

* New Mexico Wild * Animas Valley Women Business Owner Association * Chiricahua Regional Council * Dark Sky New Mexico * Gila Native Plant Society * Friends of the Organ Mountains-Desert Peaks * Heart of the Gila * Las Cruces Green Chamber of Commerce * Malpai Borderlands Group * Monumental Loop *

May 11, 2026

U.S. Bureau of Land Management
New Mexico State Office
Attn: Michael Gibson, Deputy State Director
Division of Minerals
301 Dinosaur Trail
Santa Fe, NM 87508

Submitted via eplanning: <https://eplanning.blm.gov/Project-Home/?id=ae8d6bf4-a7f2-f011-8407-001dd80bcf93>

Re: Comments on Q2 2026 Competitive Geothermal Lease Sale - Las Cruces District Office; DOI-BLM-NM-L000-2026-0002-EA

Dear Bureau of Land Management:

These comments are submitted to the U.S. Bureau of Land Management (BLM) by New Mexico stakeholders including the New Mexico Wilderness Alliance (New Mexico Wild), Animas Valley Women Business Owner Association, Chiricahua Regional Council, Dark Sky New Mexico, Gila Native Plant Society, Friends of the Organ Mountains-Desert Peaks, Heart of the Gila, Las Cruces Green Chamber of Commerce, Malpai Borderlands Group, Monumental Loop, and our tens of thousands of members and supporters in New Mexico and across the country. For decades, our organizations have advocated for responsible stewardship of America's shared natural and cultural heritage on public lands managed by the BLM within New Mexico. We appreciate this opportunity to provide comments on the 2026 Las Cruces District Office Competitive Geothermal Lease Sale Nomination Environmental Assessment (EA). These comments are timely submitted by May 11, 2026.

While we generally support the concept of geothermal energy development in appropriate locations, including on public lands, we are concerned about the BLM's nomination of parcels for geothermal lease sale in areas that have been designated for the protection of important resource values and in areas that may merit administrative designation for the protection of important resource values.

Specifically, one of the sixty-eight parcels included in this proposed geothermal lease sale conflicts with a designated Research Natural Area (RNA) – the Antelope Pass RNA. Additionally, forty of the sixty-eight parcels conflict with Lands with Wilderness

Characteristics Units¹ identified by the BLM and an additional six parcels conflict with areas that New Mexico Wild has inventoried and determined to have wilderness characteristics. In sum, forty-six out of sixty-eight parcels (68% of the parcels nominated for the June 2026 lease sale) overlap with lands that may merit administrative designation and management as Lands with Wilderness Characteristics (LWCs). The BLM's nomination of these parcels as opposed to lands that are already developed, degraded, and/or are not intact needlessly risks needlessly degrading important values through potential geothermal development, including related to research, biodiversity, plant and wildlife habitat, habitat connectivity, functioning hydrologic processes, quiet recreation opportunities, and more. We strongly urge the BLM to not lease any parcels that conflict with existing designated areas or areas that may merit one or more administrative designations.

Additionally, we are concerned with the lack of adequate analysis in the EA and the associated 2008 Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States. This issue is compounded by the very limited public engagement opportunities associated with the EA and related to potential future geothermal development on public lands managed by the BLM's Las Cruces District Office. These issues combine to overly limit transparency for interested members of the public related to the potential adverse effects to a variety of resources and values that may result from potential future geothermal development, as well as a missed opportunity for the BLM to better understand these effects through public comments and associated information sharing with BLM staff.

I. The Antelope Pass Research Natural Area (RNA) should not be leased

Parcel 0738 overlaps with the southeastern portion of the Antelope Pass RNA, which, per the 1993 Mimbres Resource Management Plan (RMP), “features several State-listed and Federal candidate plant and animal species as well as a great diversity of lizard species (19 known species).”² The management goals for the RNA are “...to protect biological and research values, especially lizard diversity and Dixon’s whiptail habitat,” which is to be accomplished, among other management restrictions (termed “Planned Actions” in the RMP), a prohibition on fluid mineral leasing in the RNA.³ “Fluid leasable minerals” are defined in the RMP’s Glossary as, “...oil, gas, and geothermal resources are fluid minerals that are acquired through the mineral leasing process.”⁴ The Antelope Pass RNA is therefore closed to any leasing of geothermal resources and should be removed from the proposed geothermal lease sale.

¹ 2026 Las Cruces District Office Competitive Geothermal Lease Sale Nomination Environmental Assessment (June 2026), p. 10.

² Mimbres Resource Management Plan, Section 5 – ACECs/SMAs, pp. 5-55 (1993), *available at* <https://eplanning.blm.gov/Documents/?id=bcc4d291-a7f2-f011-8407-001dd80db62a&spid=1fffdb54-a8f2-f011-8407-001dd803d7d3#>

³ *Id.*

⁴ *Id.* at p. GL-4.

As a related aside, according to the BLM’s interactive map for this project, parcel 0738 also overlaps with private property (as do several other parcels proposed for lease sale).⁵ If the United States has not reserved the mineral estate on these lands they should also be removed from the proposed geothermal lease sale.

II. Lands that may possess wilderness characteristics should not be leased

The BLM has identified forty parcels nominated for lease sale that intersect with Lands with Wilderness Characteristics units (proposed parcels 0721, 0724, 0722, 0723, 0729, 6914, 6915, 0701, 0685, 6910, 6911, 0686, 0687, 0688, 0689, 0690, 0691, 0725, 0676, 0677, 0712, 6916, 0707, 0706, 0696, 0674, 0684, 0675, 0710, 0700, 6917, 0693, 0683, 0692, 0726, 0718, 0735, 0737, 0738, and 0740).⁶ Eleven of these forty parcels contain lands that were also identified by New Mexico Wild as possessing wilderness characteristics during inventories conducted between 2005 and 2010 (proposed parcels 0721, 0724, 0676, 0677, 0684, 0693, 0692, 0718, 0735, 0740, and 0738). An additional six parcels not identified by the BLM as intersecting with Lands with Wilderness Characteristics units were identified by New Mexico Wild as possessing wilderness characteristics during these same inventories conducted between 2005 and 2010 (proposed parcels 0741, 0717, 0719, 0734, 0733, and 0736). See the Map Appendix on pages 8-13 of this letter for more information on where the seventeen proposed parcels overlap with areas that New Mexico Wild has found via on-the-ground inventories to have wilderness characteristics.

While it is possible that portions of these lands identified by both the BLM and New Mexico Wild as possessing wilderness characteristics have been degraded since they were inventoried, it is also likely that portions of these lands still retain wilderness characteristics that could be lost as a result of access to and/or development resulting from geothermal exploration or development.

BLM Policy Manual 6310 – Conducting Wilderness Characteristics Inventory on BLM Lands – states that BLM must maintain an inventory of all public lands and their resources and other values, including lands with wilderness characteristics (LWCs), on a continuing basis. Further, this Policy Manual states that BLM will determine when it is necessary to update its wilderness characteristics inventory, including when the public or BLM identifies wilderness characteristics as an issue when the BLM is conducting an analysis under the NEPA process, when the BLM is undertaking a land use planning process, or when the BLM has new information concerning resource conditions, including wilderness characteristics information submitted by the public, among other reasons.⁷

⁵ BLM New Mexico Geothermal Lease Sale Parcels, *available at*:

<https://experience.arcgis.com/experience/d0b98e67a13b48209ce71a2706340380>

⁶ 2026 Las Cruces District Office Competitive Geothermal Lease Sale Nomination Environmental Assessment (June 2026), p. 10.

⁷ BLM Policy Manual 6310 – Conducting Wilderness Characteristics Inventory on BLM Lands, 1.6 Policy, A. Maintaining the Inventory, pp. 1-2 to 1-3.

Given the above, the forty sale parcels identified by the BLM as intersecting with Lands with Wilderness Characteristics (as listed above) and the additional six sale parcels that overlap with lands identified by New Mexico Wild as possessing wilderness characteristics (also listed above) should be removed from this proposed lease sale until BLM completes a LWC inventory on surrounding public lands. These parcels should not be leased as part of the June 2026 Competitive Geothermal Lease Sale or in the future if BLM concurs that nominated parcels intersect or overlap with lands have wilderness characteristics. Such lands are likely undeveloped and intact and therefore may be characterized by higher-than-average habitat quality, habitat connectivity, hydrologic function, outstanding quiet recreation opportunities, and other values. Alternatively, only those portions of the proposed parcels that are confirmed to lack wilderness characteristics should be leased.

III. The EA lacks adequate analysis

The EA only analyzes the environmental effects from the proposed action on cultural resources, mineral and energy development, surface hydrology and groundwater quality, and socioeconomics,⁸ dismissing air quality, greenhouse gas emissions, soils, lands with wilderness characteristics, noxious weeds, invasive plants, paleontological resources, dispersed public recreation, lands, access, realty, game and non-game species, human health and safety, and special designation areas as “issues considered but not analyzed in this EA,” or “non-issues.”⁹ Much of the rationale for deeming these important values as “non-issues” that do not merit analysis in the EA is that they were already “analyzed in the 2008 Record of Decision and Resource Management Plan Amendments for Geothermal Leasing in the Western United States and in the 2008 Final Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States”¹⁰ (PEIS).

The PEIS is now 18 years old. Citing analysis that is nearly two decades old for issues such as air quality, greenhouse gas emissions, soils, lands with wilderness characteristics, noxious weeds, invasive plants, dispersed public recreation, wildlife, and special designation areas neglects a very real possibility of substantially changed circumstances related to these values. For example, climate change has resulted in a significant increase in temperatures and drought in the Southwest as compared to 18 years ago, affecting species, habitat integrity, surface water quantity, and more. Geothermal development could easily add to these impacts, for instance by fragmenting habitat. Similarly, the Monumental Loop – the internationally renowned bikepacking route that is a pride and joy and a driver of tourism and the outdoor economy in Doña Ana County – appears to pass through one or more proposed lease sale parcels. This route was established in 2017, 9 years after the PEIS analyzed impacts from geothermal leasing on public dispersed recreation. Again, geothermal development that conflicts with this route or the recreation experience that it offers could impact the growing renown of the region’s backpacking

⁸ 2026 Las Cruces District Office Competitive Geothermal Lease Sale Nomination Environmental Assessment (June 2026), pp. 15-24.

⁹ *Id.* at pp. 10-12.

¹⁰ See, e.g., *Id.* at p. 10.

opportunities. These specific examples illustrate that 18-year-old analysis is insufficient in deeming climate change and recreation to be “non-issues” that do not need to be analyzed in the EA.

It is also reasonable to presume if it is not likely that over the past 18 years, for instance, air quality issues could have increased due to drought (and associated dust) or development; soils and rangeland conditions could have been degraded from drought; lands with wilderness characteristics could have been lost due to development or unmanaged motorized recreation; new noxious weed species of concern could have become established in the region or the extent of existing populations could have expanded; other public recreation activities and patterns could have changed; wildlife species or populations could have become imperiled due to development, climate change, and/or habitat degradation; and/or special designation areas could have been degraded from development, unmanaged recreation, and/or other factors. Again, 18-year-old analysis is insufficient in rationalizing these values as “non-issues” that do not merit analysis in the EA.

In addition, while unlikely, even if circumstances have not changed related to any of the above values over the past nearly two decades, there are problems with the EA citing site-specific evaluation and mitigation measures and established best management practices in the PEIS as rationale for deeming resource values to be “non-issues” that do not necessitate additional analysis. For example, the EA states related to lands with wilderness characteristics, “Effects of future development-stage activities that might occur subsequent to the issuance if a lease would be allowed only following additional site-specific evaluation and mitigation using established best management practices analyzed and proposed in the PEIS.”¹¹ However, the PEIS does not include any best management practices related to lands with wilderness characteristics (and possibly other values) that we are able to identify, rendering this rationale in the EA for not analyzing these effects to be moot. Furthermore, in the response to comments in the PEIS, the BLM states related to wilderness characteristics, “...the BLM must consider in its NEPA analyses possible impacts on wilderness characteristics, if present, and may manage the lands to protect and/or preserve some or all of those characteristics through the local land use planning process.”¹² This is yet another example of why the lack of analysis in the EA related to lands with wilderness characteristics (and possibly other values) is problematic.

The BLM also makes numerous mentions of future site-specific environmental review at the geothermal development stage.¹³ Will the effects of geothermal development on the

¹¹ 2026 Las Cruces District Office Competitive Geothermal Lease Sale Nomination Environmental Assessment (June 2026), p. 10.

¹² Final Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States, Volume I: Programmatic Analysis (October 2008), Appendix L: Public Comments and Comment Analysis, comment response # F-40-4 and others.

¹³ See, e.g., 2026 Las Cruces District Office Competitive Geothermal Lease Sale Nomination Environmental Assessment (June 2026), p. 8.

values deemed to be “non-issues” in this EA – air quality, greenhouse gas emissions, soils, lands with wilderness characteristics, noxious weeds, invasive plants, paleontological resources, dispersed public recreation, lands, access, realty, game and non-game species, human health and safety, and special designation areas – be analyzed at this stage? If yes, will they be analyzed in conjunction with opportunity for public input in an Environmental Assessment or Environmental Impact Statement? Given the lack of analysis in the EA, the BLM should both conduct site specific analysis for any proposal for geothermal exploration or development to analyze the effects on these values and conduct a robust and transparent public input process (scoping and comment periods) associated with this analysis.

IV. Failure to Provide Adequate Opportunities for Public Input

The BLM has failed to provide adequate opportunity to provide public input on this project. The two-week public comment period associated with the EA was announced via an April 27, 2026 press release¹⁴ and outside of tribal consultation, no public scoping period was held for the project.¹⁵ According to the EA, the agency intends to conduct the geothermal lease sale in June 2026, shortly after the conclusion of the comment period.¹⁶

The rushed timeline and truncated procedures for this project stand in stark contrast to the public processes that the BLM has historically undertaken for projects analyzed under Environmental Assessments. We would expect that for this level of analysis that the BLM offers 30-day comment opportunities for both scoping and comment periods. The current 14-day comment period offers inadequate opportunities for New Mexicans to fully understand and evaluate the proposal, and to make their voices heard. This matter could be rectified at least in part if the BLM provides for robust public participation opportunities – both scoping and comment periods – associated with site-specific environmental reviews at the development stage. In addition to providing for transparency about proposed federal actions on federal public lands, public engagement opportunities are important in providing the opportunity for BLM staff to learn from the public about issues they may have overlooked yet are critical in meeting the intent of law, regulation, policy, and/or plan guidance, and/or in protecting important resource values.

V. Conclusion

In conclusion, the 10 signatory organizations listed below have significant concerns with the impacts of geothermal leasing on lands designated for the protection of important resource values and in areas that may merit administrative designation for the protection of important resource values, the lack of adequate analysis in the EA resulting from the

¹⁴ BLM seeks input for June 2026 geothermal lease sale in New Mexico (April 27, 2026), available at: <https://www.blm.gov/announcement/blm-seeks-input-june-2026-geothermal-lease-sale-new-mexico>

¹⁵ 2026 Las Cruces District Office Competitive Geothermal Lease Sale Nomination Environmental Assessment (June 2026), p. 7.

¹⁶ *Id.* at p. 12.

BLM inappropriately dismissing a wide array of values as “non-issues,” and a lack of adequate public engagement opportunities related to this proposed geothermal lease sale.

If you have any questions regarding this letter, please contact Bjorn Fredrickson, Conservation Director at New Mexico Wild, bjorn@nmwild.org. Thank you for your consideration of our comments.

Sincerely,



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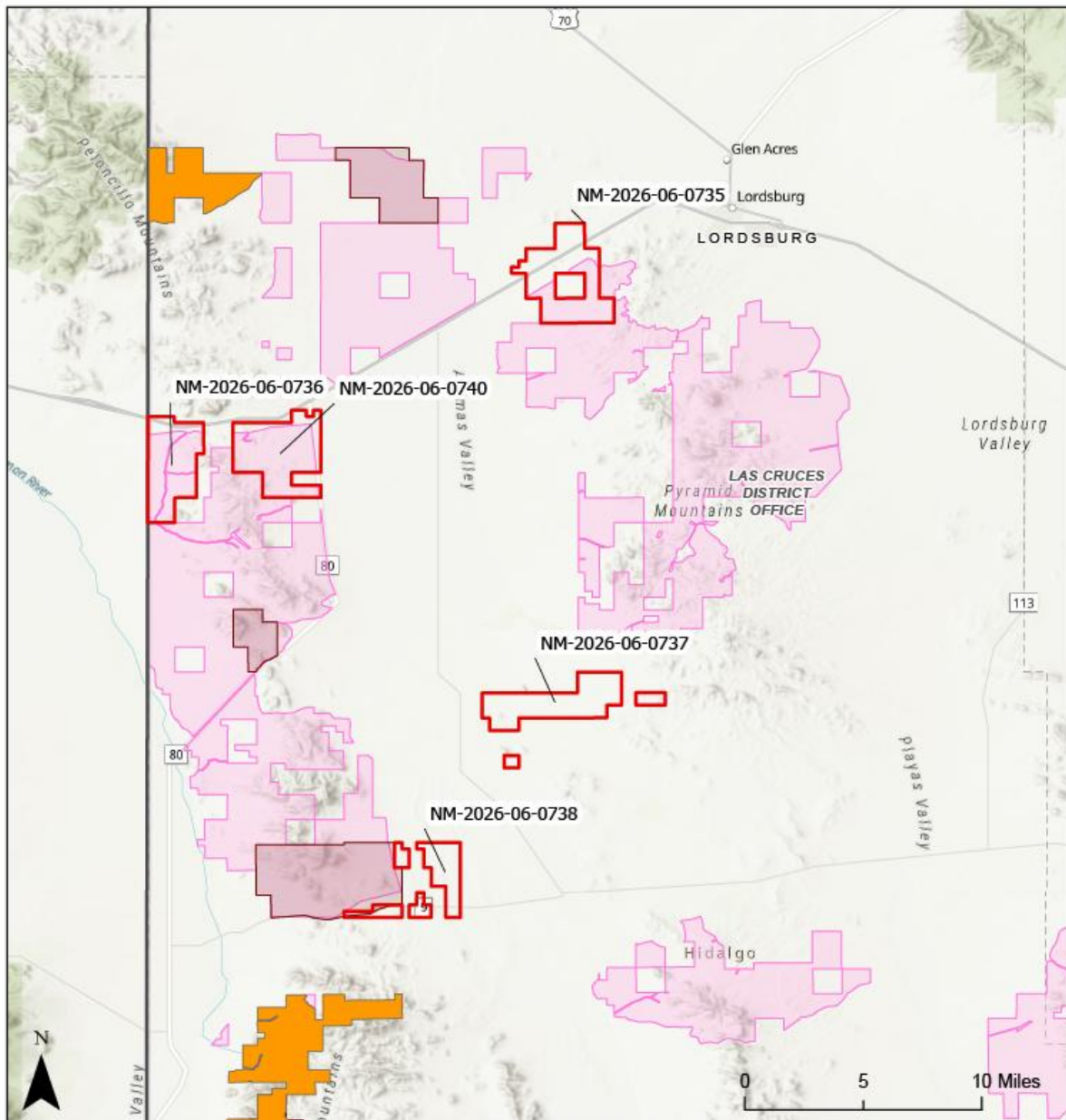
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Map Appendix
(See pages 9-13)

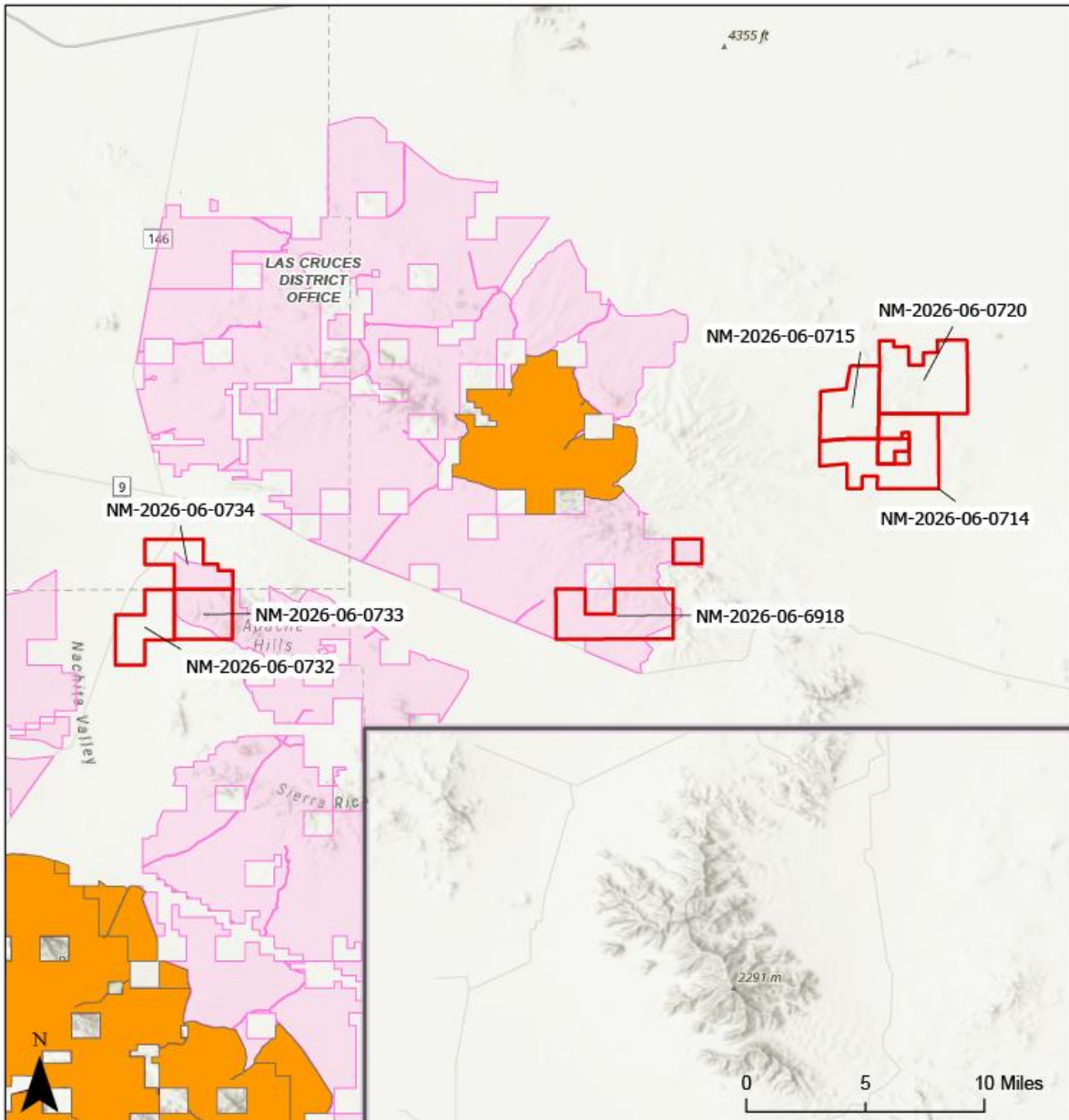


Lands of Concern for Geothermal Lease Sale June 2026 #1






- June 2026 Geothermal Lease Sale draft
- New Mexico Wild Citizen Inventoried Lands
- BLM Areas of Critical Environmental Concern
- BLM Wilderness Study Areas
- BLM Designated Wilderness



5/7/2026

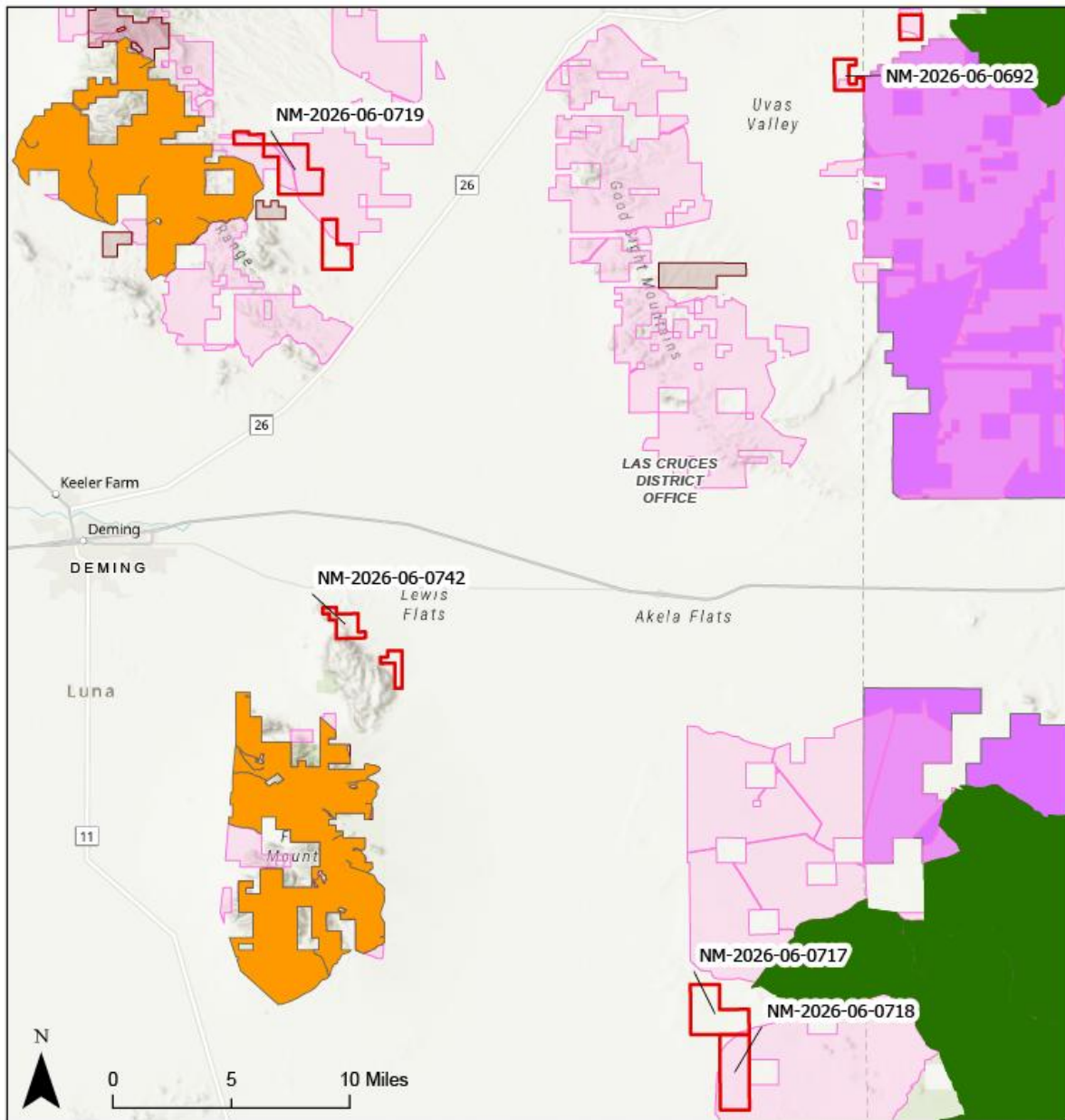


Lands of Concern for Geothermal Lease Sale June 2026 #2

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|---|---|
|  June 2026 Geothermal Lease Sale draft |  BLM Areas of Critical Environmental Concern |
|  New Mexico Wild Citizen Inventoried Lands |  BLM Wilderness Study Areas |
| |  BLM Designated Wilderness |



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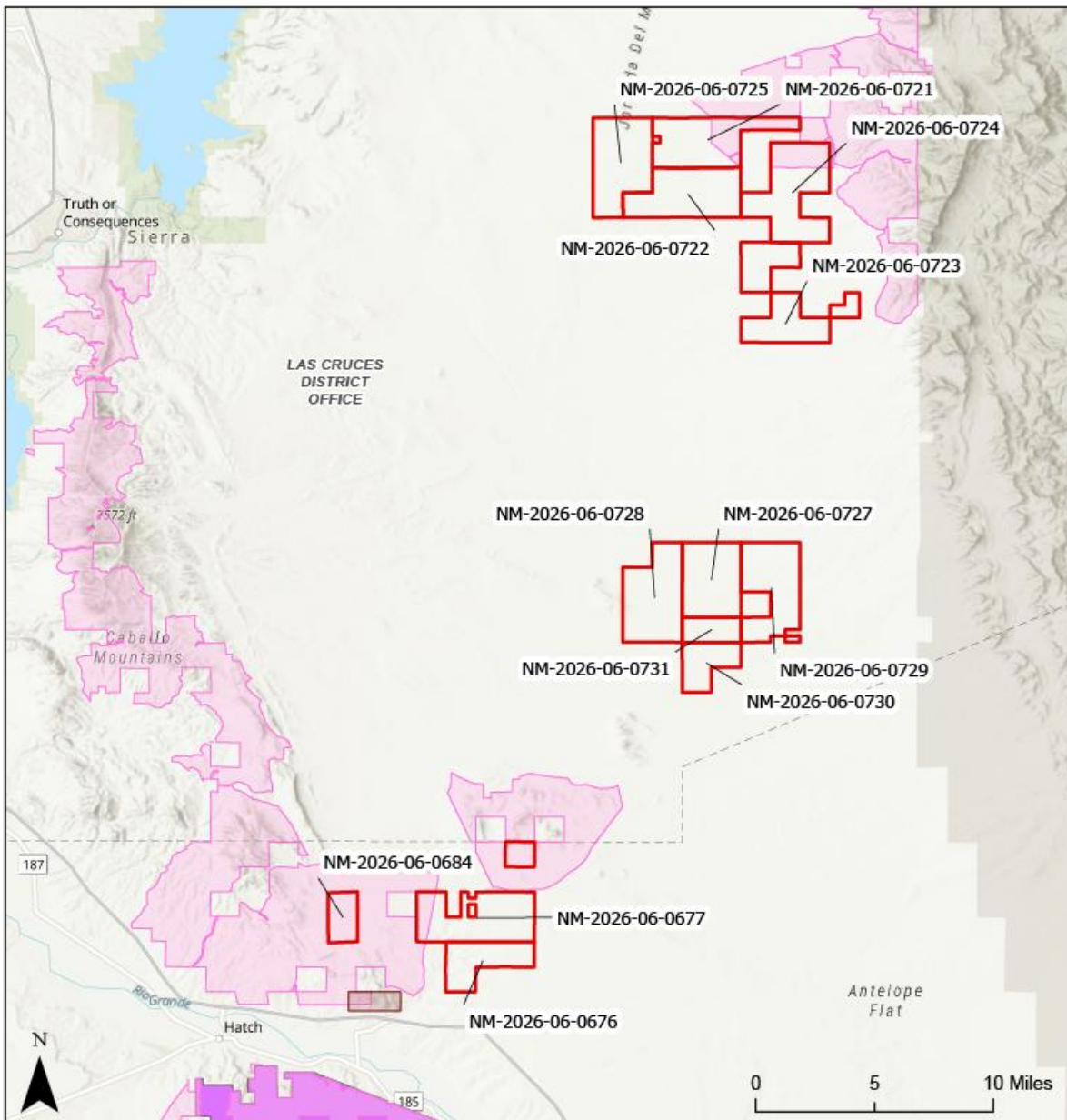


Lands of Concern for Geothermal Lease Sale June 2026 #3







- June 2026 Geothermal Lease Sale draft
- New Mexico Wild Citizen Inventoried Lands
- BLM National Monument
- BLM Areas of Critical Environmental Concern
- BLM Wilderness Study Areas
- BLM Designated Wilderness



5/7/2026

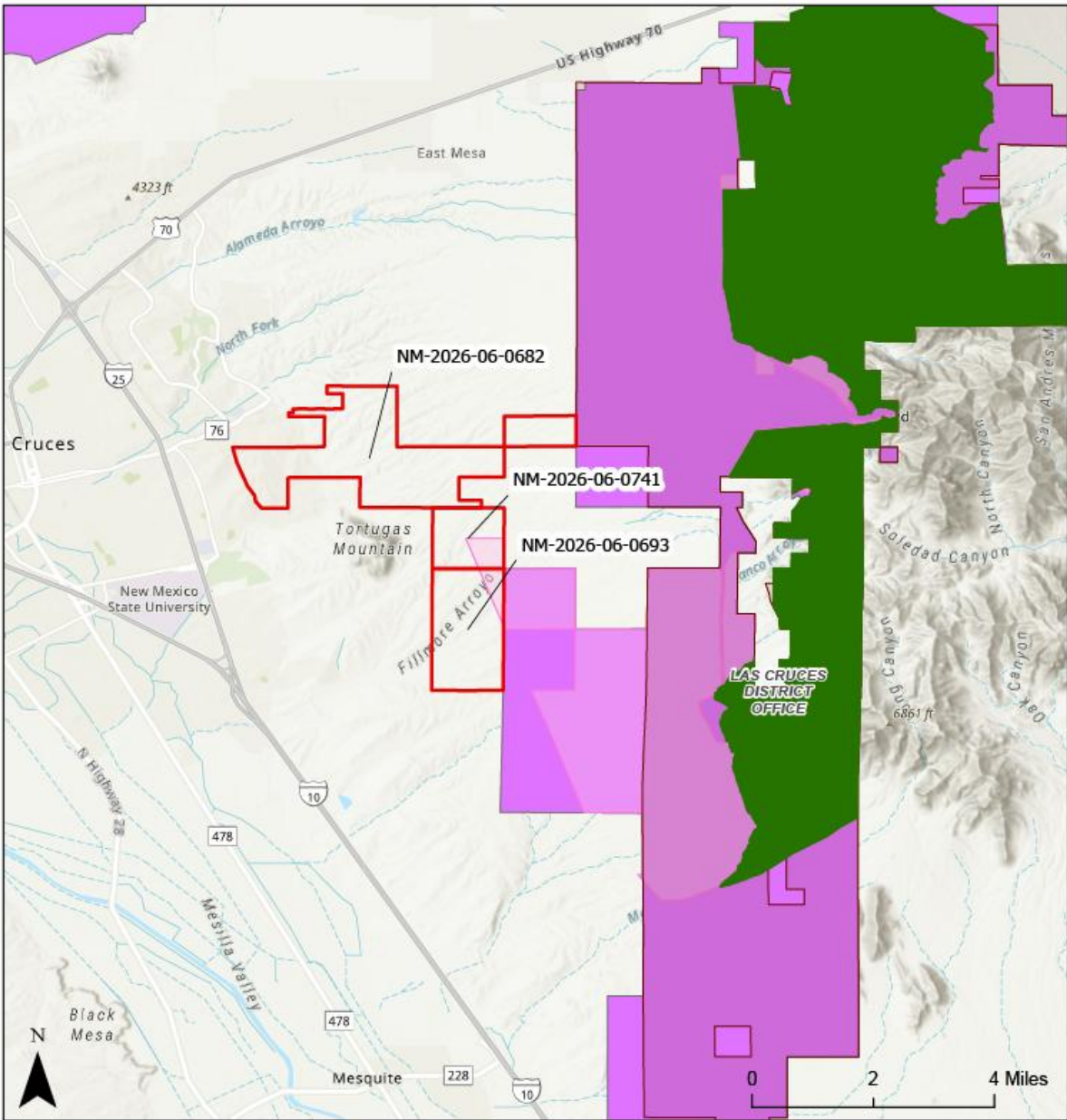


Lands of Concern for Geothermal Lease Sale June 2026 #4







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|  June 2026 Geothermal Lease Sale draft |  BLM Areas of Critical Environmental Concern |
|  New Mexico Wild Citizen Inventoried Lands |  BLM Wilderness Study Areas |
|  BLM National Monument |  BLM Designated Wilderness |



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Lands of Concern for Geothermal Lease Sale June 2026 #5

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|  June 2026 Geothermal Lease Sale draft |  BLM Areas of Critical Environmental Concern |
|  New Mexico Wild Citizen Inventoried Lands |  BLM Wilderness Study Areas |
|  BLM National Monument |  BLM Designated Wilderness |



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