

July 3, 2024

Gordon Michaud  
Planning and Environmental Coordinator  
Bureau of Land Management  
Las Cruces District Office  
1800 Marquess Street  
Las Cruces, NM 88005

Submitted via eplanning website: <https://eplanning.blm.gov/eplanning-ui/project/92170/510>

**Re: Comments on Draft Resource Management Plan and Environmental Impact Statement for Organ Mountains-Desert Peaks National Monument**

Dear Mr. Michaud,

On behalf of New Mexico Wilderness Alliance (New Mexico Wild), Center for Biological Diversity, Conservation Lands Foundation, Friends of OMDP, Sierra Club, and The Wilderness Society, thank you for this opportunity to provide comments to the Bureau of Land Management (BLM) on the draft resource management plan and environmental impact statement (RMP/EIS) for the management of the Organ Mountains-Desert Peaks National Monument (OMDP or Monument).<sup>1</sup> Once finalized, the RMP will replace the existing 1993 Mimbres Resource Management Plan (RMP)<sup>2</sup> within the decision area. These comments are timely submitted by July 5, 2024.

President Barack Obama designated OMDP on May 21, 2014, by issuing Proclamation 9131,<sup>3</sup> which directs the BLM to manage the Monument as part of the National Landscape Conservation System (NLCS). As described in Proclamation 9131, the Monument was established to preserve the area's wide diversity of Chihuahuan Desert plants and animals; cultural resources, including rock art, dwellings, and artifacts; historic sites and trails; geologic features, including mountain peaks, volcanic fields, and lava flows; paleontological resources, including fossilized footprints and fossil

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<sup>1</sup> U.S. Dep't of Interior, BLM, Organ Mountains Desert Peaks, Draft Resource Management Plan and Environmental Impact Statement (Apr. 2024), *available at* [https://eplanning.blm.gov/public\\_projects/92170/200212669/20107969/251007969/OrganMountains-DesertPeaks%20Nat%20Monument\\_DEIS%20RMP\\_20240409\\_508.pdf](https://eplanning.blm.gov/public_projects/92170/200212669/20107969/251007969/OrganMountains-DesertPeaks%20Nat%20Monument_DEIS%20RMP_20240409_508.pdf) [hereinafter Draft RMP/EIS].

<sup>2</sup> U.S. Dep't of Interior, BLM, Las Cruces District Office Mimbres Resource Area, Mimbres Resource Management Plan (Dec. 1993), *available at* [https://eplanning.blm.gov/public\\_projects/lup/72801/97036/117193/LCDO\\_-\\_1993\\_-\\_Mimbres\\_Resource\\_Area\\_RMP.pdf](https://eplanning.blm.gov/public_projects/lup/72801/97036/117193/LCDO_-_1993_-_Mimbres_Resource_Area_RMP.pdf)

<sup>3</sup> Presidential Proclamation 9131, Establishment of the Organ Mountains - Desert Peaks National Monument, 79 Fed. Reg. 30431 (May 21, 2014) (codified at 3 C.F.R. § 9131, *available at* <https://www.govinfo.gov/content/pkg/DCPD-201400387/pdf/DCPD-201400387.pdf> [hereinafter Proclamation 9131].

remnants of ancient animals; and a diverse array of ecosystems and habitats, including lowland grasslands, high-elevation pine forests, and rare desert springs, streams, and riparian areas. Proclamation 9131 describes these resources, objects, and values, and states that the Monument is intended to preserve OMDP's "cultural, prehistoric, and historic legacy and maintain its diverse array of natural and scientific resources, ensuring that the prehistoric, historic, and scientific values of this area remain for the benefit of all Americans."<sup>4</sup>

In accordance with Proclamation 9131,<sup>5</sup> federal law,<sup>6</sup> and BLM policy,<sup>7</sup> the BLM must develop a Monument Management Plan (Monument Plan) specific to OMDP. Further, under the Antiquities Act<sup>8</sup> and Proclamation 9131, BLM must manage the Monument for the protection and preservation of Monument resources, objects, and values, and the BLM may allow other discretionary uses and activities only to the extent that they do not conflict with the directives of the Proclamation.

The BLM has developed a draft Monument Plan and environmental impact statement that analyzes three action alternatives for management, plus a "no action" alternative. The alternatives have several key features in common. Under all alternatives, the Monument would remain closed to new mining and mineral development; motor vehicle use within the Monument would be limited to designated routes only (no cross-country travel); the same amount of road and trail mileage would be available for mechanized use (biking); and the same number of acres would remain available for livestock grazing.

Only Alternative B, however, prioritizes the conservation of OMDP's natural and cultural resources and its scientific values. Alternative B would establish new Areas of Critical Environmental Concern (ACECs), prioritize habitat restoration, and protect the Monument's wilderness characteristics, while still allowing responsible recreation. In contrast, the other alternatives emphasize discretionary activities, such as motorized vehicle use, that can cause damage and disturbance to the Monument's sensitive resources, objects, and values. Alternative B still allows motorized recreation and a wide array of other activities to take place on large portions of the Monument but includes more management provisions that prioritize the things the Monument was designated to protect.

Although Alternative B strikes the best balance of protecting natural and cultural resources while still allowing recreation and other activities to take place, we are disappointed that none of the BLM's four alternatives would result in the BLM managing wilderness-quality lands (outside of designated Wilderness areas) to prevent the impairment of wilderness characteristics. To address

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<sup>4</sup> Proclamation 9131 at 4.

<sup>5</sup> *Id.* at 4.

<sup>6</sup> See Federal Land Policy and Management Act of 1976 (FLPMA), 43 U.S.C. § 1712.

<sup>7</sup> Dep't of Interior, BLM Manual 6220 - National Monuments, National Conservation Areas, and Similar Designations (Jan. 25, 2017), *available at* [https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter\\_blmmanual6220.pdf](https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmmanual6220.pdf).

<sup>8</sup> Antiquities Act of 1906, Pub. L. 59-209.

this omission, we recommend that the BLM adopt a modified version of Alternative B that prioritizes the protection of Monument objects and values and also protects wilderness characteristics of qualifying areas as either Wilderness Study Areas (WSAs) under Section 202 of the Federal Land Policy Management Act (FLPMA) or as Lands with Wilderness Characteristics (LWCs), in accordance with BLM policy. We offer additional recommendations below to strengthen the Final EIS and Monument Plan and to ensure consistency with the Proclamation.

## I. Fish, Wildlife, and Habitat

As reflected in Proclamation 9131, the Monument encompasses a wide diversity of habitats that support a stunning diversity of animal life.<sup>9</sup> Wildlife and habitat are among the resources, objects, and values that OMDP was designated to protect. The wildlife resources identified in Proclamation 9131 include “many large mammal species,” the historic range for desert bighorn sheep, small mammals and rodents, avian species including raptors and migratory and grassland birds, a wide variety of reptiles, bats, and rare terrestrial snails.<sup>10</sup>

Climate change and increased public visitation are impacting ecological processes, wildlife, habitat, and water quantity and quality within the Monument. Given the Proclamation’s emphasis on wildlife and habitat as resources to be protected and restored, the BLM should adopt an RMP alternative that emphasizes these values and furthers the improvement of wildlife habitat. Alternative B best meets this goal (noting that Alternative C includes many of the same wildlife and habitat provisions set forth in Alternative B). As explained in the Draft RMP/EIS, “Alternative B contains the largest number of acres that would . . . be closed to surface disturbance from motorized vehicles; therefore, it would affect species and habitats less than other alternatives.”<sup>11</sup> This is significant because recreation noise has been shown to negatively impact wildlife behavior and habitat use.<sup>12</sup> Moreover, unmanaged or illegal off-highway vehicle (OHV) use can fragment and degrade habitat “through soil disturbance, trampling, plant removal, increased fugitive dust, and the introduction and spread of noxious and invasive weeds.”<sup>13</sup> Alternative B also excludes the largest number of acres from new Rights of Way (ROWs), and “therefore, it would affect species and habitats less than other alternatives.”<sup>14</sup>

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<sup>9</sup> Draft RMP/EIS at 2-3.

<sup>10</sup> *Id.* at 3.

<sup>11</sup> *Id.* at 2-57; 3-3.

<sup>12</sup> Katherine A. Zeller, Mark A. Ditmer, John R. Squires, William L. Rice, James Wilder, Don DeLong, Ashley Egan, Niah Pennington, Chris A. Wang, Jacinta Plucinski, Jesse R. Barber. Experimental recreationist noise alters behavior and space use of wildlife. *Current Biology*, 2024, available at [https://www.cell.com/current-biology/abstract/S0960-9822\(24\)00673-0?\\_returnURL=https%3A%2F%2Flinkinghub.elsevier.com%2Fretrieve%2Fpii%2FS0960982224006730%3Fshoall%3Dtrue](https://www.cell.com/current-biology/abstract/S0960-9822(24)00673-0?_returnURL=https%3A%2F%2Flinkinghub.elsevier.com%2Fretrieve%2Fpii%2FS0960982224006730%3Fshoall%3Dtrue).

<sup>13</sup> Draft RMP/EIS at 3-8.

<sup>14</sup> *Id.* at 3-4.

We also support the proposals in Alternatives B to develop and update habitat management plans, prohibit the grazing of domestic sheep and goats for the protection of bighorn sheep, exclude feral domestic animals from the Doña Ana Mountains ACEC, monitor recreation impacts within the Organ/Franklin Mountains ACEC, and remove fencing that is not wildlife friendly.<sup>15</sup> We oppose Alternative D, which would omit these beneficial provisions and would have the “highest [adverse] impacts on wildlife species.”<sup>16</sup>

We are pleased that all of the action alternatives include increased specificity regarding the need to protect and manage habitat for special status species, including state and federally listed endangered, threatened, and candidate species; state species of greatest conservation need; and BLM sensitive species.<sup>17</sup> We are concerned, however, that the Draft RMP/EIS erroneously states that “[t]here are no federally protected animal species . . . that exist in the planning area.”<sup>18</sup> The following special status species either exist or have recently been present in the planning area: Mexican gray wolf (*Canus lupus baleyii*) (experimental population), Northern aplomado falcon (*Falco femoralis septentrionalis*) (experimental population), and monarch butterfly (*Danaus plexippus*) (candidate species).

Although the Draft RMP/EIS includes some consideration of aplomado falcon, the Draft RMP/EIS lacks any mention of Mexican gray wolf or monarch butterfly. Mexican gray wolves have recently been documented within the planning area, and the Monument is within the Mexican Wolf Experimental Population Area, into which the experimental population of wolves is permitted to disburse.<sup>19</sup> The monarch butterfly is a candidate species with a plummeting population that needs prompt agency attention to avoid listing as threatened or endangered.<sup>20</sup> The BLM should incorporate discussion of these species into the Final RMP/EIS. Additionally, the BLM should adopt Alternative B, which would have the least “impacts on special status species as compared to Alternatives A, C, and D due to the number of acres that would be closed to surface disturbance from motorized activities and ROW development,”<sup>21</sup> and should consider increased safeguards for

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<sup>15</sup> *Id.* at 2-10.

<sup>16</sup> *Id.* at 3-14.

<sup>17</sup> *Id.* at 2-57.

<sup>18</sup> *Id.* at 3-15.

<sup>19</sup> U.S. Dep’t of Interior, U.S. Fish & Wildlife Serv., Endangered and Threatened Wildlife and Plants; Revision to the Regulations for the Nonessential Experimental Population of the Mexican Wolf, 80 Fed. Reg. 2512, 2559-2560 (Jan. 16, 2015) (2015 10(j) Rule); U.S. Dep’t of Interior, U.S. Fish & Wildlife Serv., Endangered and Threatened Wildlife and Plants; Revision to the Nonessential Experimental Population of the Mexican Wolf, 86 Fed. Reg. 59953-59973 (Oct. 29, 2021) (2021 10(j) Rule) (leaving the boundaries of the experimental population area intact).

<sup>20</sup> See, e.g., Xerces Society for Invertebrate Conservation, Eastern Monarch Butterfly Overwintering Area In Mexico Drops Precipitously (Feb. 7, 2024), available at <https://xerces.org/press/eastern-monarch-butterfly-overwintering-area-in-mexico-drops-precipitously>; Associated Press, Mark Stevenson, The number of monarch butterflies at their Mexico wintering sites has plummeted this year (Feb. 7, 2024), available at <https://apnews.com/article/mexico-monarch-butterflies-climate-change-9b8a69f58f3f576af0413fd045340c6e>.

<sup>21</sup> *Id.* at 2-57

these species, either through this planning process or through subsequent implementation actions, including travel management planning, adaptive management to close additional portions of the Monument to recreational shooting, and protections for milkweed, the monarch butterfly's host plant.

We also recommend that the Final EIS and Monument Plan give specific attention to the habitats and needs of endemic species. The Organ Mountains chipmunk (*Tamias quadrivittatus australis*) is a subspecies of Colorado chipmunk that is found only in the Organ Mountains of New Mexico.<sup>22</sup> Although not identified as a sensitive species by the BLM, the Organ Mountains chipmunk is highly endemic within the planning area, completely dependent on high-elevation woodlands, and completely isolated from other populations and subspecies of Colorado chipmunk.<sup>23</sup>

Organ Mountains chipmunk inhabit pine, oak, and juniper woodland ecosystems at elevations of approximately 5000 to 7500 feet.<sup>24</sup> The Organ Mountains unit contains montane mixed shrub communities that provide this habitat along the western and northern flanks of the Organ Mountains.<sup>25</sup> The northeast section of the Organ Mountains unit includes the area around Aguirre Springs, the densest population of the Organ Mountains chipmunk.<sup>26</sup>

Because of its isolation and small population size, the Organ Mountains chipmunk is at risk from any impact that degrades the woodland habitat. Inhabiting the highest and coolest niches on the mountain slopes, there is no opportunity for further up-slope migration. Climate change poses a substantial threat to the chipmunk, as drought and high temperatures can significantly degrade conifer woodlands at dry sites like those in the Organ Mountains.<sup>27</sup> Fire also poses a threat to the chipmunk because a single large fire could feasibly degrade a substantial portion of the total available habitat.

To address these threats, the Final EIS and Monument Plan should give specific attention to maintaining woodland habitat in the Organ Mountain unit and to minimizing the risk of unplanned fire ignition within that unit, where a resulting wildfire could move into chipmunk habitat beyond the Monument boundaries.

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<sup>22</sup> N.M. Dep't of Game & Fish, Organ Mountains Chipmunk, <https://nmswap.org/species/308/organ-mountains-colorado-chipmunk>.

<sup>23</sup> Sullivan, R. 1996. Genetics, Ecology, and Conservation of Montane Populations of Colorado Chipmunks. *Journal of Mammalogy*, 77: 951-975.

<sup>24</sup> *Id.*

<sup>25</sup> Draft RMP/EIS at 3-5, Figure 3-1, Standard Habitat Sites in the Monument. See "Mixed Shrub Mountains" in the Organ Mountains unit.

<sup>26</sup> Fitzgerald, J., C. Meaney, D. Armstrong. 1994. *Mammals of Colorado*. Denver Museum of Natural History and University Press of Colorado: 467.

<sup>27</sup> Gaylord ML, Kolb TE, Pockman WT, Plaut JA, Yopez EA, Macalady AK, Pangle RE, McDowell NG (2013) Drought predisposes piñon-juniper woodlands to insect attacks and mortality. *New Phytol* 198:567–578; Meddens AJH, Hicke JA, Macalady AK, Buotte PC, Cowles TR, Allen CD (2014) Patterns and causes of observed piñon pine mortality in the southwestern United States. *New Phytol* 206:91–97.

Finally, to mitigate adverse impacts on wildlife from climate change and increased human visitation at the Monument, the BLM should address the need to manage wildlife habitat for connectivity on a landscape scale, consistent with current habitat connectivity guidance.<sup>28</sup> We strongly support the BLM's inclusion of a new objective in all three action alternatives to “[w]ork with adjacent landowners and agencies to protect connectivity of wildlife habitat and ensure consistent management of wildlife connectivity outside of the Monument.”<sup>29</sup> We urge the BLM to go one step further by ensuring that fencing on the Monument is 100% wildlife friendly and by maximizing the use of designations and special management that promote ecological processes and high-quality habitat, including ACECs, WSAs, and LWCs, as further discussed below.

## II. Vegetation Communities

As stated in Proclamation 9131, the Monument encompasses a “wide array of vegetative communities and ecosystems, which range from low-elevation Chihuahuan grasslands and scrublands to higher elevation stands of ponderosa pine. Seasonal springs and streams in the mountains and canyon bottoms create rare desert riparian ecosystems.” OMDP’s diverse vegetation communities support a vast array of Chihuahuan Desert plants, including endemic and special status plant species. We are especially pleased that the Draft RMP/EIS includes new management direction aimed at protecting watershed and riparian health.<sup>30</sup>

We also support the inclusion of provisions directing the BLM to monitor and restore vegetation communities and to work to control and prevent invasive species in an environmentally sound manner.<sup>31</sup> Although it is important to address and prevent impacts of invasive and non-native vegetation, we are concerned about the use of chemical herbicides for vegetation management, especially outside the context of controlling invasive species.<sup>32</sup> We are also concerned about the impacts of mechanical vegetation treatments, which can compact and displace soils, increasing bare ground and erosion.<sup>33</sup> To the extent the BLM deems it necessary to rely on these tools, we urge the BLM to carefully minimize their use and to prioritize the protection of native plants and wildlife, as well as riparian areas and water resources.

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<sup>28</sup> See, e.g., Council on Env’tl 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](https://wildlifeactionplan.nmdotprojects.org/wp-content/uploads/sites/39/2022/07/Wildlife-Corridors-Action-Plan_June-2022_FINAL-reduced.pdf).

<sup>29</sup> Draft RMP/EIS at 2-9.

<sup>30</sup> *Id.* at 2-13 to -15.

<sup>31</sup> *Id.* at 2-10, 2-13.

<sup>32</sup> *Id.* at 2-14 to -17.

<sup>33</sup> *Id.* at 3-78.

The BLM should adopt Alternative B because it poses the lowest risk of introducing and spreading invasive plant species and offers “the most protection for vegetation resources due to the acres that would be closed to surface disturbance from motorized activities and ROW development.”<sup>34</sup> We also support the management prescriptions in Alternative B that would prohibit surface-disturbing activities in suitable special status plant species habitat and would close the Monument to commercial plant collecting and recreational live plant collecting (while still allowing the recreational collection of plant parts).<sup>35</sup>

We recommend that the Final EIS and Monument Plan give specific attention to the habitats and needs of endemic species. This management direction would be consistent with the goal in the Draft RMP/EIS of prioritizing “the protection and management of habitat for known populations of ...BLM sensitive species.”<sup>36</sup> There are four plant species and one plant variety that are found only in the Organ Mountains.<sup>37</sup> All five plants are identified in the Draft RMP/EIS as BLM sensitive species, species of concern.<sup>38</sup>

Organ Mountains Giant Hyssop (*Agastache pringlei* var. *verticillate*) is a narrow endemic that lives on steep cliffs at 5900 to 7500 feet. Organ Mountain Indian-Paintbrush (*Castilleja organorum*) is a narrow endemic found on slopes and canyons at elevations of 7000 to 8000 feet. Organ Mountain Figwort (*Scrophularia laevis*) is a narrow endemic found in moist canyons at 6,900 to 8,500 feet. Because these plants live on steep slopes and cliffs, they are not usually threatened by recreation and cattle disturbance. However, because these niches are isolated and susceptible to disturbance, the Monument Plan should avoid increasing recreation traffic in occupied habitats for these three species.

Organ Mountains Evening Primrose (*Oenothera organensis*) is found in seeps and springs at elevations of 5,700 to 7,600 feet. Organ Mountains Scaleshed (*Spermolepis organensis*) is found in sandy soils at 4600 to 5400 feet. Both species are threatened by livestock, by the direct impacts of trampling and grazing, and by the indirect impacts of habitat degradation. We support the management direction in the Draft RMP/EIS to “[e]nsure sensitive habitats for special status species are protected from impacts of nonnative ungulates.” To accomplish this, the Final EIS and Monument Plan should specify that the BLM will prioritize these species’ occupied habitat for livestock grazing compatibility analysis and updated management direction to prevent habitat degradation and prevent the need for listing these species.

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<sup>34</sup> *Id.* at 2-57.

<sup>35</sup> *Id.* at 2-15.

<sup>36</sup> *Id.* at 2-12.

<sup>37</sup> All plant descriptions are taken from the New Mexico Rare Plants website, available at <https://nmrareplants.unm.edu/rarelist.php>.

<sup>38</sup> Draft RMP/EIS at 3-17, Table 3-6, Special Status Species and Habitats that Have the Potential to Occur in the Planning Area.

Finally, we thank the BLM for including new management direction to “[r]estrict new land uses and, where possible, modify existing land uses in riparian habitats to achieve proper functioning conditions, while restoring and protecting riparian and aquatic ecosystems and restoring plant community structure and composition to meet site potential or site capability.”<sup>39</sup> New Mexico’s surface waters provide crucial cultural and ecological services and are critical to biodiversity. In fact, 80% of all sensitive vertebrate species in New Mexico utilize these habitats at some point in their life cycle.<sup>40</sup> The Final EIS and Monument Plan should include robust safeguards for riparian and aquatic resources.

### **III. Geological, Paleontological, and Soil Resources**

As demonstrated by Proclamation 9131, geologic and paleontological resources were important considerations in designating the Monument. The Proclamation discusses the “striking geologic features” of OMDP and provides details about the Organ, Robledo, Sierra de las Uvas, Potrillo, and Doña Ana Mountains, as well as the Monument’s unique volcanic features.<sup>41</sup> The diverse geology of OMDP’s mountain ranges has given rise to the Monument’s diverse ecosystems and plant and animal communities. Additionally, the area is renowned for its paleontological discoveries, including fossil remnants of ancient animals and fossilized tracks, and has high potential for future discoveries.<sup>42</sup>

The Draft RMP/EIS appropriately provides new provisions and more specificity for managing OMDP’s geologic, paleontological, and soil resources. We support the new management direction set forth in Alternative B for these important values.<sup>43</sup> Recreation, especially illegal OHV use, user-created trails, and unmanaged shooting, can disturb geologic and paleontological resources and soils and can cause erosion and sedimentation of water sources.<sup>44</sup> The BLM should reject Alternative D because it would make the Monument’s unique geological features, paleontological resources, and soil resources vulnerable to more of these adverse impacts.<sup>45</sup>

### **IV. Cave and Karst Resources**

Proclamation 9131 highlights the importance of caves within the Monument, including in the Robledo and Organ mountains. These caves provide important wildlife habitat, especially for bats; are often associated with cultural resources and historical events; and provide rich opportunities

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<sup>39</sup> *Id.* at 2-15.

<sup>40</sup> N.M. Dep’t of Game & Fish, Comprehensive Wildlife Conservation Strategy for New Mexico (2006), available at [http://smiley.nmsu.edu/pdnwc/319%20WRAS%20Biological%20GIS%20data%20and%20appendix/Background%20Documentation/CWCS\\_NM\\_Feb142006.pdf](http://smiley.nmsu.edu/pdnwc/319%20WRAS%20Biological%20GIS%20data%20and%20appendix/Background%20Documentation/CWCS_NM_Feb142006.pdf).

<sup>41</sup> Proclamation 9131 at 2.

<sup>42</sup> *Id.*

<sup>43</sup> Draft RMP/EIS at 2-18 to -22.

<sup>44</sup> *Id.* at 3-8; 3-51; 3-54.

<sup>45</sup> *Id.* at 2-58.



for geologic and paleontological research and discovery. We appreciate the inclusion in the Draft RMP/EIS of provisions to protect sensitive cave and karst resources and prevent the impacts of white-nose syndrome on the Monument's bats.<sup>46</sup>

## **V. Water Resources**

The limited water resources in OMDP's arid environment are of critical importance for ecosystems and communities alike. We appreciate that the proposed management direction for water resources dovetails with the protection of riparian areas, seeps and springs, as set forth in the section about management of vegetation resources. We also support the proposal in Alternatives B and C to protect water resources and riparian habitat by prohibiting the location of new visitor facilities within one-fourth mile of riparian areas.<sup>47</sup>

We urge the BLM to adopt Alternative B, which provides the best protection for water resources. This alternative "would administer the most protection for water resources by focusing on resource preservation and conservation. This alternative would meet and move toward riparian and upland land health standards to protect and restore watershed functionality and resiliency. The alternative would include mitigation of nonpoint source pollution impacts on receiving streams outside the Monument, improvements to soil characteristics to increase infiltration, reduction of runoff, and promotion of desired vegetation communities."<sup>48</sup>

During implementation of the Monument Plan, we encourage the BLM to continue emphasizing activities that restore riparian and hydrologic function, enhance water retention and infiltration, and prevent erosion. Of critical importance, the BLM should prioritize efforts to control surface disturbance and erosion, especially those caused by user-created and redundant trail networks, unmanaged or illegal OHV use, all of which Proclamation 9131 prohibits, and unsustainable or unmanaged grazing practices, which can significantly degrade water quality.<sup>49</sup> In addition to protecting water quality, monitoring and enforcement to address these impacts would also benefit other resources, objects, and values within the Monument, including air quality, wildlife and habitat, geological and paleontological resources, and vegetative communities.

## **VI. Cultural Resources and Tribal Consultation**

As reflected in Proclamation 9131, descendent Indigenous communities have a millennia-old relationship with Monument lands, and the Monument was designated in large part to protect OMDP's diverse array of cultural, archaeological, and historical resources.<sup>50</sup> We thank the BLM for including an array of provisions in the Draft RMP/EIS to protect cultural resources. We especially

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<sup>46</sup> *Id.* at 2-22.

<sup>47</sup> *Id.* at 2-38.

<sup>48</sup> *Id.* at 3-83; *see also* 2-59.

<sup>49</sup> *Id.* at 2-23; 3-8.

<sup>50</sup> *Id.* at 3-114.

appreciate the direction to apply appropriate OHV closures to protect cultural sites,<sup>51</sup> to “[c]onduct consultation with Native American Tribes and Pueblos to identify traditional cultural properties (TCPs), sacred sites, and other traditional use areas within the Monument and ensure that they are adequately protected and managed,” and to “[e]nsure that Native American Tribes have access to their traditional use areas, sacred sites, and other areas of cultural significance.”<sup>52</sup> We commend the BLM for including management direction to “[e]ngage with Tribes at the earliest possible point in project development to ensure that Tribal concerns or input are taken into consideration for undertakings that may affect their interests.”<sup>53</sup>

We support Alternative B because it would result in the least number of adverse impacts to cultural resources, which can be damaged by ground-disturbing activities, increased visitation, and degradation of visual resources.<sup>54</sup>

We oppose the proposal in Alternative D to un-designate two existing ACECs that are currently managed “to protect archaeological sites in conjunction with managing their primary biological and scenic values: 1) Doña Ana Mountains, and 2) Organ/Franklin Mountains.” These ACEC designations protect Monument resources, objects, and values, and it would be inappropriate for the BLM to remove these designations for the purpose of promoting OHV use and recreation, which are not resources, objects, or values within the scope of Proclamation 9131. The BLM should proceed to consult with affiliated Tribes and Pueblos and to finalize an RMP that provides special management attention appropriate to these resources.

In general, it is vital that the BLM seeks opportunities for co-stewardship of public lands and waters with Tribal Nations consistent with federal guidance,<sup>55</sup> and that the BLM maintains ongoing consultation and partnership with sovereign Pueblos and Tribes, as well as other affiliated and descendent communities, throughout the completion and implementation of both the Monument Plan and future projects within OMDP. 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.

## **VII. Visual Resources**

We support the BLM’s proposal to increase the protection of the quality of the visual and scenic values of the Monument for present and future generations by managing the entire Monument as

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<sup>51</sup> *Id.* at 2-27.

<sup>52</sup> *Id.* at 2-26.

<sup>53</sup> *Id.* at 2-51.

<sup>54</sup> *Id.* at 2-63.

<sup>55</sup> 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>.

either Visual Resource Management (VRM) Class I (244,122 acres) or VRM Class II (252,467 acres).<sup>56</sup> This proposal is consistent with Proclamation 9131, which reflects the significance of the rugged beauty and scenic resources in OMDP.

## VIII. Livestock Grazing

Proclamation 9131 provides that the “[l]aws, regulations, and policies followed by the BLM in issuing and administering grazing permits and leases on lands under its jurisdiction shall continue to apply with regard to the lands in the Monument, consistent with the protection of the objects identified [in the proclamation].”<sup>57</sup> In the Draft RMP/EIS, the BLM states generally that livestock management under all alternatives should “aim for sustainable grazing that maximizes traditional practices and contributes to the local economy while providing for functional rangeland ecosystems and protecting, preserving, and enhancing Monument resources, objects, and values.”<sup>58</sup> But the Draft does not analyze the current environmental impacts of grazing on the Monument or determine grazing compatibility. Instead, the Draft RMP/EIS expresses BLM’s future intent “to perform thorough land health evaluations and grazing compatibility assessment(s) to develop appropriate grazing management guidance and decisions” to determine the compatibility of livestock grazing with the protection of Monument resources, objects, and values.<sup>59</sup>

The Draft RMP/EIS does not specify a timeline or process for conducting these evaluations and assessments. At a minimum, the BLM should conduct this work when the BLM considers renewal of each permit, which typically occurs every ten years. The permits specify a maximum number of livestock that may be grazed on each allotment and set forth the basic terms and conditions under which grazing may occur. Before moving forward with renewals, the BLM should ensure that future evaluations and assessments are conducted through a transparent National Environmental Policy Act (NEPA)<sup>60</sup> process with public input.

Based on information in the Draft RMP/EIS, however, it appears that some of the allotments warrant a prompt evaluation to ensure that current grazing management is consistent with the protection of Monument objects, as required by the Proclamation. The BLM currently authorizes livestock grazing on 38 allotments, consisting of approximately 492,062 acres that are partially or entirely within the Monument. The 38 permits allow an amount of grazing equal to 85,874 animal unit months (AUMs).<sup>61</sup> Of these 38 allotments, 22 allotments have been classified in the “Improve” category, which means that the current condition of the land is unsatisfactory, and that the

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<sup>56</sup> Draft RMP/EIS at 2-28; 3-124.

<sup>57</sup> Proclamation 9131, at 4.

<sup>58</sup> Draft RMP/EIS at 3-90.

<sup>59</sup> *Id.* at I-12 to -13.

<sup>60</sup> National Environmental Policy Act of 1969 (NEPA), 42 U.S.C. §§ 4321 et seq.

<sup>61</sup> *Id.* at 3-129.

allotment is producing forage at levels below its potential.<sup>62</sup> Given that almost two-thirds of the allotments fall within the “Improve” category, the BLM should prioritize prompt management attention to improve landscape health in these allotments.

In addition to the general degradation of rangeland health, the Draft RMP/EIS reflects that poorly managed livestock grazing has had adverse impacts on the Monument’s water resources, wildlife, and habitat.<sup>63</sup> Grazing activities also have the potential to “increase susceptibility for the introduction and spread of noxious and invasive weeds by degrading the native grass community and creating ground disturbance from the livestock themselves and from maintenance of associated infrastructure.”<sup>64</sup> These disturbances can exacerbate the conversion of perennial grasslands to shrubs, which the BLM has identified as the most important trend affecting wildlife diversity and abundance.<sup>65</sup> The impacts of poorly managed grazing will only increase as the Monument becomes hotter and drier. As the BLM has acknowledged, there is a need to “[a]daptively manage livestock grazing and set utilization rates at levels compatible with protecting Monument resources, objects, and values in the face of climate change/aridification.”<sup>66</sup>

We recommend that the BLM swiftly address these issues using existing tools. The Proclamation directs the BLM to comply with existing grazing laws, regulations, and guidance in a way that is consistent with the protection of the Monument’s objects. This includes the New Mexico Standards for Public Land Health and Guidelines for Livestock Grazing Management.<sup>67</sup> At the local level, the BLM applies these standards and guidelines through the development of local Livestock Grazing Management Practices (LGMPs).<sup>68</sup> Additionally, where allotments are not meeting stated goals, the BLM can create allotment management plans (AMPs) and cooperative management plans (CMPs) to address when, where, and how much livestock grazing takes place.<sup>69</sup> “AMPs promote the protection of resource values, such as water quality and riparian area resource management, and coordinate livestock grazing with other resource uses.”<sup>70</sup> AMPs and CMPs can also be used to “address needed rangeland improvements, monitoring methods, and implementation schedules.”<sup>71</sup> As OMDP’s National Monument designation brings additional management

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<sup>62</sup> *Id.* at 3-129 to -130; Dep’t of Interior, BLM, Organ Mountains-Desert Peaks National Monument RMP/EIS, Analysis of the Management Situation, p. 192 (Dec. 2021) [hereinafter AMS].

<sup>63</sup> *Id.* at 3-4; 3-90

<sup>64</sup> *Id.* at 3-36.

<sup>65</sup> *Id.* at 3-4.

<sup>66</sup> *Id.* at 2-32.

<sup>67</sup> Dep’t of Interior, BLM, New Mexico Standards for Public Land Health and Guidelines for Livestock Grazing Management (Jan. 2001), *available at* <https://www.blm.gov/sites/blm.gov/files/Standards%20for%20Public%20Land%20Health%20and%20Guidelines%20for%20Livestock%20Grazing%20in%20New%20Mexico.pdf> [hereinafter NM Grazing Standards and Guidelines].

<sup>68</sup> NM Grazing Standards and Guidelines at 5.

<sup>69</sup> AMS at 193.

<sup>70</sup> *Id.*

<sup>71</sup> *Id.*

resources to the BLM, we urge the BLM to deploy these resources to update grazing management practices for the benefit of landscape health and Monument objects.

Despite our concerns around the timeline and process for implementation, we are pleased that the Draft RMP/EIS includes improved management guidance to ensure that grazing is conducted in a manner consistent with the protection of Monument objects. We support the BLM's inclusion in all action alternatives of new management direction that requires the BLM to "[c]onduct utilization monitoring, land health assessments, and indicators of rangeland health to ensure permitted AUMs will not lead to degradation of wildlife habitat and are compatible with restoring wildlife habitat."<sup>72</sup> We also support the management prioritization of grazing allotments that overlap with special designations, riparian areas, springs, and seeps to avoid resource impacts<sup>73</sup> and on slopes greater than 10% to reduce erosion and improve water quality.<sup>74</sup> We support the proposed management direction in Alternatives B and C to eliminate grazing of domestic sheep and goats to protect bighorn sheep from disease.<sup>75</sup> And finally, we support the proposals to prioritize fragile soils for grazing management activity<sup>76</sup> and to remove non-wildlife-friendly fencing to promote wildlife movement.<sup>77</sup> These provisions are consistent with and supplement the New Mexico Standards for Public Land Health and Guidelines for Livestock Grazing Management and will promote protection of Monument objects, if promptly implemented.

## **IX. Recreation**

As reflected in Proclamation 9131, OMDP was not established for the direct purpose of promoting outdoor recreation opportunities for neighboring communities or visitors. Outdoor recreation has nonetheless become more popular as a result of the designation of OMDP, connecting various community members and visitors to the Chihuahuan Desert landscape. Institutions and businesses have used OMDP to market adjacent communities as a destination for outdoor recreation. As set forth in the Draft RMP/EIS, the BLM's objective is "to manage recreation to protect the health and safety of visitors; to protect natural, cultural, and other resource values; to stimulate public enjoyment of public land and to resolve user conflicts."<sup>78</sup> We appreciate the BLM's proposal to accommodate a diverse array of outdoor recreation opportunities while prioritizing the protection and restoration of the resources, objects, and values outlined in the Proclamation.

Recent survey data from Monument visitors indicates "that the activities with the highest participation rates include hiking and walking (78 percent), biking (29 percent), sightseeing (21

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<sup>72</sup> Draft RMP/EIS at 2-10; 2-31.

<sup>73</sup> *Id.* at 2-15.

<sup>74</sup> *Id.* at 2-21.

<sup>75</sup> *Id.* at 2-60.

<sup>76</sup> *Id.* at 2-31.

<sup>77</sup> *Id.*

<sup>78</sup> *Id.* at 2-33.

percent), and bird-watching (13 percent).<sup>79</sup> Only “1 percent of Monument visitors participated in riding and driving on OHVs.”<sup>80</sup> Alternatives B and C would increase opportunities for primitive and quiet recreation opportunities, which are pursued by a high percentage of recreational users, whereas Alternative D would increase opportunities for motorized recreation and OHV use.<sup>81</sup> The BLM’s analysis concludes that all of the alternatives in the Draft RMP/EIS are expected to yield the same quantitative level of recreational use and to make the same contributions to the local economy.<sup>82</sup>

Alternative B best balances recreation uses with resource protection and public safety. Consistent with the survey data, Alternative B would meet the needs of a higher percentage of visitors by increasing opportunities for primitive and quiet recreation opportunities, such as pedestrian uses, wildlife viewing, and equestrian use, and by directing the BLM to seek “opportunities to create new routes for horseback and pedestrian travel in the Monument.”<sup>83</sup>

In addition to meeting the needs of more visitors, Alternative B would protect Monument resources, objects, and values by closing more of the Monument to motorized uses and recreational shooting. Despite a modest reduction in available routes, Alternative B would still leave a significant percentage of the Monument open to motorized travel. Under current management, 51% of the Monument is open to motorized travel. Alternative B would leave 46% of the Monument open<sup>84</sup> and would also establish more Special Recreation Management Areas (SMRAs), which “would decrease the potential for illegal OHV use and user-created trails.”<sup>85</sup> We strongly support Alternative B’s proposed OHV designations within the Doña Ana Mountains SMRA, Organ Mountains SRMA, and Picacho Peak SMRA.<sup>86</sup>

We also appreciate the proposal for Alternatives B and C to manage the Picacho Peak area as an SMRA.<sup>87</sup> Regarding access, we appreciate the provisions in the Draft RMP/EIS that direct the BLM to acquire additional legal public access at Achenbach Canyon south of Soledad Canyon, Sierra de las Uvas Wilderness Area, and Picacho Peak SRMA.<sup>88</sup>

As recreation and visitation increase within the Monument, it is important for the BLM to also increase public safety initiatives. Alternative B would adopt shooting buffers around several popular recreation areas for public safety,<sup>89</sup> while still leaving most of the Monument (about 94%)

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<sup>79</sup> *Id.* at 3-133.

<sup>80</sup> *Id.* at 3-134.

<sup>81</sup> *Id.* at 3-132 to -133.

<sup>82</sup> *Id.* at 2-63.

<sup>83</sup> *Id.* at 2-44.

<sup>84</sup> *Id.* at 2-61.

<sup>85</sup> *Id.* at 3-75.

<sup>86</sup> *Id.* at 2-42.

<sup>87</sup> *Id.* at 2-35.

<sup>88</sup> *Id.* at 2-37.

<sup>89</sup> *Id.* at 2-36.

available for recreational shooting.<sup>90</sup> Recreational target shooting can have widespread impacts on the landscape, including but not limited to wildlife, cultural resources, geologic and paleontological resources, and public safety. Given that Monument usage and visitation are likely to increase in the future, we recommend that the BLM incorporate adaptive management provisions into the Monument Plan that require the agency to monitor shooting impacts over time and allow the agency to close additional portions of the Monument to shooting in the future if needed to address negative impacts on Monument objects, wildlife, or public safety. BLM should also take steps to mitigate impacts on other recreational users and natural and cultural resources through adequate safety enforcement, educational signage, and frequent trash removal.

To eliminate any confusion about the scope of the BLM's shooting restrictions, we recommend that the BLM include language in the Monument Plan stating that the BLM's recreational target shooting closures do not restrict persons who are hunting in compliance with a license or permit issued by the New Mexico Game and Fish Department within the boundaries of the Monument.

Finally, to mitigate the impacts of recreation, the Monument Plan should prioritize management and enforcement activities to prevent illegal dumping and illegal motorized use, to protect water resources, to clean up recreational shooting waste and other trash, to remediate user-created trails and impacts from illegal OHV use, and to prevent and other adverse impacts to Monument resources, objects and values.

## **X. Lands, Realty, and Cadastral Survey**

Proclamation 9131 provides, "Nothing in this proclamation shall be construed to preclude the Secretary from renewing or authorizing the upgrading of existing utility line rights-of-way [ROWs] within the physical scope of each such right-of-way that exists on the date of this proclamation. Other rights-of-way shall be authorized only if they are necessary for the care and management of the objects identified above."<sup>91</sup> We appreciate that the BLM has incorporated this limitation into the Draft RMP/EIS,<sup>92</sup> and we support the proposal in Alternative B to manage 288,169 acres of the Monument as ROW exclusion areas, including the Picacho Peak SRMA, the five ACECs proposed for Alternative B, the Kilbourne Hole National Natural Landmark (NNL), and the Monument's ten Wilderness areas.<sup>93</sup>

We also support the objectives in the Draft RMP/EIS that direct the BLM to facilitate the acquisition or exchange of public lands to provide efficient management of public resources, protect the Monument, and improve public access; and to attempt to enter into an agreement with the New Mexico State Land Office to acquire State Trust Land within the Monument boundary by

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<sup>90</sup> *Id.* at 2-61.

<sup>91</sup> Proclamation 9131, at 4.

<sup>92</sup> Draft RMP/EIS, at 2-37 to -38.

<sup>93</sup> *Id.* at 2-27.

exchange.<sup>94</sup> These provisions are consistent with Proclamation 9131, which allows “disposition . . . by exchange that furthers the protective purposes of the monument,”<sup>95</sup> and the 2019 Dingell Act, which directed the Department of Interior to attempt to enter into an agreement to initiate an exchange with the New Mexico Public Lands Commissioner for the purpose of acquiring State Trust Lands within the Monument Boundary.<sup>96</sup> As stated in the Draft RMP, a “total of approximately 93,110 acres of State Trust Land and 56,210 acres of private land” have been “identified for potential acquisition.”<sup>97</sup> We encourage the BLM to continue working on these acquisitions.

## **XI. Transportation and Access**

Proclamation 9131 provides, “Except 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 roads and trails designated for their use. . . . No additional roads or trails shall be established for motorized vehicle or non-motorized mechanized vehicle use unless necessary for public safety or protection of the objects identified above.”<sup>98</sup> Consistent with the Proclamation, the BLM proposes to classify all areas of the Monument as either closed to OHV travel or open to OHV travel on designated routes only. We support the continued use of these two classifications and the objective in the Draft RMP/EIS to “[m]anage the Monument travel and transportation system to protect objects and resources and ensure sustainable public use and enjoyment.”<sup>99</sup>

We are concerned, however, that the Monument has languished for over a decade without adequate travel management planning or enforcement, and we urge the BLM to prioritize the prompt development, implementation, and enforcement of travel management planning. Although the Proclamation limits motorized travel to designated routes, the BLM has not yet designated motorized routes within the Monument.<sup>100</sup> To address this deficiency, the Draft RMP/EIS includes a provision that would direct the BLM to “[d]evelop a comprehensive Trails and Travel Management Plan to identify and designate routes within the Monument according to type and condition of use.”<sup>101</sup> The lack of designated routes leaves visitors without adequate guidance and Monument resources without adequate protection. We urge the BLM to prioritize this aspect of

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<sup>94</sup> *Id.* at 2-36 to -37.

<sup>95</sup> Proclamation 9131, at 3.

<sup>96</sup> John D. Dingell, Jr. Conservation, Management, and Recreation Act, 133 Stat. 649, Pub. L. 116-9, Sec. 1201(d)(2) (Mar. 12, 2019) [hereinafter Dingell Act].

<sup>97</sup> Draft RMP/EIS at 2-37.

<sup>98</sup> Proclamation 9131, at 4.

<sup>99</sup> Draft RMP/EIS at 2-41.

<sup>100</sup> At the virtual public meeting held June 13, 2024, BLM staff confirmed that the Las Cruces District Office has not yet developed a Travel Transportation Management Plan that designates uses for each inventoried road and trail on the Monument and that this action will be completed after the RMP is finalized, during plan implementation.

<sup>101</sup> Draft RMP/EIS at 2-41.



implementation of the RMP and note that the RMP/EIS directs BLM to develop an OMDP travel and transportation management plan within 5 years of the completion of the RMP.<sup>102</sup>

With the lack of a comprehensive travel management plan, OMDP currently suffers negative impacts from illegal and unmanaged motorized activities, especially illegal OHV use and the establishment of user-created roads and trails. As reflected in the analysis in the Draft RMP/EIS, OHV use within the Monument can cause considerable adverse effects on soil, vegetation, wildlife, wildlife habitat, cultural resources, historical resources, threatened or endangered species, wilderness suitability, cave and karst resources, water quality, visual and scenic resources, other authorized uses, and other resources.<sup>103</sup>

Of the alternatives set forth in the Draft RMP/EIS, the OHV travel designations set forth in Alternative B best protect Monument objects and values while still promoting sustainable use and enjoyment.<sup>104</sup> The Monument consists of 496,591 acres of federal public lands. Currently, 242,889 acres are closed to OHV use (49% of the Monument), including Wilderness areas and the scenic portion of the Organ/Franklin Mountains ACEC. Under Alternative B, 269,697 acres would be closed to OHV use (54% of the Monument). Under the BLM's preferred Alternative C, 255,870 acres would be closed to OHV use (51.5% of the Monument). Alternative B's modest increase in acreage closed to OHV use would prevent damage in sensitive areas, including the scenic portion of Organ/Franklin Mountains ACEC (which would not be closed under the BLM's preferred alternative C); and the Northern Doña Ana Mountains RMZ, Picacho Peak SRMA, Doña Ana Mountains ACEC, and Kilbourne Hole NNL (which are not closed under current management prescriptions).

Finally, regarding access, we appreciate the provisions in the Draft RMP/EIS that direct the BLM to acquire additional legal public access at Achenbach Canyon south of Soledad Canyon, Sierra de las Uvas Wilderness, and Picacho Peak SRMA.<sup>105</sup>

## **XII. Areas of Critical Environmental Concern (ACECs)**

When Congress enacted FLPMA in 1976, Congress imposed a mandatory obligation on the BLM to “give priority to the designation and protection of areas of critical environmental concern.”<sup>106</sup> FLPMA also requires the BLM to give priority to ACECs when preparing and maintaining on a continuing basis an inventory of all public lands and their resources and values.<sup>107</sup> The recently adopted Conservation and Landscape Health Rule (Public Lands Rule) reaffirms that “[a]n area of critical environmental concern (ACEC) designation is the principal BLM designation for public lands

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<sup>102</sup> *Id.* at 2-42.

<sup>103</sup> *Id.* at 2-43; 3-79.

<sup>104</sup> *Id.* at 2-42.

<sup>105</sup> *Id.* at p. 2-37.

<sup>106</sup> FLPMA, 43 U.S.C. § 1712.

<sup>107</sup> *Id.* § 1711.

where special management is required to protect and prevent irreparable damage to important historic, cultural, or scenic values; fish or wildlife resources; or natural systems or processes.”<sup>108</sup>

The BLM should adopt Alternative B, which best prioritizes the designation and protection of ACECs. Alternative B would result in the retention of two existing ACECs and the creation of three new ACECs, as follows:<sup>109</sup>

- Doña Ana Mountains ACEC: 1,427 acres to protect biological, scenic, and cultural values;
- Organ/Franklin Mountains ACEC: 55,223 acres to protect biological, scenic, riparian, special status species, and cultural values;
- Broad Canyon ACEC: 4,720 acres to protect scenic, biological, and cultural values;
- East Potrillo Mountains ACEC: 9,040 acres to protect scenic values; and
- Picacho Peak ACEC: 949 acres to protect scenic and cultural values.

Consistent with FLPMA and the Public Lands Rule, the BLM has included appropriate special management rules for each proposed ACEC, specifically designed to protect the identified resources and values for each ACEC. We urge the BLM to finalize the proposal in Alternative B to designate five ACECs consisting of 71,359 acres in total and to provide special management attention to protect the relevant and important values and resources of those areas. We especially support the inclusion of the Doña Ana Mountains ACEC in Alternative B, which would close the area to OHV use and thereby prevent ground disturbance and provide more protection to wildlife, habitat, vegetation, cultural, soil, geologic, paleontological, and water resources.<sup>110</sup>

### **XIII. Wilderness**

In 2019, Congress passed the Dingell Act, which created the following ten Wilderness areas within the Monument: Aden Lava Flow Wilderness, Broad Canyon Wilderness, Cinder Cone Wilderness, East Potrillo Mountains Wilderness, Mount Riley Wilderness, Organ Mountains Wilderness, Potrillo Mountains Wilderness, Robledo Mountains Wilderness, Sierra de las Uvas Wilderness, and Whitethorn Wilderness. In total, the Dingell Act designated approximately 241,554 acres in the Monument as Wilderness and components of the National Wilderness Preservation System, in accordance with the Wilderness Act.<sup>111</sup>

Wilderness areas must be managed to preserve their "wilderness character."<sup>112</sup> The express purpose of the Wilderness Act is

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<sup>108</sup> Dep't of Interior, BLM, Conservation and Landscape Health, Final Rule, 89 Fed. Reg. 40308, 40337 (May 9, 2024) (to be codified at 43 C.F.R. § 1610.7-2(a)) [hereinafter Public Lands Rule].

<sup>109</sup> Draft RMP/EIS at 2-44.

<sup>110</sup> *Id.* at 3-120.

<sup>111</sup> The Wilderness Act of 1964, 16 U.S.C. §§ 1131 *et seq.*

<sup>112</sup> *Id.* § 1133(b).

to assure that an increasing population, accompanied by expanding settlement and growing mechanization, does not occupy and modify all areas within the United States and its possessions, leaving no lands designated for preservation and protection in their natural condition, it is hereby declared to be the policy of the Congress to secure for the American people of present and future generations the benefits of an enduring resource of wilderness.<sup>113</sup>

Only certain activities and recreational uses are appropriate in Wilderness areas; motorized and mechanized activities are generally prohibited.<sup>114</sup> The Act provides the following about the prohibited activities and uses within Wilderness:

Except as specifically provided for in this Act, and subject to existing private rights, there shall be no commercial enterprise and no permanent road within any wilderness area designated by this Act and except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.<sup>115</sup>

Given these limitations in the Act, we strongly encourage the BLM to clarify language in Table 2-3 of the Draft RMP/EIS, titled “Alternatives Matrix - Wilderness,” to ensure there is no confusion about the legal prohibition on mechanized transport within designated Wilderness areas. Specifically, we are concerned about the “goal” in Table 2-3 to “[i]mprove and enhance roads and trails designated for nonmotorized mechanized vehicle use.”<sup>116</sup> This language could be interpreted to apply to roads and trails within designated Wilderness, which would constitute a clear violation of the Wilderness Act.

We are also concerned about the management direction in the Draft RMP/EIS regarding operations, maintenance, renewal, or upgrade of existing ROWs. As quoted above, the Wilderness Act generally prohibits new structures and installations within designated Wilderness.<sup>117</sup> And yet, the Draft RMP/EIS would expressly allow “[o]perations, maintenance, renewal, or upgrade of existing ROWs . . . within the authorized width of existing ROW in designated wilderness,” which may incorporate “design features that avoid, remove, or appropriately mitigate potential adverse impacts on wilderness character.”<sup>118</sup> This provision could be read to allow new structures or

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<sup>113</sup> *Id.* § 1131(a).

<sup>114</sup> See *Mont. Wilderness Ass'n v. McAllister*, 666 F.3d 549, 551 (2011) (“Only certain recreational uses are appropriate in wilderness areas; motorized and mechanized activities are generally prohibited.”).

<sup>115</sup> 16 U.S.C. § 1133(c).

<sup>116</sup> Draft RMP/EIS at 2-53.

<sup>117</sup> 16 U.S.C. § 1133(c).

<sup>118</sup> Draft RMP/EIS at 2-55.

installations that violate the Wilderness Act, and we strongly urge the BLM to clarify the management direction in the Final EIS and Monument Plan to eliminate confusion.

We acknowledge that the Dingell Act includes some special provisions that apply to Wilderness areas within OMDP to facilitate necessary border security and law enforcement, as well as grazing activities. Specifically, the Act states that

- “Nothing in this section . . . prevents the Secretary of Homeland Security from undertaking law enforcement and border security activities, in accordance with section 4(c) of the Wilderness Act (16 U.S.C. 1133(c)), within the wilderness areas, including the ability to use motorized access within a wilderness area while in pursuit of a suspect.”<sup>119</sup>
- “The use of motor vehicles, motorized equipment, and mechanical transport shall be prohibited in the area . . . except as necessary for-- (i) the administration of the area (including the conduct of law enforcement and border security activities in the area); or (ii) grazing uses by authorized permittees.”<sup>120</sup>
- “Nothing in this paragraph precludes the Secretary from allowing within the area . . . the installation and maintenance of communication or surveillance infrastructure necessary for law enforcement or border security activities.”<sup>121</sup>

Given the Dingell Act’s special provisions related to border security and law enforcement in OMDP Wilderness areas, the EIS for the Monument Plan should disclose and analyze the effects of these uses and activities on wilderness character.

Moreover, we strongly urge the BLM to include in the Final EIS and Monument Plan a requirement and process for the BLM to formally document decisions related to these uses and activities. Specifically, the BLM should make necessity determinations reflecting the basis for BLM’s approval of activities and uses that are being authorized pursuant to the special provisions of the Dingell Act. Where activities cannot be authorized in advance (e.g., law enforcement pursuit of a suspect), the BLM should still document the activity after it has occurred. Additionally, the BLM should continue to conduct project-specific analyses and public engagement, including under NEPA, when authorizing nonconforming uses related to grazing.

We acknowledge and support the other provisions in the Draft RMP/EIS that are consistent with the Wilderness Act. We especially appreciate the inclusion of the following management direction: “Within designated wilderness areas, identify routes previously used for motorized travel to be converted, decommissioned, and reclaimed, when needed, to maintain wilderness character and restore ecological functions.”<sup>122</sup> A desktop review of aerial imagery of the Wilderness areas in OMDP indicates that numerous motorized routes (whether authorized or not) exist within

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<sup>119</sup> Dingell Act, § 1201 (c)(1)(A).

<sup>120</sup> *Id.* § 1201 (c)(2)(C).

<sup>121</sup> *Id.* § 1201 (c)(2)(D).

<sup>122</sup> Draft RMP/EIS at 2-44; 2-55.

designated Wilderness, and the BLM should close and restore routes that are not used for pedestrian or equestrian uses or otherwise authorized for administrative purposes such as border security or grazing.

#### **XIV. Lands with Wilderness Characteristics (LWCs)**

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 wilderness characteristics.<sup>123</sup> BLM policy likewise directs BLM to maintain an LWC inventory on a continuing basis.<sup>124</sup> Policy Manual 6310 directs BLM field and district managers to “[d]etermine and document whether it is necessary to update an existing inventory”<sup>125</sup> when the “BLM is undertaking a land use planning process,” when the “BLM has new information concerning resource conditions, including wilderness characteristics information submitted by the public,” if “there has been a change in circumstances that no longer supports the previous wilderness characteristics inventory,” or in other contexts.<sup>126</sup>

We urge the BLM to exercise its discretion to update its Wilderness inventory in OMDP, in accordance with BLM Policy. The BLM is undertaking a land use planning process for the Monument, and there have been recent changed circumstances that warrant an updated wilderness characteristics inventory, including the designation of the Monument and the passage of the Dingell Act, which designated new Wilderness areas and removed portions of some previous WSAs from Wilderness consideration.<sup>127</sup>

Additionally, in our scoping comments we shared portions of a report that documented New Mexico Wild’s efforts to inventory and document a “citizen’s inventory” of LWCs, which was finalized in 2007. This report identified numerous units that at the time of inventory had a high degree of wilderness characteristics within the current OMDP boundaries, including outside of what were previously managed as WSAs and what are currently designated as Wilderness areas. Consistent with the requirements of BLM Policy Manual 6310, this inventory included the establishment of unit boundaries, provided the acreage for each unit, provided information on the naturalness and outstanding opportunities for solitude or a primitive and unconfined type of recreation for each unit, and provided information on other values such as the ecology, scenery, and cultural resources in each unit.

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<sup>123</sup> FLPMA, 43 U.S.C. § 1711(a).

<sup>124</sup> U.S. Dep’t of Interior, BLM, Manual 6310 – Conducting Wilderness Characteristics Inventory on BLM Lands (Jan. 8, 2021), available at <https://www.blm.gov/sites/default/files/docs/2021-01/BLM-Policy-Manual-6310.pdf>.

<sup>125</sup> *Id.* at 1-2.

<sup>126</sup> *Id.* at 1-2, 1-3.

<sup>127</sup> AMS at 188.

Despite our providing this information during the scoping period for this RMP, the BLM did not consider the potential for wilderness characteristics in large swaths of the Monument. In the Draft RMP/EIS, the BLM states that the identification and management of LWCs is an issue that the BLM considered but did not analyze.<sup>128</sup> The BLM explains that it excluded this issue from the analysis because “[n]o additional areas of the Monument meet the size criterion to be considered as a wilderness study area. For this reason, lands with wilderness characteristics are not considered further in this planning effort.”<sup>129</sup>

We disagree with the BLM’s conclusion that there are no areas that meet the size criterion to be considered for management as LWCs. The BLM considers roadless areas of BLM land consisting of 5,000 acres or more to meet the size criterion, as well as roadless areas of less than 5,000 acres of BLM land that are contiguous to other protected federal lands.”<sup>130</sup> The lands that we recommended that the BLM analyze for administrative designation as LWCs or WSAs in our scoping comments are located in what we described as three parts of OMDP: the Organ Mountains Complex (two areas, approximately 7,500 acres in total), the Greater Potrillo Mountains (two areas, approximately 14,600 acres in total), and the Robledo Mountains/Sierra de las Uvas (three areas, approximately 122,000 acres in total).

Further, in 2006 the BLM conducted an Analysis of the Management Situation for the TriCounty planning area that referenced a proposal submitted by New Mexico Wild and The Wilderness Society for the designation of WSAs in the lands that now comprise OMDP.<sup>131</sup> Much of that 2006 proposal overlaps with what we provided in our scoping comments for the current planning process, and it appears that in 2006 the BLM deemed those areas worthy of consideration as LWCs. However, after OMDP was designated as a national monument in 2014, the BLM removed lands within OMDP from its subsequent inventory of LWCs, as shown on the map, “Lands with Wilderness Characteristics Inventory Units - TriCounty Planning Area.”<sup>132</sup> It thus appears that although BLM acknowledged potential LWCs located within what is now OMDP during BLM’s Analysis of the Management Situation for the TriCounty planning effort, BLM never proceeded to analyze those potential LWCs. The information on lands that we believe to possess wilderness characteristics is therefore functionally new information to the BLM.

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<sup>128</sup> Draft RMP/EIS at I-10.

<sup>129</sup> *Id.* at 3-3.

<sup>130</sup> BLM Manual 6310 - Conducting Wilderness Characteristics Inventory on BLM Lands, at 1-7 (Jan. 8, 2021), available at <https://www.blm.gov/sites/default/files/docs/2021-01/BLM-Policy-Manual-6310.pdf>; see also BLM Manual 6330 - Management of BLM Wilderness Study Areas, p. 1-5 (July 13, 2012), available at [https://www.blm.gov/sites/default/files/uploads/mediacenter\\_blmpolicymanual6330.pdf](https://www.blm.gov/sites/default/files/uploads/mediacenter_blmpolicymanual6330.pdf).

<sup>131</sup> BLM Las Cruces District Office, TriCounty RMPs/EIS: Analysis of the Management Situation, p. 2-280 to 2-285 (June 2006), available at [https://eplanning.blm.gov/public\\_projects/lup/83982/113313/138449/TriCounty\\_AMS\\_Final\\_2006\\_June\\_2.pdf](https://eplanning.blm.gov/public_projects/lup/83982/113313/138449/TriCounty_AMS_Final_2006_June_2.pdf).

<sup>132</sup> BLM Las Cruces District Office, Lands with Wilderness Characteristics Inventory Units - TriCounty Planning Area (Sept. 7, 2018), available at [https://eplanning.blm.gov/public\\_projects/lup/83982/156638/191712/LWC\\_Inventory\\_Units\\_Map\\_Large\\_File.pdf](https://eplanning.blm.gov/public_projects/lup/83982/156638/191712/LWC_Inventory_Units_Map_Large_File.pdf).

The only documented analysis of wilderness characteristics of lands that are now within OMDP that we have been able to locate is from the 1980 reports, “New Mexico Wilderness Study Area Proposals”<sup>133</sup> and “New Mexico Wilderness Study Area Decisions.”<sup>134</sup> These reports lack any overview maps, and the maps of areas evaluated for wilderness characteristics are of poor quality. It is therefore difficult to determine precisely what lands within what is now OMDP were actually evaluated for wilderness characteristics. Nonetheless, these evaluations are now nearly 45 years old. In addition to changed circumstances related to the designation of OMDP and the passage of the Dingell Act, much else has undoubtedly changed over this period. Additionally, the lands that were ultimately designated as the Robledo Mountains and Las Uvas Mountains WSAs in the “New Mexico Wilderness Study Area Decisions” report<sup>135</sup> were initially found to lack wilderness characteristics and therefore were initially determined to not qualify for wilderness study in the “New Mexico Wilderness Study Area Proposals” report.<sup>136</sup> Based on public comments that portions of these areas actually contained wilderness characteristics, the BLM chose to re-evaluate their suitability for WSA designation. This demonstrates that the BLM lacks complete information on the potential for wilderness characteristics over large landscapes, which is particularly true in this case because the lands in question appear to not have been analyzed for wilderness characteristics in nearly 45 years.

To aid the BLM in making an informed decision about lands that merit updated analysis for wilderness characteristics, we reanalyzed the information that we provided in scoping, including removing non-federal lands from the proposed areas that we initially provided, using aerial imagery to exclude obvious developments, and cross-referencing with information provided in the Draft RMP/EIS as well as with geospatial data available on BLM’s Geospatial Business Platform to ensure that we excluded roads and trails open to motorized and/or mechanized use by the public. We note that the Draft RMP/EIS includes a map called “Existing Transportation Network.”<sup>137</sup> This map depicts numerous “existing routes,” some of which appear to be located within the areas that we believe contain wilderness characteristics and should be considered for LWC designation. However, based on BLM data available on a BLM interactive map that is available publicly,<sup>138</sup> none of these routes are designated as roads or trails that are open to public motorized or mechanized use, and it is not clear the extent to which they may detract from the naturalness of these areas, whether any motorized or mechanized use occurs on them, or whether the BLM may ultimately make a decision to adopt or rehabilitate these routes.

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<sup>133</sup> BLM New Mexico State Office, New Mexico Wilderness Study Area Proposals (Mar. 1980), *available at* [ia802908.us.archive.org/21/items/wildernessstudy16unit/wildernessstudy16unit.pdf](https://ia802908.us.archive.org/21/items/wildernessstudy16unit/wildernessstudy16unit.pdf).

<sup>134</sup> BLM New Mexico State Office, New Mexico Wilderness Study Area Decisions (Nov. 1980), *available at* [dn790008.ca.archive.org/0/items/wildernessstudy20unit/wildernessstudy20unit.pdf](https://dn790008.ca.archive.org/0/items/wildernessstudy20unit/wildernessstudy20unit.pdf).

<sup>135</sup> *Id.* at 174, 176.

<sup>136</sup> BLM New Mexico State Office, New Mexico Wilderness Study Area Proposals (Mar. 1980) at 2-146, 2-148.

<sup>137</sup> Draft RMP/EIS at 3-155.

<sup>138</sup> Untitled ArcGIS Map, *available at*

[https://www.arcgis.com/home/webmap/viewer.html?url=https%3A%2F%2Fgis.blm.gov%2Farcgis%2Frest%2Fservices%2Ftransportation%2FBLM\\_Natl\\_GTLF\\_Public\\_Display%2FMapServer&source=sd](https://www.arcgis.com/home/webmap/viewer.html?url=https%3A%2F%2Fgis.blm.gov%2Farcgis%2Frest%2Fservices%2Ftransportation%2FBLM_Natl_GTLF_Public_Display%2FMapServer&source=sd).

Based on our reanalysis of what we provided during scoping pertaining to areas that we believe to possess wilderness characteristics, there are 12 areas that merit consideration by the BLM for LWC designation. Please see Attachment A to this letter for maps and proposed unit boundaries of these areas and Attachment B to this letter for a resubmittal of the relevant portion of our 2007 inventory report that describes what we believe to be the naturalness and outstanding opportunities for solitude or a primitive and unconfined type of recreation for each area, as well as information on other values such as the ecology, scenery, and cultural resources present for each area.

The following table includes the 12 areas that merit consideration, the code that we used to label each area on the maps in Attachment A, the general location of each area within OMDP, the GIS acreage of each area, whether each area is contiguous with designated Wilderness, and the unit name for each area that is listed within the excerpt of our 2007 inventory report in Attachment B (to be cross referenced with the maps in Attachment A).

<b>Area Name /Code</b>	<b>General Location</b>	<b>GIS Acreage</b>	<b>Contiguous with Designated Wilderness?</b>	<b>Name of Area in 2007 Inventory Report / Attachment B</b>
RLU 1	Sierra de Las Uvas and Robledo Mountains	1,091.55	Yes	Sierra de las Uvas
RLU 2	Sierra de Las Uvas and Robledo Mountains	8,608.30	No	Sierra de las Uvas
RLU 3	Sierra de Las Uvas and Robledo Mountains	1,857.23	Yes	Sierra de las Uvas
RLU 4	Sierra de Las Uvas and Robledo Mountains	43,536.54	Yes	Sierra de las Uvas
RLU 5	Sierra de Las Uvas and Robledo Mountains	21,523.17	Yes	Broad Canyon-Robledo Mountains
RLU 6	Sierra de Las Uvas and Robledo Mountains	162.68	Yes	Sierra de las Uvas
RLU 7	Sierra de Las Uvas and Robledo Mountains	19,516.18	Yes	Sierra de las Uvas
RLU 8	Sierra de Las Uvas and Robledo Mountains	10,047.52	No	Sleeping Lady Hills
OM 1	Organ Mountains	37.88	Yes	Organ Mountains
OM 2	Organ Mountains	6,046.57	Yes	Organ Foothills
GP 1	Potrillo Mountains	6,820.68	No	Providence Cone South
GP 2	Potrillo Mountains	665.23	Yes	West Potrillo Mountains
<b>Total Acreage</b>		<b>119,913.54</b>		

As the BLM has recognized, specially designated areas have fewer impacts on Monument resources, objects, and values because they restrict certain impactful activities, such as motorized



use and ROW development.<sup>139</sup> Designated areas “have an incidental beneficial impact of protecting wildlife,”<sup>140</sup> including special status species,<sup>141</sup> because they provide protection for habitats. They also safeguard water quality, cultural resources, and visual and scenic resources.<sup>142</sup> We recommend that the BLM update its LWC inventory and provide management for qualifying areas designed to maintain wilderness characteristics.

## CONCLUSION

We thank the BLM for the obvious hard work and dedication that went into the Draft RMP/EIS. We know that the entire agency, from headquarters to the Las Cruces District 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 OMDP National Monument. 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 completing travel management planning, conducting grazing compatibility analyses, addressing visitor access issues, conducting trail and infrastructure projects, improving signage and interpretation, and conducting fish and wildlife habitat improvement projects.

Overall, the proposed Monument Plan would provide for better management of OMDP and its resources, objects, and values. We strongly urge the BLM to adopt Alternative B, modified to include appropriate management of wilderness-quality lands and other recommendations set forth in these comments.

Thank you for the opportunity to provide these comments. Please include them in the official record. If you have any questions about these comments, please contact Sally Paez, Staff Attorney, New Mexico Wild.

Sincerely,

New Mexico Wilderness Alliance  
Sally Paez  
Staff Attorney  
[sally@nmwild.org](mailto:sally@nmwild.org)  
(505) 843-8696

Friends of OMDP  
Patrick Nolan

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<sup>139</sup> *Id.* at 3-8.

<sup>140</sup> *Id.* at 3-12.

<sup>141</sup> *Id.* at 3-18.

<sup>142</sup> *Id.* at 3-127.

Executive Director  
[director@organmtfriends.org](mailto:director@organmtfriends.org)

Center for Biological Diversity  
Brian Nowicki  
Southwest Deputy Director  
[bnowicki@biologicaldiversity.org](mailto:bnowicki@biologicaldiversity.org)

The Wilderness Society  
Michael Casaus  
New Mexico State Director  
[Michael\\_casaus@twso.org](mailto:Michael_casaus@twso.org)

Conservation Lands Foundation  
Romir Lahiri  
Associate Program Director  
[romir@conservationlands.org](mailto:romir@conservationlands.org)

Antoinette Reyes  
Southern N.M. & El Paso Organizer  
Sierra Club: Rio Grande Chapter  
[Antoinette.Reyes@sierraclub.org](mailto:Antoinette.Reyes@sierraclub.org)

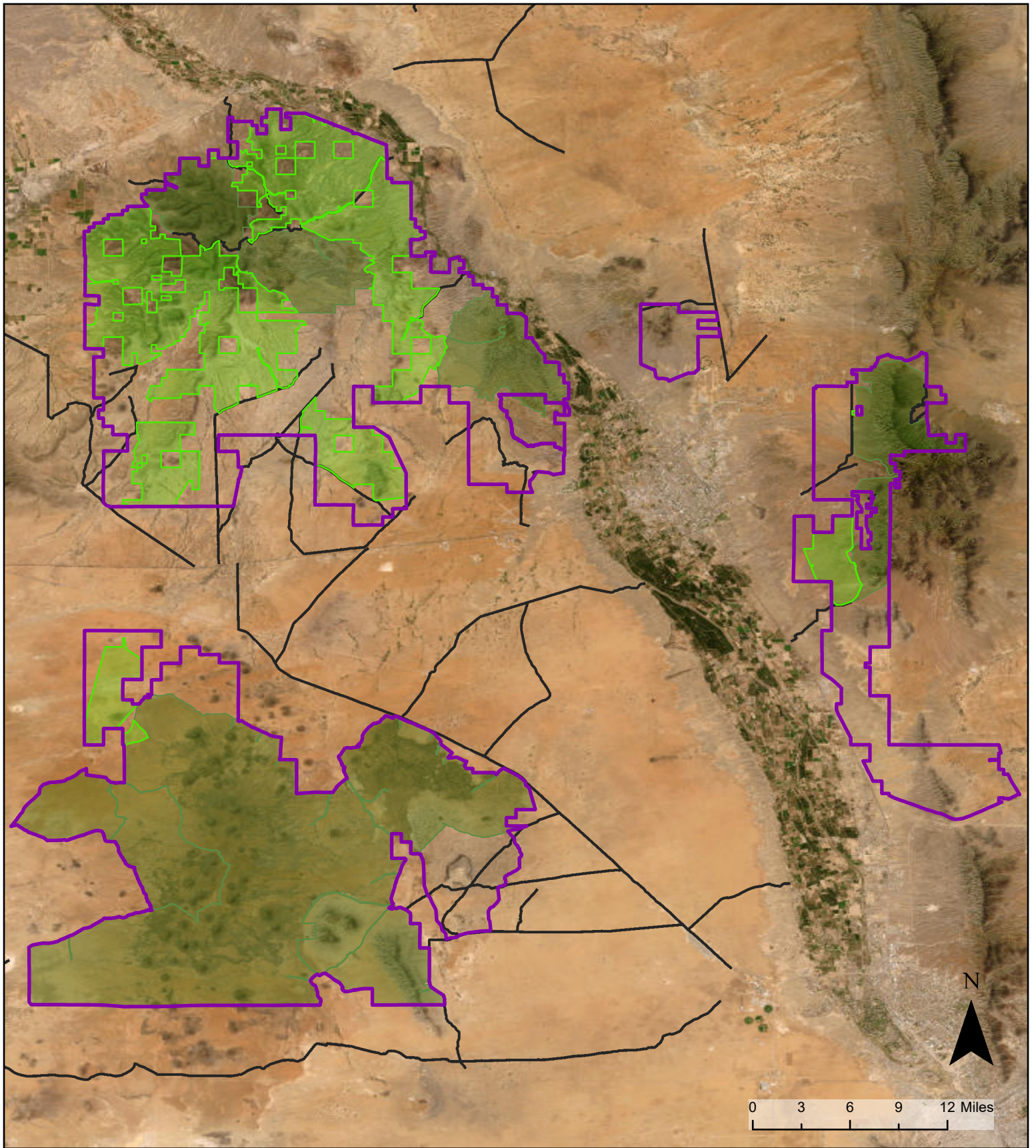
**Exhibits:**

- Attachment A – Maps of Potential LWCs
- Attachment B - Excerpt from 2007 New Mexico Wild “Citizen’s Inventory” of LWCs

## **Attachment A: Maps**

**(1) Organ Mountains-Desert Peaks National Monument Potential Lands With Wilderness Characteristics; (2) Organ Mountains-Desert Peaks National Monument Robledos-Las Uvas Complex Potential Lands With Wilderness Characteristics; (3) Organ Mountains-Desert Peaks National Monument Organ Mountains Complex Potential Lands With Wilderness Characteristics; and (4) Organ Mountains-Desert Peaks National Monument Greater Potrillos Complex Potential Lands With Wilderness Characteristics**

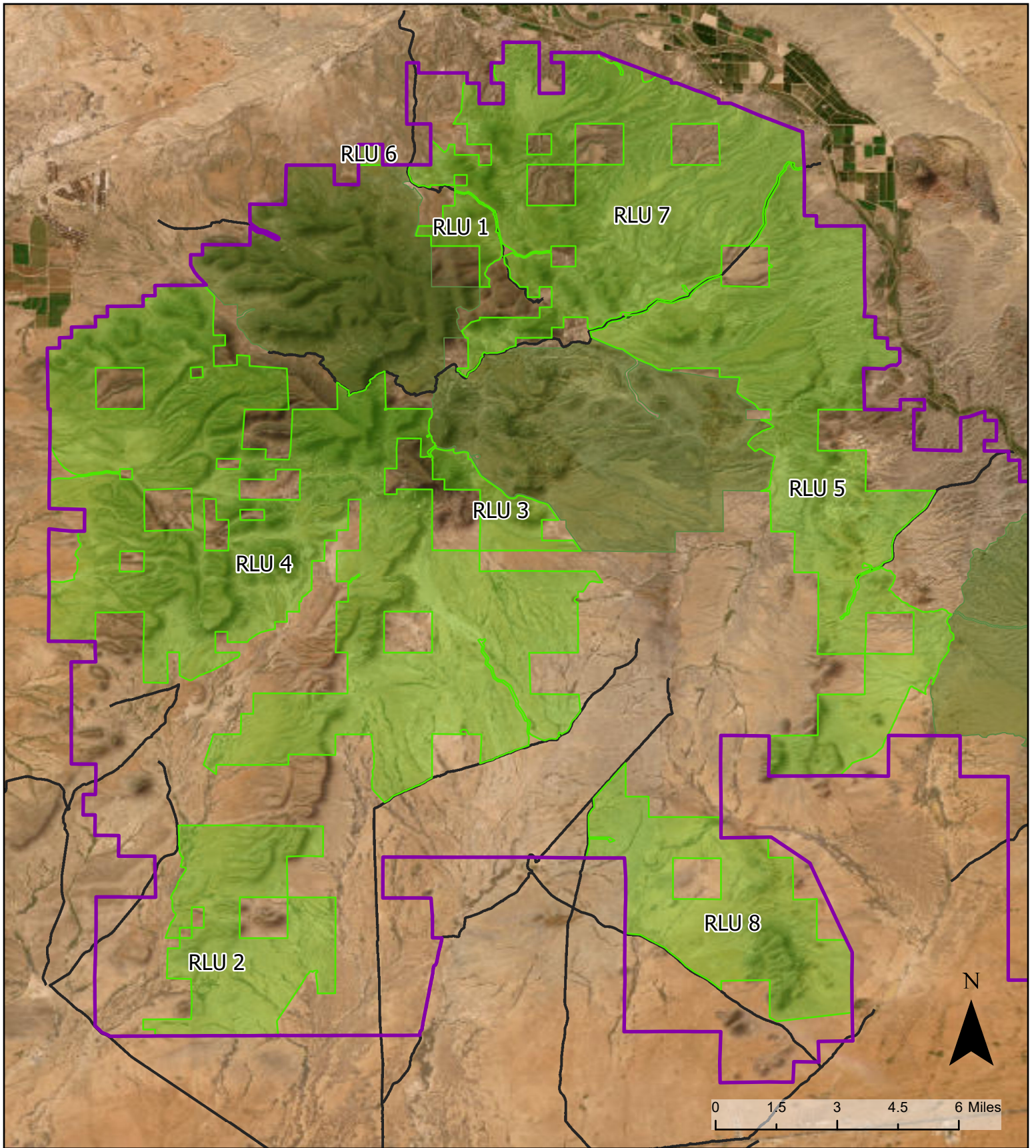
**(See the following 4 pages)**



## Organ Mountains-Desert Peaks National Monument Potential Lands with Wilderness Characteristics

— Transportation System - Road  
■ BLM Wilderness

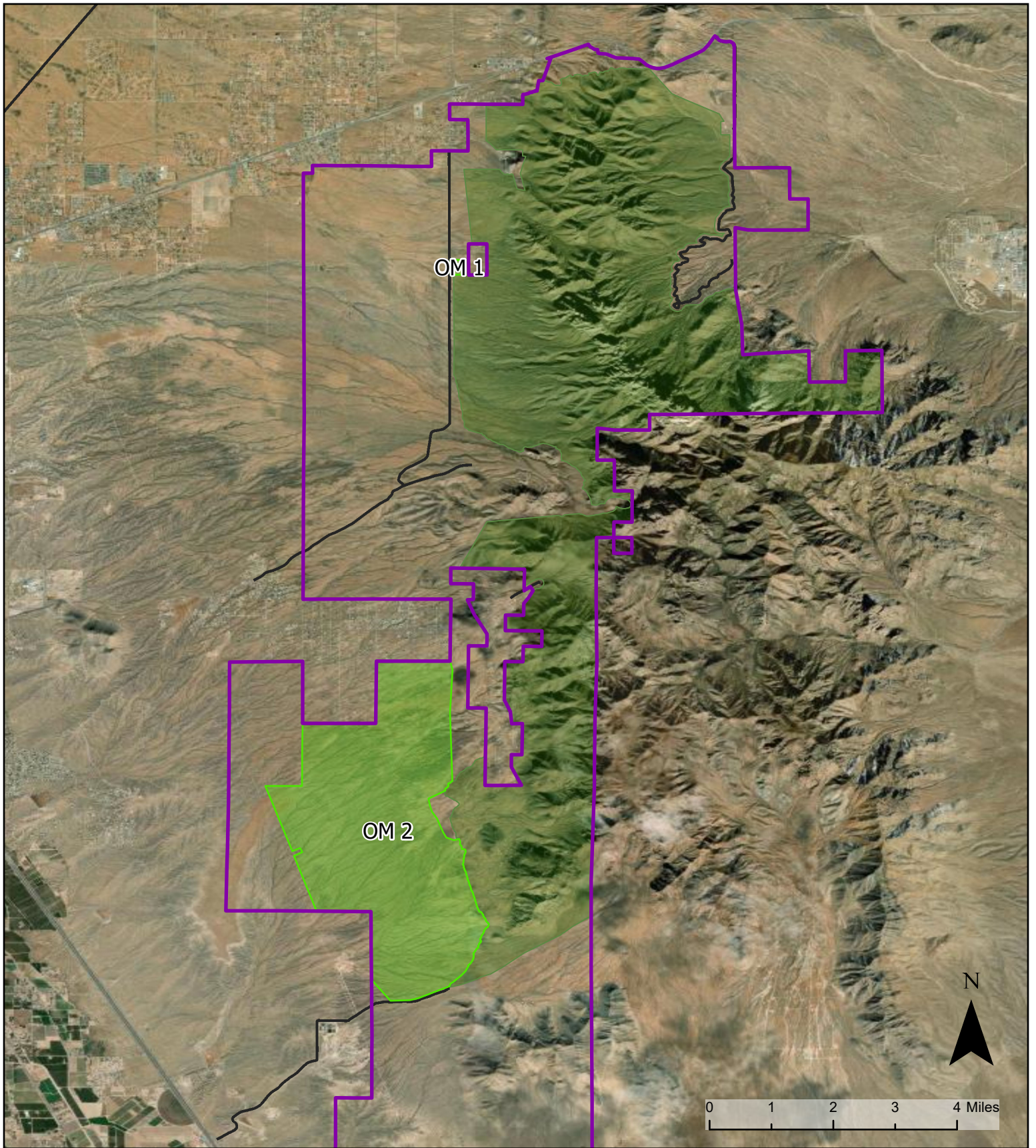
■ Potential Lands with Wilderness Characteristics  
■ Organ Mountains-Desert Peaks National Monument



## Organ Mountains-Desert Peaks National Monument Robledos-Las Uvas Complex Potential Lands with Wilderness Characteristics

— Transportation System - Road  
 ■ BLM Wilderness

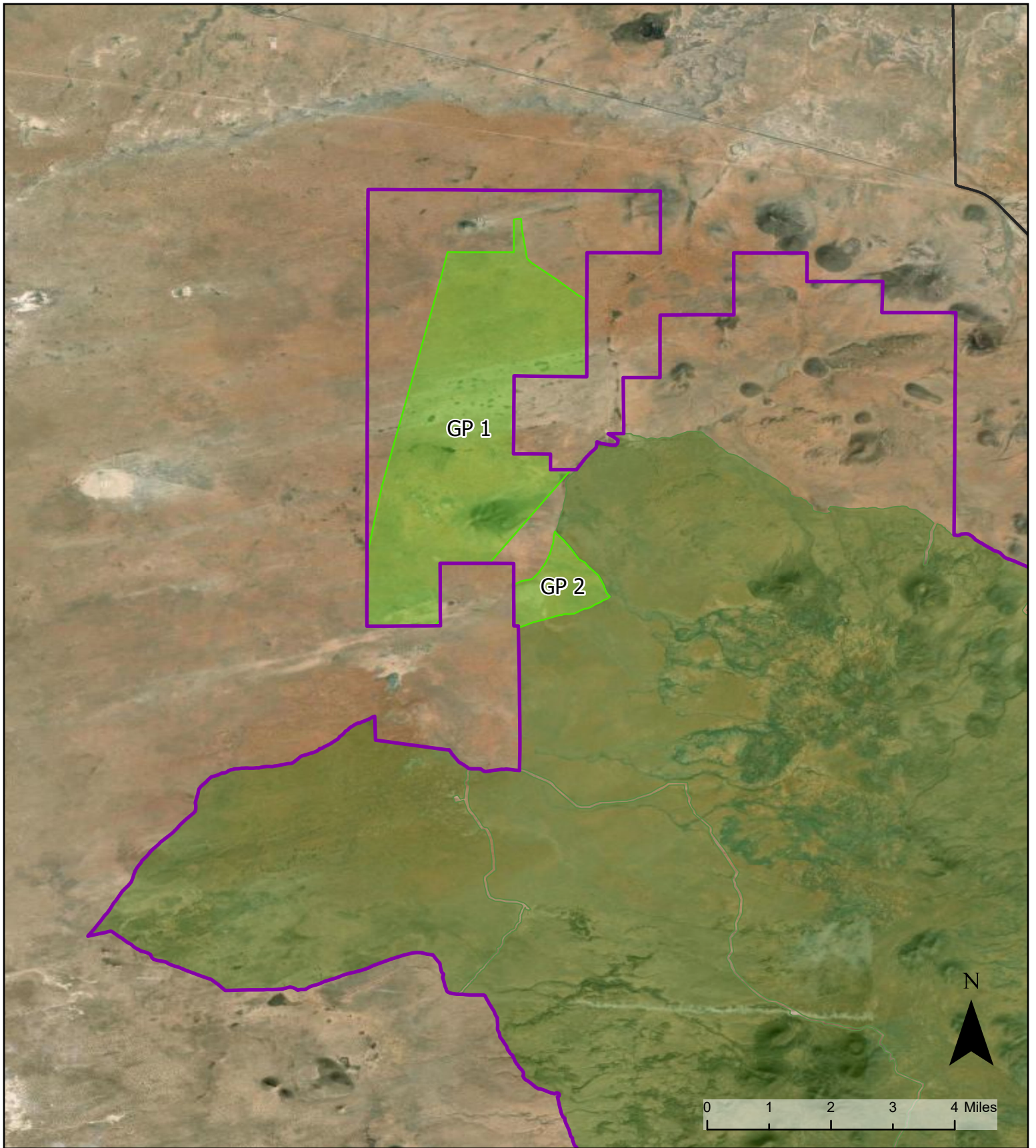
■ Potential Lands with Wilderness Characteristics  
 ■ Organ Mountains-Desert Peaks National Monument



## Organ Mountains-Desert Peaks National Monument Organ Mountains Complex Potential Lands with Wilderness Characteristics

— Transportation System - Road  
■ BLM Wilderness

■ Potential Lands with Wilderness Characteristics  
■ Organ Mountains-Desert Peaks National Monument



## Organ Mountains-Desert Peaks National Monument Greater Potrillos Complex Potential Lands with Wilderness Characteristics

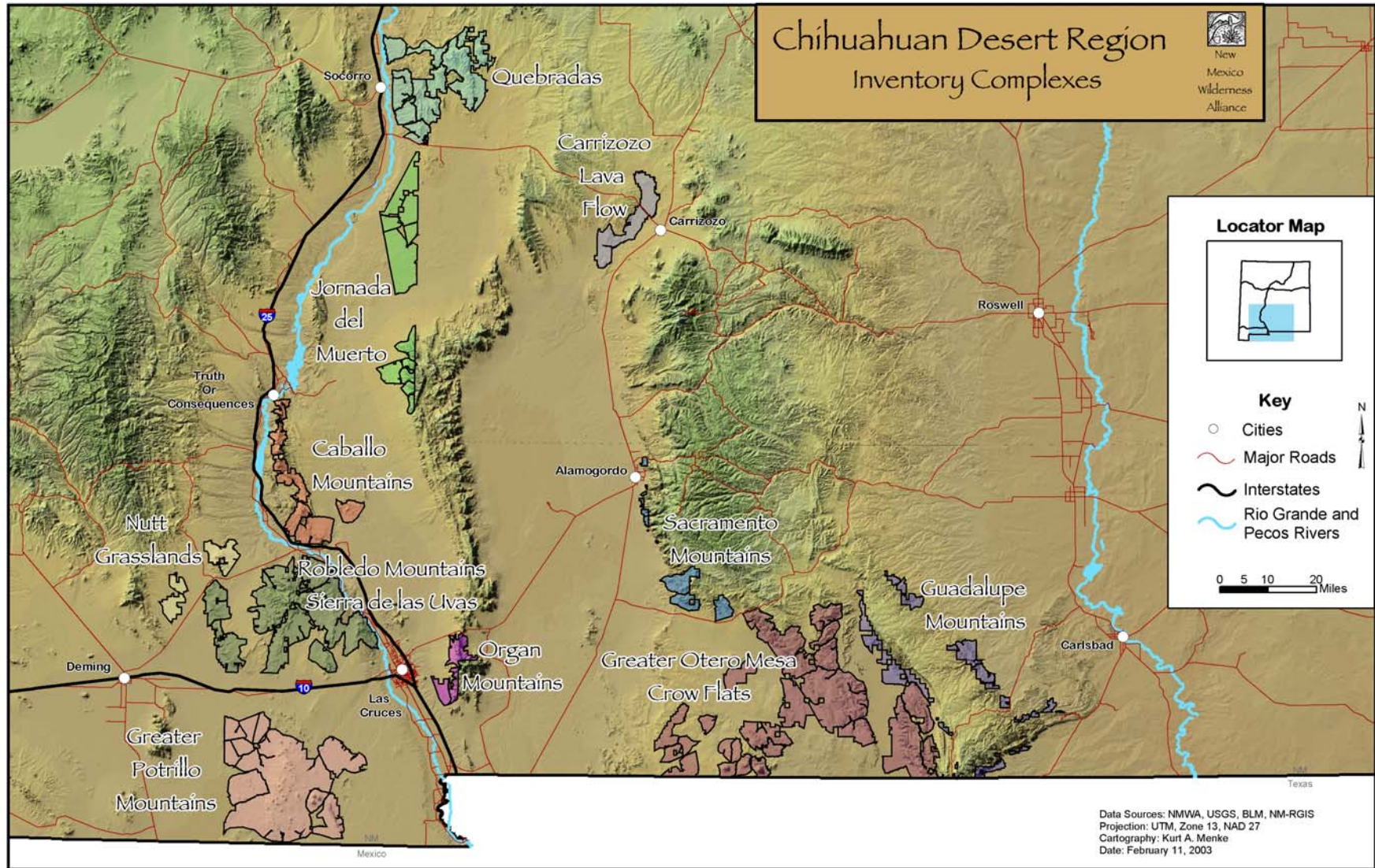
— Transportation System - Road  
■ BLM Wilderness

■ Potential Lands with Wilderness Characteristics  
■ Organ Mountains-Desert Peaks National Monument

**Attachment B: Excerpt from 2007 New Mexico Wild “Citizen’s Inventory” of LWCs**

**(See the following 25 pages)**





## The Chihuahuan Desert Region

In New Mexico, the Chihuahuan Desert region is found throughout the south-central and southeastern part of the state, with finger-like extensions protruding north up the Rio Grande and Pecos River valleys into the central part of the state. New Mexico represents the northern portion of the Chihuahuan Desert, which extends south through west Texas and deep into Mexico. This desert is one of the most biologically rich and diverse ecoregions in the world (Olson and Dinerstein 1998).

The northern portion of the Chihuahuan Desert is a dry grassland ecosystem dominated by shrubs and native grasses. Yet the region contains a variety of other geographic and habitat



types. Several mountain ranges rise dramatically from the desert floor and act as 'sky islands' similar to the adjacent Sky Island region of southwestern New Mexico. This landscape diversity also includes unique low-elevation mountains, mesas, hills, and canyons; volcanic features such as lava flows, craters, and cinder cones; and freshwater environments such as playas, streams, and springs. The wild lands described here represent this mix of landscape types, encompassing shrub covered desert, vast grasslands, riparian areas, oak, juniper, and pinyon woodlands, and even sheltered Ponderosa Pine forests.

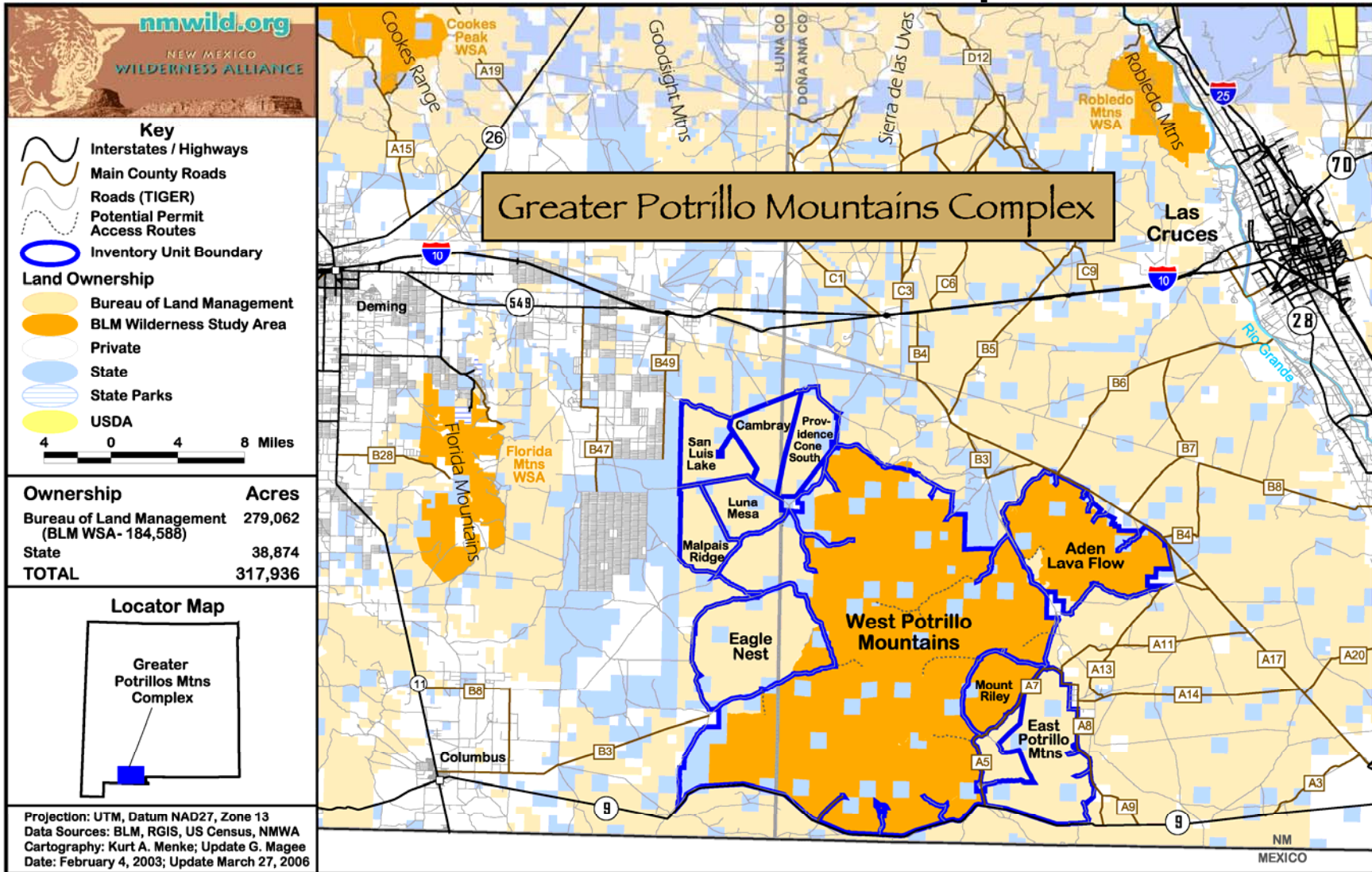
Cacti, yucca, and agave are common plants of the region. In fact, this desert is especially known for having high cacti diversity and endemism. Similarly, grasses, euphorbs, asters, and legumes also demonstrate this same trait. The plant diversity of this region in turn supports a high variety of invertebrate and reptile species. Mammals in the area include pronghorn, deer, javelina, bobcat, and coyotes, as well as some rare species such as desert bighorn sheep and prairie dogs. Numerous migrating and

resident birds use the region, including the rare Aplomado falcon. The freshwater biota of the ecoregion is considered some of the most unique in the world because of its complexity and high level of endemism.

In addition to their unique geographical and ecological characteristics, the wild lands described here also have all the characteristics of wilderness as outlined in the Wilderness Act. These areas also serve as buffers around existing conserved areas and as linkages with other wildlands in the region.

Protection of these lands is crucial for maintaining diverse communities of plants and animals, watershed functions, wildlife habitat and travel corridors, and open spaces for human use. Wilderness designations will ensure that these lands maintain these important functions.

# Greater Potrillo Mountains Complex



## Greater Potrillo Mountains Complex



### Area Description

The Greater Potrillo Mountains Complex is located approximately 30 miles southwest of Las Cruces adjacent to the border with Mexico. The West Potrillo Mountains are the focal point of this area, which is one of the largest relatively undisturbed stretches of Chihuahuan Desert landscape in New Mexico. The area also includes the Aden Lava Flow, Mount Riley, Cox Peak, Eagle Nest, Indian Basin, and the East Potrillo Mountains. This landscape is a broad volcanic field encompassing hundreds of

cinder cones, large craters, and the shield volcano of Aden Crater that produced extensive lava flows over 10,000 years ago. Mount Riley is the highest point in the region, rising abruptly over 1,700 feet above the surrounding desert plain to an elevation of nearly 6,000 feet.

Ephemeral lakes are found in Indian Basin. In addition, the area is made up of isolated intrusive peaks like Eagle Nest, steep sedimentary mountains like the East Potrillo Mountains, sand dunes, and expansive, relatively level plains.



## Ecological Values

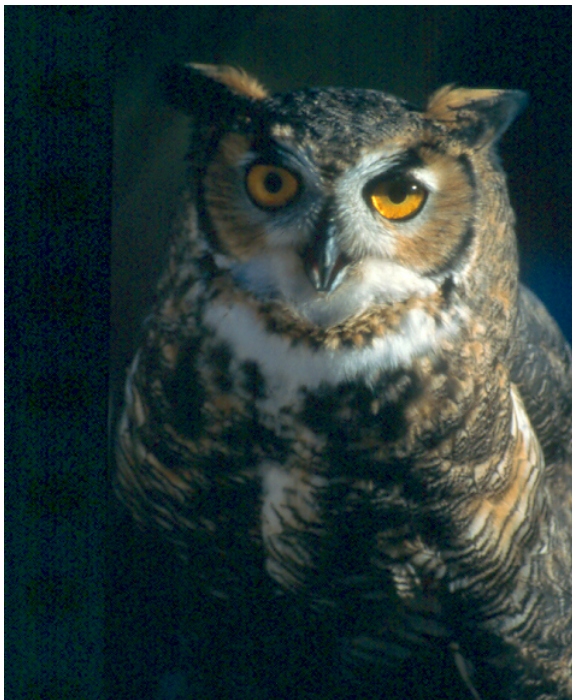
Chihuahuan Desert grassland and yucca, in association with a mosaic of other desert shrubs such as creosote, acacia, and mesquite, make up the majority of the plant cover in the area. Isolated clumps of netleaf hackberry and other desert trees are found in the lava flow where depressions or deeper pockets of soil hold extra water after rainfall. Occasional juniper trees are also found on mountain slopes and in larger drainages. The limestone substrate of the East Potrillo Mountains provides habitat for a wide diversity of cacti, and sandy areas likely contain populations of the State-endangered sand prickley pear, *Opuntia arenaria*, a BLM special status species. The late summer rains bring extensive stands of wildflowers in this area including white and yellow desert zinnias, desert



marigolds, blackfoot daisies, globe mallow, pepperweed, desert sunflowers, Chihuahuan flax, and summer poppy. In one of the large basins in the center of the West Potrillo Mountains, there is a unique 'cholla savannah' vegetation type with large 8 to 10 foot tall cholla trees evenly spaced amongst the grasses. Unusually large specimens of barrel cactus are also found in this area.

Protection of large natural areas is particularly important for long-term preservation of biological diversity. Each unit is an important component in the larger complex of wildlands in the greater Potrillo Mountains area. This area's proximity to northern Mexico adds to its ecological significance. Like the Peloncillo and Big Hatchet Mountains to the west, the Greater Potrillo Mountains Complex forms a biotic link between species in northern Mexico and those in the southwestern United States.

The area's naturalness and large size also contributes to its significance for wildlife. Raptors are common, especially during the winter. Golden eagles, great-horned owls, and Swainson's hawks nest here, and peregrine falcons have also been reported. Extensive grasslands in the



area provide important habitat for grassland birds that have declined in recent years. This includes potential habitat for Aplomado falcons. Other species that forage and live in the area include pronghorn, mule deer, quail, jackrabbits, and occasional migrating ducks on ephemeral ponds. A high diversity of bats are found in the complex, and melanistic forms of mammals and reptiles occur on the lava flows. The Great Plains narrow-mouth toad has been reported immediately to the south of the West Potrillos and can be expected to occur here. A rare mollusk is also found in the area.



Lava flows, craters, and cinder cones evoke a primeval, “moonscape” image for visitors. The shapes and forms of the lava rock are interesting, especially when juxtaposed to the varied forms of the desert vegetation found here. The Aden Lava Flow contains pressure ridges, lava tubes, and crevices up to 5 feet wide and 20-30 feet deep. In contrast, rounded, grass-covered hills in the complex add a hint of softness to the rugged landscape. These features provide excellent opportunities for photography and geological sightseeing.

### Scenic and Recreational Qualities

Although this complex is located near a bi-national metro-plex of more than 2.5 million residents, the Greater Potrillo Mountains area appears very natural, maintaining its wild beauty. Due to the rugged terrain and lack of water, many areas are inaccessible to cattle and largely ungrazed, adding to the scenic quality.



Although less than an hour’s drive from either Las Cruces or El Paso, most of the area receives little visitor use. This is an excellent area to explore if one desires to avoid contact with others. The area does not have any maintained trails, making cross-country travel for horseback riders, hikers, backpackers a very primitive experience. Isolated mountains, like Mount Riley and Cox Peak’s, rise abruptly from the desert floor and make excellent day hikes. These seldom traveled peaks remind the visitor of the true remoteness and isolation of the area.

As one gains elevation, range after range appears on the horizon, jutting up out of vast valleys in the distance. This gives not only a sense of immense space, but also a visual connection between the region's of southwest New Mexico and northern Mexico, which lies only a few short miles to the south. Additional recreational opportunities include botanical study in the East Potrillo Mountains and excellent quail hunting throughout the area.

As nearby urban populations rapidly expand, nearby wild areas assume an even greater importance. The Greater Potrillo Mountains Complex provides these urban dwellers with primitive recreational opportunities that, in many places in the southwest, no longer exist due to urban sprawl into once wild areas. The primeval nature of the complex provides visitors with a wilderness experience and primitive recreational opportunities of the highest order.





### Special Management Areas

Three Wilderness Study Areas (WSAs) are located in this complex: Aden Lava Flow, Mount Riley, and West Potrillo Mountains. The West Potrillo Mountains is the largest BLM WSA in New Mexico. The Aden Lava Flow Research Natural Area (RNA) is also located here. The RNA was designated in 1978 to preserve the unique geological and biological phenomena associated with the Aden Lava Flow and to provide research and educational opportunities. A portion of the area also falls within the West Potrillo Habitat Management Plan Area managed to improve habitat for deer and upland game.

### Cultural Values

Evidence of pre-Columbian Indian habitation exists in caves in the East

Potrillo Mountains. A Classic Mimbres Pueblo located in the region has the highest concentration of bird bones of any known Mimbres site. Several undisturbed El Paso Phase structures have also been found in the West Potrillo Mountains.

### Access Information

The south part of the Greater Potrillo Mountains complex is easily reached by Highway 9 that goes from Santa Teresa to Columbus along the border with Mexico. From I-10 exit #8 in Texas, head west toward the border crossing on Highway 136. Just north of the border, about 9½ miles southwest of the interstate exit, turn west on Highway 9. In 16½ miles, CR A008 comes in on the north. This road forms the eastern boundary of the East Potrillo Mountains unit.





About 8 miles further west on Highway 9 from the intersection of CR A008, CR A005 comes in on the north side of the road.

Approximately 4½ miles north of Highway 9, CR A007 intersects CR A005 from the east. This road heads to the northeast and forms the eastern boundary of Mount Riley and eventually accesses the southern end of the Aden Lava Flow unit (consult a detailed map before attempting to drive this route). From the intersection of CR A007 and CR A005, CR A005 continues north in between the Mount Riley unit on the east and the West Potrillo Mountains on the west. The southwest part of the West Potrillo Mountains is reached by continuing west on Highway 9 from the intersection of CR A005.

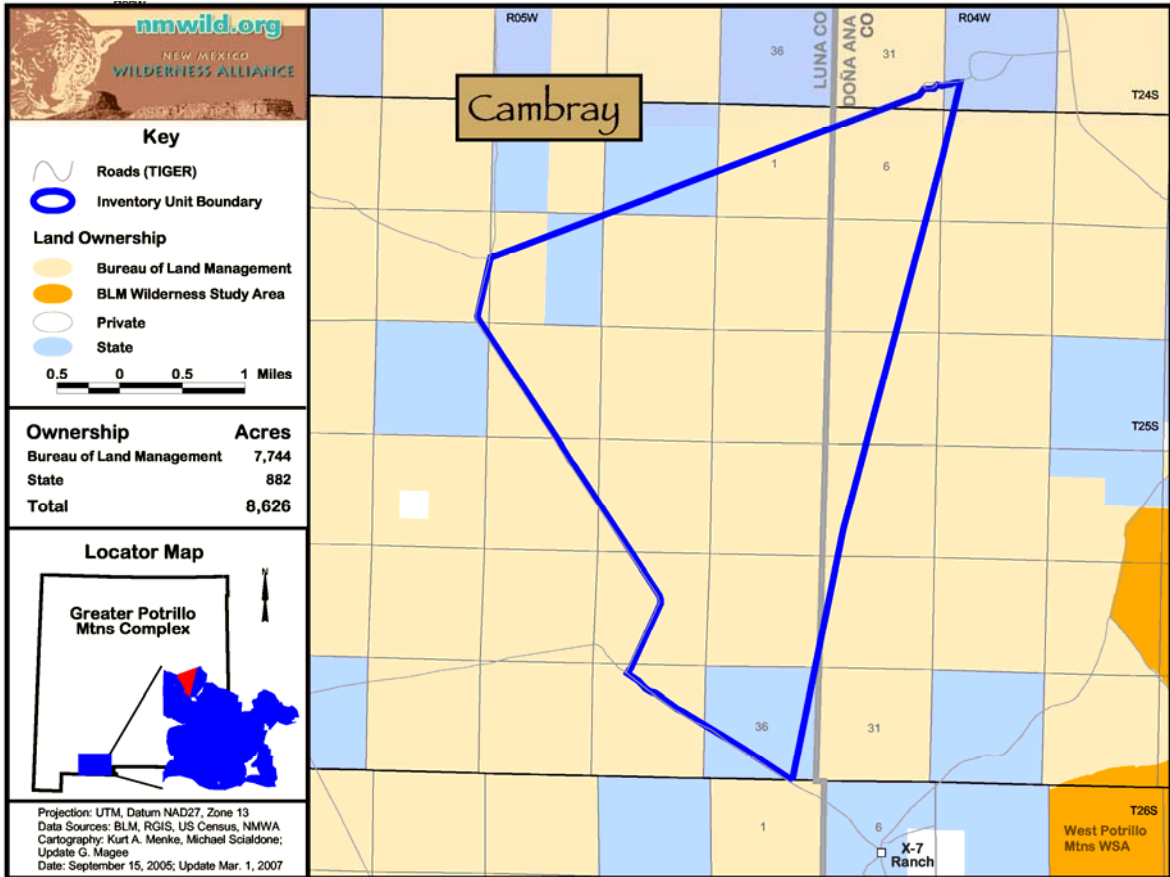
To get to the northeast part of the West Potrillo Mountains and the northwest part of Aden Lava Flow, take the Corralitos Ranch exit #127 off of I-10, about 15 miles west of Las Cruces. From the south side of the interstate, head west on CR B005, which also parallels the

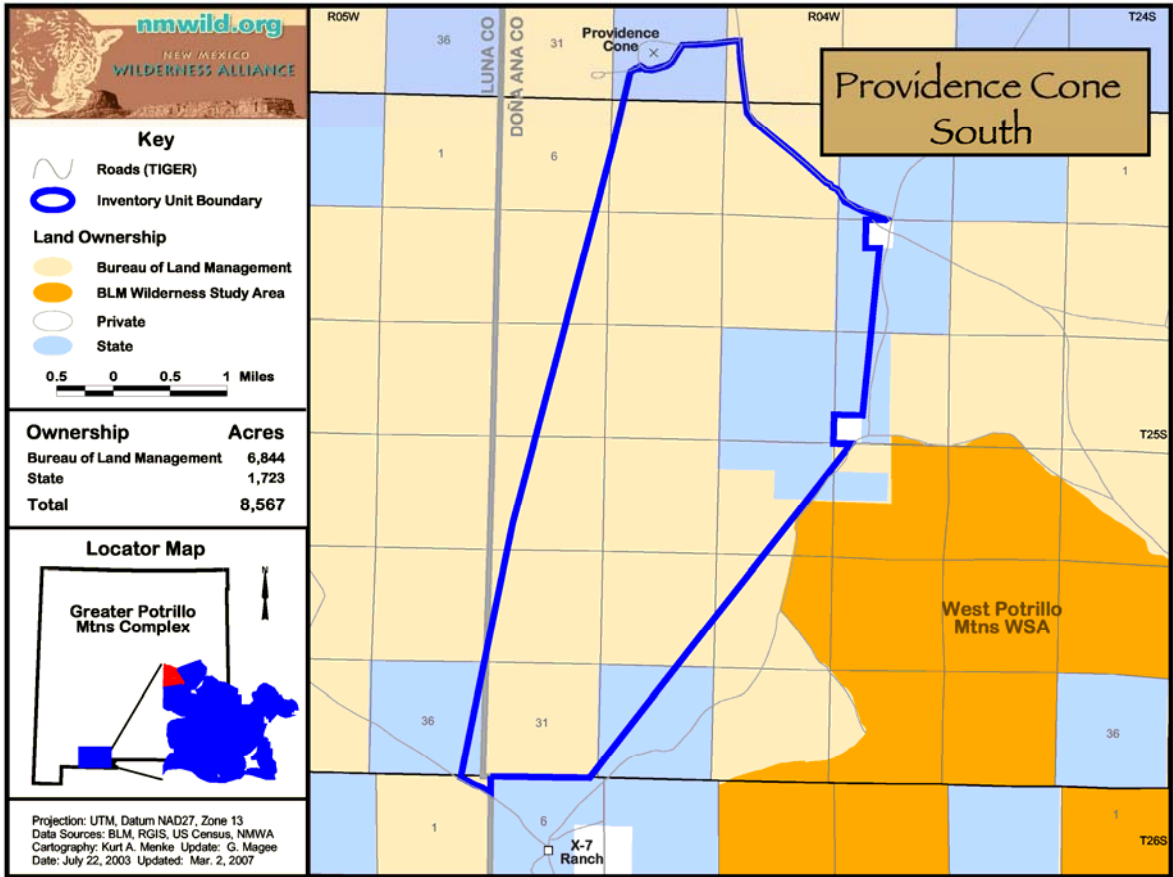


interstate. After about 2 miles, follow the gravel road as it curves away from the interstate. Continue on CR B005 from this point for about 8½ miles to the intersection of CR B004 at the railroad tracks. Cross over the railroad tracks here and turn left. Follow CR B004 and the RR tracks to the southeast for about 7 miles to the intersection of a road on the south. This route forms the western boundary of the Aden Lava Flow unit. The northeast part of the West Potrillo Mountains can be reached by following this side route southwest for about 7½ miles. The northern part of Aden Lava Flow can be explored by continuing southeast along the RR tracks and CR B004.

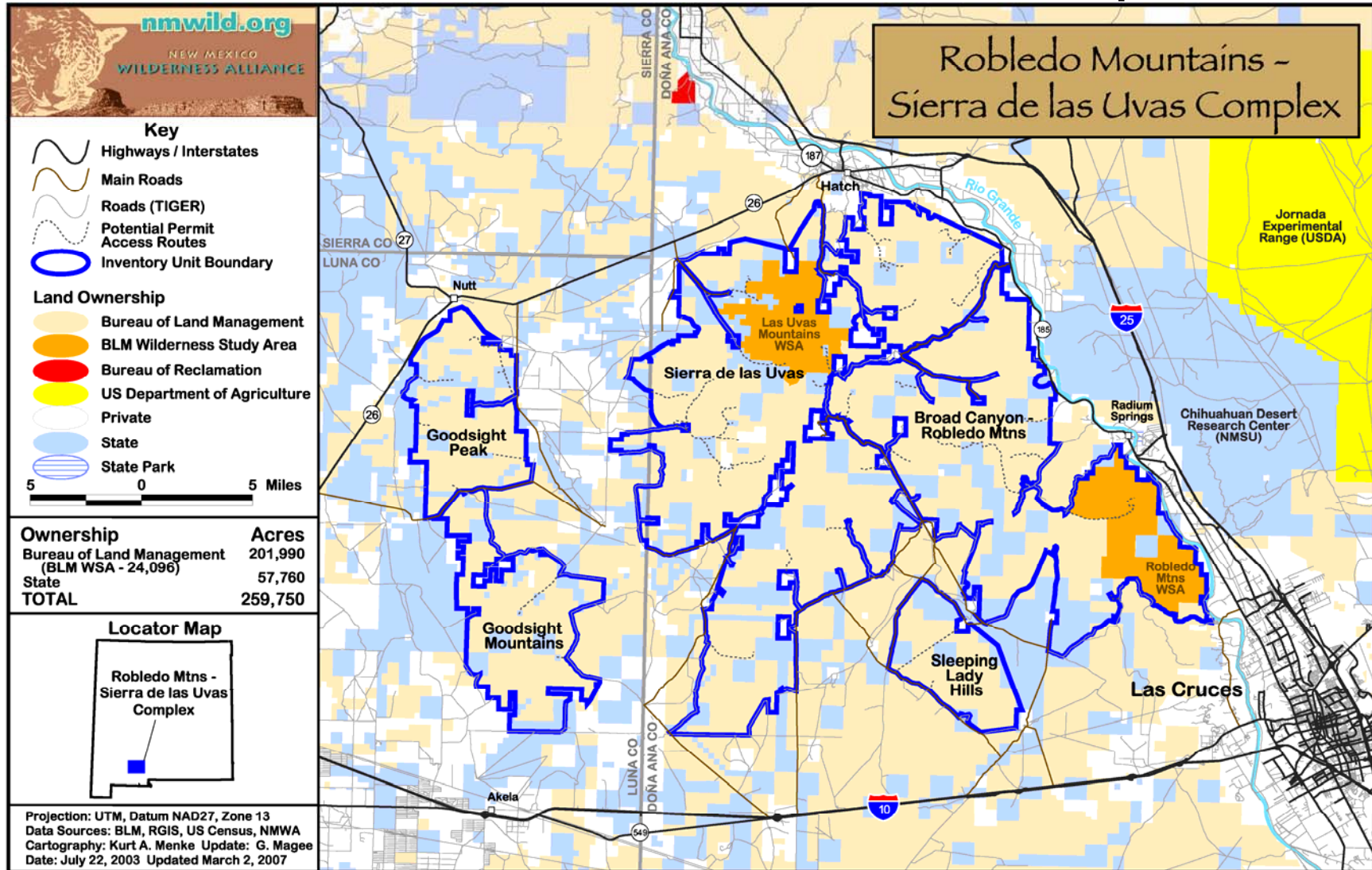
The USGS 7.5 minute maps that cover this complex are: Akela, Cambray, Mount Aden, Sibley Hole, X-7 Ranch, Mount Aden SW, Aden Crater, Afton, Mesquite Lake, POL Ranch, Potrillo Peak, Mount Riley, Kilbourne Hole, Coyote Hill, Camel Mountain, Guzmans Lookout Mountain, Mount Riley SE, and Potrillo.







# Robledo Mountains - Sierra de las Uvas Complex



## Robledo Mtns – Sierra de las Uvas Complex



### Area Description

The Robledo Mountains – Sierra de las Uvas Complex is located in northeastern Luna and northwestern Doña Ana Counties just northwest of Las Cruces. Highway 26 on the north and west, I-10 on the south, and the Rio Grande on the east roughly form the boundaries of the area. An incredibly diverse range of landscape forms and habitat types are found here: juniper-dotted volcanic mountains; dramatic limestone, igneous, and volcanic cliffs; remote grass-covered hills, mesas, and buttes; caves; deep and rugged ‘box’ canyons with riparian habitats; gentle alluvial fan slopes covered with grasses and shrubs; expansive desert

grassland swales; and creosote-dominated lowlands are all found in this exceptional wilderness complex. Elevations within the area range from a low of approximately 4,000 feet near the Rio Grande to over 6,000 feet on Magdalena Peak in the Sierra de las Uvas.



## Ecological Values

The diversity of vegetation types found in this complex is exceptional. Juniper woodland, juniper savannah, and montane shrubs such as mountain mahogany, shrub live oak, and sumac are found in the higher elevations; desert shrub-cactus associations with plants like creosote, ocotillo, sotol, yucca, barrel cactus, penstemon, and lyreleaf greensages in the lower elevations; large areas of black grama grasslands on the mesas of the Sierra de las Uvas; expansive tobosa grass swales in some areas of the desert flats; arroyo riparian areas with plants like velvet ash, netleaf hackberry, soapberry, desert willow, wolfberry, sumac, and sacaton grass in the larger canyons of the area. The lush riparian zone along the Rio Grande is also adjacent to the complex. The Robledo Mountains support an unusually high diversity of cacti, including the State-endangered night-blooming cereus.

Pronghorn, mule deer, mountain lion, bobcat, coyote, bats, rock squirrels and other rodents, quail, and numerous other birds call this area home. The grasslands



found here are important to a declining grassland fauna and provide habitat for rare birds like the Aplomado falcon and Baird's sparrow. The abundance of cliffs in the mountains provides nesting and perching sites for many raptors, including bald and golden eagles, various hawks and owls, and the Federal-endangered peregrine falcon. Reptile diversity is also high; banded rock rattlers, Madrean alligator lizards, and Trans-Pecos rat snakes are all found here, as are other reptiles that reach the northern or western limits of their range.

The complex also contains important watershed values since canyons in the northern and eastern parts of the area direct rainfall to the Rio Grande. These canyons are also important corridors for the movement of animals from the desert areas to water sources along the river.



### Scenic and Recreational Qualities

Scenic quality is exceptionally high within the Robledo Mountains - Sierra de las Uvas complex. Expansive vistas of the wild landscape are afforded from the mountaintops and ridges, while dramatic cliffs, 'box' canyons, and other impressive geologic features can be found throughout the complex. In addition, the Robledo Mountains are an important scenic view-shed for the people living in and traveling through the Rio Grande Valley to the east.

Though relatively close to Las Cruces, the nature and degree of human impacts in the Robledo Mountains – Sierra de las Uvas complex are quite minimal. Affected primarily by the forces of nature, the landscape here has retained its wild character and influence. Rugged terrain and large size also contribute to exceptional opportunities for visitors to enjoy a primitive wilderness experience. Recreational opportunities in the complex are numerous. The varied volcanic, igneous, and sedimentary

outcrops create outstanding opportunities for geological sight seeing as well as mountain and rock climbing, and day-hiking. Parts of the complex have open terrain leading to lonely mesas that provide excellent opportunities for backpacking and horseback riding. The varied features of the complex and the high quality of southern New Mexico sunlight, particularly at sunrise and sunset, provide outstanding opportunities for outdoor photography.

With the population of Las Cruces and El Paso projected to expand dramatically in the next several decades, protection of these remaining wildlands so close to these cities will safeguard a much-needed source of primitive recreation and quiet refuge for citizens of south-central New Mexico and west Texas.



### Special Management Areas

Two Wilderness Study Areas (WSAs) are encompassed within this complex: Robledo Mountains and Las Uvas Mountains. BLM has also declared two Areas of Critical Environmental Concern (ACECs), one in the Robledo Mountains and the other in the Uvas Valley adjacent to the Goodstight Mountains unit. The former was designated in recognition of the biological, scenic, and recreational values found there; and the latter for its excellent example of black grama grassland. In addition, the Butterfield Trail Special Management Area protects the route of the historic overland trail through the area.

### Cultural Values

Archaeological and historic resources are also rich in the Greater Robledo Mountains – Sierra de las Uvas Complex. At least 20 historic and prehistoric sites are known to occur within or adjacent to the Robledo Mountains WSA, including some of the earliest known prehistoric habitation sites in southern New Mexico.



Also included are several undisturbed pothouse villages, two Lithic Indian sites in Horse Canyon, and at least two excellent petroglyph sites in the Sierra de las Uvas. More prehistoric sites likely exist, but no comprehensive survey has taken place. In terms of more recent historic resources, Lookout Peak in the Robledo Mountains was the site of a heliograph station during the early 1880's, used by explorers to communicate with similar stations elsewhere about Apache activities. The historic Butterfield Trail also runs through the area.





### Access Information

The Robledo Mountains – Sierra de las Uvas unit is accessible by several county roads. To reach the southwest portion of the Sierra de las Uvas, take I-10 exit #116, 25 miles west of Las Cruces. Drive north on CR C001 northwest from the interstate for about 8 miles and turn right onto CR D001. Approximately 10 miles to the northeast, CR D001 intersects with CR D005, which runs to the west. The unit lies to the east of CR D001 and to the north of CR D005.

The south-central portion of the Sierra de las Uvas is accessed by CR D012. This is a paved road that leads to the towers on top of Magdalena Peak and creates a long cherry-stem in the inventory area. To get to CR D012, take the Airport exit #131 and travel west along the frontage road for 4 miles to Corralitos Ranch Road, CR C009, and turn right. Take CR C009 north for about 3 miles, then turn right onto CR C007 at the Corralitos Ranch Headquarters. Take CR C007 north for 3½ miles, then turn left on CR D012. In 3 miles to the west, CR D011 comes in on the left. The Sleeping Lady Hills unit is about a mile south from here and can be accessed by CR D011. The paved CR D012 goes on to the west through a pass in the Rough and Ready Hills, then curves to the northwest and continues about 8 miles to the base of the Sierra de las Uvas.

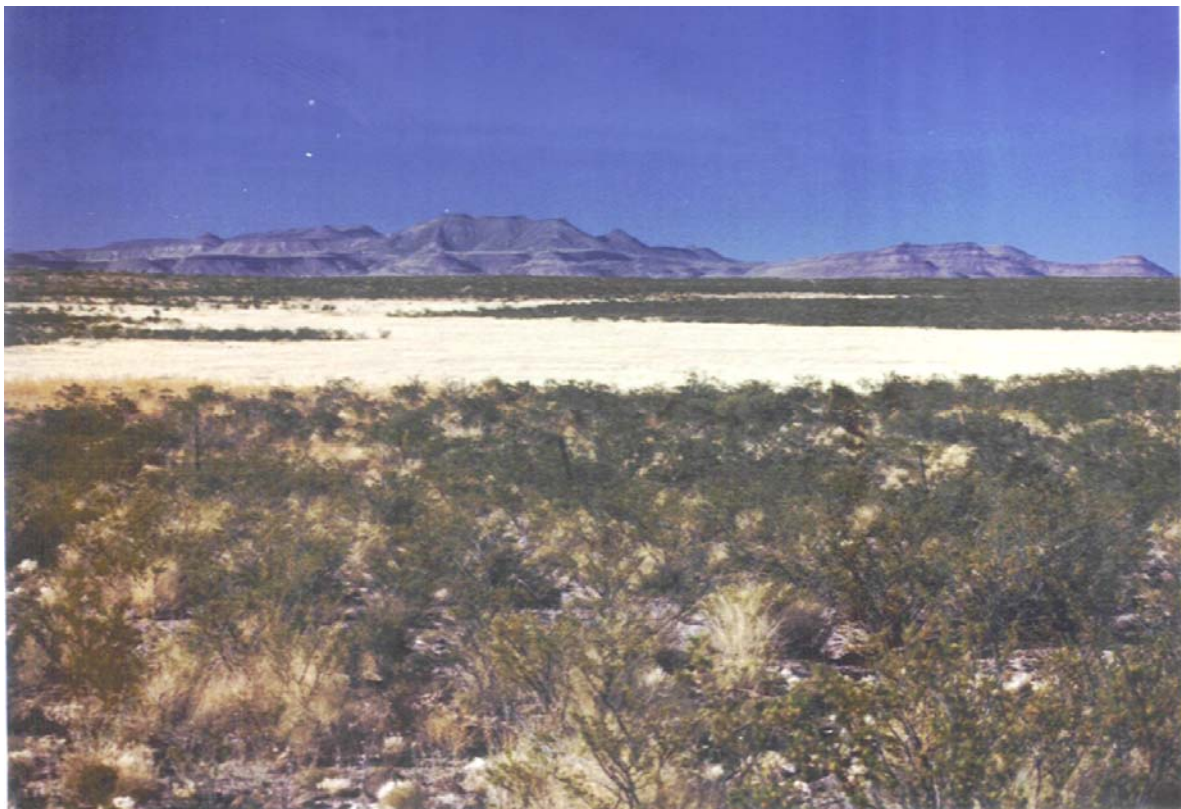
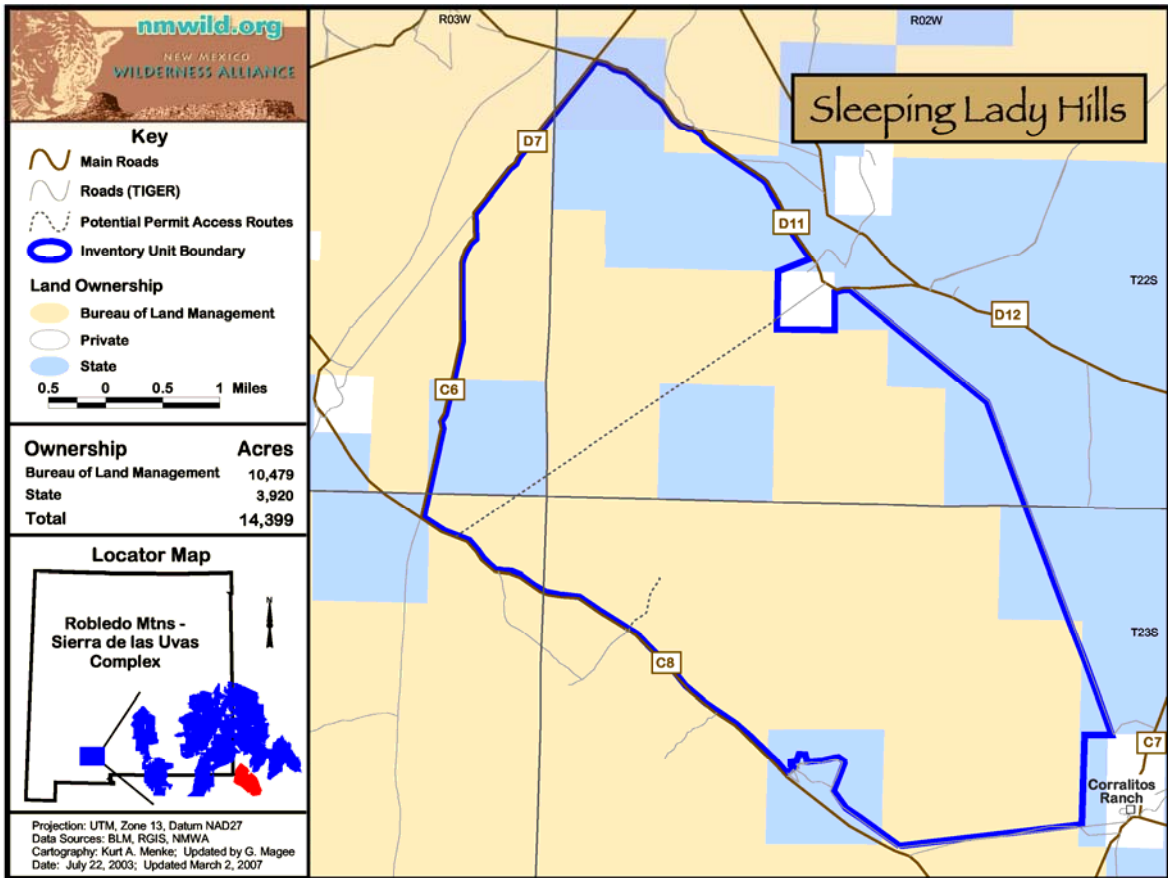
The northeast part of the Sierra de las Uvas is accessed by CR E006. To reach CR E006, take exit #19 off of I-25, about 14 miles north of Las Cruces. Go west on Highway 157 for 1½ miles to Highway 180. Turn right on 180 and go north along the river for about 12 miles, then turn left on CR E006, ¼ mile north of the Border Patrol Check Point.

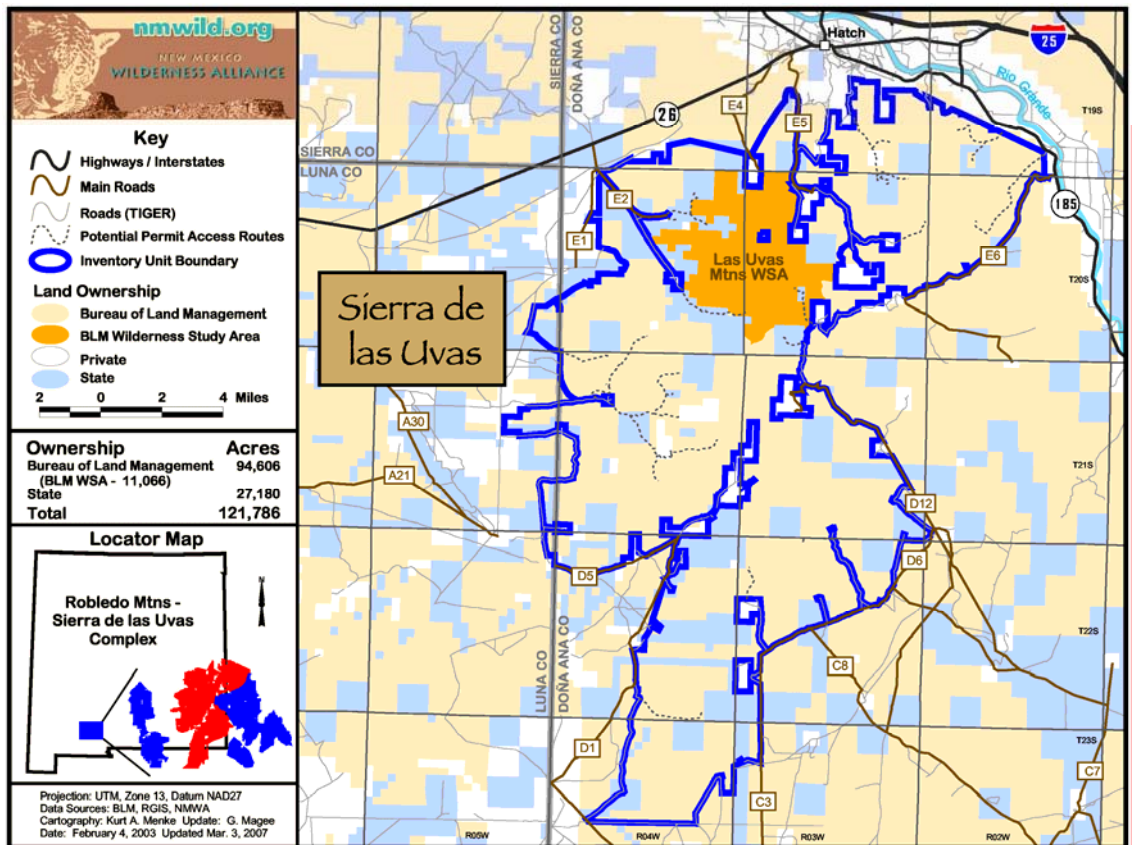
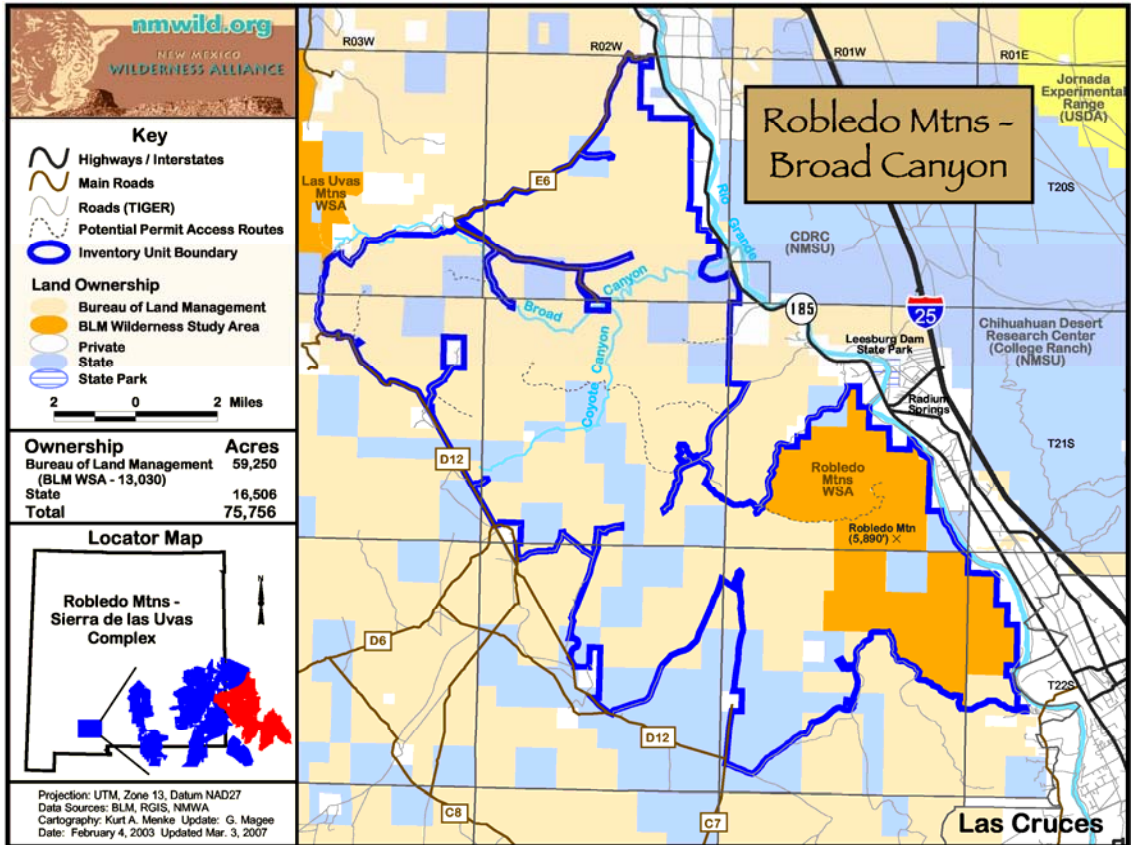
The north and northwest parts of the Sierra de las Uvas are accessed by CR E004 and CR E002. From Hatch, take Highway 26 southwest toward Deming. Both maintained gravel roads come in on the south side of the highway: CR E004 is approximately 2 miles southwest of Hatch, and CR E002 is about 8 miles southwest of Hatch.

To get to the Good sight Peak and Good sight Mountains units, drive northeast from Deming on Highway 26 for 17 miles (or 10½ miles southwest from Nutt) and look for Barksdale Road, CR A021, on the east side of the highway. Drive east on CR A021 for about 8 miles where Good sight Peak is on the north side of the road, and Good sight Mountains are on the south. The Good sight Peak unit also lies a short distance south of Highway 26 at a point 29 miles northeast of Deming and 18 miles southwest of Hatch.

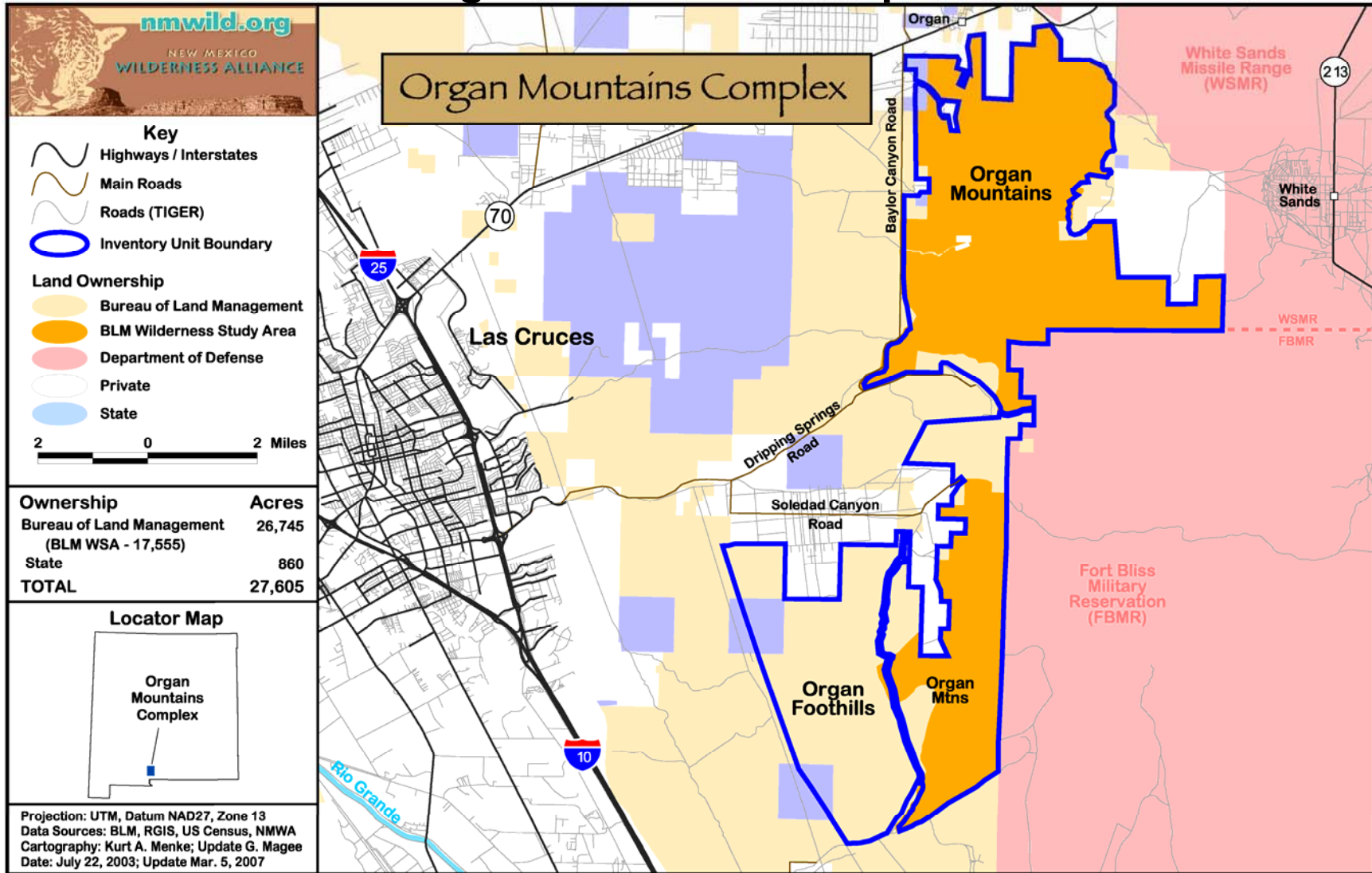
The USGS 7.5 minute maps that cover this complex are: Hatch, Rincon, Hockett, Souse Springs, Sierra Alta, Selden Canyon, Good sight Peak NE, Magdalena Peak, Rough and Ready Hills, Leasburg, Doña Ana, Lazy E Ranch, Magdalena Gap, Sleeping Lady Hills, Picacho Mountain, and Las Cruces.







# Organ Mountains Complex



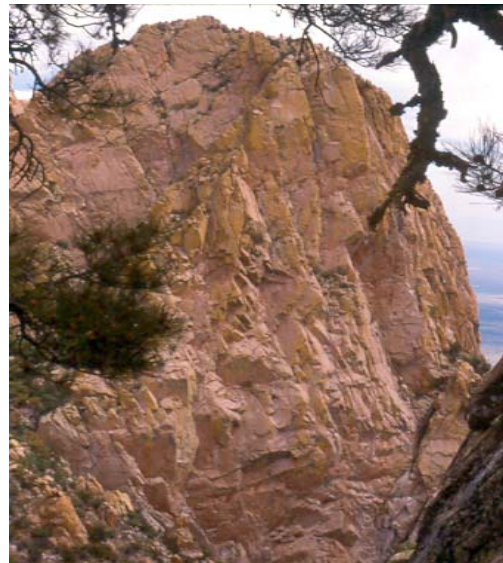
## Organ Mountains Complex



### Area Description

The Organ Mountains Complex is located in eastern Doña Ana County, about 10 to 15 miles east of Las Cruces, NM. Talavera and Organ Mountains, separated only by a bike trail, are the two inventory units within the complex. The Organ Mountains encompass extremely rugged terrain with a multitude of steep-sided crevices, canyons, and spires; and several perennial springs. Organ Needle is the high point in the complex, topping out at slightly over 9,000 feet in elevation. In a mere three miles to the west the elevation drops over 4,000 feet, making the Organ Mountains one of the steepest mountain ranges in the western US. A wide variety of vegetation types are found here, including grasses, mixed desert shrubs, pinyon-juniper woodland, mixed mountain shrubs, and ponderosa pine. Most residents and visitors to Las Cruces are impressed with the picturesque backdrop to the city

provided by the towering peaks of the Organs, so named because of the steep, needle-like spires that resemble the pipes of an organ. The arroyos in the Organ Mountains cut across the rolling mesas to carry storm runoff to the Mesilla Valley and the Rio Grande on the west side and the Tularosa Basin on the east side.



## Ecological Values

The presence of springs in the Organ Mountains makes the area critically important to wildlife including golden eagles, hawks, owls, mule deer, Montezuma quail, and mountain lions. Desert bighorn sheep were historical inhabitants and could be reintroduced.

Special-status animal species occurring in the Organs are the peregrine falcon, an Organ Mountain race of the Colorado chipmunk, and four species of endemic mollusks. Special-status plant species found here include Sneed's pincushion cactus, night-blooming cereus, Organ Mountains pincushion cactus, Villard's pincushion, white-flowered visnaguita, Wright's fishhook cactus, nodding cliff



daisy, long-stemmed flame flower, *Rosa stellata*, Organ Mountain evening primrose, Organ Mountains paintbrush, and smooth figwort, the last three being endemic to the area. Sheer's pincushion cactus may also be present. The diverse plant life also includes black grama grasslands, ocotillo, yuccas, mesquite, sumac, mountain mahogany, oaks, pinyon, juniper, and ponderosa pine.



## Scenic and Recreational Qualities

The quartz monzonite spires of the Organ Needles provide the most spectacular scenery in southern New Mexico, a view that the more than 80,000 inhabitants of Las Cruces see daily. A 9,000-acre portion of the Organs has been designated as a Scenic ACEC. The Organ Needles are massive spires of almost barren rock cleft with narrow chasms containing ribbons of green oak trees. Huge boulders are found resting along the base of spires. The complex also contains canyons of angular blocky rock outcrops arranged in pyramidal patterns, red rhyolite cliffs, and bands of mountain mahogany nestled deep in vertical crevices between

white ridges of volcanic tuff. During the summer growing season, the hills are washed in a bright green hue from the thick carpet of grasses. The scenic resources of the Organs are important to the vast majority of Las Cruces residents, most of which are of the opinion that they should be protected and preserved. The Organs provide a source of considerable civic pride for the residents of Las Cruces.

Outstanding recreational opportunities include hiking, backpacking, horseback riding, birding, and nature photography. Rock climbing in the Organs is well known and nationally significant. The Baylor Pass and Pine Tree National Recreation Trails are found within the complex, as are a series of hiking trails near Dripping Springs National Recreation Area.

### **Special Management Areas**

This complex encompasses the Organ Mountains Wilderness Study Area

(WSA), the Organ Needles WSA, the Peña Blanca WSA, the Organ Mountains Scenic Area of Critical Environmental Concern (ACEC) and a portion of the Organ/Franklin Mountains ACEC, designated to protect the biological, scenic, riparian, special status species, and cultural values of the area.

### **Cultural Values**

Archaeological sights include the La Cueva rock shelter, which was professionally excavated in the 1970's. This excavation provided a significant number of artifacts and data on prehistoric cultures that have inhabited the cave, some as long ago as 7,000 years. The Peña Blanca rock shelters were professionally excavated in the 1980's and contained what were determined to be the earliest known cultivated corn in the US. Other sites in the complex are known to exist but have not been inventoried.





### Access Information

The Organ Mountains are designated a National Recreation Area and there are two developed recreation sites where a fee is charged. Aguirre Springs is on the northeast side of the mountains and has a campground, picnic sites, and developed hiking trails. From exit #6 on I-25, drive northeast from Las Cruces on Highway 70 for 14 miles, and turn right on the Aguirre Springs turnoff. Drive south on the paved road for 5½ miles to the fee area.

Dripping Springs is on the west side of the mountains and has a visitors center, picnic sites, and developed trails. To get there, take the University exit #1 off of I-25 and drive northeast on University for about 10 miles to the visitors center. This road turns to gravel about 4 miles east of town and becomes Dripping Springs Road, CR C077, to the east.

The Baylor Canyon Road, CR D071, which goes between Highway 70 and

Dripping Springs Road, accesses the northwest side of the mountains. The northern terminus of this road intersects Highway 70 about 11 miles northeast of I-25 exit #6; the southern terminus intersects Dripping Springs Road about 8 miles northeast of I-25 exit #1.

To get to the Talavera unit and the south part of the Organ Mountains unit, take the Mesquite exit #151 off of I-10, about 10 miles southeast of Las Cruces. Head northeast from the interstate on the well-graded gravel road. The Talavera unit is on the north side of the road after you cross under the second set of power lines about 3 ½ to 4 miles from the interstate. The Organ Mountains unit is on the north side of the road about 4½ to 5 miles northeast of the interstate.

The USGS 7.5 minute maps that cover this complex are: Organ, Tortugas Mountain, Organ Peak, San Miguel, Bishop Cap.



