

## Native Plant Society of New Mexico

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Albuquerque, NM 87176-5388

November 5, 2018

Dear BLM Carlsbad Field Office:

This letter is in response to your request for public comment on the Draft Resource Management Plan/ Environmental Impact Statement. The updated Plan will replace the existing 1988 Plan. It is intended to provide a comprehensive framework for managing public lands and mineral estate in portions of Eddy, Lea and Chaves Counties, southeastern New Mexico. This comment is submitted on behalf of the Native Plant Society of NM, a non-profit with approximately 900 members in seven chapters located 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.

BLM staff have been working on the new RMP since at least 2011 (the date of the scoping report). This effort has resulted in a Draft RMP/EIS that does indeed seem to be comprehensive. However, it is also voluminous, many terms are poorly defined, and the whole thing is not organized in a way that would provide easy access to the information therein by persons not already familiar with the document. The four Action Alternatives are given narrative theme descriptions, but, other than Alternative D, which would maximize commercial development, it is not consistently made clear in what way the specific proposals in each Alternative correspond to those themes. Similarly, it is not always clear what management policies are associated with the No Action alternative. Action Alternative C is identified as the BLM Preferred Alternative. NPSNM recommends, as is suggested in the "Dear Reader Letter", that a "new or modified alternative" be developed, incorporating those elements of Action Alternatives A, B and C which best facilitate progress toward the conservation of native plants and plant communities, as laid out in the remainder of this letter.

Cross-country OHV travel is harmful to vegetation both directly and through generation of dust and soil compaction. As best we can tell from the Draft RMP/EIS document, the Carlsbad FO intends to conduct a separate travel management planning process, subsequent to approval of the new RMP. On Table 2-15, the No Action Alternative column states that "Approximately 2,011,506 acres would be designated open for OHV use" (open is defined on page 4-346 as "open to unlimited cross-country travel"), and also that "Approximately 2,035,307 acres would be managed as OHV limited". Both statements cannot be true on the 2,093,000 acres of BLM surface; however, all of the Action Alternatives include the statement "The OHV Limited designation would limit all OHV use to the same manner and degree occurring at the time of the designation in the RMP." It is not clear what this means in areas that are currently designated open. In

any case, NPSNM supports the need for comprehensive travel management planning, and limiting OHVs to existing routes until that potentially lengthy process is completed.

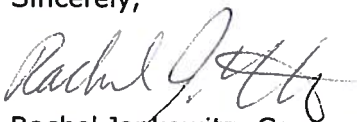
NPSNM supports special designation for locations whose identified values include rare plants or plant communities, in order to facilitate identifying and implementing management measures for their conservation. As best we can tell from the Draft RMP/EIS document, those include Pecos River Canyons Complex, Dark Canyon, Seven Rivers, Gypsum Soils, Blue Springs, Chosa Draw, Lonesome Ridge, Serpentine Bends, Six Shooter, and Chihuahuan Desert Rivers. Some of the Action Alternatives propose the consolidation of existing special designated areas into new ACECs. The conservation implications of doing so are not explained in the Draft document, but it does seem logical that consolidation would facilitate management for the conservation of important values.

Wetlands, including riparian corridors, constitute rare and valuable habitat in arid environments. NPSNM supports management policies that protect these habitats from adverse impact. Policies proposed under the various RMP Alternatives, which would accomplish needed protections, include establishing a Playa Management Plan; No Surface Occupancy for a buffer zone around playas and seeps and springs; grazing and OHV closures where tamarisk treatments have made river banks newly accessible to cattle and motorized vehicles; and nominating all suitable river reaches for Wild and Scenic designation. It should also be noted that the likely original native riparian vegetation within the planning area was grass or shrub dominated, with scattered stands of tall woody vegetation. Restoration efforts should take into account the local soil and hydrologic conditions, and avoid planting cottonwoods in places that may be more suited to shrubby, grassy, or emergent herbaceous dominated plant communities.

A very large proportion of the surface area managed by the Carlsbad FO is already under lease for oil and gas development. Since lease stipulations can't be imposed retroactively, NPSNM encourages the use of the strongest available Conditions of Approval and Best Management Practices to minimize adverse impact to vegetation resources.

Thank you for the opportunity to provide public comment on this planning process.

Sincerely,



Rachel Jankowitz, Conservation Chair  
Native Plant Society of New Mexico