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Monument Review MS-1530,  
U.S. Department of the Interior  
1849 C Street NW  
Washington, DC 20240

**Re:** DOI-2017-0002

The Native Plant Society of New Mexico (NPSNM) respectfully submits the following comments in regards to the Department of Interior review of National Monuments designated under the Antiquities Act of 1906. Our focus is on the two Monuments under review which are located within the state of New Mexico: the Rio Grande del Norte (RGDN) NM and the Organ Mountains-Desert Peaks (OMDP) NM. NPSNM is a non-profit organization with more than 700 members in seven chapters around the state and in El Paso, Texas. Our mission is to educate the public about native plants by promoting knowledge of plant identification, ecology, and uses; foster plant conservation and the preservation of natural habitats; support botanical research; and encourage the appropriate use of native plants to conserve water, land, and wildlife.

Executive Order 13792 directs the Secretary of the Interior to determine whether each National Monument designation or expansion conforms to the policy set forth in the order. In making the requisite determinations, the Secretary is directed to consider:

- (i) the requirements and original objectives of the Act, including the Act's requirement that reservations of land not exceed "the smallest area compatible with the proper care and management of the objects to be protected";
- (ii) whether designated lands are appropriately classified under the Act as "historic landmarks, historic and prehistoric structures, [or] other objects of historic or scientific interest";
- (iii) the effects of a designation on the available uses of designated Federal lands, including consideration of the multiple-use policy of section 102(a)(7) of the Federal Land Policy and Management Act (43 U.S.C. 1701(a)(7)), as well as the effects on the available uses of Federal lands beyond the monument boundaries;

- (iv) the effects of a designation on the use and enjoyment of non-Federal lands within or beyond monument boundaries;
- (v) concerns of State, tribal, and local governments affected by a designation, including the economic development and fiscal condition of affected States, tribes, and localities;
- (vi) the availability of Federal resources to properly manage designated areas; and
- (vii) such other factors as the Secretary deems appropriate.

Our comments primarily address considerations (i) appropriate size of the monuments, (ii) historic and scientific interest, and (v) concerns of State, tribal and local governments.

The five mountain ranges and intervening grasslands of the OMDP NM are exceptionally rich in biodiversity, hosting a very high density of special status species. There are five species of plants endemic to the Organ Mountains range alone. The area surrounding OMDP NM has been identified as an Important Plant Area under the state Rare Plant Conservation Strategy, with a rank of Outstanding, the highest possible rank for biodiversity, and one of the highest biodiversity scores in the state. The entire monument also includes a very high level of what is known as beta diversity, meaning diversity of vegetation types, some of them unique or of very high habitat value for wildlife. Thus the large size of the monument is necessary for the proper care and management of a high diversity of biotic communities in unique proximity to one another, in order to conserve ecologically functional wildlife corridors, transition zones and resilience to climate change. In addition to the assemblage of plant communities in close proximity and generally good condition, the monument protects high value paleontologic, prehistoric, historic, wildlife and geological resources.

In terms of vegetation, the greatest value of the RGDN NM lies in its large expanses of valuable wildlife habitat, such as sagebrush flats and riparian zones. Migratory animals such as elk, and many bird species, need large unfragmented expanses to support their life history strategies. Native plants also provide the basis for ongoing cultural practices of regulated firewood gathering and pinyon nut collection by the public. In addition to important wildlife habitat and cultural landscape, the Monument protects high value prehistoric, geologic and recreational resources.

The proclamations establishing both National Monuments direct that they be managed as part of the Bureau of Land Management's National Conservation Lands system (NCLS). The NCLS offers the American people exceptional opportunities for recreation, solitude, wildlife viewing, history exploration, scientific research, and a wide range of traditional

uses. The program's mission is to conserve, protect, and restore nationally significant landscapes that are recognized for their outstanding cultural, ecological, and scientific values. The NCLS was created in 2000, but without Congressional authorization there was no guarantee that the System would be permanent. In 2009, former New Mexico senator Jeff Bingaman introduced, and Congress passed, the Omnibus Public Lands Management Act, which provides a statutory basis for the NLCS.

Both of our current New Mexico senators, along with two out of our three Congressional representatives, have written to Secretary Zinke to express their strong support for the National Monument designations. OMDP NM has the support of the Cities of Las Cruces and El Paso, the Town of Mesilla, and the Dona Ana County Commission, as well as two tribes native to the area and a long list of local organizations and businesses (see the list of supporters at <https://www.organmountains.org/supporters/community-conservation-supporters/>). A 2012 opinion poll showed that Dona Ana county residents supported the Monument designation by 83% to 10% opposed, with a similar margin of support statewide (<https://www.organmountains.org/supporters/2012-public-opinion-poll-results/>). RGDN NM has the support of the City of Santa Fe, the Towns of Taos and Red River, the village of Questa, the Taos County Commission, and the Taos Pueblo (list of supporters at <http://www.riograndedelnorte.org/support/list-of-supporters/>). The value to local communities of future recreation and tourism dollars will surely be greater and more sustainable than any extractive or development interests that might be hindered by limiting their access to public lands.

The OMDP and RGDN National Monuments embody great historic and scientific value and have the overwhelming support of state and local government entities. Their size is fully compatible with the proper care and management of the objects to be protected. NPSNM urges the Department of the Interior to conclude your review by leaving these designations intact.

Sincerely,

Rachel Jankowitz, Conservation Chair

Native Plant Society of New Mexico