ponderosa pine and mixed conifer, along with small aspen stands. The unit includes two playa lakes that add to the geologic and ecological diversity of the area. The area has been used for decades for hunting, wood cutting, and pinyon nut gathering.

Big game, including Rocky Mountain elk and mule deer, use the area as critical winter range and a migration corridor to move seasonally through the unit, providing landscape connectivity for resistant and resilient populations that, in turn, represent ecosystem integrity (able to withstand changes, such as climate or wildfire). The Heritage Program New Mexico, in coordination with University of New Mexico, recently released a report describing areas of opportunity for interagency coordination to promote and protect wildlife connectivity across the landscape. Using a variety of data sources, including the New Mexico Critical Habitat Assessment Tool (CHAT), they developed an initial assessment of Wildlife Movement Focal Areas that includes this inventory unit (Muldavin, Esteban, R. McCollough. Natural Heritage New Mexico (NHNM). Wildlife Doorways – Supporting Wildlife Habitat Connectivity Across Borders in the Upper Rio Grande. UNM, Albuquerque, NM. March 2016).

Pinyon jay, a BLM Sensitive Species, occurs here, due to the amount and density of pinyon-juniper woodlands on Cerro de la Olla. A resident species, pinyon jays rely on the nuts produced by pinyon trees. During the winter, as food supplies decrease, seeds cached in pinyon juniper woodlands, such as those within the inventory unit, are critical to survival. This unique and specialized species fosters ecological diversity of the unit itself, by distributing cached seeds; forgotten by the birds, these caches facilitate the perpetuation of pinyon woodlands. Out of four habitat types, pinyon juniper woodlands

had the second highest avian species diversity (n=51), with ponderosa pine, also part of this inventory unit, holding the greatest avian species richness (n=55) (Hawks Aloft 2010).

Seven different raptor species, including golden eagle, nest nearby in the cliff habitat of the Rio Grande, all of which would rest, hide, and forage inside the inventory unit and surrounding areas. Additional species that could nest in this unit include northern goshawk and ferruginous hawk. Other raptors that might travel through or forage in the unit include sharp-shinned hawk, Cooper's hawk, northern harrier, Swainson's hawk, rough-legged hawk, zone-tailed hawk, common black-hawk, Harris's hawk, American kestrel, or owls. Bald eagles, a BLM Sensitive Species, are found in the inventory unit during winter months. The area is within the Central Flyway - migratory birds can be found throughout the unit and it represents important breeding, resting, hiding and foraging habitat, while resident avian species live and breed here year-round. Waterfowl and shorebirds fly directly over the unit as they move north/south, most likely from Alamosa and/or Monte Vista Wildlife Refuges in Colorado north of the unit and the Bosque del Apache Wildlife Refuge to the south, during spring and fall migration. USFWS Birds of Conservation Concern with habitat in the unit include juniper titmouse and Grace's warbler.

Bats, including Townsend's big eared bat, a BLM Sensitive Species, forage for insects over the site regularly during summer months. Lava tubes (caves) that are known to exist within the unit could provide habitat for bats and other wildlife. Surveys and monitoring of bats occur as funding allows.

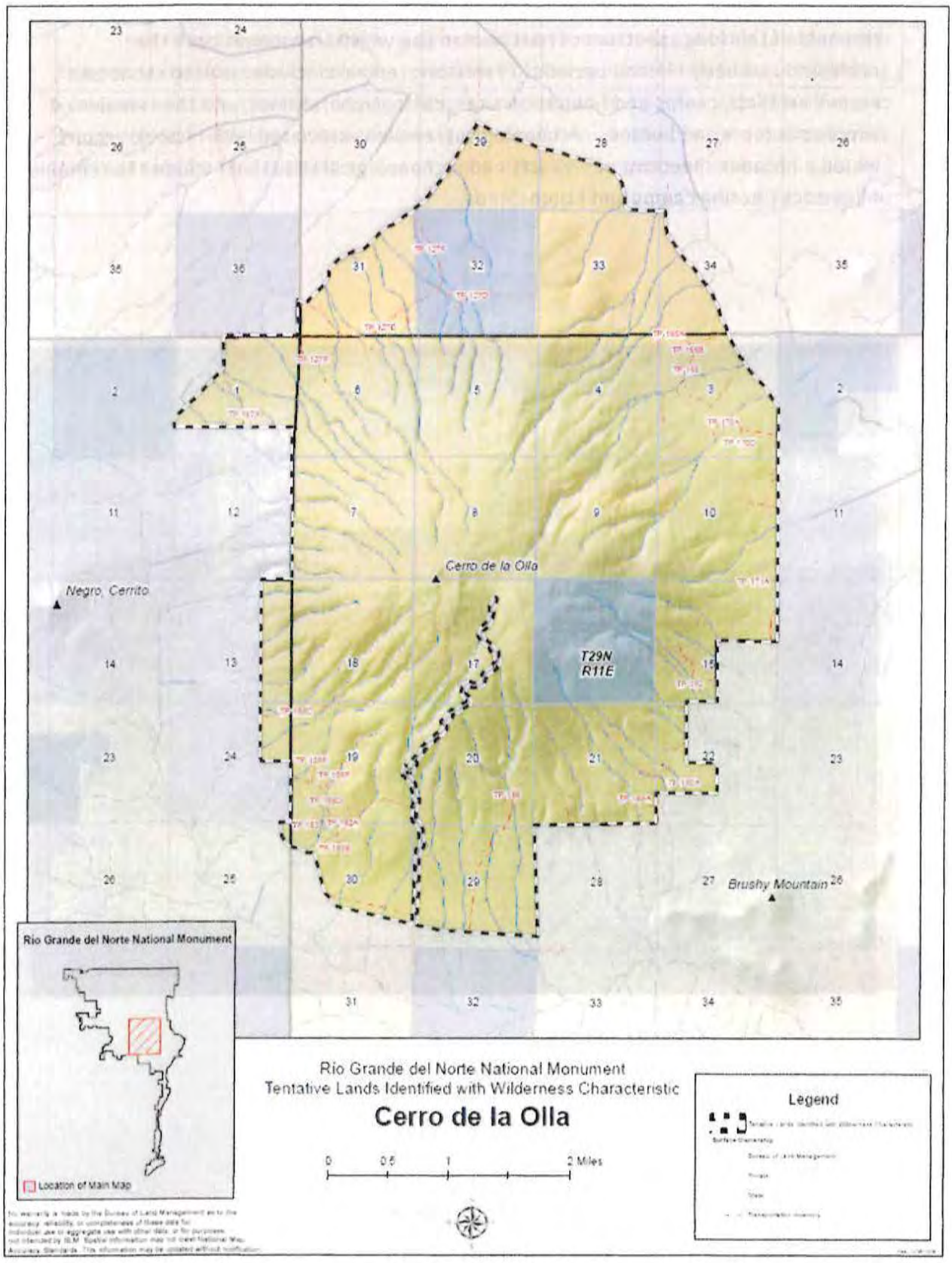
Pollinators, including bees, butterflies and some avian species within the unit, are essential to local ecological diversity and functioning ecosystems on a landscape scale. Plants within the unit that may support one or more species of pollinators include rubber rabbitbrush, skunkbush sumac, sunflower, Rocky Mountain beeplant, globemallow and others.

Astragalus ripleyi, a BLM Sensitive Species, is known to occur in various habitat types throughout the Monument, and has been found in this inventory unit. Continued monitoring and inventory is needed to effectively manage this species and to document its distribution on the Monument.

Sagebrush communities, scattered through this unit, are unique ecosystems and hosts obligate species, such as Brewer's sparrow, sage sparrow, sage thrasher and antelope. In four different habitat types, pinyon jay, a BLM Sensitive Species, occurs in sagebrush habitat more frequently than its primary habitat of pinyon-juniper woodlands (Hawks Aloft 2010).

The area is part of a larger landscape that has been continuously traversed and intermittently inhabited by different human groups and cultures during the past 12,000

years. Archaeological remains are scattered across this area that are the material remnants of this long spectrum of past human use which transcends both the prehistoric and early historic periods. Prehistoric remains include isolated stone and ceramic artifacts, camps and habitation sites, petroglyphs, shrines, and the remains of simple structures and homes. Archaeological remains associated with historic groups include a broader spectrum of artifacts and archaeological sites that include the remains of livestock herding camps and homesteads.



Map 3 – Cerro de la Olla

Summary of Analysis*

Area/ Identifier: Cerro de la Olla [NM-010-36]

Summary

Results of Analysis:

1. Does the area meet size requirements? **Yes**
2. Does the area appear to be natural? **Yes**

   Intrusions noted in the 1970s have largely disappeared. Range improvements are well-screened by topography and vegetation cover.

3. Does the area offer outstanding opportunities for solitude OR a primitive and unconfined type of recreation? **Yes**
4. Does the area have supplemental values? **Yes**

Check One:

■ The entire area has wilderness characteristics and is identified as lands with wilderness characteristics.

☐ The area does not have wilderness characteristics.

Prepared by:

John Bailey	Monument Manager
Christopher Hitsman	Rangeland Management Assistant
Mark Sundin	River Manager
Valerie Williams	Wildlife Biologist

Reviewed by Sarah Schlanger, Taos Field Manager 1-27-2017: Sarah Schlanger

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Guadalupe Mountains [NM-020-02]

Acreage: **7,131**

(1) Is the area of sufficient size?

Yes. See Maps 1 and 4 for location and boundary information. The north and east boundaries are private lands; the south boundary follows a power line, and the west boundary a series of two-tracks and trails.

(2) Does the area appear to be natural?

Yes. The Guadalupe Mountains remain natural in appearance. Old wood cutting areas and the network of associated tracks left by vehicle access to the cutting sites have been substantially reclaimed by natural processes. Some small pockets within the roadless area have seen vegetation treatments, primarily by thinning and prescribed burns, but were designed to have natural-appearing edges, and have recovered a natural appearance quickly.

Human intrusions are limited, and are only noticed when close up due to the pinon-juniper cover. A 2010 route inventory identified 14.7 miles of primitive routes. One old route was converted to a non-motorized trail (Guadalupe Mountain Trail); Las Vistas de Questa Trail runs east-west through the roadless area, and is open to hiking, biking and equestrian use. There are 12.7 miles of fence line in the inventory unit. One crosses the area east-west, and is the boundary for two adjacent grazing allotments. A dirt tank in the Guadalupe saddle and two old wells, only one still in use, provide water for cattle and wildlife. These scattered improvements are substantially unnoticeable in the area, in large part due to the cover of shrubs and woodlands.

(3) Does the area have outstanding opportunities for solitude?

Yes. The Guadalupe Mountains are covered in stands of pinon, juniper; and ponderosa or fir along the ridge tops and in north facing drainages. The vegetation cover and the topography of the mountains provide good visual screening from other people or the fences or other intrusions found in the inventory unit. The area's size allows for a fair degree of separation from others who may be in the area. Gathering of dead and down wood is permitted in specific locales, and chainsaws are allowed for cutting the wood up, contributing to some occasional noise that would disturb someone seeking solitude.

(4) Does the area have outstanding opportunities for primitive and unconfined recreation?

Yes. The area is very popular for hunting, hiking, and mountain biking. The opportunity for wildlife viewing is high. The rugged landscape on these volcanoes provides a great opportunity to roam in a wild setting.

(5) Does the area have supplemental values (ecological, geological, or other features of scientific, educational, scenic or historical value)?

Yes. Big game, including Rocky Mountain elk and mule deer, use the area as critical winter range. Small resident herds of deer and elk can be found in this unit year round.

The Heritage Program New Mexico, in coordination with University of New Mexico, recently released a report describing areas of opportunity for interagency coordination to promote and protect wildlife connectivity across the landscape. Using a variety of data sources, including the New Mexico Critical Habitat Assessment Tool (CHAT), they developed an initial assessment of Wildlife Movement Focal Areas that includes this inventory unit (Muldavin, Esteban, R. McCollough. Natural Heritage New Mexico (NHNM). Wildlife Doorways – Supporting Wildlife Habitat Connectivity Across Borders in the Upper Rio Grande. UNM, Albuquerque, NM. March 2016).

Pinyon jay, a BLM Sensitive Species, occurs here, due to the amount and density of pinyon-juniper woodlands. A resident species, pinyon jays rely on the nuts produced by pinyon trees. During the winter, as food supplies decrease, seeds cached in pinyon juniper woodlands, such as those within the inventory unit, are critical to survival. This unique and specialized species fosters ecological diversity of the unit itself, by distributing cached seeds; forgotten by the birds, these caches facilitate the perpetuation of pinyon woodlands. Out of four habitat types, pinyon juniper woodlands had the second highest avian species diversity (n=51), with ponderosa pine, also part of this inventory unit, holding the greatest avian species richness (n=55) (Hawks Aloft 2010).

Seven different raptor species, including golden eagle, nest nearby in the cliff habitat of the Rio Grande, all of which would rest, hide, and forage inside the inventory unit and surrounding area. Additional species that could travel through or forage in the unit include ferruginous hawk, sharp-shinned hawk, Cooper's hawk, northern harrier, Swainson's hawk, rough-legged hawk, zone-tailed hawk, common black-hawk, Harris's hawk, American kestrel, or owls. Bald eagles, a BLM Sensitive Species, are in the inventory unit during winter months. Surveys and monitoring for raptors occur as funding allows.

The area is included within the Central Flyway - migratory birds are found throughout the unit and it represents important breeding, resting, hiding and foraging habitat; while resident avian species live and breed here year-round. Waterfowl and shorebirds fly directly over the unit as they move north/south, most likely from Alamosa and/or Monte Vista Wildlife Refuges in Colorado north of the unit and the Bosque del Apache Wildlife Refuge to the south, during spring and fall migration. USFWS Birds of Conservation Concern with habitat in the unit include juniper titmouse and Grace's warbler.

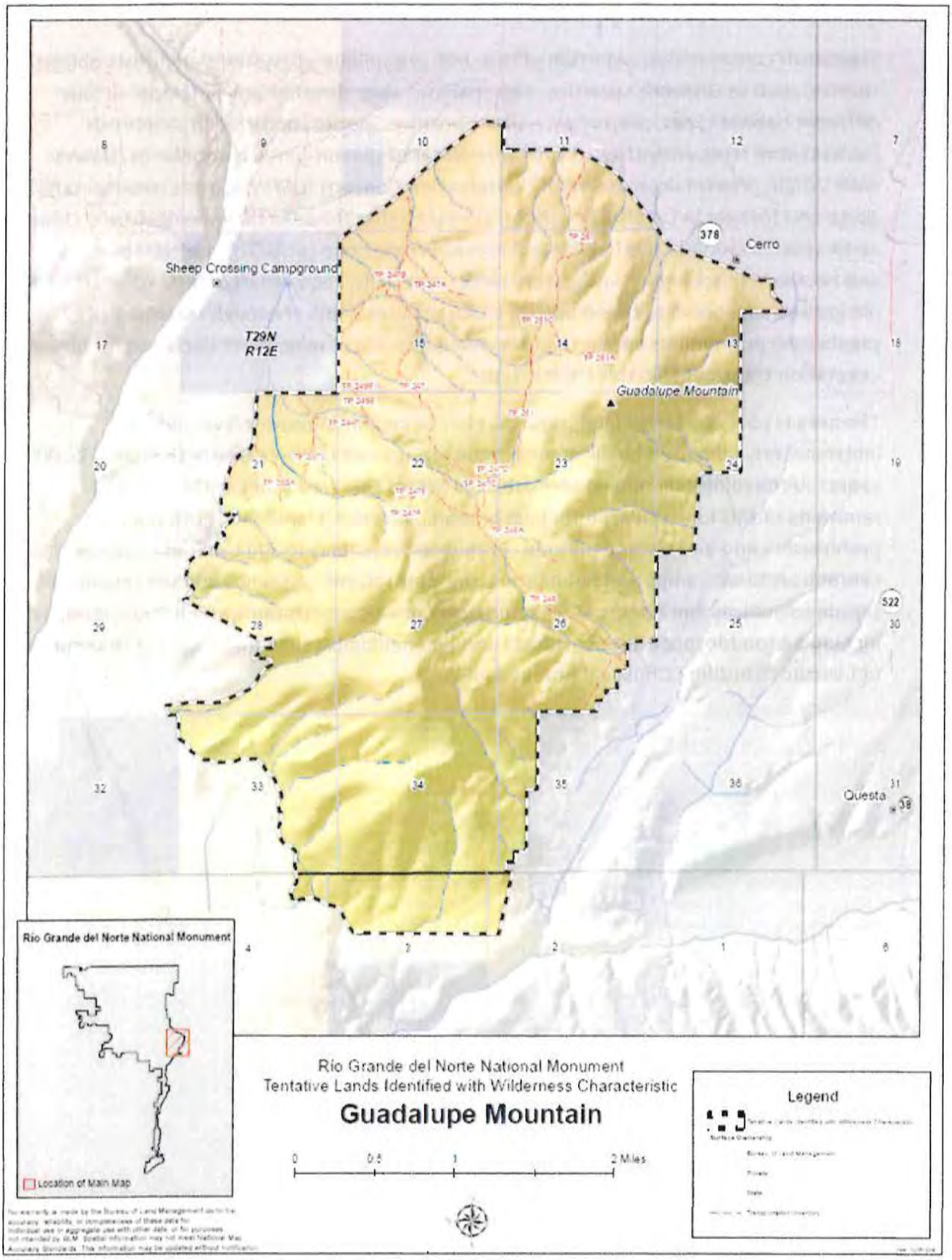
Bats, including Townsend's big eared bat, a BLM Sensitive Species, forage for insects over the site regularly during summer months. Surveys and monitoring of bats occur as funding allows.

Pollinators, including bees, butterflies and some avian species within the unit, are essential to local ecological diversity and functioning ecosystems on a landscape scale. Plants within the unit that may support one or more species of pollinators include rubber rabbitbrush, skunkbush sumac, sunflower, Rocky Mountain beeplant, globemallow and others.

Astragalus ripleyi, a BLM Sensitive Species, is known to occur in various habitat types throughout the Monument, and has been found in this inventory unit. Continued monitoring and inventory is needed to effectively manage this species and to document its distribution on the Monument.

Sagebrush communities, a portion of this unit, are unique ecosystems and hosts obligate species, such as Brewer's sparrow, sage sparrow, sage thrasher and antelope. In four different habitat types, pinyon jay, a BLM Sensitive Species, occurred in sagebrush habitat more frequently than its primary habitat of pinyon-juniper woodlands (Hawks Aloft 2010). Prairie falcon, a Bird of Conservation Concern (USFWS), nests nearby in the gorge and forages in sagebrush habitat, similar to that found in the inventory unit. Other avian species found in this habitat include mourning dove (a SGCN), spotted towhee, and northern mockingbird. Migratory birds, especially, require large tracts of intact and old growth sagebrush to breed and reproduce successfully. Thorough inventory of sagebrush communities within the unit would assist in management decisions for future vegetation treatments in this habitat type.

The area is part of a larger landscape that has been continuously traversed and intermittently inhabited by different human groups and cultures during the past 12,000 years. Archaeological remains are scattered across this area that are the material remnants of this long spectrum of past human use which transcends both the prehistoric and early historic periods. Prehistoric remains include isolated stone and ceramic artifacts, camps and habitation sites, petroglyphs, shrines, and the remains of simple structures and homes. Archaeological remains associated with historic groups include a broader spectrum of artifacts and archaeological sites that include the remains of livestock herding camps and homesteads.



Map 4 – Guadalupe Mountains

Summary of Analysis*

Area / Identifier: Guadalupe Mountains [NM-020-02]

Summary

Results of Analysis:

1. Does the area meet size requirements? **Yes**
2. Does the area appear to be natural? **Yes**
3. Does the area offer outstanding opportunities for solitude OR a primitive and unconfined type of recreation? **Yes**
4. Does the area have supplemental values? **Yes**

Check One:

■ The entire area has wilderness characteristics and is identified as lands with wilderness characteristics.

☐ The area does not have wilderness characteristics.

Prepared by:

John Bailey	Monument Manager
Christopher Hitsman	Rangeland Management Assistant
Mark Sundin	River Manager
Valerie Williams	Wildlife Biologist

Reviewed by Sarah Schlanger, Taos Field Manager 1-27-2017: Sarah Schlanger

*This form documents information that constitutes an inventory finding on wilderness characteristics. It does not represent a formal land use allocation or a final agency decision subject to administrative remedies under either 43 CFR parts 4 or 1610.5-3.

La Junta Rim [NM-020-03]

Acreage: **9,335**

(1) Is the area of sufficient size?

Yes. See Maps 1 and 5 for location and boundary information. This long, narrow roadless area is dominated by the Rio Grande Gorge. The south boundary is a power line, the west boundary is formed by private/state land holdings and in part road TP 130. The north edge is a power line, which also is the south boundary of the North Chiflo roadless area. The eastern side is the east rim of the Gorge in the Wild Rivers area, then the middle of the Rio Grande adjacent to the Carson National Forest. Further south, the east boundary is a power line.

(2) Does the area appear to be natural?

Yes. The heart of this unit is the Rio Grande Gorge, which in this area is a 'wild' segment of the Rio Grande Wild and Scenic River, designated in 1968. A few trails, shelters and vault toilets are along the east bank of the Rio Grande in the Wild Rivers area. On the west side, there are no human intrusions until you are away from the rim. Some user created trails in the Horsethief Mesa area provide opportunity for mountain biking, hiking and equestrian use. This area is also a popular site for hunting.

A 2012 route inventory 62.1 miles of primitive routes in this inventory unit, almost all on the west side of the Rio Grande.

(3) Does the area have outstanding opportunities for solitude?

Yes. Particularly when in or adjacent to the Rio Grande Gorge, the opportunity for solitude is outstanding. On the west side, human use is extremely low, so the chance of any encounter with an individual or a group is very low. On the east side, the trail system is more frequently used, but the chance of an encounter with more than one or two groups or individuals is still very low.

(4) Does the area have outstanding opportunities for primitive and unconfined recreation?

Yes. The Rio Grande Gorge provides opportunities for fishing and boating in a primitive, unconfined setting. Hiking opportunities exist on and off-trail. Hunting is available on the west side of the Gorge, and in the Horsethief Mesa area in the southeast corner of the roadless area.

(5) Does the area have supplemental values (ecological, geological, or other features of scientific, educational, scenic or historical value)?

Yes. The area contains significant cultural resources, wildlife habitat, and ecological diversity due to the elevation gradients, springs and associated nesting habitat for raptors. The gorge is a significant geological feature.

Bighorn sheep have been relocated into the area, and occupy the Rio Grande gorge inside the inventory unit. This species represents economic, cultural and recreational values as well as a wildlife resource.

Other big game, including Rocky Mountain elk and Mule deer, use the area as critical winter range and a migration corridor to move seasonally through the unit, providing landscape connectivity for resistant and resilient populations that, in turn, represent ecosystem integrity (able to withstand changes, such as climate, wildfire, etc.). Collaring studies for Mule deer occur as funding allows.

The Heritage Program New Mexico, in coordination with University of New Mexico, recently released a report describing areas of opportunity for interagency coordination to promote and protect wildlife connectivity across the landscape. Using a variety of data sources, they developed an initial assessment of wildlife "doorways," including one within this inventory unit. This designation is approximately 60 square miles and includes lands on the Carson National Forest and BLM-administered lands identified as a key corridor of movement for big game. This doorway is one of three such features identified in the report that stretch east to northwest across the monument, and include the San Antonio Mountain and Los Pinos areas, and described collectively in the report as the Northern Taos Plateau Wildlife Movement Focal Area (Muldavin, Esteban,

R. McCollough. Natural Heritage New Mexico (NHNM). Wildlife Doorways – Supporting Wildlife Habitat Connectivity Across Borders in the Upper Rio Grande. UNM, Albuquerque, NM. March 2016).

River otters have also been relocated into the Rio Grande and occur within the inventory unit. This species represents a top predator and is a keystone species that provides ecosystem services that keep the food chain balanced, which in turn provides ecosystem diversity and resilient populations of aquatic species. Anecdotal reports of river otters occur often, and surveys and monitoring of river otter occur as funding allows.

Because the unit includes the Rio Grande, the Southwestern willow flycatcher, a federally listed endangered species, migrates through the inventory unit along the Rio Grande during spring and fall migration to breeding grounds in the north in San Luis Valley, Colorado, and to wintering grounds in Mexico and Central America. The species would rest or forage within the unit, however, nesting habitat is not present at this time.

Pinyon jay, a BLM Sensitive Species, occurs here, due to the amount and density of pinyon-juniper woodlands on Cerro de la Olla. A resident species, Pinyon jays rely on the nuts produced by pinyon trees. During the winter, as food supplies decrease, seeds cached in pinyon juniper woodlands, such as those within the inventory unit, are critical to survival. This unique and specialized species fosters ecological diversity of the unit itself, by distributing cached seeds; forgotten by the birds, these caches facilitate the perpetuation of pinyon woodlands. Out of four habitat types, pinyon juniper woodlands had the second highest avian species diversity (n=51), with ponderosa pine, also part of this inventory unit, holding the greatest avian species richness (n=55) (Hawks Aloft 2010).

Seven different raptor species, including Golden eagle, nest within the cliff habitat of the inventory unit. Cliffs represent a unique habitat feature and are critical to sustainable cliff-nesting raptor populations. They are top predators and represent functioning ecological diversity within the region. Additional raptor species that could occur or forage in the unit include Ferruginous hawk, Sharp-shinned hawk, Cooper's hawk, Northern harrier, Swainson's hawk, Rough-legged hawk, Zone-tailed hawk, Common black-hawk, Harris's hawk, American kestrel, or owls. Bald eagles, a BLM Sensitive Species, are found in the inventory unit during winter months.

The area is included within the Central Flyway. Due to the diversity of habitat types, many migratory birds can be found throughout the unit and it represents important breeding, resting, hiding and foraging habitat, while resident avian species live and breed here year-round. Waterfowl and shorebirds fly directly over the unit, and will land and rest within the unit as they move north/south, most likely from Alamosa and/or

Monte Vista Wildlife Refuges in Colorado north of the unit and the Bosque del Apache Wildlife Refuge to the south, during spring and fall migration. USFWS Birds of Conservation Concern with habitat in the unit include Juniper titmouse. Other migratory birds that could occur here include: Mourning dove (SGCN), Gray flycatcher, Western wood-pewee, Northern flicker, Hammond's flycatcher, Dusky flycatcher, Plumbeous vireo, Ash-throated flycatcher, Clark's nutcracker, Mountain chickadee, Rock wren, Warbling vireo, Red-breasted nuthatch, Bushtit, White-breasted nuthatch, Pygmy nuthatch, Bewick's wren, Blue-gray gnatcatcher, Northern mockingbird, Sage thrasher, Black-throated gray warbler, Western tanager, Green-tailed towhee, Spotted towhee, Chipping sparrow, Ruby-crowned kinglet, Mountain bluebird, Townsend's solitaire, Hermit thrush, American robin, Yellow-rumped warbler, Red crossbill, Lesser goldfinch, Dark-eyed junco, Cassin's finch, and Pine siskin. Surveys and monitoring for migratory birds occur as funding allows.

Bats, including Townsend's big eared bat, a BLM Sensitive Species, forage for insects over the site regularly during summer months, and habitat is located within the boulder fields and cliffs of the Rio Grande gorge within the unit, providing habitat for wildlife as well as a unique geological feature. Surveys and monitoring of bats occur as funding allows.

Pollinators, including bees, butterflies and some avian species within the unit, are essential to local ecological diversity and functioning ecosystems on a landscape scale. Plants within the unit that may support one or more species of pollinators include rubber rabbitbrush, skunkbush sumac, sunflower, Rocky Mountain beeplant, globemallow and others. More research and monitoring is needed to understand the role pollinators play and the status and trend of these species within the inventory unit.

The Yuma skipper, an endemic species that only occurs within the Upper Rio Grande, and a BLM Sensitive Species, is known to occur within the Rio Grande gorge in the northern section of the inventory unit. Additional populations have been found immediately south of the inventory unit, at John Dunn Bridge, so it is likely they are using the length of the river through and adjacent to the unit as a metapopulation. This species adds to the biodiversity of the area and provides ecological diversity at a landscape scale. Surveys and monitoring for the Yuma skipper occur as funding allows.

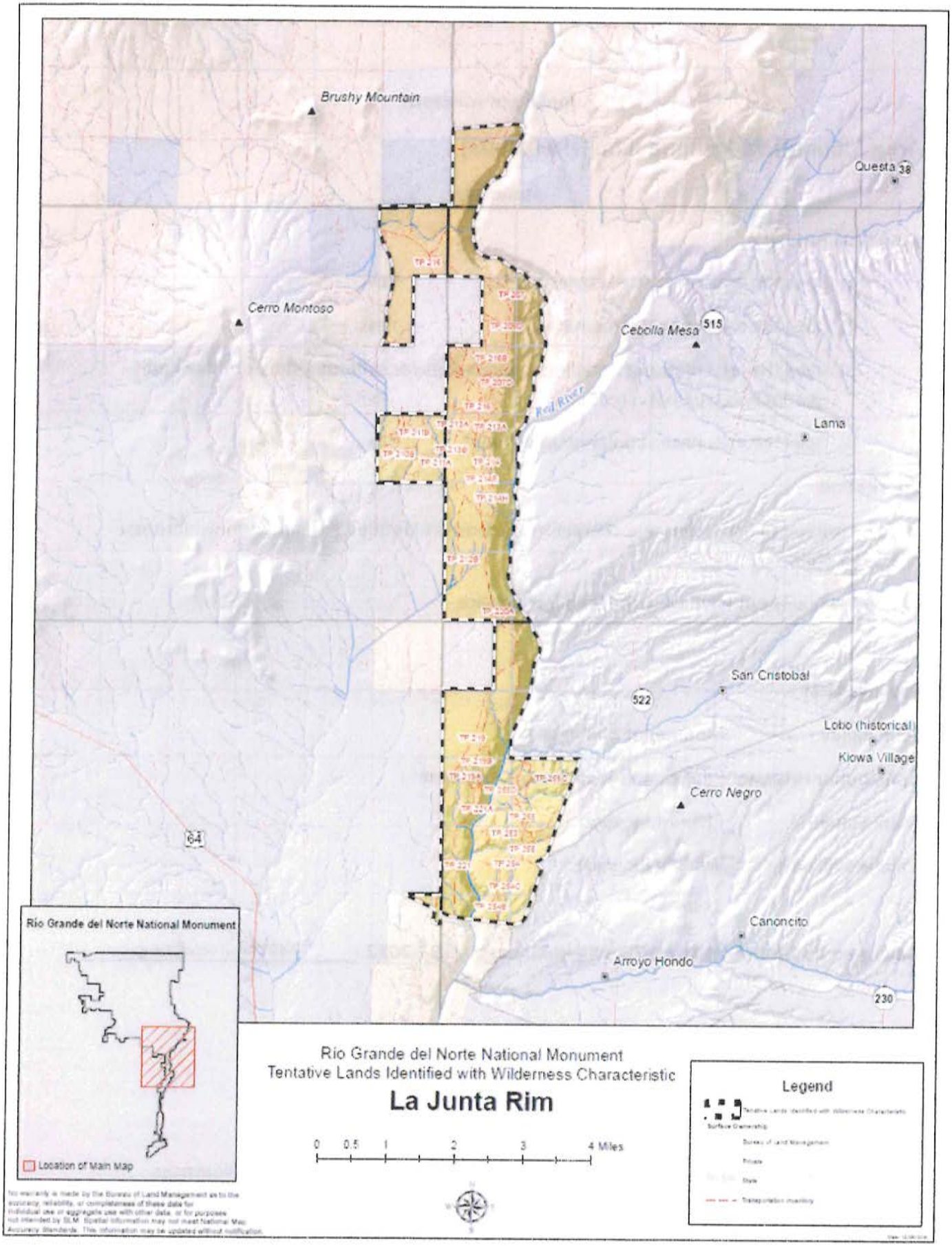
Rio Grande chub, Rio Grande sucker and Rio Grande cutthroat trout, all BLM Sensitive Species, are found within the Rio Grande that runs through the inventory unit. Surveys and monitoring of these species occur as funding allows.

Biological soil crusts provide an integral association between soil particles and cyanobacteria, algae, microfungi, lichens and bryophytes on the soil surface. Often these crusts are found in the soil spaces not occupied by trees, grasses or shrubs and help mitigate soil loss while facilitating soil moisture and nutrient exchange. Ecological

diversity is enhanced where biological soil crusts exist within the unit, and there is need for further research and monitoring of this resource.

Sagebrush communities, a portion of this unit, are unique ecosystems and hosts obligate species, such as Brewer's sparrow, sage sparrow, sage thrasher and antelope. In four different habitat types, Pinyon jay, a BLM Sensitive Species, occurred in sagebrush habitat more frequently than its primary habitat of pinyon-juniper woodlands (Hawks Aloft 2010). Prairie falcon, a Bird of Conservation Concern (USFWS), nests nearby in the gorge and forages in sagebrush habitat, similar to that found in the inventory unit. Other avian species found in this habitat include Mourning dove, a SGCN, Spotted towhee, and Northern mockingbird. Migratory birds, especially, require large tracts of intact and old growth sagebrush to breed and reproduce successfully.

The area is part of a larger landscape that has been continuously traversed and intermittently inhabited by different human groups and cultures during the past 12,000 years. Archaeological remains are scattered across this area that are the material remnants of this long spectrum of past human use which transcends both the prehistoric and early historic periods. Prehistoric remains include isolated stone and ceramic artifacts, camps and habitation sites, petroglyphs, shrines, and the remains of simple structures and homes. Archaeological remains associated with historic groups include a broader spectrum of artifacts and archaeological sites that include the remains of livestock herding camps and homesteads.



Map 5 – La Junta Rim

Summary of Analysis*

Area / Identifier: La Junta Rim [NM-020-03]

Summary

Results of Analysis:

1. Does the area meet size requirements? **Yes**
2. Does the area appear to be natural? **Yes**
3. Does the area offer outstanding opportunities for solitude OR a primitive and unconfined type of recreation? **Yes**
4. Does the area have supplemental values? **Yes**

Check One:

■ The entire area has wilderness characteristics and is identified as lands with wilderness characteristics.

☐ The area does not have wilderness characteristics.

Prepared by:

John Bailey	Monument Manager
Christopher Hitsman	Rangeland Management Assistant
Mark Sundin	River Manager
Valerie Williams	Wildlife Biologist

Reviewed by Sarah Schlanger, Taos Field Manager 1-27-2017: Sarah Schlanger

*This form documents information that constitutes an inventory finding on wilderness characteristics. It does not represent a formal land use allocation or a final agency decision subject to administrative remedies under either 43 CFR parts 4 or 1610.5-3.

Llano [NM-020-04]

Acreage: **6,588**

(1) Is the area of sufficient size?

Yes. See maps 1 and 6. The northern boundary of the inventory unit is road TP 121; the eastern side is bounded by State and private lands; the south and west edge is road TP 120, and state and private lands.

(2) Does the area appear to be natural?

Yes. Rolling plains low lying Servilleta basalt flows characterize this inventory unit. Vegetation cover is primarily winterfat, broom snakeweed and grama grasses. The primary human uses are grazing, with associated water tanks and fence lines, and big game hunting. The area remains substantially natural in appearance, with few intrusions that can only be seen from nearby vantage points. The area is very irregular in shape, with a boundary formed in large part by adjacent State lands.

Human intrusions are limited: 2 range fences totaling 3.3 miles, and five water improvements. A 2010 route inventory identified primitive routes totaling four miles in this roadless area.

(3) Does the area have outstanding opportunities for solitude?

Yes. Rolling terrain provides a visitor with views of a wide area. Intrusions are few and far between, and human activity in extremely low most of the year. The only exception might be during hunting season, since the area provides habitat for Antelope, Rocky Mountain elk and Mule deer. Within a mile of the western boundary, US 285 traffic can be heard, and seen from points further east.

(4) Does the area have outstanding opportunities for primitive and unconfined recreation?

Yes. Hunting, wildlife and bird viewing, photography, hiking and primitive camping in a basically wild setting.

(5) Does the area have supplemental values (ecological, geological, or other features of scientific, educational, scenic or historical value)?

Yes. The area contains significant ecological diversity due to the expanse of high elevation short grass prairie habitat and the obligate and semi-obligate species found therein (prairie dog/antelope association); and the playa lakes found throughout the unit. There is scientific and educational potential because of the cultural and wildlife habitat resources.

Big game, including Antelope, Rocky mountain elk and Mule deer, use the area as critical winter range and a migration corridor to move seasonally through the unit, providing landscape connectivity for resistant and resilient populations that, in turn, represent ecosystem integrity (able to withstand changes, such as climate, wildfire, etc.).

The Heritage Program New Mexico, in coordination with University of New Mexico, recently released a report describing areas of opportunity for interagency coordination to promote and protect wildlife connectivity across the landscape. Using a variety of data sources, including the New Mexico Critical Habitat Assessment Tool (CHAT), they developed an initial assessment of Wildlife Movement Focal Areas that includes this inventory unit (Muldavin, Esteban, R. McCollough. Natural Heritage New Mexico (NHNM). Wildlife Doorways – Supporting Wildlife Habitat Connectivity Across Borders in the Upper Rio Grande. UNM, Albuquerque, NM. March 2016.).

Colonies of Gunnison prairie dogs, a BLM Sensitive Species, exist throughout the unit. Five known prairie dog colonies have been assessed in this unit between 2003 and 2014. Prairie dog towns are dynamic, shrinking and swelling depending on habitat conditions and levels of predation upon them. This keystone species provides a prey base for raptors, carnivores, and nesting habitat for Western burrowing owl, a BLM Sensitive Species. The last assessment made in this unit was in 2014 for only one colony. At that time the size of that colony increased to 33 acres from 11 acres in 2006. The last comprehensive survey in this inventory unit included a total acreage of approximately 81 acres of active prairie dog towns, including one town of 53 acres. Due to the number

and extent of prairie dog colonies in this unit, it is likely Western burrowing owl occurs here. Both in 2014 and 2016 a NLCS Science Grant was awarded to study the status of the Gunnison prairie dog within the Monument to determine feasibility of potential reintroduction of black-footed ferret. Surveys and monitoring for prairie dogs and burrowing owls occur as funding allows. .

Mountain plover, a ground nesting bird and formerly federally proposed listed species, is not known to breed in this inventory unit. This unit represents potential nesting habitat as the species is documented to breed in similar adjacent habitat to the north and east of the unit. It is believed that the breeding population in this region represents the largest known in New Mexico, and is itself adjacent to other significant populations in southern Colorado (South Park). This metapopulation represents a connection of species habitat and reproductive sites and renders scientific and academic opportunities. Surveys and monitoring for mountain plover occur as funding allows.

Seven different raptor species, including Golden eagle, nest nearby in the cliff habitat of the Rio Grande or Rio San Antonio, all of which would rest, hide, and forage inside the inventory unit and surrounding area. Ferruginous hawk could potentially nest within the unit, if a lone juniper or pinyon tree provides the needed structure to hold a nest. Additional species that could travel through or forage in the unit include Sharp-shinned hawk, Cooper's hawk, Northern harrier), Swainson's hawk, rough-legged hawk, Zone-tailed hawk, Common black-hawk, Harris's hawk, American kestrel, or owls. Bald eagles, a BLM Sensitive Species, would be found in the inventory unit during winter months. Surveys and monitoring for raptors occur as funding allows.

The area is included within the Central Flyway. Migratory birds of grassland and shrubland guilds can be found throughout the unit and it represents important breeding, resting, hiding and foraging habitat, while resident avian species live and breed here year-round. Waterfowl and shorebirds fly directly over the unit as they move north/south, most likely from Alamosa and/or Monte Vista Wildlife Refuges in Colorado north of the unit and the Bosque del Apache Wildlife Refuge to the south, during spring and fall migration. Migratory birds that could occur here include: Mourning dove (SGCN), Pinyon jay (SGCN), Horned lark, Sage thrasher, Brewer's sparrow, Vesper sparrow, Sage sparrow, and Western meadowlark. Surveys and monitoring for migratory birds occur as funding allows.

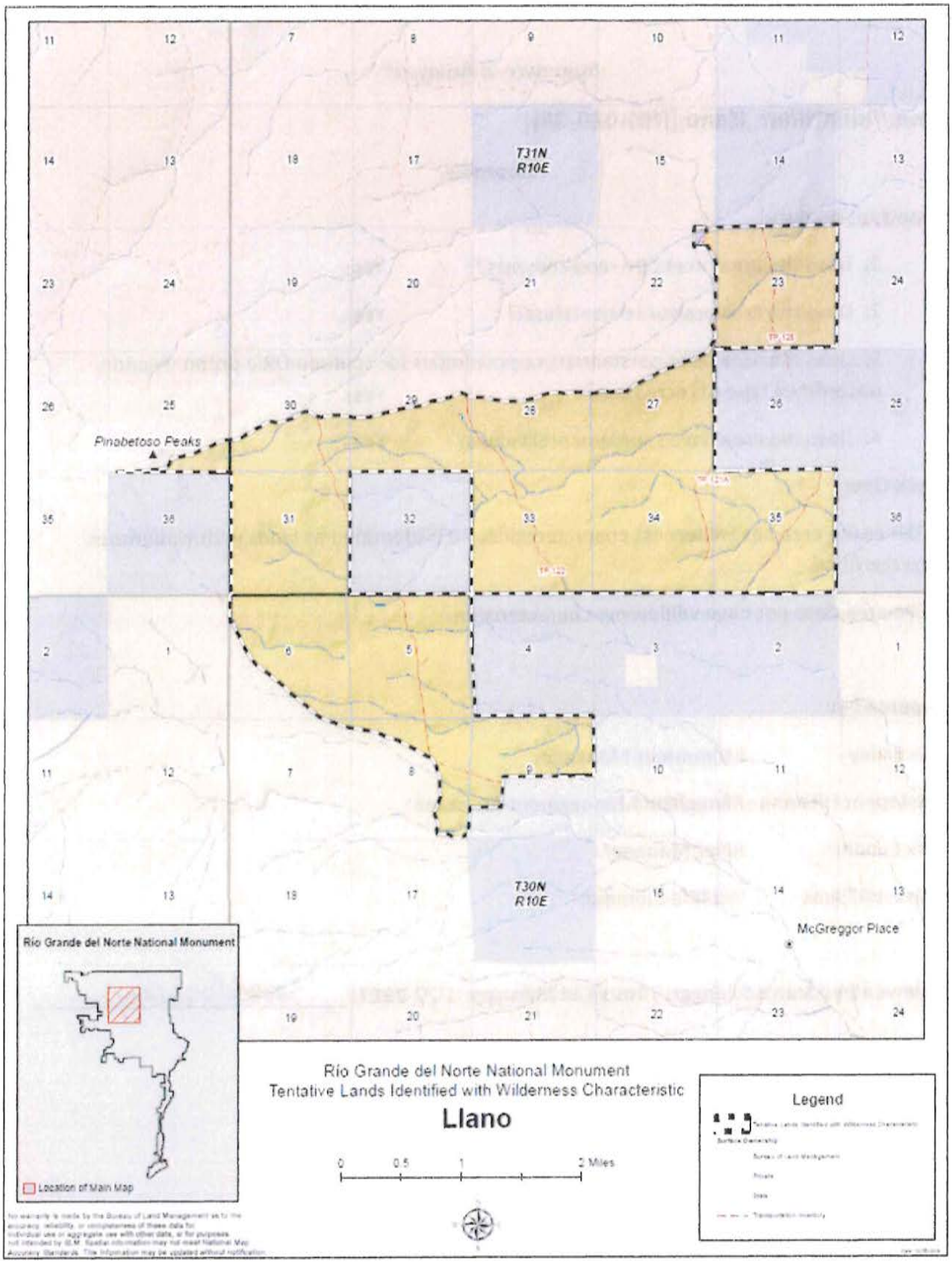
Bats, including Townsend's big eared bat, a BLM Sensitive Species, forage for insects over the site regularly during summer months. Surveys and monitoring of bats occur as funding allows.Pollinators, including bees, butterflies and some avian species within the unit, are essential to local ecological diversity and functioning ecosystems on a landscape scale. Plants within the unit that may support one or more species of pollinators include rubber rabbitbrush, skunkbush sumac, sunflower, Rocky Mountain beeplant, globemallow and others. More research and monitoring is needed to

understand the role pollinators play and the status and trend of these species within the inventory unit.

Biological soil crusts provide an integral association between soil particles and cyanobacteria, algae, microfungi, lichens and bryophytes on the soil surface. Often these crusts are found in the soil spaces not occupied by trees, grasses or shrubs and help mitigate soil loss while facilitating soil moisture and nutrient exchange. Ecological diversity is enhanced where biological soil crusts exist within the unit, and there is need for further research and monitoring of this resource.

Sagebrush communities, where they exist within the unit, are unique ecosystem and hosts obligate species, such as Brewer's sparrow, sage sparrow, sage thrasher and antelope. In four different habitat types, Pinyon jay, a BLM Sensitive Species, occurred in sagebrush habitat more frequently than its primary habitat of pinyon-juniper woodlands (Hawks Aloft 2010). Prairie falcon, a Bird of Conservation Concern (USFWS), forages in sagebrush and grassland habitat, similar to that found in the inventory unit. Other avian species found in the habitat of this include Mourning dove, a SGCN, Spotted towhee, and Northern mockingbird. Inventory of sagebrush communities within the unit would assist in management decisions for future vegetation treatments in this habitat type.

The area is part of a larger landscape that has been continuously traversed and intermittently inhabited by different human groups and cultures during the past 12,000 years. Archaeological remains are scattered across this area that are the material remnants of this long spectrum of past human use which transcends both the prehistoric and early historic periods. Prehistoric remains include isolated stone and ceramic artifacts, camps and habitation sites, petroglyphs, shrines, and the remains of simple structures and homes. Archaeological remains associated with historic groups include a broader spectrum of artifacts and archaeological sites that include the remains of livestock herding camps and homesteads


T31N
R10E
T30N
R10E
Pinabetoso Peaks
McGregor Place
Río Grande del Norte National Monument
Location of Main Map
Río Grande del Norte National Monument
Tentative Lands Identified with Wilderness Characteristic
Llano
0 0.5 1 2 Miles
Legend

Map 6 - Llano

Summary of Analysis*

Area / Identifier: Llano [NM-020-04]

Summary

Results of Analysis:

1. Does the area meet size requirements? **Yes**
2. Does the area appear to be natural? **Yes**
3. Does the area offer outstanding opportunities for solitude OR a primitive and unconfined type of recreation? **Yes**
4. Does the area have supplemental values? **Yes**

Check One:

■ The entire area has wilderness characteristics and is identified as lands with wilderness characteristics.

☐ The area does not have wilderness characteristics.

Prepared by:

John Bailey	Monument Manager
Christopher Hitsman	Rangeland Management Assistant
Mark Sundin	River Manager
Valerie Williams	Wildlife Biologist

Reviewed by Sarah Schlanger, Taos Field Manager 1-27-2017: Sarah Schlanger

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North Chiflo [NM-010-33]

Acreage: **37,887**

(1) Is the area of sufficient size?

Yes. See Maps 1 and 7 for location and boundary information. The northern boundary is the New Mexico-Colorado state line; the eastern boundary is a series of roads that provide access to Ute Mountain from the north and south. The south boundary is a power line that is the north boundary for La Junta Rim Inventory Unit. Along the west side, the boundary is a mix of state and private lands, or Road TP 130.

Most of the roadless area is public land; the boundary encloses two sections that are partly State Lands (1,414 acres), and three sections that are partly private (80 acres).

(2) Does the area appear to be natural?

Yes. This unit is dominated by the Rio Grande Wild and Scenic River, Rio Costilla and Cerro Chiflo. The landscape to the west of the river is an open plain with low rolling hills and a cover of sagebrush or winterfat.

There are some trails that provide access for hunting or to range improvements, but are not really noticeable when walking through the area. The portion of the unit north of

Ute Mountain was disked before BLM acquired the property – natural reclamation has begun to render signs of vegetation treatments less noticeable, but this portion of the roadless area does not meet the naturalness criterion. An area covering 3,434 acres on BLM lands north of Cerro Chiflo have been disked and reseeded to improve habitat for Mule deer. When seen at close range, the treated area appears natural, but when seen from the north slope of Cerro Chiflo, boundaries of the treated areas are very apparent (following the BLM-State Land boundary, for example).

Several fence lines totaling 78.8 miles are in this area, and 17 small-scale water improvements installed to support grazing and wildlife; because of topographic screening, these do not stand out to a casual viewer.

(3) Does the area have outstanding opportunities for solitude?

Yes. Almost all of this unit provide these opportunities, particularly in and around the Rio Grande Gorge, Rio Costilla, and Cerro Chiflo. The sagebrush areas west of the Gorge are expansive, with enough topographic relief to shield a visitor from other users.

(4) Does the area have outstanding opportunities for primitive and unconfined recreation?

Yes. This unit offers an outstanding setting for hiking, fishing, hunting, wildlife/bird watching, primitive camping, white water boating, and sightseeing and exploration.

(5) Does the area have supplemental values (ecological, geological, or other features of scientific, educational, scenic or historical value)?

Yes. The area contains 19 playas, which provide significant habitat for waterfowl and amphibians and represent islands of biodiversity within the sagebrush and pinon-juniper woodland communities and winterfat flats. Cultural resources are associated with the playas, but are also represented by a great number of petroglyphs, lithic scatters, and other elements that go back thousands of years. In the gorge are several interesting geologic features such as lava tubes and springs.

Big game, including antelope, Rocky Mountain elk and mule deer, use the area as critical winter range and a migration corridor to move seasonally through the unit, providing landscape connectivity for resistant and resilient populations that, in turn, represent ecosystem integrity (able to withstand changes, such as climate, wildfire, etc.).

Bighorn sheep have been relocated into the area, and occupy the Rio Grande gorge inside the inventory unit. This species represents economic, cultural and recreational values as well as a wildlife resource.

The Heritage Program New Mexico, in coordination with University of New Mexico, recently released a report describing areas of opportunity for interagency coordination to promote and protect wildlife connectivity across the landscape. Using a variety of data sources, including the New Mexico Critical Habitat Assessment Tool (CHAT), they developed an initial assessment of Wildlife Movement Focal Areas that includes this inventory unit (Muldavin, Esteban, R. McCollough. Natural Heritage New Mexico (NHNM). Wildlife Doorways – Supporting Wildlife Habitat Connectivity Across Borders in the Upper Rio Grande. UNM, Albuquerque, NM. March 2016.).

River otters have also been relocated into the Rio Grande and occur within the inventory unit. This species represents a top predator and is a keystone species that provides ecosystem services that keep the food chain balanced, which in turn provides ecosystem diversity and resilient populations of aquatic species. Anecdotal reports of river otters occur often, and surveys and monitoring of river otter occur as funding allows.

Colonies of Gunnison prairie dogs, a BLM Sensitive Species, exist throughout the unit. Twelve known prairie dog colonies have been assessed in this unit between 2003 and 2014. Prairie dog towns are dynamic, shrinking and swelling depending on habitat conditions and levels of predation upon them. This keystone species provides a prey base for raptors, carnivores, and nesting habitat for Western burrowing owl, a BLM Sensitive Species. Surveys conducted in 2005, 2006 and 2010 found 147 acres, 392 acres, and 168 acres of active prairie dog towns, respectively, within this unit. In 2006, one colony was measured at 169 acres, while in 2010 the largest colony was estimated at 81 acres. Due to the number and extent of prairie dog colonies in this unit, it is likely Western burrowing owl occurs here. NLCS Science Grants were awarded in 2014 and 2016 to study the status of the Gunnison prairie dog within the Monument to determine feasibility of potential reintroduction of black-footed ferret.

Because the unit includes the Rio Grande, the Southwestern willow flycatcher, a federally listed endangered species, migrates through the inventory unit along the Rio Grande during spring and fall migration to breeding grounds in the north in San Luis Valley, Colorado, and to wintering grounds in Mexico and Central America. The species would rest or forage within the unit, however, nesting habitat is not present at this time.

Pinyon jay, a BLM Sensitive Species, occurs due to the pinyon and juniper trees, along with sagebrush, that occur within the unit. Surveys and monitoring for nesting pinyon jay will occur as funding allows. Pinyon jays are a resident species. They rely on pinyon nuts produced from pinyon trees. During the winter, as food supplies decrease, seeds cached in pinyon juniper woodlands, such as those within the inventory unit, are critical to survival. This unique and specialized species fosters ecological diversity of the unit itself, as well as the landscape by distributing cached seeds forgotten by the bird to facilitate the perpetuation of pinyon woodlands. Out of four habitat types, pinyon juniper woodlands had the second highest avian species diversity (n=51), with ponderosa pine, also part of this inventory unit, holding the greatest avian species richness (n=55) (Hawks Aloft 2010).

Mountain plover, a ground nesting bird and formerly federally proposed listed species, is known to breed in this inventory unit. It is believed that the breeding population in this region represents the largest known in New Mexico, and is itself adjacent to other significant populations in southern Colorado (South Park). This metapopulation represents a connection of species habitat and reproductive sites and renders scientific

and academic opportunities. Surveys and monitoring for mountain plover occur as funding allows.

Seven different raptor species, including Golden eagle, nest in the cliff habitat of the Rio Grande within the inventory unit, all of which would also rest, hide, and forage inside the inventory unit and surrounding area. Bald eagles, a BLM Sensitive Species, is found in the inventory unit during winter months.

The area is included within the Central Flyway. Due to the diversity of habitat types, many migratory birds can be found throughout the unit and it represents important breeding, resting, hiding and foraging habitat, while resident avian species live and breed here year-round. Waterfowl and shorebirds fly directly over the unit, and will land and rest within the unit as they move north/south, most likely from Alamosa and/or Monte Vista Wildlife Refuges in Colorado north of the unit and the Bosque del Apache Wildlife Refuge to the south, during spring and fall migration. USFWS Birds of Conservation Concern with habitat in the unit include juniper titmouse.

Bats, including Townsend's big eared bat, a BLM Sensitive Species, forage for insects over the site regularly during summer months, and habitat is located within the boulder fields and cliffs of the Rio Grande gorge within the unit, providing habitat for wildlife as well as a unique geological feature. Surveys and monitoring of bats occur as funding allows.

The Yuma skipper, an endemic species that only occurs within the Upper Rio Grande, and a BLM Sensitive Species, is known to occur within the Rio Grande gorge within the inventory unit. Additional populations have been found immediately south of the inventory unit, at John Dunn Bridge, so it is likely they are using the length of the river through and adjacent to the unit as a metapopulation. This species adds to the biodiversity of the area and provides ecological diversity at a landscape scale. Surveys and monitoring for the Yuma skipper occur as funding allows.

Rio Grande chub, Rio Grande sucker and Rio Grande cutthroat trout, all BLM Sensitive Species, are found within the Rio Grande that runs through the inventory unit. Surveys and monitoring of these species occur as funding allows.

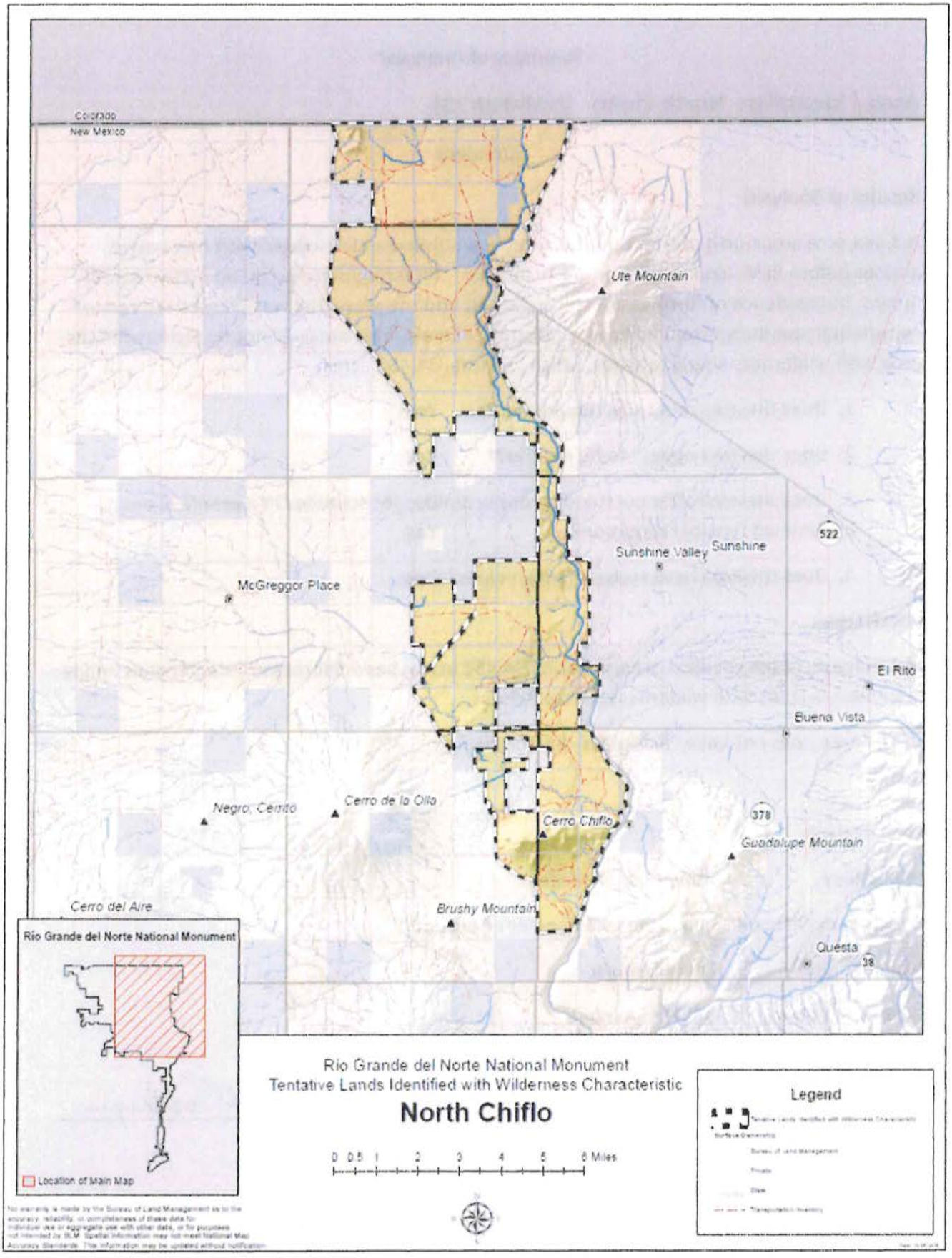
Astragalus ripleyi, a BLM Sensitive Species, is known to occur in various habitat types throughout the Monument, and has been found in this inventory unit. Continued monitoring and inventory is needed to effectively manage this species and to document its distribution on the Monument.

Biological soil crusts provide an integral association between soil particles and cyanobacteria, algae, microfungi, lichens and bryophytes on the soil surface. Often these crusts are found in the soil spaces not occupied by trees, grasses or shrubs and help mitigate soil loss while facilitating soil moisture and nutrient exchange. Ecological

diversity is enhanced where biological soil crusts exist within the unit, and there is need for further research and monitoring of this resource.

Sagebrush communities, where they exist within the unit, are unique ecosystem and hosts obligate species, such as Brewer's sparrow, sage sparrow, sage thrasher and antelope. In four different habitat types, pinyon jay, a BLM Sensitive Species, occurred in sagebrush habitat more frequently than its primary habitat of pinyon-juniper woodlands (Hawks Aloft 2010). Prairie falcon, a Bird of Conservation Concern (USFWS), forages in sagebrush and grassland habitat, similar to that found in the inventory unit.

The area is part of a larger landscape that has been continuously traversed and intermittently inhabited by different human groups and cultures during the past 12,000 years. Archaeological remains are scattered across this area that are the material remnants of this long spectrum of past human use which transcends both the prehistoric and early historic periods. Prehistoric remains include isolated stone and ceramic artifacts, camps and habitation sites, petroglyphs, shrines, and the remains of simple structures and homes. Archaeological remains associated with historic groups include a broader spectrum of artifacts and archaeological sites that include the remains of livestock herding camps and homesteads. Perhaps most importantly, the very pristine, natural condition of this area that qualifies it for consideration as an area with Wilderness Characteristics is a direct reflection of certain very specific, past human sentiments, values, and land-use patterns.



Map 7 – North Chiflo

Summary of Analysis*

Area / Identifier: North Chiflo [NM-010-33]

Summary

Results of Analysis:

A 3,434 acre area north of Ute Mountain had been disked and reseeded with non-native grasses before BLM acquired the property in 2005. It has begun to be reclaimed by natural means, but evidence of furrows are still apparent, and the grass that was planted is a mono-culture that stands out from adjacent undisturbed lands. This area will not be included in the area with wilderness characteristics, which will total 34,452 acres.

1. Does the area meet size requirements? **Yes**
2. Does the area appear to be natural? **Yes**
3. Does the area offer outstanding opportunities for solitude OR a primitive and unconfined type of recreation? **Yes**
4. Does the area have supplemental values? **Yes**

Check One:

■ A majority of the roadless area, covering 34,452 acres, has wilderness characteristics and is identified as lands with wilderness characteristics.

☐ The area does not have wilderness characteristics.

Prepared by:

John Bailey	Monument Manager
Christopher Hitsman	Rangeland Management Assistant
Mark Sundin	River Manager
Valerie Williams	Wildlife Biologist

Reviewed by Sarah Schlanger, Taos Field Manager 1-27-2017: Sarah Schlanger

*This form documents information that constitutes an inventory finding on wilderness characteristics. It does not represent a formal land use allocation or a final agency decision subject to administrative remedies under either 43 CFR parts 4 or 1610.5-3.

Plover Prairie [NM-020-05]

Acreage: **32,636**

(1) Is the area of sufficient size?

Yes. See Maps 1 and 8. The west boundary follows the Chile Line, and the north the Colorado-New Mexico state line. The east and south boundaries are roads or private/state property lines. The area immediately north of the north boundary in Colorado is a designated solar energy zone. On the west, US 285 is a short distance from the Chili Line.

(2) Does the area appear to be natural?

Yes. Rolling plains with a few prominent hills (most notably, one of the Pinabetoso Peaks) and low lying Servilleta basalt flows characterize this inventory unit. Vegetation cover is primarily winterfat, broom snakeweed and grama grasses. The primary human uses are grazing, with associated water tanks and fence lines, and big game hunting. The area remains substantially natural in appearance, with few intrusions that can only be seen from nearby vantage points. The area is about seven by seven miles and all public lands, with the exception of four state land sections.

Human intrusions are limited: 11 range fences totaling 38.8 miles, and 14 water improvements. The 2010 route inventory identified 58.1 miles of primitive routes in this roadless area.

(3) Does the area have outstanding opportunities for solitude?

Yes. The gently rolling terrain provides a visitor with views of a wide area. Intrusions are few and far between, and human activity in extremely low most of the year. The only exception might be during hunting season, since the area provides habitat for Antelope, Rocky Mountain elk and Mule deer. Within a mile of the western boundary, US 285 traffic can be heard, and seen from points further east.

(4) Does the area have outstanding opportunities for primitive and unconfined recreation?

Yes. Hunting, wildlife and bird viewing, photography, hiking and primitive camping in a basically wild setting.

(5) Does the area have supplemental values (ecological, geological, or other features of scientific, educational, scenic or historical value)?

Yes. The area is ecologically diversity due to the expanse of high elevation short grass prairie habitat and the obligate and semi-obligate species found there (prairie dog/antelope association); playa lakes found in the unit; scientific and educational potential in cultural and wildlife habitat resources. The area has been used for decades for hunting.

Geologic features of note include the visually interesting Pinabetoso Peaks, and a few playa lakes characteristic of a poorly drained area. The entire unit is covered by the four million year old Servilleta lava flows which cover most of the Monument.

Big game, including antelope, Rocky Mountain elk and mule deer, use the area as critical winter range and can be found in large herds in this unit during this season.

The Heritage Program New Mexico, in coordination with University of New Mexico, recently released a report describing areas of opportunity for interagency coordination to promote and protect wildlife connectivity across the landscape. Using a variety of data sources, including the New Mexico Critical Habitat Assessment Tool (CHAT), they developed an initial assessment of Wildlife Movement Focal Areas that includes this inventory unit (Muldavin, Esteban, R. McCollough. Natural Heritage New Mexico (NHNM). Wildlife Doorways – Supporting Wildlife Habitat Connectivity Across Borders in the Upper Rio Grande. UNM, Albuquerque, NM. March 2016.).

Colonies of Gunnison prairie dogs, a BLM Sensitive Species, exist throughout the unit. Eleven known prairie dog colonies have been assessed in this unit between 2003 and 2014. Prairie dog towns are dynamic, shrinking and swelling depending on habitat conditions and levels of predation upon them. This keystone species provides a prey base for raptors, carnivores, and nesting habitat for western burrowing owl, a BLM Sensitive Species. In two colonies measured in 2014, both grew considerably since the previous assessment in 2010. One colony was estimated at2 acres in 2010 and found to be 60 acres in 2014. An additional site measured at approximately 9 acres in 2010 had grown to 67 acres by 2014. Approximately 704 acres of occupied prairie dog habitat was documented in 2010 within the inventory unit, the largest colony size at the time being 312 acres.

Due to the number and extent of prairie dog colonies in this unit, it is likely western burrowing owl occurs here. Breeding of western burrowing owls, with four adults and one juvenile detected, was confirmed in this unit in 2010 (Hawks Aloft 2010). Pinyon jay,

a BLM Sensitive Species, occurs here; however, due to the limited amount and density of pinyon-juniper woodlands in the unit, it is likely foraging, resting and hiding habitat only; there is little potential for nesting habitat.

Mountain plover, a ground nesting bird and formerly proposed for federal listing is known to breed in this inventory unit. It is believed that the breeding population in this region represents the largest known in New Mexico, and is itself adjacent to other significant populations in southern Colorado (South Park). This metapopulation represents a connection of species habitat and reproductive sites and renders scientific and academic opportunities. Surveys and monitoring for mountain plover occur as funding allows.

Seven different raptor species, including golden eagle, nest nearby in the cliff habitat of the Rio Grande or Rio San Antonio, all of which would rest, hide, and forage inside the inventory unit and surrounding area. Additional species that travel through or forage in the unit include sharp-shinned hawk, Cooper's hawk, northern harrier), Swainson's hawk, rough-legged hawk, zone-tailed hawk, common black-hawk, Harris's hawk, American kestrel, and owls. Bald eagles, a BLM Sensitive Species, are found in the inventory unit during winter months. Surveys and monitoring for raptors occur as funding allows.

The area is included within the Central Flyway. Migratory birds of grassland and shrubland guilds can be found throughout the unit and it represents important breeding, resting, hiding and foraging habitat, while resident avian species live and breed here year-round. Waterfowl and shorebirds fly directly over the unit as they move north/south, most likely from Alamosa and/or Monte Vista Wildlife Refuges in Colorado north of the unit and the Bosque del Apache Wildlife Refuge to the south, during spring and fall migration. Two playas are found in the unit and represent important stopover habitat for many species of birds, including potential habitat for sandhill cranes and White-faced ibis. Migratory birds that could occur here include: mourning dove (SGCN), pinyon jay (SGCN), horned lark, sage thrasher, Brewer's sparrow, vesper sparrow, sage sparrow, and western meadowlark.

Bats, including Townsend's big eared bat, a BLM Sensitive Species, forage for insects over the Rio Grande regularly during summer months. It is likely, with two playas in the unit, bats drink from these sites when water exists and forage over the unit when prey species are abundant. Surveys and monitoring of bats occur as funding allows.

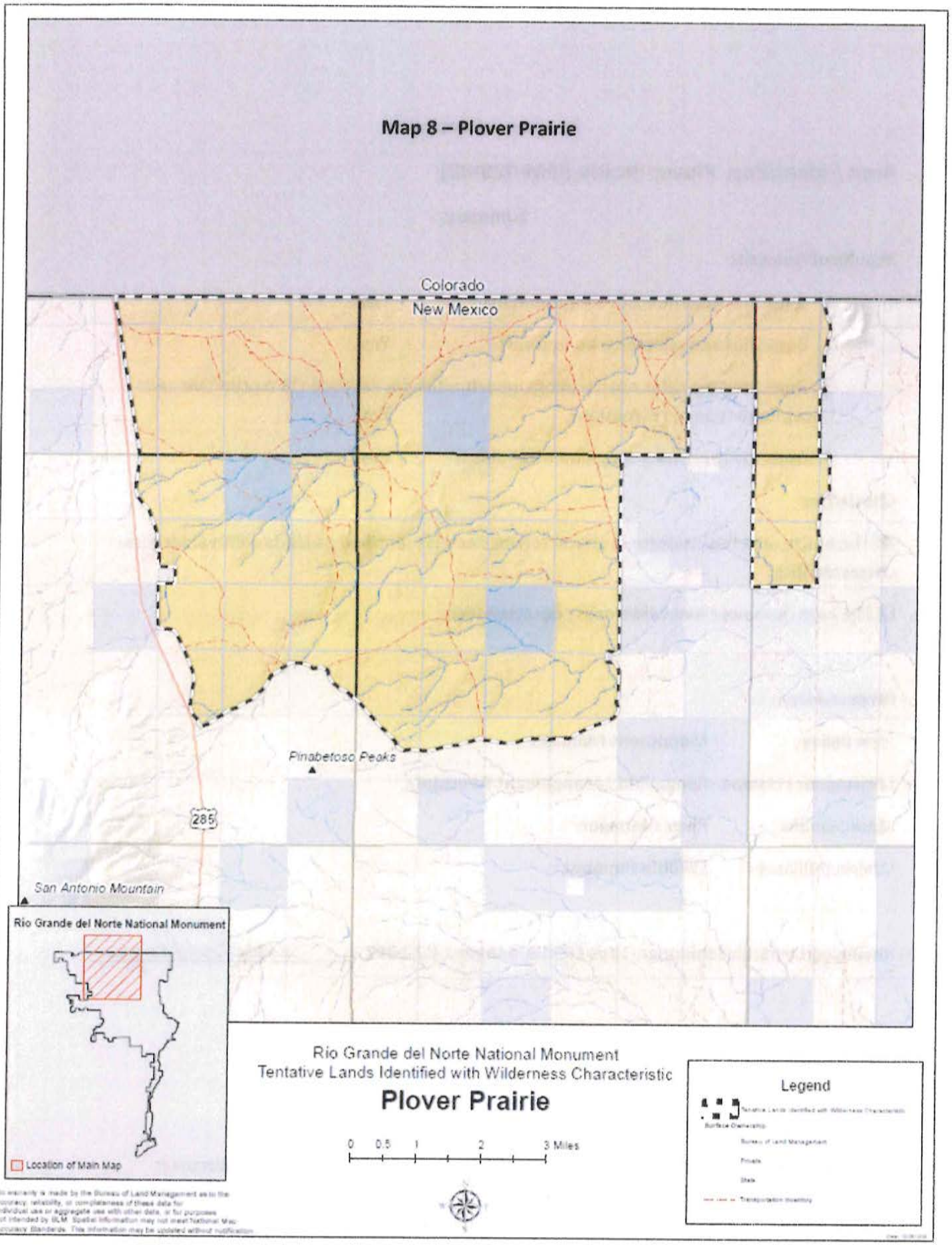
Pollinators, including bees, butterflies and some avian species within the unit, are essential to local ecological diversity and functioning ecosystems on a landscape scale. Plants within the unit that may support one or more species of pollinators include rubber rabbitbrush, skunkbush sumac, sunflower, Rocky Mountain beeplant,

globemallow and others. More research and monitoring is needed to understand the role pollinators play and the status and trend of these species within the inventory unit.

Biological soil crusts provide an integral association between soil particles and cyanobacteria, algae, microfungi, lichens and bryophytes on the soil surface. Often these crusts are found in the soil spaces not occupied by trees, grasses or shrubs and help mitigate soil loss while facilitating soil moisture and nutrient exchange. Ecological diversity is enhanced where biological soil crusts exist within the unit, and there is need for further research and monitoring of this resource.

The area is part of a larger landscape that has been continuously traversed and intermittently inhabited by different human groups and cultures during the past 12,000 years. Archaeological remains are scattered across this area that are the material remnants of this long spectrum of past human use which transcends both the prehistoric and early historic periods. Prehistoric remains include isolated stone and ceramic artifacts, camps and habitation sites, petroglyphs, shrines, and the remains of simple structures and homes. Archaeological remains associated with historic groups include a broader spectrum of artifacts and archaeological sites that include the remains of livestock herding camps and homesteads.

Map 8 – Plover Prairie



Summary of Analysis*

Area / Identifier: Plover Prairie [NM-020-05]

Summary

Results of Analysis:

1. Does the area meet size requirements? **Yes**
2. Does the area appear to be natural? **Yes**
3. Does the area offer outstanding opportunities for solitude OR a primitive and unconfined type of recreation? **Yes**
4. Does the area have supplemental values? **Yes**

Check One:

■ The entire area has wilderness characteristics and is identified as lands with wilderness characteristics.

☐ The area does not have wilderness characteristics.

Prepared by:

John Bailey	Monument Manager
Christopher Hitsman	Rangeland Management Assistant
Mark Sundin	River Manager
Valerie Williams	Wildlife Biologist

Reviewed by Sarah Schlanger, Taos Field Manager 1-27-2017: Sarah Schlanger

*This form documents information that constitutes an inventory finding on wilderness characteristics. It does not represent a formal land use allocation or a final agency decision subject to administrative remedies under either 43 CFR parts 4 or 1610.5-3.

Punche Valley [NM-020-06]

Acreage: **25,772**

(1) Is the area of sufficient size?

Yes. See Maps 1 and 9. The west boundary follows the Chile Line. The remainder of the boundary is comprised of roads or private/state property lines. Most of the area is BLM land, with about 80 acres of private land enclosed by the boundary near the western edge.

(2) Does the area appear to be natural?

Yes. Rolling, rocky plains of winterfat and grasses with scattered pinon and juniper trees provide screening from other visitors. The area is large to provide several long-distance views of a near-pristine landscape.

Human intrusions are limited: range fences totaling 27.4 miles, and five water improvements. The 2010 route inventory identified 58.8 miles of primitive routes in this roadless area. Within a mile of the western boundary, US 285 traffic can be heard, and seen from points further east.

(3) Does the area have outstanding opportunities for solitude?

Yes. Rolling terrain provides a visitor with untrammeled views of a wide area. Intrusions are few and far between, and human activity is extremely low most of the year. The only exception might be during hunting season since the area provides habitat for antelope, Rocky Mountain elk and mule deer.

(4) Does the area have outstanding opportunities for primitive and unconfined recreation?

Yes. Opportunities include hunting, wildlife and bird viewing, photography, hiking and primitive camping in a basically wild setting.

(5) Does the area have supplemental values (ecological, geological, or other features of scientific, educational, scenic or historical value)?

Yes. The area is ecologically diverse due to the expanse of high elevation short grass prairie habitat and the obligate and semi-obligate species found therein (prairie dog/antelope association); playa lakes found throughout the unit; scientific and educational potential in cultural and wildlife habitat resources. The area has been used for decades for hunting.

Big game, including antelope, Rocky Mountain elk and mule deer, use the area as critical winter range and a migration corridor to move seasonally through the unit, providing landscape connectivity for resistant and resilient populations that, in turn, represent ecosystem integrity (able to withstand changes, such as climate, wildfire, etc.). The Heritage Program New Mexico, in coordination with University of New Mexico, recently

released a report describing areas of opportunity for interagency coordination to promote and protect wildlife connectivity across the landscape. Using a variety of data sources, including New Mexico Critical Habitat Assessment Tool (CHAT), they developed an initial assessment of wildlife "doorways," including one that covers this inventory unit. This designation is approximately 144 square miles and includes lands on the Carson National Forest and BLM-administered lands identified as a key corridor of movement for big game (Muldavin, Esteban, R. McCollough. Natural Heritage New Mexico (NHNM). Wildlife Doorways – Supporting Wildlife Habitat Connectivity Across Borders in the Upper Rio Grande. UNM, Albuquerque, NM. March 2016.).

Looking towards Pinabetoso Peaks from Punche Lake

Colonies of Gunnison prairie dogs, a BLM Sensitive Species, exist throughout the unit. Ten known prairie dog colonies have been assessed in this unit between 2003 and 2014. Prairie dog towns are dynamic, shrinking and swelling depending on habitat conditions and levels of predation upon them. This keystone species provides a prey base for raptors, carnivores, and nesting habitat for western burrowing owl, a BLM Sensitive Species. A total of 228 acres of active prairie dog colonies were inventoried in 2010, with one town growing from 12 acres to 33 acres in 2014. The largest single colony in the inventory unit in 2010 was approximately 109 acres. Due to the number and extent of prairie dog colonies in this unit, it is likely the western burrowing owl occurs here. Both in 2014 and 2016 a NLCS Science Grant was awarded to study the status of the Gunnison prairie dog within the Monument to determine feasibility of potential reintroduction of black-footed ferret.

Pinyon jay, a BLM Sensitive Species, occurs here; however, due to the limited amount and density of pinyon-juniper woodlands in the unit, it is likely foraging, resting and hiding habitat only; there is little potential for nesting habitat. Surveys and monitoring for pinyon jay occur as funding allows.

Ferrunginous hawk nest, Punche Valley Photo by Valerie Williams

Seven different raptor species, including Golden eagle, nest nearby in the cliff habitat of the Rio Grande or Rio San Antonio, all of which would rest, hide, and forage inside the inventory unit and surrounding area. There is one known Ferruginous hawk nest within the unit. Additional species that could travel through or forage in the unit include sharp-shinned hawk, Cooper's hawk, northern harrier, Swainson's hawk, rough-legged hawk, zone-tailed hawk, common black-hawk, Harris's hawk, American kestrel, or owls. Bald eagles, a BLM Sensitive Species, would be found in the inventory unit during winter months. Surveys and monitoring for raptors occur as funding allows.

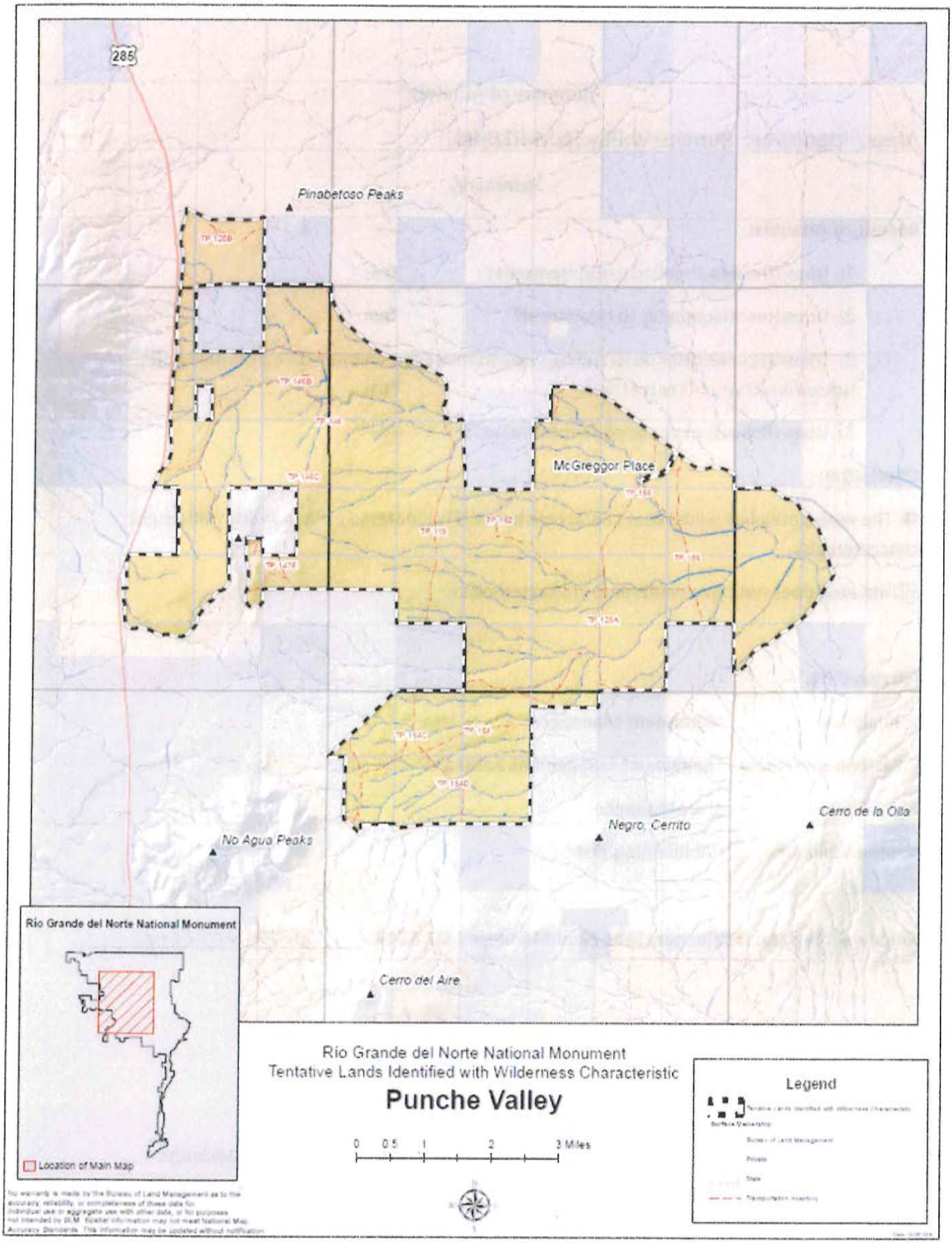
The area is included within the Central Flyway. Migratory birds of grassland and shrubland guilds can be found throughout the unit and it represents important breeding, resting, hiding and foraging habitat, while resident avian species live and breed here year-round. Waterfowl and shorebirds fly directly over the unit as they move north/south, most likely from Alamosa and/or Monte Vista Wildlife Refuges in Colorado north of the unit and the Bosque del Apache Wildlife Refuge to the south, during spring and fall migration. Playas are found in the unit and represent important stopover habitat for many species of birds, including potential habitat for Sandhill cranes and white-faced ibis.

Bats, including Townsend's big eared bat, a BLM Sensitive Species, forage for insects over the Plateau during summer months. It is likely, with playas in the unit, bats drink from these sites when water exists and forage over the unit when prey species are abundant. Surveys and monitoring of bats occur as funding allows.

Sagebrush communities, where they exist within the unit, are unique ecosystem and hosts obligate species, such as Brewer's sparrow, sage sparrow, sage thrasher and antelope. In four different habitat types, Pinyon jay, a BLM Sensitive Species, occurred in sagebrush habitat more frequently than its primary habitat of pinyon-juniper woodlands (Hawks Aloft 2010). Prairie falcon, a Bird of Conservation Concern (USFWS), forages in sagebrush and grassland habitat, similar to that found in the inventory unit. Other avian species found in the habitat of this include Mourning dove, a SGCN, Spotted towhee, and Northern mockingbird. Inventory of sagebrush communities within the unit would assist in management decisions for future vegetation treatments in this habitat type.

Astragalus ripleyi, a BLM Sensitive Species, is known to occur in various habitat types throughout the Monument, and has been found in this inventory unit. Continued monitoring and inventory is needed to effectively manage this species and to document its distribution on the Monument.

The area is part of a larger landscape that has been continuously traversed and intermittently inhabited by different human groups and cultures during the past 12,000 years. Archaeological remains are scattered across this area that are the material remnants of this long spectrum of past human use which transcends both the prehistoric and early historic periods. Prehistoric remains include isolated stone and ceramic artifacts, camps and habitation sites, petroglyphs, shrines, and the remains of simple structures and homes. Archaeological remains associated with historic groups include a broader spectrum of artifacts and archaeological sites that include the remains of livestock herding camps and homesteads.



Map 9 – Punche Valley

Summary of Analysis*

Area / Identifier: Punche Valley [NM-020-06]

Summary

Results of Analysis:

1. Does the area meet size requirements? **Yes**
2. Does the area appear to be natural? **Yes**
3. Does the area offer outstanding opportunities for solitude OR a primitive and unconfined type of recreation? **Yes**
4. Does the area have supplemental values? **Yes**

Check One:

■ The entire area has wilderness characteristics and is identified as lands with wilderness characteristics.

☐ The area does not have wilderness characteristics.

Prepared by:

John Bailey	Monument Manager
Christopher Hitsman	Rangeland Management Assistant
Mark Sundin	River Manager
Valerie Williams	Wildlife Biologist

Reviewed by Sarah Schlanger, Taos Field Manager 1-27-2017: Sarah Schlanger

*This form documents information that constitutes an inventory finding on wilderness characteristics. It does not represent a formal land use allocation or a final agency decision subject to administrative remedies under either 43 CFR parts 4 or 1610.5-3.

San Antonio - East [NM-020-07]

Acreage: **9,855**

(1) Is the area of sufficient size?

Yes. See Maps 1 and 10 for location and boundary information. This area is separated from the San Antonio WSA to the west by a right-of-way (now relinquished) that is the WSA's east boundary. Portions of the unmaintained telephone line remain, but the associated maintenance road has deteriorated to where parts of it no longer exist.

(2) Does the area appear to be natural?

Yes. No change from 2007; increases in vegetation cover may actually have improved the visual quality of the area.

Human intrusions are limited: 17.1 miles of range fence, and two water improvements. The 2012 route inventory identified 20.3 miles of primitive routes in this roadless area.

(3) Does the area have outstanding opportunities for solitude?

Yes. Rolling terrain provides a visitor with untrammeled views of a wide area, with visual screening provided by vegetation and rolling hills. Intrusions are few and far between, and human activity in extremely low most of the year. The only exception might be during hunting season, since the area provides habitat for Antelope, Rocky Mountain elk and Mule deer. Sights and sounds associated with travel on US 285 would affect visitors in the eastern area.

(4) Does the area have outstanding opportunities for primitive and unconfined recreation?

Yes. Hunting, wildlife and bird viewing, photography, hiking and primitive camping in a basically wild setting.

(5) Does the area have supplemental values (ecological, geological, or other features of scientific, educational, scenic or historical value)?

Yes. The area contains significant ecological diversity due to the expanse of high elevation short grass prairie habitat and the obligate and semi-obligate species found therein (prairie dog/antelope association); playa lakes found within the unit ; scientific and educational potential in cultural and wildlife habitat resources. The area has been used for decades for hunting.

Big game, including antelope, Rocky Mountain elk and mule deer, use the area as critical winter range and a migration corridor to move seasonally through the unit, providing landscape connectivity for resistant and resilient populations that, in turn, represent ecosystem integrity (able to withstand changes, such as climate, wildfire, etc.). The Heritage Program New Mexico, in coordination with University of New Mexico, recently released a report describing areas of opportunity for interagency coordination to

promote and protect wildlife connectivity across the landscape. Using a variety of data sources, including New Mexico Critical Habitat Assessment Tool (CHAT), they developed an initial assessment of wildlife "doorways," including one at the southern portion of this inventory unit. This designation is approximately 144 square miles and includes lands on the Carson National Forest and BLM-administered lands identified as a key corridor of movement for big game. This doorway is one of three such features identified in the report that stretch east to northwest across the monument, and include the Rio Grande and Los Pinos areas, described collectively in the report as the Northern Taos Plateau Wildlife Movement Focal Area (Muldavin, Esteban, R. McCollough. Natural Heritage New Mexico (NHNM). Wildlife Doorways – Supporting Wildlife Habitat Connectivity Across Borders in the Upper Rio Grande. UNM, Albuquerque, NM. March 2016.).

Pinyon jay, a BLM Sensitive Species, occurs here; however, due to the limited amount and density of pinyon-juniper woodlands in the unit, it is likely foraging, resting and hiding habitat only; there is little potential for nesting habitat. Surveys and monitoring for pinyon jay occur as funding allows.

Similar to prairie dog surveys, mountain plover surveys have not occurred within the inventory unit. Protocol surveys have only occurred within the study site where known breeding pairs are found to the east of Highway 285. Potential habitat is found within the inventory unit, however no nesting pairs have been identified to date. Surveys and monitoring for mountain plover occur as funding allows.

Seven different raptor species, including golden eagle, nest nearby in the cliff habitat of the Rio Grande or Rio San Antonio, all of which would rest, hide, and forage inside the inventory unit and surrounding area. Additional species that could travel through or forage in the unit include sharp-shinned hawk, Cooper's hawk, northern harrier), Swainson's hawk, rough-legged hawk, zone-tailed hawk, common black-hawk, Harris's hawk, American kestrel, and owls. Bald eagles, a BLM Sensitive Species, are in the inventory unit during winter months.

The area is included within the Central Flyway. Migratory birds of grassland and shrubland guilds can be found throughout the unit and it represents important breeding, resting, hiding and foraging habitat, while resident avian species live and breed here year-round. Waterfowl and shorebirds fly directly over the unit as they move north/south, most likely from Alamosa and/or Monte Vista Wildlife Refuges in Colorado north of the unit and the Bosque del Apache Wildlife Refuge to the south, during spring and fall migration. Playas found in the unit represent important stopover habitat for many species of birds, including potential habitat for sandhill cranes and white-faced ibis. Migratory birds that could occur here include: mourning dove (SGCN), pinyon jay (SGCN), horned lark, sage thrasher, Brewer's sparrow, vesper sparrow, sage sparrow, and western meadowlark.

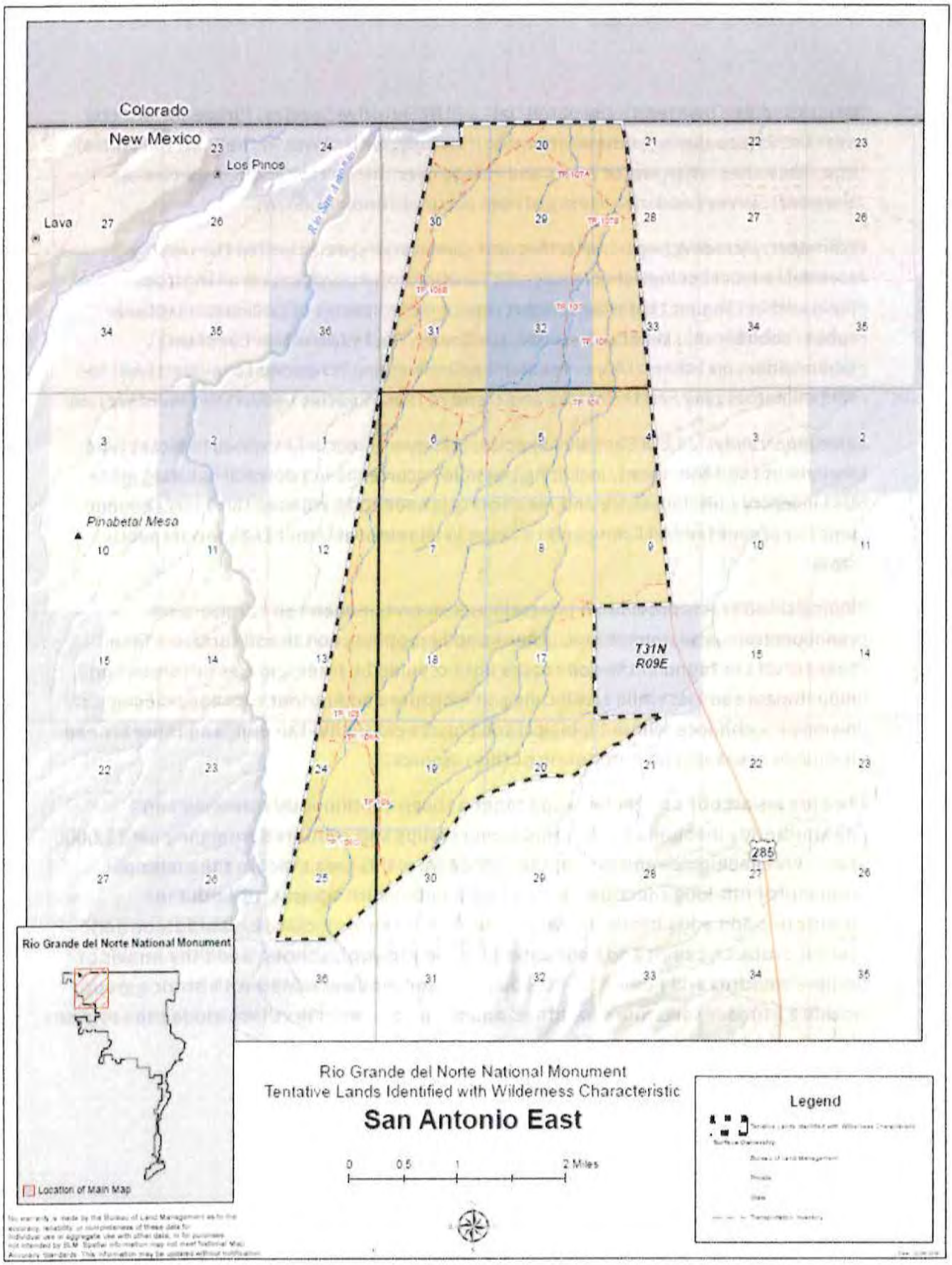
Bats, including Townsend's big eared bat, a BLM Sensitive Species, forage for insects over the Plateau during summer months. It is likely, with playas in the unit, bats drink from these sites when water exists and forage over the unit when prey species are abundant. Surveys and monitoring of bats occur as funding allows.

Pollinators, including bees, butterflies and some avian species within the unit, are essential to local ecological diversity and functioning ecosystems on a landscape scale. Plants within the unit that may support one or more species of pollinators include rubber rabbitbrush, skunkbush sumac, sunflower, Rocky Mountain beeplant, globemallow and others. More research and monitoring is needed to understand the role pollinators play and the status and trend of these species within the inventory unit.

Astragalus ripleyi, a BLM Sensitive Species, is known to occur in various habitat types throughout the Monument, including possible occurrence in potential habitat within this inventory unit. Inventory and monitoring is needed to manage this rare/endemic plant to prevent federal listing and to assist in its removal from BLM special species status.

Biological soil crusts provide an integral association between soil particles and cyanobacteria, algae, microfungi, lichens and bryophytes on the soil surface. Often these crusts are found in the soil spaces not occupied by trees, grasses or shrubs and help mitigate soil loss while facilitating soil moisture and nutrient exchange. Ecological diversity is enhanced where biological soil crusts exist within the unit, and there is need for further research and monitoring of this resource.

The area is part of a larger landscape that has been continuously traversed and intermittently inhabited by different human groups and cultures during the past 12,000 years. Archaeological remains are scattered across this area that are the material remnants of this long spectrum of past human use which transcends both the prehistoric and early historic periods. Prehistoric remains include isolated stone and ceramic artifacts, camps and habitation sites, petroglyphs, shrines, and the remains of simple structures and homes. Archaeological remains associated with historic groups include a broader spectrum of artifacts and archaeological sites that include the remains of livestock herding camps and homesteads.



Map 10 – San Antonio - East

Summary of Analysis*

Area / Identifier: San Antonio - East [NM-020-07]

Summary

Results of Analysis:

1. Does the area meet size requirements? **Yes**
2. Does the area appear to be natural? **Yes**
3. Does the area offer outstanding opportunities for solitude OR a primitive and unconfined type of recreation? **Yes**
4. Does the area have supplemental values? **Yes**

Check One:

■ The entire area has wilderness characteristics and is identified as lands with wilderness characteristics.

☐ The area does not have wilderness characteristics.

Prepared by:

John Bailey	Monument Manager
Christopher Hitsman	Rangeland Management Assistant
Mark Sundin	River Manager
Valerie Williams	Wildlife Biologist

Reviewed by Sarah Schlanger, Taos Field Manager 1-27-2017: Sarah Schlanger

*This form documents information that constitutes an inventory finding on wilderness characteristics. It does not represent a formal land use allocation or a final agency decision subject to administrative remedies under either 43 CFR parts 4 or 1610.5-3.

San Antonio - North [NM-020-08]

Acreage: **5,841**

(1) Is the area of sufficient size?

Yes. See Maps 1 and 11 for location and boundary information. The north boundary is a constructed road that circles the base of San Antonio Mountain. The eastern boundary is US 285, and the southern and western boundaries are an access road to private land, the private land itself, and the Carson Nation Forest. No private or state lands are within the inventory unit.

(2) Does the area appear to be natural?

Yes. The area is dominated by the 10,890 foot San Antonio Mountain – the inventory unit comprises the lower northeast portion of the Mountain.

Human intrusions are limited: 9.7 miles of range fence, 4 improved water sources; no primitive routes were identified in a 2010 route inventory.

(3) Does the area have outstanding opportunities for solitude?

Yes. Rolling terrain provides a visitor with untrammeled views of a wide area, with visual screening provided by vegetation and rolling hills. Intrusions are few and far between, and human activity in extremely low most of the year. The only exception might be during hunting season, since the area provides habitat for antelope, Rocky Mountain elk and mule deer. Sights and sounds associated with travel on US 285 would affect visitors in the lower, less vegetated portions of the inventory unit.

(4) Does the area have outstanding opportunities for primitive and unconfined recreation?

Yes. Hunting, wildlife and bird viewing, photography, hiking and primitive camping are available in a basically wild setting of very high scenic quality.

(5) Does the area have supplemental values (ecological, geological, or other features of scientific, educational, scenic or historical value)?

Yes. The area is ecologically diverse due to the expanse of high elevation short grass prairie habitat and the obligate and semi-obligate species found therein (prairie dog/antelope association); one playa lake is found within the unit ; scientific and educational potential in cultural and wildlife habitat resources. The area has been used for decades for hunting.

Big game, including antelope, Rocky Mountain elk and mule deer, use the area as critical winter range and a migration corridor to move seasonally through the unit, providing landscape connectivity for resistant and resilient populations that, in turn, represent ecosystem integrity (able to withstand changes, such as climate, wildfire, etc.). The Heritage Program New Mexico, in coordination with University of New Mexico, recently

released a report describing areas of opportunity for interagency coordination to promote and protect wildlife connectivity across the landscape. Using a variety of data sources, including New Mexico Critical Habitat Assessment Tool (CHAT), they developed an initial assessment of wildlife "doorways," including one at the southern portion of this inventory unit. This designation is approximately 144 square miles and includes lands on the Carson National Forest and BLM-administered lands identified as a key corridor of movement for big game. This doorway is one of three such features identified in the report that stretch east to northwest across the monument, and include the Rio Grande and Los Pinos areas, described collectively in the report as the Northern Taos Plateau Wildlife Movement Focal Area (Muldavin, Esteban, R. McCollough. Natural Heritage New Mexico (NHNM). Wildlife Doorways – Supporting Wildlife Habitat Connectivity Across Borders in the Upper Rio Grande. UNM, Albuquerque, NM. March 2016.).

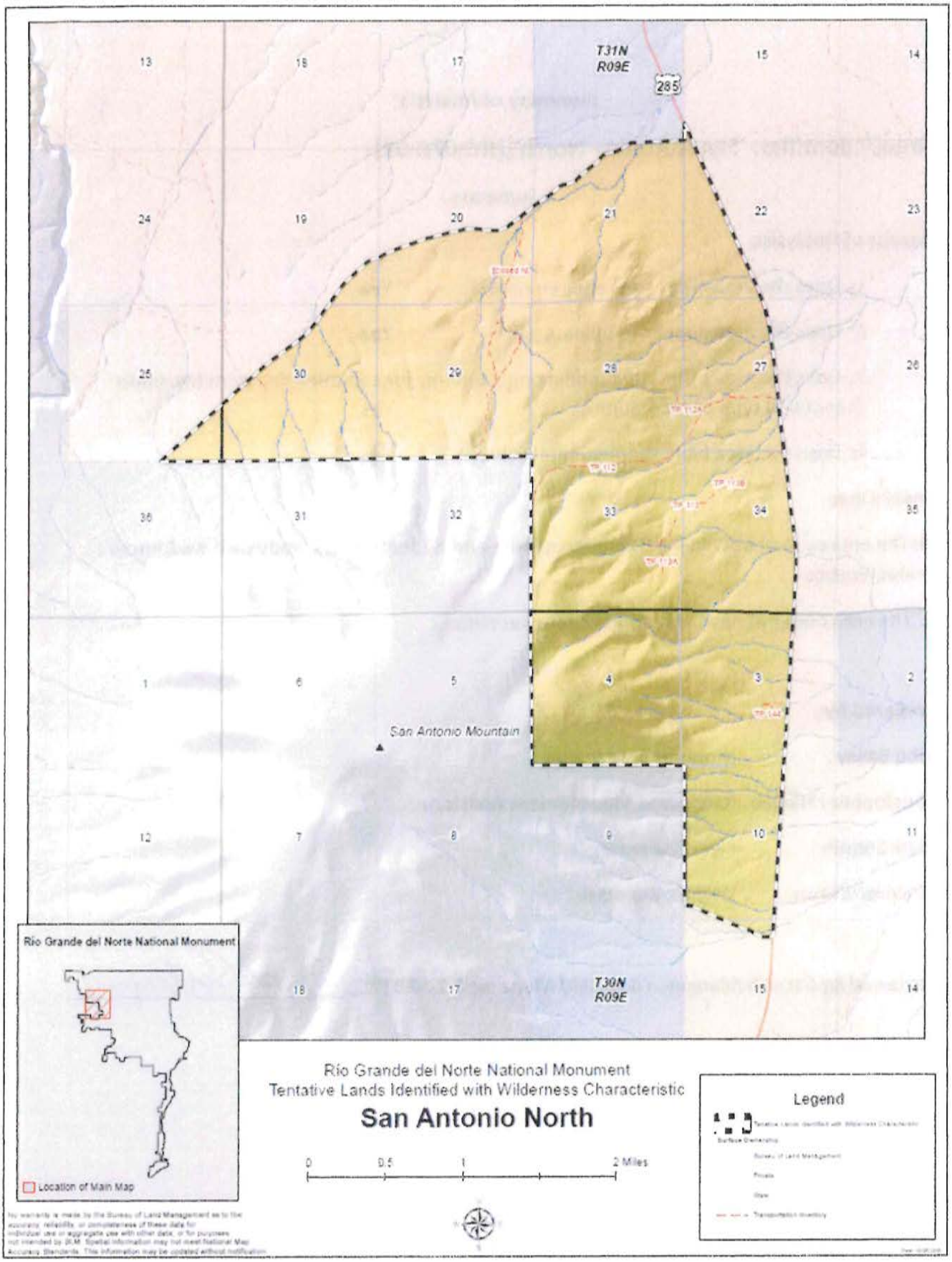
Pinyon jay, a BLM Sensitive Species, occurs due to the stand of pinyon and juniper trees, along with sagebrush, that occur within the unit. The species nests in colonies in pinyon-juniper woodlands and, to date, no nesting colonies have been identified. Surveys and monitoring for nesting pinyon jay will occur as funding allows. Pinyon jays are a resident species. They rely on pinyon nuts produced from pinyon trees. During the winter, as food supplies decrease, seeds cached in pinyon juniper woodlands, such as those within the inventory unit, are critical to survival. This unique and specialized species fosters ecological diversity of the unit itself, as well as the landscape by distributing cached seeds forgotten by the bird to facilitate the perpetuation of pinyon woodlands. Out of four habitat types, pinyon juniper woodlands had the second highest avian species diversity (n=51), with ponderosa pine, also part of this inventory unit, holding the greatest avian species richness (n=55) (Hawks Aloft 2010).

The area is included within the Central Flyway. Migratory birds of grassland and shrubland guilds can be found throughout the unit and it represents important breeding, resting, hiding and foraging habitat, while resident avian species live and breed here year-round. Waterfowl and shorebirds fly directly over the unit as they move north/south, most likely from Alamosa and/or Monte Vista Wildlife Refuges in Colorado north of the unit and the Bosque del Apache Wildlife Refuge to the south, during spring and fall migration. Playas found in the unit represent important stopover habitat for many species of birds, including potential habitat for Sandhill cranes and White-faced ibis. Migratory birds that could occur here include: Mourning dove (SGCN), Pinyon jay (SGCN), Horned lark, Sage thrasher, Brewer's sparrow, Vesper sparrow, Sage sparrow, and Western meadowlark. Surveys and monitoring for migratory birds occur as funding allows.

Bats, including Townsend's big eared bat, a BLM Sensitive Species, forage for insects over the Plateau during summer months. It is likely, with playas in the unit, bats drink

from these sites when water exists and forage over the unit when prey species are abundant. Surveys and monitoring of bats occur as funding allows.

The area is part of a larger landscape that has been continuously traversed and intermittently inhabited by different human groups and cultures during the past 12,000 years. Archaeological remains are scattered across this area that are the material remnants of this long spectrum of past human use which transcends both the prehistoric and early historic periods. Prehistoric remains include isolated stone and ceramic artifacts, camps and habitation sites, petroglyphs, shrines, and the remains of simple structures and homes. Archaeological remains associated with historic groups include a broader spectrum of artifacts and archaeological sites that include the remains of livestock herding camps and homesteads.



Map 11 – San Antonio – North

Summary of Analysis*

Area / Identifier: San Antonio - North [NM-020-08]

Summary

Results of Analysis:

1. Does the area meet size requirements? **Yes**
2. Does the area appear to be natural? **Yes**
3. Does the area offer outstanding opportunities for solitude OR a primitive and unconfined type of recreation? **Yes**
4. Does the area have supplemental values? **Yes**

Check One:

■ The entire area has wilderness characteristics and is identified as lands with wilderness characteristics.

☐ The area does not have wilderness characteristics.

Prepared by:

John Bailey	Monument Manager
Christopher Hitsman	Rangeland Management Assistant
Mark Sundin	River Manager
Valerie Williams	Wildlife Biologist

Reviewed by Sarah Schlanger, Taos Field Manager 1-27-2017: Sarah Schlanger

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Ute Mountain [NM-020-10]

Acreage: **13,190**

(1) Is the area of sufficient size?

Yes. See Maps 1 and 12 for location and boundary information. This area was acquired in 2004–05 for its wildlife, wilderness character, and scenic resources. An inventory was conducted in 2006 and found the main part of the acquired land, plus some adjacent land already managed by the BLM, had high-quality wilderness characteristics, retaining a predominately natural character and having outstanding opportunities for solitude and primitive and unconfined recreation. The Ute Mountain area having wilderness character covers 13,190 acres.

(2) Does the area appear to be natural?

Yes. No real change from the original inventory in 2007. Some small-scale intrusions along the northern and western boundaries have seen limited or no new vehicle use, or have been reclaimed by volunteer help. Human intrusions are limited: the 2010 inventory of roads identified 9.7 miles of primitive routes in this inventory unit; there are 8.2 miles of range fence within the unit.

Members of Wilderness Volunteers 'erasing' a road

(3) Does the area have outstanding opportunities for solitude?

Yes. No change from 2007. Outstanding opportunities to find seclusion and solitude are found throughout the inventory unit.

(4) Does the area have outstanding opportunities for primitive and unconfined recreation?

Yes. No change from 2007. There are outstanding opportunities for hiking, backpacking, horseback riding, bird and animal watching, photography, white water boating, and sightseeing.

(5) Does the area have supplemental values (ecological, geological, or other features of scientific, educational, scenic or historical value)?

Yes. The area is ecologically diverse due to an elevation gradient from the base of the mountain to the highest point (10,093 feet) in the monument; and is an important geological feature (a shield volcanic cone in the midst of high elevation desert habitat); scientific and educational potential in cultural and wildlife habitat resources. The area has been used for decades for hunting, and pinon nut and fuelwood collection.

Big game, including antelope, Rocky Mountain elk and mule deer, use the area as critical winter range. The unit contains a resident herd of elk, and the area is used by many wildlife species as they access the Rio Grande for water.

Colonies of Gunnison prairie dogs, a BLM Sensitive Species, exist within the unit. Prairie dogs are keystone species and provide habitat and a prey base for a multitude of wildlife species, including the western burrowing owl (BLM Sensitive Species) and ferruginous hawk (BLM Watch species), thereby increasing local biodiversity and increasing ecological diversity across the landscape. Recently, an NLCS Science Grant was awarded to study the status of the Gunnison prairie dog within the Monument to determine feasibility of potential reintroduction of black-footed ferret.

Pinyon jay, a BLM Sensitive Species, occurs here, due to the amount and density of pinyon-juniper woodlands on Ute Mountain. The species nests in colonies in pinyon-juniper woodlands and, to date, no nesting colonies have been identified within this inventory unit. Pinyon jays are a resident species. They rely on pinyon nuts produced from pinyon trees. During the winter, as food supplies decrease, seeds cached in pinyon juniper woodlands, such as those within the inventory unit, are critical to survival. This unique and specialized species foster ecological diversity of the unit itself, as well as the landscape by distributing cached seeds forgotten by the bird to facilitate the perpetuation of pinyon woodlands. Out of four habitat types surveyed in this unit, pinyon juniper woodlands had the second highest avian species diversity (n=51), with ponderosa pine, also part of this inventory unit, holding the greatest avian species richness (n=55) (Hawks Aloft 2010).

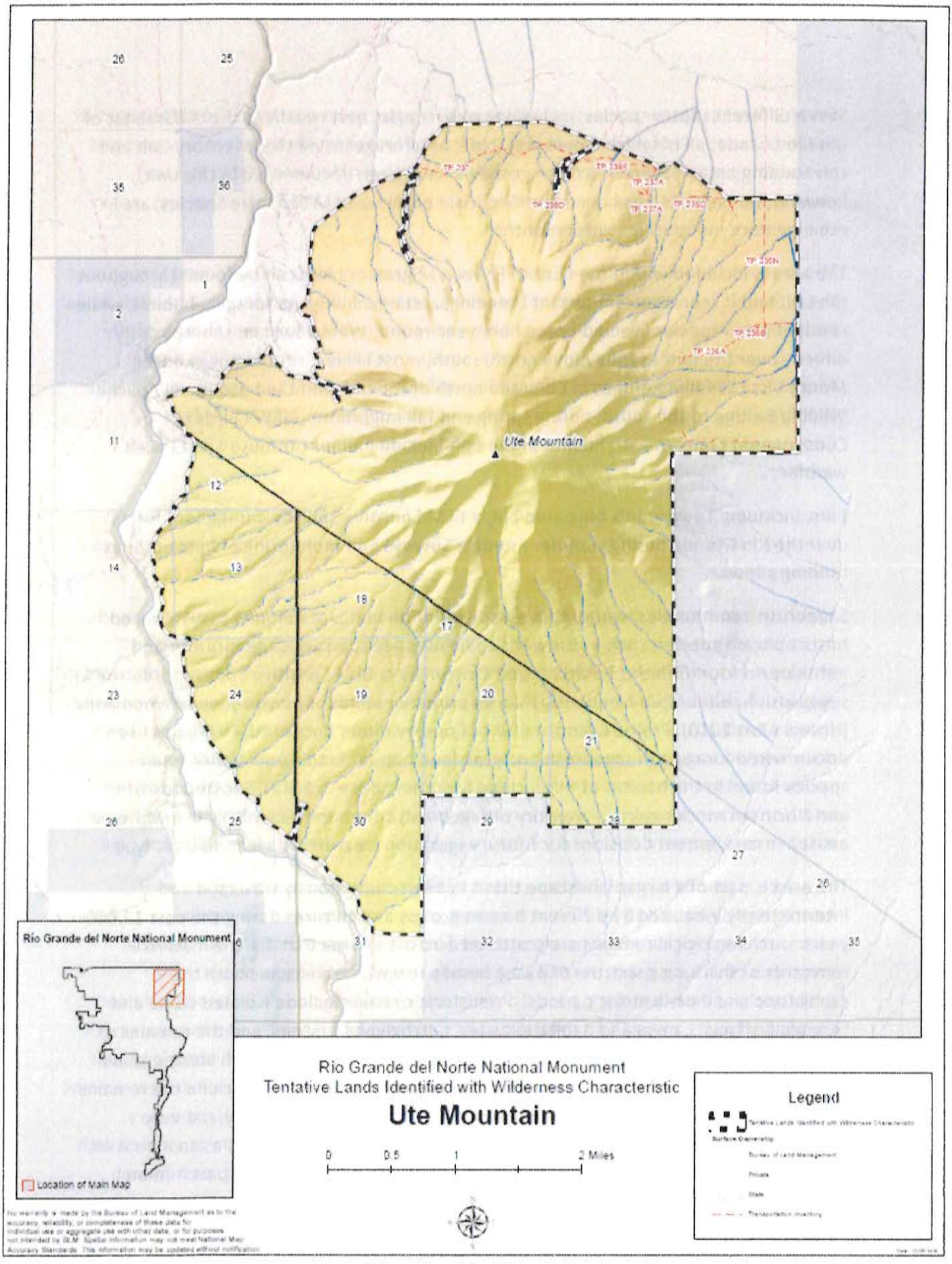
Seven different raptor species, including golden eagle, nest nearby in the cliff habitat of the Rio Grande, all of which would rest, hide, and forage inside the inventory unit and surrounding area. Several northern goshawk have been documented in this unit, however, no nest site has been identified. Bald eagles, a BLM Sensitive Species, are in the inventory unit during winter months.

The area is included within the Central Flyway. Migratory birds can be found throughout the unit and it represents important breeding, resting, hiding and foraging habitat, while resident avian species live and breed here year-round. Waterfowl and shorebirds fly directly over the unit as they move north/south, most likely from Alamosa and/or Monte Vista Wildlife Refuges in Colorado north of the unit and the Bosque del Apache Wildlife Refuge to the south, during spring and fall migration. USFWS Birds of Conservation Concern with habitat in the unit include juniper titmouse and Grace's warbler.

Bats, including Townsend's big eared bat, a BLM Sensitive Species, forage for insects over the Rio Grande during summer months. Surveys and monitoring of bats occur as funding allows.

Sagebrush communities, where they exist within the unit, are unique ecosystem and hosts obligate species, such as Brewer's sparrow, sage sparrow, sage thrasher and antelope. In four different habitat types, Pinyon jay, a BLM Sensitive Species, occurred in sagebrush habitat more frequently than its primary habitat of pinyon-juniper woodlands (Hawks Aloft 2010). Prairie falcon, a Bird of Conservation Concern (USFWS), has been documented foraging in sagebrush and grassland habitat in this unit. Other avian species found in the habitat of this include Mourning dove, a SGCN, Spotted towhee, and Northern mockingbird. Inventory of sagebrush communities within the unit would assist in management decisions for future vegetation treatments in this habitat type.

The area is part of a larger landscape that has been continuously traversed and intermittently inhabited by different human groups and cultures during the past 12,000 years. Archaeological remains are scattered across this area that are the material remnants of this long spectrum of past human use which transcends both the prehistoric and early historic periods. Prehistoric remains include isolated stone and ceramic artifacts, camps and habitation sites, petroglyphs, shrines, and the remains of simple structures and homes. Archaeological remains associated with historic groups include a broader spectrum of artifacts and archaeological sites that include the remains of livestock herding camps and homesteads. Perhaps most importantly, the very pristine, natural condition of this area that qualifies it for consideration as an area with Wilderness Characteristics is a direct reflection of certain very specific, past human sentiments, values, and land-use patterns.



Map 12 – Ute Mountain

Summary of Analysis*

Area / Identifier: Ute Mountain [NM-020-10]

Summary

Results of Analysis:

Since our inventory in 2007/8, Ute Mountain has seen some natural or man-caused reclamation of old road scars or tracks left from wood cutting several decades ago, improving the area's wilderness character.

1. Does the area meet size requirements? **Yes**
2. Does the area appear to be natural? **Yes**
3. Does the area offer outstanding opportunities for solitude OR a primitive and unconfined type of recreation? **Yes**
4. Does the area have supplemental values? **Yes**

Check One:

■ The entire area has wilderness characteristics and is identified as lands with wilderness characteristics.

☐ The area does not have wilderness characteristics.

Prepared by:

John Bailey	Monument Manager
Christopher Hitsman	Rangeland Management Assistant
Mark Sundin	River Manager
Valerie Williams	Wildlife Biologist

Reviewed by Sarah Schlanger, Taos Field Manager 1-27-2017: Sarah Schlanger

*This form documents information that constitutes an inventory finding on wilderness characteristics. It does not represent a formal land use allocation or a final agency decision subject to administrative remedies under either 43 CFR parts 4 or 1610.5-3.

Exhibit D

Letter from N.M. Congressional Delegation

to Melanie Barnes, BLM NM State Director

Re: Protection of Cerro de la Olla

under Section 202 of FLPMA

Dec. 14, 2023

Congress of the United States

Washington, DC 20515

December 14, 2023

Melanie Barnes
New Mexico State Director
Bureau of Land Management
301 Dinosaur Trail
Santa Fe, NM 87508

Dear State Director Barnes,

We are writing to respectfully request that you exercise your authority under Section 202 of the Federal Land Policy and Management Act when developing the Rio Grande Del Norte National Monument Resource Management Plan to protect wilderness-quality lands within the monument as wilderness study areas (WSAs). Specifically, we urge you to prioritize protecting Cerro de la Olla, an extinct shield volcano with an elevation of 9,475 feet.

The area also holds deep cultural significance for Taos Pueblo. The upper elevations of the volcano offer solitude and expansive views of the Sangre de Cristo and San Juan Mountains, and the dramatic Rio Grande Gorge. It also provides recreational opportunities such as hiking, camping, and hunting; contains important habitat for a wide range of wildlife species including elk, mule deer, black bears, and mountain lions; and supports traditional uses such as the collection of herbs, firewood, and piñon nuts.

When developing the 2012 Taos Resource Management Plan (RMP), the Bureau of Land Management (BLM) inventoried the Cerro de la Olla planning unit for wilderness characteristics and determined that it met the wilderness criteria of sufficient size, naturalness, and outstanding opportunity for solitude or primitive and unconfined recreation. Unfortunately, the BLM declined to manage this area as lands with wilderness characteristics, despite having received public comments in support of managing this area to protect its wild character.

In the absence of administrative protections, New Mexico's congressional delegation has been seeking permanent protection for this special place for several years. In 2020, during the 116th Congress, Senators Heinrich and Udall and then-Representative Luján sponsored legislation (S. 3241; H.R. 8564) to protect Cerro de la Olla as congressionally designated wilderness. The legislation was reintroduced by Senator Heinrich and Representative Leger Fernández in the 117th Congress (S. 177; H.R. 2522). At a Senate Energy and Natural Resources Committee (SENR) hearing on S. 177, BLM Deputy Director Nada Wolff Culver testified in support of the bill, emphasizing that the legislation aligns with President Biden's Administration's conservation goals, including Executive Order 14008, Tackling the Climate Crisis at Home and Abroad. The Senate bill passed favorably out of SENR Committee.

In 2023, members of the delegation reintroduced the legislation once again (S. 593, H.R. 1303), and in July the Senate bill *unanimously* passed out of the SENR Committee. The bill is supported by a wide range of local

stakeholders including the Taos County Commission, Taos Pueblo, and community members. We remain dedicated to permanently protecting Cerro de la Olla and we urge the BLM to exercise its statutory authority to designate the area as a WSA.

In addition to Cerro de la Olla, we encourage the BLM to consider and evaluate the Rio San Antonio East for WSA designation. This area comprises approximately 9,210 acres adjacent to the Rio San Antonio Wilderness, which was congressionally designated in 2019. During the 2012 Taos RMP planning process, public comments identified Rio San Antonio East as an area with wilderness characteristics, and the BLM agreed. Since the adoption of the 2012 Taos RMP, the BLM has been managing this area to protect its wilderness characteristics. Although the area has some existing administrative protection under the 2012 Taos RMP, designating this area as a WSA would provide more robust protection for this landscape and provide a buffer for the adjacent Rio San Antonio Wilderness.

We thank the BLM for its management of New Mexico's public lands and look forward to working with you on protections for lands with wilderness qualities in our state.

Sincerely,

Martin Heinrich
United States Senator

Ben Ray Luján
United States Senator

Melanie Stansbury
Member of Congress

Teresa Leger Fernández
Member of Congress

Gabe Vasquez
Member of Congress