



Native Plant Society of New Mexico

P. O. Box 35388

Albuquerque, NM 87176-5388

September 9, 2020

BLM Farmington Field Office
Attn.: Sarah Scott, Project Manager
6251 College Blvd, Suite A, Farmington, NM 87402

BIA Navajo Regional Office
Attn.: Robert Begay, Project Manager
P.O. Box 1060, Gallup, NM 87301

Re: Farmington Mancos-Gallup Draft Resource Management Plan Amendment and associated Environmental Impact Statement (RMPA/EIS)

Thank you for this opportunity to comment on the above referenced document. 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.

The agencies have produced a Draft RMPA/EIS document that is clear and coherent for the public, especially considering the many years of development, and substantial changes to the project during the planning process. For the BLM, this RMPA will amend the Farmington Field Office 2003 Resource Management Plan, to analyze the potential impacts from changing oil and gas development patterns. For the BIA, the EIS will be used to evaluate alternatives and issues related to its authority over mineral leasing and associated activity decisions in the planning area.

BLM and BIA each put forth for analysis a No Action alternative, and four action alternatives labelled A through D. The agency Preferred Alternative in both cases is Alternative C. NPSNM supports BLM Alternative A. Alternatives A and B are the only ones which would reduce the number of new wells and acres of surface disturbance, which is already extreme in parts of the planning area, relative to the No Action alternative. They are also the only alternatives to protect fragile soils from right-of-way development. We support Alternative A because it includes 6800 acres of Plant Conservation Areas where No Surface Occupancy and right-of-way

withdrawal would be stipulated. Alternative A also has stronger pre-project requirements to survey suitable habitat for special status plants. NPSNM cannot support any of the BIA alternatives. None of them, including the No Action alternative, includes provisions likely to provide much protection for rare plants or vegetative community health.

Ozone is harmful to plants, causing injury to individual plants and reduction in biomass productivity even without visible symptoms (exact effects will depend on the species). Reduction in biomass of wild plants may adversely affect the herbivores that consume them. A large body of research has shown that adverse effects may begin at current ambient levels of ozone, and increase above those levels. The adverse effects to plant health of ozone and other stressors such as climate change may be synergistic. The planning area is within 95% of the National Ambient Air Quality Standard for ozone. Alternatives A and B are predicted to produce lower oil and gas related emissions than the other alternatives, resulting in less impact to the vegetation of the planning area, the adjacent San Pedro Parks Clean Air Act Class I area, and several nearby sensitive Class II areas. Even under Alternative A, it is predicted based on modelling that the NAAQS indicator for 8-hour ozone could be exceeded.

In Section 3.4.6, "Noxious Weeds and Invasive Plants", the Draft RMPA/EIS says that "Observations indicate some noxious weeds and invasive plants are spreading or increasing in density in parts of the planning area, especially in oil and gas fields, along roadways, and in some watersheds" and "control objectives are not being fully met. This is because of the large scale of infestations and lack of resources needed to treat these species." Yet, "There are no BLM decisions being considered that would affect noxious weeds and invasive plants". Table 2-2 states that "vegetation treatments may include thinning, prescribed fire, selective herbicides appropriate to the community type, wood gathering and cutting, commercial cutting, seedings, shrub planting, and other treatments approved for BLM use." NPSNM respectfully suggests that weed management above the current level of effort be prioritized as a form of vegetation treatment, until the trajectory can be reversed toward meeting weed control objectives.

Please make all the corrections to Chapter 3.4.8, "Special Status Species and Species of Special Management Concern", as recommended during the public comment period by the NM Energy, Minerals and Natural Resources Department. Please also follow their recommendation that rare plant surveys must be conducted in the appropriate flowering season, by a qualified biologist.

Please update Table 3-100 to show the NM state endangered status of Clover's cactus (effective date July 28, 2020). According to the EMNRD rule change proposal, oil & gas development remains the most significant threat to most populations of the species, and especially to the largest population, which occurs in the vicinity of Lybrook. Eighty percent of known occupied sites and habitat occur

within areas of active oil & gas leases on BLM lands. The entire range of the species was identified as having a very high potential for oil & gas development, with the highest development potential in the Lybrook area. Due to the current and potential scale of surface disturbance within its limited range, and the documented mediocre success rate of transplantation of Clover's cactus, transplanting should be accepted as mitigation only in accordance with an approved species conservation plan, with compulsory mitigation measures, to assure that incremental and cumulative impacts to the species are sustainable.

Sincerely,

Rachel Jankowitz, Conservation Chair
Native Plant Society of New Mexico