U.S. Department of the Interior
Bureau of Land Management

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# PROPOSED

# TAOS RESOURCE MANAGEMENT PLAN AMENDMENT AND ENVIRONMENTAL ASSESSMENT FOR THE RÍO GRANDE DEL NORTE NATIONAL MONUMENT MANAGEMENT PLAN

Photo courtesy of BLM New Mexico

**BLM Mission**
The Bureau of Land Management's mission is to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations.

NATIONAL CONSERVATION LANDS

**Mission**
Conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations.

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**September 2024**

U.S. DEPARTMENT OF THE INTERIOR

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## List of Acronyms and Abbreviations

| Term | Definition |
|---|---|
| ACEC | Area of Critical Environmental Concern |
| AIM | Assessment, Inventory, and Monitoring |
| AUM | Animal Unit Month |
| BA | Biological Assessment |
| BLM | United States Department of the Interior, Bureau of Land Management |
| BMP | Best Management Practice |
| CFR | Code of Federal Regulations |
| CWA | Clean Water Act |
| Dingell Jr. Act | John D. Dingell, Jr. Conservation, Management, and Recreation Act |
| EA | Environmental Assessment |
| e-bikes | electric bicycles |
| EIS | Environmental Impact Statement |
| EO | Executive Order |
| ERMA | Extensive Recreation Management Area |
| ESA | Endangered Species Act |
| FLPMA | Federal Land Policy and Management Act of 1976, as amended |
| FMP | Fire Management Plan |
| FONSI | Finding of No Significant Impact |
| FR | *Federal Register* |
| GIS | geographic information system |
| HCPI | Historic Cultural Property Inventory |
| HMA | Habitat Management Area |
| HUC | Hydrologic Unit Code |
| IDT | Interdisciplinary Team |
| IM | Instruction Memorandum |
| LANDFIRE | Landscape Fire and Resource Management Planning Tools |
| LWD | large woody debris |
| Monument | Río Grande del Norte National Monument |
| NEPA | National Environmental Policy Act |
| NHPA | National Historic Preservation Act |
| NISIMS | National Invasive Species Information Management System |
| NLCS | National Landscape Conservation System |
| NMDA | New Mexico Department of Agriculture |
| NMDGF | New Mexico Department of Game and Fish |
| NMED | New Mexico Environment Department |

| Term | Definition |
|---|---|
| NOI | Notice of Intent |
| NRCS | Natural Resource Conservation Service |
| NWI | National Wetlands Inventory |
| OHV | off-highway vehicle |
| ONRW | Outstanding National Resource Water |
| ORV | outstandingly remarkable value |
| OSNHT | Old Spanish National Historic Trail |
| PRMP/FEIS | Proposed Resource Management Plan/Final Environmental Impact Statement |
| R&I | relevant and important |
| RFFA | reasonably foreseeable future action |
| RMA | Recreation Management Area |
| RMP | Resource Management Plan |
| RMPA | Resource Management Plan amendment |
| RMZ | Recreation Management Zone |
| ROW | right of way |
| SHPO | State Historic Preservation Office |
| SOP | Standard Operating Procedure |
| SRMA | Special Recreation Management Area |
| SRP | Special Recreation Permit |
| State Trust Land | 39,125 acres are under jurisdiction of the New Mexico State Land Office |
| TMA | Travel Management Area |
| TMP | Travel Management Plan |
| US | United States |
| USC | United States Code |
| USDA | U.S. Department of Agriculture |
| USFS | US Forest Service |
| USFWS | U.S. Fish and Wildlife Service |
| VCC | vegetation condition class |
| VRI | Visual Resource Inventory |
| VRM | Visual Resource Management |
| WSA | Wilderness Study Area |
| WSR | Wild and Scenic River |

# 1 Introduction

The United States (US) Department of the Interior, Bureau of Land Management (BLM) Taos Field Office and BLM New Mexico State Director are proposing to prepare a Resource Management Plan (RMP) Amendment and associated Environmental Assessment (EA) for the Río Grande del Norte National Monument (Monument) Management Plan. Current management for the Monument would be updated by amending the 2012 Taos RMP. The Proposed RMP amendment (RMPA) would change goals, objectives, and management decisions, as described in Chapter 2, *Alternatives*, to provide for the protection and restoration of the Monument objects identified in Presidential Proclamation 8946 (see Appendix A, *Presidential Proclamation 8946 and Other Laws, Regulations, Policies and Plans*), which established the Monument. This EA describes and analyzes the Proposed RMPA.

## 1.1 Background and Planning Area

On March 25, 2013, President Obama signed Proclamation 8946, which established the Monument and identified cultural and historic resources, ecological diversity, geological features, and wildlife resources and their associated landscapes as objects that the Monument was designated to protect, preserve, and restore. The Taos Field Office originally initiated preparation of a management plan for the Monument in January 2014.

In April 2017, the effort to prepare the Monument Management Plan was put on hold with the issuance of Executive Order (EO) 13792, *Review of Designations Under the Antiquities Act*, which included Río Grande del Norte National Monument among those designations placed under review. Because expending resources on the Monument planning effort would have been contradictory to this review, the Monument planning process was suspended.

In March 2021, EO 13792 was rescinded, and the Taos Field Office was directed to proceed with its Monument planning effort. Because the 2012 Taos RMP was completed at the time Proclamation 8946 established the Monument, and the BLM does not anticipate needing substantial changes to how the Monument is currently being managed under the 2012 Taos RMP, an EA-level plan amendment has been determined to be the appropriate means of streamlining the process now that planning for the Monument is once again proceeding. The BLM believes that the purposes for which the Monument was designated—the protection, preservation, and restoration of important resource values—can be achieved without substantial changes to its current management. Under the 2012 Taos RMP, the Monument lands are being managed as two Areas of Critical Environmental Concern (ACECs), which provide management largely consistent with the purposes of the Monument's designation.

The BLM's *Land Use Planning Handbook* (H-1601-1) (BLM 2005) differentiates between geographic areas associated with planning. These areas include the planning area, decision area, and analysis area.

- The ***planning area*** is the geographic area within which the BLM would propose management decisions during a planning effort. The planning area encompasses lands within the Monument boundary, regardless of surface ownership or jurisdiction (see Appendix B, Map B.1). The planning area totals approximately 310,793 acres, 242,668 acres of which are BLM-administered lands; 39,125 acres are under jurisdiction of the New Mexico State Land Office (State Trust Land), and 29,000 acres are privately held.
- The ***decision area*** includes all public land in the planning area for which the BLM has authority to make land-use decisions (Appendix B, Map B.1). Generally, the BLM has jurisdiction over all BLM-administered lands (surface and subsurface) and over subsurface minerals in areas of split estate (i.e., the surface is owned by a non-federal entity, such as the State Trust Land or private land). The decision area is limited to the 242,668 acres of BLM-administered lands in the Monument.
- The ***analysis area*** includes any lands, regardless of jurisdiction, for which the BLM synthesizes, analyzes, and interprets information that relates to planning for BLM-administered land. For the RMPA/EA, this may include all lands within Rio Arriba County and Taos County, regardless of jurisdiction or ownership, depending on the resource or resource use. The analysis area can be any size, can vary according to the resource, and can be located anywhere within, around, partially outside, or completely outside the planning or decision areas. The cumulative effects analysis areas in the RMPA/EA may expand beyond these general planning boundaries, depending on the resource or resource use.

## 1.2 Purpose and Need

The need for the Taos RMPA was established by Presidential Proclamation 8946, which designated the Monument. The Proclamation states, “For purposes of protecting and restoring the objects…the Secretary, through the BLM, would prepare and maintain a management plan….” An amendment to the Taos RMP is necessary—as mandated by the Proclamation—for providing the management guidance critical for ensuring the Monument objects are preserved (Appendix A).

The Federal Land Policy and Management Act of 1976, as amended (FLPMA), which established public land policy, also requires the BLM to “develop, maintain, and, when appropriate, revise land-use plans” for the management of public lands. Furthermore, it is BLM policy that each Monument has an independent decision document that specifies the management guidance for that Monument.

In addition to these mandates, an amendment to the Taos RMP is necessary to address the new information that has been accrued and the changed circumstances the Monument has experienced since its designation in 2013. New surveys of seeps and springs, cultural resources, sagebrush distribution, sensitive species, and wildlife corridors, among other resources, have been conducted in recent years that add to the BLM’s catalogue of best-available information. This new information would enable the BLM to reevaluate and adjust its

current management of the Monument under an amended Taos RMP. Changed circumstances include increased demand for recreational opportunities and increased pressure on recreational facilities and infrastructure within the Monument. The public is seeking a wider array of trail-use opportunities, particularly around the communities of Taos and Questa, and increased pressure on existing trails and recreational facilities has been especially evident since the onset of the COVID-19 pandemic. Trailhead parking is regularly at or exceeds capacity throughout much of the Monument.

Opportunities for new rights of way (ROWs) for electrical transmission in support of renewable energy development is an evolving circumstance that may require new authorizations consistent with the parameters specified in Proclamation 8946. Changed circumstances regarding climatic conditions also require careful management considerations for a broad spectrum of resources in an updated plan, including those contributing to the objects for which the Monument was established to protect.

A RMPA is also necessary for providing protective management of Cerro del Yuta Wilderness and Rio San Antonio Wilderness, designated by Congress in 2019. Wilderness areas are required to be managed according to the provisions of the Wilderness Act of 1964, and this management plan would provide the framework for the implementation-level wilderness plans that would be completed once a management plan is approved. This Proposed RMPA/EA would also consider designating lands with wilderness characteristics and a new wilderness study area as options to further protect Monument objects. As specified in Presidential Proclamation 8946, the overarching purpose of this action—the Proposed RMPA/EA—is to provide for the protection and restoration of the Monument objects presented below and allow for the enjoyment and use of the Monument lands and resources through recreation, traditional uses, and other means. The management plan would establish goals and objectives and identify allocations and allowable uses to achieve a balance of protection and use for the Monument. More specifically, the BLM seeks to achieve the objectives outlined below under the guidance of an approved management plan.

- Protect Monument objects listed under the Proclamation.
    - Provide protection and preservation of cultural resources and the integrity of cultural landscapes from conflicts that have emerged from resource uses. The BLM also has an opportunity to promote stewardship, interpretation, and an understanding of the area's ethnographic data, as well as provide opportunities for Tribal co-stewardship.
    - Provide for the protection and restoration of the Monument's ecological diversity. The BLM would foster resistance and resilience of diverse, native vegetative communities in the face of changing climate and water conditions and public use. The BLM would identify opportunities for sustaining the health of a broad range of species, their habitats, and conditions that contribute to the ecological diversity of the Monument, including, for example, various special status species, pollinators, and soils, in the face of the same challenges. The BLM would also update strategies and practices for enhancing wildlife corridors and restoring vegetative communities through treatments and management of fuels.

  - Provide for the protection and restoration of diverse terrestrial and aquatic wildlife populations and their habitats, including threatened and endangered species and other special status species and their habitats. The BLM would minimize fragmentation of seasonal habitats, strengthen habitat connectivity, and reduce the displacement of wildlife from those habitats, while allowing for recreational and traditional uses of the Monument.
  - Protect the geologic features, functions, and visual integrity of the Monument, while balancing the increased recreational use, demand for ROWs, and other uses that could affect Monument lands.

- Resolve conflicts between recreational and other uses and protect Monument objects.
  - Provide for a variety of recreational opportunities in diverse settings in an effort to meet the demand of the public and resolve conflicts between recreational use, livestock grazing, and the protection of Monument objects.
  - Provide for traditional uses of the public lands in a manner consistent with the protection, preservation, and restoration of Monument objects. Traditional uses are very important to sustaining cultural customs and traditions of local populations, such as those associated with food, shelter, and other basic human needs. Traditional uses include livestock grazing[1] fuelwood collection, piñon nut collection, herb collection, hunting, fishing, and other similar uses.
  - Allow for motorized and nonmotorized access to the Monument, as consistent with the Proclamation (which states "except for emergency or authorized administrative purposes, motorized vehicle use in the Monument shall be permitted only on designated roads and nonmotorized mechanized vehicle use shall be permitted only on designated roads and trails"), for traditional uses, livestock grazing, fuelwood collection, and recreational opportunities, while protecting Monument objects. A long-term, sustainable travel and transportation network must be defined by allocations necessary to provide access while preventing any degradation to Monument objects, wild and scenic river (WSR) corridors, and the two new wilderness areas. FLPMA requires that, among other uses, "the public lands be managed in a manner that will…provide for outdoor recreation" (43 Code of Federal Regulations [CFR] 1701).
  - Update the use of existing designated corridors, allowing for new, expanded, and upgraded utility ROWs that serve local communities in a manner consistent with the protection, preservation, and restoration of Monument objects. Proclamation 8946, which established the Monument, allows for limited opportunities to upgrade or modify utility ROWs. The linear layout of the Monument makes it difficult to avoid crossing the Monument with transmission lines and other utilities.

[1] The BLM acknowledges the long history of grazing by local communities in the planning area, particularly sheep herding and grazing as noted in Presidential Proclamation 8946. Cattle grazing is a historic use within the planning area. The BLM manages livestock grazing in accordance with Federal law and BLM policy as described in Section 3.2.14, *Livestock Grazing*.

- Protect newly designated wilderness areas within the Monument.
- Preserve the wilderness character of the newly designated Cerro del Yuta Wilderness and Rio San Antonio Wilderness areas.

## 1.3 Decision to be Made

The BLM New Mexico State Director would approve the planning-level decisions for the RMPA, whereas the Taos Field Office Field Manager would decide on other aspects of the EA as implementation-level decisions, if applicable. Combined, they would decide whether to adopt an alternative or to modify the action based on environmental analysis and any other factors identified during public review of this EA and unsigned Finding of No Significant Impact (FONSI). The decision would be made based on analysis of the issues and how well the alternatives respond to the purpose and need.

## 1.4 Planning Process

The BLM planning process for an RMPA/EA is set forth in the Federal regulations at 43 CFR 1600, and the land-use planning guidance is found in the BLM's *Land Use Planning Handbook* (H-1601-1) (BLM 2005).

The planning process for the RMPA/EA consists of the following steps.

1. Publish Notice of Intent (NOI), and initiate scoping.
2. Conduct scoping.
3. Formulate alternatives.
4. Analyze effects of alternatives.
5. Prepare a draft RMPA/EA and FONSI.
6. Provide a minimum 30-day public comment period.
7. Prepare a proposed RMPA/EA and FONSI.
8. Provide a 30-day protest period, and resolve protests.
9. Conduct a 60-day governor's consistency review period with a 30-day appeal period.
10. Prepare a decision record and RMPA.
11. Implement, monitor, and evaluate plan decisions.

### *1.4.1 Cooperating Agencies and Consulting Parties*

Federal, State, and local agencies, along with Tribal nations and other parties that may be interested in or affected by the Proposed RMPA/EA that the BLM is evaluating were invited to participate in the scoping process and, if eligible, were invited by the BLM to participate in the development of the environmental analysis as cooperating agencies. Chapter 4, *Consultation*

*and Coordination*, identifies agencies and entities that the BLM has invited to participate as cooperating agencies and those who have accepted.

### *1.4.2 Tribal Consultation*

As part of the planning process, the BLM initiated government-to-government consultation for this planning effort in March 2023 and extended invitations on May 26, 2023, to the 21 Native American Tribes, Pueblos, and Tribal organizations to participate as cooperating agencies listed below.

1. All Pueblo Council of Governors
2. Cochiti Pueblo
3. Comanche Nation of Oklahoma
4. Hopi Tribe
5. Pueblo of Isleta
6. Jicarilla Apache Nation
7. Kiowa Indian Tribe of Oklahoma
8. Navajo Nation
9. Ohkay Owingeh Pueblo
10. Pueblo of Nambe
11. Pueblo of Picuris
12. Pueblo of Pojoaque
13. Pueblo of San Ildefonso
14. Pueblo of Sandia
15. Pueblo of Santa Clara
16. Pueblo of Santo Domingo
17. Pueblo of Taos
18. Pueblo of Tesuque
19. Southern Ute Tribe
20. Zia Pueblo
21. Zuni Pueblo

No Tribes accepted the invitation to become a cooperating agency for the RMPA by signing a Memoranda of Understanding. The BLM hosted a government-to-government informational meeting with representatives of the Taos Pueblo on July 29, 2024, to provide an overview of the RMPA/EA and planning process.

In the planning process, the BLM recognizes that it carries the responsibility of complying with Section 106 of the National Historic Preservation Act (NHPA). Therefore, the BLM invited the State Historic Preservation Office (SHPO) to participate in the development of this Proposed RMPA/EA. In addition to having been invited to participate as a cooperating agency, the BLM invited Tribal Nations, Pueblos, and Tribal organizations to participate under the provisions of Section 106 of the NHPA and as co-stewards, per Secretarial Order 3403. Additional information is available in Section 4.2.1, *Consultation with Tribes*.

### *1.4.3 Results of Scoping*

Preliminary Proposed Action and planning criteria for the RMPA/EA was posted on the BLM's National Environmental Policy Act (NEPA) Register website (https://eplanning.blm.gov/eplanning-ui/project/2024165/510), and public scoping was conducted from August 11 to September 20, 2023. The BLM received 67 unique submissions during the public scoping period, comprising 361 substantive comments. Submissions were received via email and through the project website. Additional information regarding the scoping process can be found in Section 4.1.1, *Scoping*, of this RMPA/EA.

Overarching concerns and comments presented by the public and organizations are summarized below; additional details for all concerns and issues identified during the scoping process can be found in the *Scoping Report for the Taos Resource Management Plan Amendment and Environmental Assessment for the Río Grande del Norte National Monument Plan* (BLM 2023a), which is available at the project website (https://eplanning.blm.gov/eplanning-ui/project/2024165/510).

- Recommendations encouraging the BLM to actively engage with local partners throughout the planning process
- Comments expressing support for the preliminary proposed management updates and the need to provide reliable protection for Monument objects
- Recommendations for the development of a reasonable range of alternatives that meet the project's purpose and need
- Concerns regarding the importance of protecting cultural resources within the Monument and the importance of consultation with the sovereign Pueblos and Tribes of the area
- Concerns emphasizing the importance of the BLM's consideration of traditional land uses of the Monument in the planning process, including traditional uses of firewood, herb, and piñon nut collection, hunting, fishing, and sustainable grazing for Hispanic, Native American, and other traditional communities in the area
- Requests that BLM protect the Monument's diversity of wildlife and overall ecological diversity through clear management guidelines and requests that management include provisions designed to enhance habitat connectivity, wildlife corridors, big-game winter range, habitat improvement and restoration projects, invasive species control, including aquatic invasives, and fence removal and/or modification

- Requests that the BLM prioritize fisheries management that support native species and species conservation on the mainstem of the Rio Grande and its tributaries
- Recommendations for protective management guidelines for eligible WSR segments within the Monument
- Recommendations for livestock-grazing management and requests to minimize conflicts between grazing and other uses
- Concerns regarding how the BLM would manage recreational uses and ensure that sustainable uses were consistent with the protection of Monument objects
- Recommendations for how the BLM should manage recreational uses for increased visitation, as well as recommendations for infrastructure improvements and management to address climbing, electric bicycles (e-bikes), mountain biking, river use, and recreation within the Monument

### *1.4.4 Planning Issues*

Preliminary issues for the planning area were identified by BLM personnel and through early engagement conducted for this planning effort with Federal, State, and local agencies, Tribes, and other interested and/or cooperating parties. The BLM sought input on preliminary issues in the NOI. The planning criteria associated with the preliminary issues are described in Section 1.5, *Planning Criteria*.

Issues identified during scoping brought forward for analysis are listed in the Environmental Consequences section for each resource program evaluated in Chapter 3, *Affected Environment and Environmental Consequences*.

### *1.4.5 Issues Considered, but Not Analyzed Further*

The following issue was considered, but is not being analyzed further for the reasons outlined below.

- *How would proposed management affect land tenure and opportunities for land acquisitions for the protection, preservation, and enhancement of Monument objects and other resource values?*

  Presidential Proclamation 8946 withdraws all BLM-administered land within the Monument from selection, sale, or other disposition under the public land laws, other than by exchange that furthers the protective purposes of the Monument. As such, the BLM would acquire land only from willing sellers as opportunities arise. Therefore, the alternatives would not measurably affect land tenure in the Monument.

### *1.4.6 Issues Addressed Through Policy, Regulation, or Administrative Actions*

Policy or administrative actions do not require a planning decision to implement. These include those actions that are implemented by the BLM as a Standard Operating Procedure (SOP), because they are required by law, or because they are the established BLM policy.

The following issues can be addressed by administrative actions.

- Complying with existing laws and policies (e.g., FLPMA, NEPA, Endangered Species Act [ESA], American Antiquities Act, Clean Air Act, NHPA)
- Conducting education, enforcement/prosecution, and volunteer coordination
- Managing petroglyphs and other cultural resources, including archeological inventories, and nondisclosure of spatial data
- Administering existing leases, permits, or other authorized uses and valid existing rights
- Implementing standard law enforcement–operating procedures, which would be followed in accordance with existing Taos Field Office and BLM New Mexico law enforcement plans and procedures
- Issuing citations for illegal activities in accordance with all provisions provided for in 43 CFR, Subpart 8365.1-1(b) for dumping and littering, 43 CFR, Subparts 8365.1-5(a)(1) for vandalism and damage to resources, and 43 CFR, Subparts 8365.1-4(a)(2) for creating a hazard or nuisance (recreational target shooting on BLM-administered land is an allowed activity, except where restricted, and must be conducted in a safe manner)
- Conducting monitoring and assessment processes, including rangeland health, watershed, soils, vegetation, wildlife, and air quality
- Applying mitigation measures for site-specific projects
- Conducting emergency stabilization and rehabilitation planning and implementation

### *1.4.7 Issues Beyond the Scope of the Resource Management Plan Amendment/Environmental Assessment*

Issues beyond the scope of the RMPA/EA include all items not related to decisions that would occur as a result of this planning process. They include decisions that are not under the jurisdiction of the BLM or are beyond the capability of the BLM to resolve as part of this RMPA/EA. Additionally, an issue is not germane to the planning process if it is beyond the scope of this particular planning effort, or if it involves a matter normally addressed in plan implementation. Examples of issues beyond the scope of this Proposed RMPA/EA include the following.

- Construction of new visitor service facilities, such as a learning center at Wild Rivers
- Removal of concrete barriers within the Rio Grande Gorge Bridge area ROW

- Changes to the number of BLM staff dedicated to law enforcement or for processing special-use recreation permittee applications
- Installation of educational, interpretive signs, or kiosks to promote stewardship, and installation of multi-lingual signage
- Development of information materials to be available online or at visitor centers

## 1.5 Planning Criteria

Planning criteria guide the development of BLM planning documents by defining the decision space. 43 CFR 1610.4-2(b) states, "Planning criteria would generally be based upon applicable law, Director and State Director guidance, the results of public participation, and coordination with any cooperating agencies and other Federal agencies, State, and local governments, and federally recognized Indian Tribes." Planning criteria represent the overarching factors used to resolve issues and to develop alternatives. The preliminary issues for the planning area and issues identified during the scoping period were described in Section 1.4.4, *Planning Issues*.

The planning criteria that define the scope of the RMPA/EA consist of the following.

- To the extent reasonable, the RMPA/EA would tier to and incorporate relevant portions of the 2012 Taos RMP.
- The RMPA/EA would encompass public lands administered by the BLM within the Monument boundary. All decisions formulated within the Proposed RMPA/EA would pertain solely to BLM-administered public lands.
- The RMPA/EA would provide management to safeguard and restore the Monument's designated objects and values, aligned with the guidelines set forth in Presidential Proclamation 8946, the Omnibus Public Land Management Act of 2009, NHPA, and FLPMA.
- The BLM would aim to ensure that land-use plan decisions are aligned with the existing plans and policies of Federal, State, local, and Tribal entities. The RMPA/EA would promote stewardship, conservation, and appreciation of cultural resources.
- The BLM would assess the impact of its Proposed Actions on ecological and cultural values, as well as the current land uses. Additionally, the RMPA/EA would ensure compliance with the legal obligations outlined in the designating proclamation and other relevant laws.
- The RMPA/EA would establish the protection and preservation of geological resources as a Monument object.
- Within the decision area, the RMPA/EA would delineate lands and realty actions, including ROWs, land-use permits, and leases, alongside surface-management patterns.

- Management for livestock-grazing allotments within the Monument boundary, and allotments partially within the Monument, would be guided by decisions in the RMPA/EA.
- The RMPA/EA would establish appropriate management for the newly designated Cerro del Yuta Wilderness and Rio San Antonio Wilderness areas in accordance with the Wilderness Act of 1964.
- The BLM would consult with Native American Tribes to identify any cultural values or religious beliefs that may be affected by the BLM's authorizations or actions. Provisions would be made for Native American use of traditional cultural properties.
- The RMPA/EA would evaluate existing recreational designations and determine whether updates would be necessary to address changed circumstances in recreational demand since the Monument was established.
- The BLM would consider areas of habitat connectivity in planning efforts to inform land-use decisions in the RMPA/EA.

## 1.6 Land-Use Conformance

The designation of the Monument is not in conformance with the 2012 Taos RMP, which currently manages nearly the entirety of the Monument as two ACECs. Although current management of the ACECs provides administration largely consistent with the purposes of the Monument's designation, Presidential Proclamation 8946 mandates development of a management plan to ensure that Monument objectives are preserved. Furthermore, the Monument is a component of the National Landscape Conservation System (NLCS), which was established "to conserve, protect, and restore nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations" and, therefore, the BLM is required to manage the Monument "in a manner that protects the values for which the components of the system were designated" (16 United States Code [USC] 7202). Therefore, any discretionary uses in the Monument that are not consistent with the protection of its objects and values cannot be permitted. The BLM's decisions regarding discretionary uses in the Monument must conform to the BLM's approved land-use plan. Other changed circumstances and opportunities detailed above in Section 1.2, *Purpose and Need*, necessitate preparation of an RMPA for the management and care of objects and resources within the Monument.

## 1.7 Relationship to Statutes, Regulations, and Other Plans

### *1.7.1 Taos Field Office Resource Management Plan and Existing Management*

The Monument is currently managed under the guidance set forth in the 2012 Taos RMP. Two ACECs, the Taos Plateau ACEC (222,500 acres) and the Lower Gorge ACEC (21,190 acres),

overlap the Monument nearly in its entirety. The Taos Plateau ACEC contains relevant and important values associated with wildlife habitat, special status species, water quality and quantity, wetlands, and scenic quality. The Lower Gorge ACEC was established to provide direct management of relevant and important riparian vegetation, special status species and wildlife habitat, and cultural values. Management of the Lower Gorge ACEC also includes emphasis on recreation and contains the Orilla Verde Recreation Area. The remainder of the Monument not managed as an ACEC is included within the Rio Grande Wild and Scenic River, which includes a segment of the Red River, and is managed pursuant to the National Wild and Scenic Rivers Act, as amended.

The National WSR System includes two river segments in the Monument: (1) the lower 4 miles of the Red River; and (2) approximately 62 miles of the Rio Grande from the Colorado–New Mexico State Line, south to Pilar, New Mexico. The outstandingly remarkable values (ORVs) protected under the designation are scenic, recreational, geological, fish habitat, wildlife, cultural, and riparian. The BLM has identified four other river segments in the Monument as eligible: (1) another segment of the Red River; (2) Arroyo Hondo; (3) Rio San Antonio; and (4) the Rio Pueblo de Taos, the latter of which was also determined suitable for designation as a WSR. The Arroyo Hondo, Rio San Antonio, and Red River were determined to be eligible for designation as WSRs. The designated WSRs, as well as river segments that have been found eligible or suitable for designation, would be managed pursuant to the National Wild and Scenic Rivers Act, as amended.

In March 2019, two wilderness areas were also designated within the Monument and are managed by the Taos Field Office: (1) the Rio San Antonio Wilderness (8,120 acres); and (2) the Cerro del Yuta Wilderness (13,420 acres).

### *1.7.2 Other Laws, Regulations, Policies, and Plans*

In preparing this Proposed RMPA/EA, the BLM evaluated the proposed management relative to the relevant laws, regulations, policies, and plans listed in Appendix A, as they apply to the proposed undertaking.

# 2 Alternatives

## 2.1 Introduction

Consistently with the purpose and need for this Proposed RMPA/EA, the alternatives focus primarily on the protection and restoration of the Monument objects, while providing for the enjoyment and use of the Monument lands and resources through recreation, traditional uses, and other means. Alternatives carried forward for detailed analysis must meet the purpose and need for the RMPA; the BLM considered alternatives that it determined did not warrant detailed analysis (see Section 2.6, *Alternatives Considered, but Eliminated from Detailed Analysis*).

## 2.2 Alternatives Development

The BLM used several sources of input to formulate alternatives.

- BLM Interdisciplinary Team (IDT) workshops were held in June 2023 to conduct an evaluation of the Taos 2012 RMP, consistently with 43 CFR 1610.4-9, to identify and create a matrix of which land-use plan components require updates to ensure the mandates established under Proclamation 8946 are achieved.
- The BLM utilized the Taos 2012 RMP evaluation matrix from the June 2023 IDT workshops to develop the purpose and need, planning criteria, and a list of preliminary proposed management updates for the RMPA/EA. This information was provided in the NOI package, which was published in the *Federal Register* (FR) on August 11, 2023.
- On August 25, 2023, a workshop was held with cooperating agencies who accepted the May 26, 2023, invitation to participate as a cooperating agency for the RMPA/EA. The objectives of the workshop included providing an overview of the purpose and need, the preliminary planning issues, and preliminary proposed management updates and soliciting feedback from the cooperating agencies.
- Public scoping, which included opportunities for input from the public, Federal agencies, State and local governments, and Tribal Nations/Pueblos. Refer to the scoping report for a detailed description of the issues identified during the scoping period (https://eplanning.blm.gov/eplanning-ui/project/2024165/570).
- To refine the alternatives in response to input received during public scoping, additional workshops between the BLM IDT, cooperating agencies, and Tribal Nations/Pueblos were held from October 2023 through January 2024.

Planning challenges identified through the BLM's preplanning and public scoping efforts helped the IDT identify key planning issues to be addressed in this Proposed RMPA/EA. Because the 2012 Taos RMP established two ACECs that coincide with the Monument boundary, one action alternative (the Proposed Action), in addition to the No-Action Alternative, was determined to be sufficient to meet the mandates of Presidential Proclamation 8946 and the changed circumstances since designation of the Monument in 2013. Alternatives considered, but eliminated from further study are described in Section 2.6.

The following sections include a summary of the alternatives carried forward for detailed analysis. For detailed descriptions of the alternatives, refer to Appendix C, *Detailed Description of Alternatives*.

## 2.3 Alternative A (No-Action – Current Management)

Under the No-Action Alternative, management of the Monument would continue to follow the decisions of the existing Taos RMP (BLM 2012a). Two ACECs, the Taos Plateau ACEC (222,500 acres) and the Lower Gorge ACEC (21,190 acres), overlap the Monument nearly in its entirety. The Taos Plateau ACEC contains relevant and important values associated with wildlife habitat,

special status species, water quality and quantity, wetlands, and scenic quality. The Lower Gorge ACEC was established to provide direct management of relevant and important riparian vegetation, special status species and wildlife habitat, and cultural values. Management of the Lower Gorge ACEC also includes emphasis on recreation and contains the Orilla Verde Recreation Area. The Monument also includes the Rio Grande WSR, which includes a segment of the Red River, and is managed pursuant to the National Wild and Scenic Rivers Act, as amended. Under the No-Action Alternative, existing management for BLM-administered lands within the Monument would be largely consistent with the purposes of the Monument's designation. Refer to Appendix C for a detailed description of the goals, objectives, management actions, allowable uses, and administrative designations under the No-Action Alternative.

## 2.4 Alternative B (Proposed Action/Proposed Monument Management Plan) and Alternative B1 (Designate Cerro de la Olla Wilderness Study Area)

Alternative B, the Proposed Action, builds from existing management direction contained in the 2012 Taos RMP to ensure greater protection for Monument objects, while also accommodating an integrated approach that would provide for continual multiple uses, including those considered traditional. The management strategy would be accomplished by using a variety of proactive and prescriptive measures that would protect Monument objects and promote the continuation of multiple-use management. Details of the full alternative can be found in Appendix C. Representative examples of management direction are as follows.

- Seek opportunities for co-stewardship of public lands and waters with Tribal Nations. Ensure that access is available for Native American Tribal members and Hispanic communities to religious and cultural sites for noncommercial traditional cultural and customary uses.
- Protect cultural and aquatic resources associated with playas and work cooperatively with livestock-grazing permittees to assess impacts of grazing on playas.
- Identify, define, and delineate cultural landscapes within the Monument, recognizing them as a larger equivalent of cultural resources, and refine the definition and delineation of these cultural landscapes as additional information becomes available.
- Habitat would be considered on a landscape scale and when data becomes available, and BLM lands would be managed to consider the relationship between large wildlife populations and smaller isolated populations, whenever possible.
- Newly constructed fences would be built to the BLM's wildlife-friendly specifications and allow safe wildlife passage, except for fences built specifically to keep native ungulates out of an area (i.e., forage-monitoring plots). As funding allows, modify, replace, or remove existing fences identified as barriers to wildlife movement.

- To provide important fish habitat, protect and leave large woody debris (LWD) in the Rio Grande (when not a danger to rafters), Red River, Rio Hondo, Arroyo Hondo, Rio San Antonio, and Rio Pueblo de Taos.
- To protect geologic objects, apply existing constraints on development from the 2012 Taos RMP and Presidential Proclamation 8946 relating to mineral withdrawal, solar/wind ROW exclusions, and recreational area restrictions on surface-disturbing activities. Implement case-by-case evaluations and site-specific NEPA policies in the review of surface-disturbing activities to determine whether geologic objects would be affected. Prioritize the preservation and protection of geological objects from surface-disturbing activities, while allowing for recreation/visitation.
- Consistent with Proclamation 8946, allow for new, expanded, and upgraded utility ROWs that serve local communities (see Appendix B, Map B.14), as follows.
    - Widen the existing Powerline Falls ROW corridor over the Rio Grande gorge from 190 feet to 600 feet.
    - Designate a new ROW corridor following an existing 115-kilovolt transmission line within the Horsethief Mesa and the Arroyo Hondo Land Grant.
- Allow livestock grazing as a vegetation management/maintenance tool in the Ute Mountain area (outside of the designated wilderness boundary) to promote seed propagation, reduce "wolfy" caespitose[2] grasses, and promote new growth that wildlife can utilize.
- Manage the Cerro del Yuta Wilderness (13,420 acres) and Rio San Antonio Wilderness (8,120 acres) consistently with the Wilderness Act of 1964, the properties' enabling legislation, and regulations for wilderness management at 43 CFR 6300, BLM Manuals 8560 and 8561, BLM Handbook H-8560-1. A Wilderness Management Plan would be prepared by BLM following completion of this RMPA/EA.
- Manage the Cerro de la Olla (5,120 acres) and San Antonio East (9,855 acres) units to minimize impacts on wilderness characteristics, while allowing compatible uses that are consistent with the protection of Monument objects.
- Where Outstanding National Resource Waters (ONRWs) have been designated, prohibit new or increased degradation and manage for the values for which the ONRW was designated (exceptional recreational and ecological attributes).
- Apply interim protective management guidelines for eligible WSR segments (i.e., Arroyo Hondo: 1.3 miles; Red River: 1.0 mile; Rio San Antonio: 4.5 miles).

The BLM made changes to the Proposed Action based on public comments received on the Draft RMPA/EA, and from additional input from cooperating agencies, tribes, and the BLM IDT. The BLM also made revisions for clarity, consistency, and accuracy. The management tables contained in Appendix C list these changes under "Proposed Monument Management Plan."

[2] *Caespitose grasses* are grasses that grow in clumps or bunches and are not sod-forming (Allred 2005).

Primary changes in the Proposed RMPA/Final EA compared to the Draft RMPA/EA are summarized below.

- Hot air balloon flights below the rim of the gorge would be allowed outside of the seasonal closure period (January 1 through August 31), but only in the area between John Dunn Bridge and Manby Hot Springs. The following wildlife-harassment and land-based stipulation would be added to the Special Recreation Permit (SRP):
    - Wildlife must not be pursued if seen from a hot air balloon. The pilot must continue on the original path. If wildlife is showing stressed behavior (e.g., running away from the balloon, cowering, hiding), then the pilot must pull back immediately and remove themselves from the area. Within the John Dunn Bridge Recreation Management Zone (RMZ), tours would be allowed throughout the year except for flights below the rim from January 1 through August 31. Flights below the rim outside of the seasonal closure will be restricted to the area between the John Dunn Bridge and Manby Hot Spring. Launching is approved at three designated sites above the bridge. SRPs may be subject to adaptive-management strategies that apply spatial and timing limitations on activities in order to protect important wildlife habitat (Appendix C, Table C-16, REC Management Action 9).
- No climbing within raptor nesting areas during seasonal restrictions, and no disturbance of migratory-bird nesting, as identified in Wildlife Management 13, or within 50-feet of cultural resources, as determined on a case-by-case basis. Existing routes determined to be in conflict with Monument objects and values would be subject to removal (Appendix C, Table C-16, REC Management Action 5).
- Additional livestock-grazing exclosures may be implemented as necessary for riparian, wetland, playas, and watershed health, as well as to protect critical wildlife habitat or other Monument objects (Appendix C, Table C-8, VEGR Management Action 6). Consider other options for exclosures, such as virtual fencing (Appendix C, Table C-15, LG Management Action 5).
- Two additional, vacant grazing allotments within the Black Rock Special Recreation Management Area (SRMA) would be unavailable for grazing (Dunn Bridge allotment [305 acres] and Hot Spring allotment [1,510 acres]) (Appendix C, Table C-15, LG Management Action 4). The total acreage that would be made unavailable for grazing under Alternative B would be 3,587 acres (East Rio Grande allotment [946 acres], Arroyo Hondo allotment [826 acres], Dunn Bridge allotment [305 acres], and Hot Spring allotment [1,510 acres]).
- A decision regarding the use of e-bikes on trails within the Monument has been removed from the scope of this analysis because it has been determined that the BLM does not have discretion to make such a decision due to the limitations on motorized vehicles specified in Presidential Proclamation 8946.

### *2.4.1 Alternative B1*

Alternative B1 would designate 5,120 acres of the Cerro de la Olla planning unit as a new Wilderness Study Area (WSA) under the authority of Section 202 of FLPMA. Like Alternative B, the Cerro de la Olla unit would be closed to new ROWs and motorized travel; however, Alternative B1 would also manage the area consistently with BLM Manual 6330, *Management of Wilderness Study Areas* (BLM 2012b), including managing the area with Visual Resource Management (VRM) Class I objectives. All other elements of Alternative B1 would be the same as Alternative B.

In 1964, Congress passed the Wilderness Act, establishing a national system of lands for the purpose of preserving a representative sample of ecosystems in a natural condition for the benefit of future generations. With the passage of FLPMA in 1976, Congress directed the BLM to inventory, study, and recommend which lands under its administration should be designated as wilderness. Sections 201 and 202 of FLPMA provide general direction for BLM-administered land and resource inventory and planning.

Section 201 requires the BLM to inventory all public lands and their resources, including wilderness values, and provides the basis for inventorying lands for wilderness characteristics. Section 202 requires the BLM to develop, maintain, and revise land-use plans for public lands; these plans set the framework for management, use, and protection of the planning area. Additionally, under Section 603, Congress provided the BLM 15 years to complete a wilderness inventory of BLM-administered lands. Inventories conducted under Section 201 served as the basis for the wilderness review required under Section 603 of FLPMA.

Following completion of the Section 603 wilderness review, the BLM's obligation to inventory for the presence or absence of wilderness resources on BLM-administered lands continued under Section 201 of FLPMA. Section 202 of FLPMA further provides the BLM with broad discretion and authority in deciding how to manage public lands, including management for the preservation of inventoried wilderness resources. The BLM continues to have discretion under Section 202 to designate a WSA (Section 202 WSA) and manage such areas of land to protect wilderness resources, including under a non-impairment standard.

The BLM administers all WSAs under the management policies for WSAs (BLM 2012b) to avoid impairing the suitability of such areas for preservation as wilderness. Activities that would impair wilderness suitability are prohibited unless that use is grandfathered or a valid existing right that predates the BLM's designation of the area as a WSA. The BLM has discretion to modify Section 202 WSA designations through its land-use planning process. This contrasts to Section 603 WSAs, which the BLM must continue to manage under the terms of that provision until action by Congress.

## 2.5 Monitoring and Mitigation Protocol

In compliance with 43 CFR 1610.4–9 and 36 CFR 219.12, land-use plans must establish monitoring intervals and standards based on resource sensitivity. Additionally, BLM Manual

6220 mandates that plans for national monuments analyze and incorporate measures ensuring the conservation, protection, and restoration of objects and values. This involves the inclusion of a monitoring strategy specifying change indicators, methodologies, protocols, and time frames for evaluating outcome achievement.

Recognizing that conditions may evolve during the lifespan of a land-use plan, the BLM may utilize adaptive management to ensure protection of resources and minimize potential resource conflicts. To address changing conditions and provide management flexibility incorporating Best Management Practices (BMPs) (refer to Appendix D, *Best Management Practices*), the BLM would evaluate the effectiveness of management actions, analyze current resource conditions, and, if necessary, adjust management approaches.

Monitoring would track the BLM's advancement in fully implementing the land-use plan and attaining desired outcomes. Monitoring efforts would be prioritized in alignment with the *Río Grande del Norte National Monument Science Plan* (BLM 2019a), as well as the goals and objectives outline in the RMP. Monitoring would be done in collaboration with Federal, State, and local agencies, with consideration of staffing and funding constraints.

## 2.6 Alternatives Considered, but Eliminated from Detailed Analysis

The BLM evaluated all reasonable alternatives presented. The following alternatives were considered, but eliminated from detailed analysis based on the rationale provided below.

### *2.6.1 Adjustments to Areas Open to Recreational Target Shooting*

The BLM eliminated from detailed analysis an alternative that would alter existing allowable uses related to recreational target shooting. Under the No-Action and Proposed Action Alternatives, the Monument would allow recreational target shooting throughout the Monument, except for at developed recreation areas, including Wild Rivers and Orilla Verde, as well as the Taos Valley Overlook RMZ, which is also closed to hunting due to the terrain and concentrated use in the area. By maintaining the existing management within the Monument, the BLM can meet the needs of the resources and values in this area under the BLM multiple use and sustained yield mandate, while preserving and protecting Monument objects and values. The BLM would continue to monitor shooting impacts and consider restrictions on recreational target shooting, if necessary, during area-specific implementation planning to avoid or correct public safety issues, conflicts between recreational uses, and adverse impacts on Monument objects or values.

### *2.6.2 Close Some or All of the Decision Area to Livestock Grazing*

The BLM eliminated from detailed analysis an alternative that would close BLM-administered surface lands to livestock grazing. In accordance with Proclamation 8946, laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on BLM-administered lands within the Monument would continue to apply. Management for

Monument objects can occur through implementation-level management, including avoidance and minimization, without the complete elimination of livestock grazing within any or all of the decision area. The Taos Field Office authorizes grazing to comply with the fundamentals of rangeland health (USDI-BLM Grazing Regulations, 43 CFR Part 4100 § 4180.1) and the *New Mexico Statewide RMPA/Environmental Impact Statement* (EIS) (BLM 2001), which adopted statewide standards for public land health and guidelines for livestock-grazing management. The assessment and adjustment process for authorized livestock grazing occurs on an allotment basis and is conducted through a land health evaluation, followed by appropriate NEPA analysis, in compliance with the Grazing Regulations 43 CFR Part 4100, Subparts 4110, 4120, 4130, 4160 and 4180. Analyzing a “no grazing” alternative within this RMPA/EA would involve broad landscape considerations of effects across the entirety of the Monument, whereas a site-specific analysis during the permitting process would provide a more thorough understanding of grazing management and its effects on land health and Monument objects. Implementing a "no grazing" alternative would be considered remote and speculative. Grazing effects are often site-specific and not evenly distributed; therefore, grazing is not incompatible with the protection of objects in all portions of the Monument, making it unlikely that the BLM would be able to justify selecting such an alternative. Therefore, because implementation of a no-grazing alternative is remote and speculative, a no-grazing alternative was not analyzed in detail.

When the NOI was published, the BLM initially identified 10 vacant allotments that would be made unavailable to grazing under the Proposed Action because the allotments had not been applied for since Monument designation. The BLM’s rationale was that the allotments had not been applied for because of the lack of access and lack of range improvements, such as fencing and water developments. After further review and consideration of scoping comments and comments received from the public on the Draft RMPA/EA, the BLM has adjusted the Proposed RMPA to make four of the 10 vacant allotments initially identified unavailable for application. These four allotments are within the Black Rock SRMA and would become unavailable to livestock grazing to reduce potential conflicts with recreational uses (see Appendix C, Section C.3.3, Management Action 6; Appendix F, Section F.3.2;, and Section 3.2.15, *Recreation*, of this EA). Under Alternative A, and the Proposed RMPA, the BLM designates land as “unavailable” to livestock grazing; therefore, the remaining public land within the decision area is “available” for livestock grazing. The remaining six vacant allotments would maintain “available” status and be open to application by qualified applicants. If an application were received, then the BLM would follow the regulations under 43 CFR Part 4100, and, after consultation, cooperation, and coordination, including site-specific NEPA analysis regarding impacts to monument objects, issue a decision compliant to 43 CFR Section 4160 regarding acceptance/rejection of the application and issuance of a grazing permit or lease. An alternative to close all 10 vacant allotments has been dismissed from detailed analysis per the feedback received during public scoping, due to the rationale above, and because the grazing-authorization process allows for compatibility of livestock grazing “consistent with the purposes of this proclamation [Presidential Proclamation 8946].”

### *2.6.3 Designate San Antonio East as a New Wilderness Study Area*

The BLM eliminated from detailed analysis an alternative that would designate the San Antonio East unit as new WSA within the Monument. Although an alternative that would designate the Cerro de la Olla unit as a WSA has been brought forward for detailed analysis (see Section 2.4.1, *Alternative B1*), management of the San Antonio East unit as a WSA is not warranted because managing the area to protect its wilderness characteristics as a priority over other multiple uses would be sufficient to avoid impacts that have potential to degrade wilderness characteristics. The BLM is not considering management actions or allocations that would preclude Congress from designating the Rio San Antonio East unit as wilderness in the future. Therefore, this issue was eliminated from detailed analysis.

# 3 Affected Environment and Environmental Consequences

## 3.1 Introduction

This chapter describes the environment in the planning area and the likely direct, indirect, and cumulative effects on the human and natural environment that could occur from implementing the alternatives described in Chapter 2, *Alternatives*. This chapter is organized by topic and includes an affected environment discussion, a methods of analysis section that identifies indicators, methods, and assumptions, an analysis of impacts for each of the alternatives, and a cumulative effects analysis section. Because Alternative B1 is the same as Alternative B, with the exception that Alternative B1 would designate the Cerro de la Olla unit (5,120 acres) as a new WSA, the effects analysis for Alternative B in this chapter also applies to Alternative B1. Differences between Alternatives B and B1 in comparison to Alternative A are only noted where necessary in this chapter. Additional context and background information for special status species, recreation, and socioeconomics and environmental justice is provided in Appendix E, *Special Status Species*, Appendix F, *Recreation Management*, and Appendix G, *Socioeconomic Context and Environmental Justice*. No program specifically addresses climate change; however, the effects of climate change on resources is analyzed throughout Section 3.2, *Resources and Resource Uses*, where applicable. Appendix H, *Climate Change*, provides information on current climate-change conditions, trends, and forecasts for the planning area, as well as an analysis of climate change for the alternatives.

Although the BLM is responsible for managing only BLM-administered lands in the planning area—that is, the decision area—proposed decisions could affect environmental components outside the decision area. Unless indicated otherwise, discussion and analysis in this section encompasses the planning area, and potential effects outside the planning area are discussed in the cumulative effects analysis section, if applicable. Area calculations are presented for the BLM-administered lands within the Monument.

Several resources and resource uses were not brought forward for consideration in this Proposed RMPA/EA, either because they are not present in the planning area, because they would not be affected at the level requiring detailed analysis, because they were analyzed in detail in the 2011 Taos Proposed RMP/Final EIS (PRMP/FEIS; BLM 2011) and are incorporated by reference, or because they were determined to be unaffected by implementation of the alternatives presented in Chapter 2, *Alternatives*. The resources and resource uses not analyzed in detail in this Proposed RMPA/EA are described in Table 3-1.

**Table 3-1. Resources and Resource Uses Not Analyzed in Detail**

| Resources | Rationale |
|---|---|
| Air Quality, Greenhouse Gases, and Climate Change | All alternatives analyzed in this Proposed RMPA/EA would result in either similar or reduced, negligible effects on air quality, greenhouse gases, and climate change, as described for Alternative A, *Proposed RMP*, in the 2011 Taos PRMP/FEIS. The 2011 Taos PRMP/FEIS analysis for air quality indicated that, except for mineral leasing, implementation of any alternative and subsequent activities would result in very low emissions relative to total emissions within the planning area for the life of the plan (BLM 2011:373–374). Additionally, the 2011 Taos RMP/FEIS concluded that the proposed plan (Alternative A) would reduce emissions through use restrictions dealing with travel management, mineral development, and other surface-disturbing activities. Air quality in the Monument planning area is generally good, and management changes discussed in this Proposed RMPA/EA would not change the air quality analysis discussed in the 2011 Taos RMP/FEIS. Therefore, these resources were dismissed from detailed analysis in Chapter 3 of this EA; however, Appendix H, *Climate Change*, provides information on current climate-change conditions, trends, and forecasts for the planning area, as well as a qualitative analysis of greenhouse gas emissions and climate change under the alternatives. |
| Mineral Resources | The establishment of the Monument under Proclamation 8946 withdrew all Federal lands within the Monument from all forms of entry, location, selection, sale, leasing, or other disposition under the public land laws, including withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of the Monument. Therefore, no mineral exploration or development would occur within the planning area, except pursuant to valid existing rights. Few mineral material authorizations (approximately 116 acres) occur within the Monument; however, 10 unpatented placer mining claims (all held by the same claimant) exist in the Monument. Six of the placer claims were filed in 1982, and four were filed in 1997. If mining claims are found to be valid pursuant to 43 CFR 3809.100, then an operator must attain the stated level of protection or reclamation required by specific laws in BLM-administered National Monuments pursuant to regulations at 43 CFR 3809.415I. Because all Federal lands within the Monument were withdrawn from mineral entry, no significant effects from mineral entry are anticipated; therefore, this resource was dismissed from detailed analysis. |

| Resources | Rationale |
|---|---|
| Paleontological Resources | The Taos Field Office uses a paleontology-sensitivity map during site-specific reviews for all proposed earth-disturbing projects. All land-use actions with a potential to affect vertebrate fossils, or noteworthy occurrences of invertebrate or plant fossils, would be screened against this map. The majority (approximately 87 percent) of the Monument is classified as PFYC 1 (very low potential). Although approximately 34,876 acres of the monument are identified as PFYC Class IV (high potential), Class V (very high potential), or unknown potential, all alternatives in this Proposed RMPA/EA would result in either similar or reduced negligible effects on paleontological resources as described for Alternative A, *Proposed RMP*, in the 2011 Taos PRMP/FEIS. Impacts on paleontological resources from surface-disturbing activities would be mitigated by surveys and potential monitoring by a qualified paleontologist. All PFYC III, IV, and V areas are considered critical areas, and impacts on paleontological resources would be avoided or minimized. Therefore, this resource was dismissed from detailed analysis. |
| Scenic Routes and BLM Backcountry Byways | Three National Scenic Byways cross public lands or have viewsheds that include BLM-administered lands in the planning area: Enchanted Circle, High Road to Taos, and Wild Rivers Back Country. All alternatives analyzed in this Proposed RMPA/EA would result in either similar or reduced, negligible effects on National Scenic Byways, as described for Alternative A, *Proposed RMP*, in the 2011 Taos PRMP/FEIS. Additionally, the BLM would collaborate with groups that have been established to manage these byways and would notify them of any actions within the byway viewshed that might affect the purposes for which the byway is managed. Therefore, this resource was dismissed from detailed analysis. |
| Forestry and Woodland Products | All alternatives analyzed in this Proposed RMPA/EA would result in either similar or reduced, negligible effects on forestry and woodland products as described for Alternative A, *Proposed RMP*, in the 2011 Taos PRMP/FEIS. Therefore, this resource was dismissed from detailed analysis. |

Source: BLM 2011.
BLM = Bureau of Land Management; CFR = Code of Federal Regulations; EA = Environmental Assessment; FEIS = Final Environmental Impact Statement; PFYC = potential fossil yield classification; PRMP = Proposed Resource Management Plan; RMP = Resource Management Plan.

### *3.1.1 Analytical Assumptions*

Descriptions of the affected environment and analysis of the effects that program management could have on resources and resource uses can be found in the 2011 Taos PRMP/FEIS (BLM 2011). These previous descriptions and analyses have been considered in this Proposed RMPA/EA and incorporated into the applicable resource sections. New information since publication of the 2011 Taos PRMP/FEIS, if available, has been incorporated where applicable.

Assumptions specific to this RMPA/EA include the following.

- Geographic information system (GIS) data have been used in developing area calculations and generating maps. Calculations are dependent on the quality and

availability of data, and calculations in this Proposed RMPA/EA are representative of the most recent data. Given the scale of the analysis, the compatibility constraints between data sets, and the lack of data for some resources, all calculations are approximate and for comparison and analytic purposes only. Similarly, the maps (Appendix B) are provided for illustrative purposes and subject to the limitations discussed above. The BLM may receive additional GIS data; therefore, acreages may be recalculated and revised at a later date. Not all acreages reported may sum to the 242,668-acre decision area due to misalignment at more detailed scales and rounding.

- Implementation-level actions necessary to execute the land-use plan-level decisions in this Proposed RMPA/EA would be subject to further environmental review, including NEPA, as appropriate.
- The discussion of impacts is based on the best available data. Knowledge of the planning area and professional judgment, based on observation and analysis of conditions and responses in similar areas, are used to infer environmental impacts where data are limited.
- Surface-disturbing activities result from land uses and affect soils and vegetation to varying degrees, depending on the amount, location, and type of disturbance, soil type, time of year, climate, and surface hydrology. Surface-disturbing activities remove the protective vegetation cover and soil crusts.

Additional program- or resource-specific assumptions are included in respective sections below.

### *3.1.2 General Methodology for Analyzing Effects*

Potential impacts or effects are described using the same definitions used in the 2011 Taos PRMP/FEIS. Types of effects are changes to the environment from the alternatives that are reasonably foreseeable and include the following.

- **Direct effects** occur at the same time and place as the action responsible for the impact. For example, removal of vegetative cover caused by facility construction would be considered a direct effect on vegetation resources.
- **Indirect effects** are caused by the action, but occur later in time and farther removed in distance. For example, removal of vegetative cover caused by facility construction that consequently results in increased surface runoff and sedimentation of nearby streams would be considered an indirect effect on riparian resources. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and other related effects on natural systems.
- **Cumulative effects** are effects on the environment that result from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions (RFFAs), regardless of which agency (Federal or non-federal) or person

undertakes such other actions. Cumulative effects can result from individually minor, but collectively significant, actions that take place over time.

### *3.1.3 Cumulative Actions*

The cumulative effects discussion considers the alternatives in the context of the broader human environment—specifically, it addresses the incremental effect of each alternative when added to other past, present, and RFFAs. The analysis assesses the magnitude of cumulative effects by comparing the environment in its baseline condition with the expected effects of the alternatives and other actions in the same geographic area. The previous cumulative effects from relevant past, present, and RFFAs disclosed in the 2011 Taos PRMP/FIES have been considered and incorporated into the applicable resource sections. RFFAs considered in addition to those discussed in the 2011 Taos PRMP/FEIS include the following.

- Ongoing permitted dead and down fuelwood gathering
- Hazardous fuelwood reduction in the next 10 to 15 years
- Integrated weed management
- Development and incorporation of the Rio Grande Trail connectors to the John Dunn Bridge at the southern portion of Horsethief Mesa and at the Carson National Forest boundary at the northern portion of Horsethief Mesa, as described in the 2018 *Rio Grande Trail Master Plan* (NM EMNRD 2018)
- Development of the Questa to Red River Trail Corridor on the Carson National Forest (a 14-mile, multi-use, sustainable recreation trail that would connect the communities of Questa and Red River)
- Future permitted recreational events
- Ongoing updates, replacement, or modifications to existing transmission and distribution lines and potential development of new transmission lines
- Ongoing land-use authorizations, including leases, permits, and ROW authorizations to support utilities, film permits, and other activities
- Increases in temperatures and variations in precipitation resulting from climate change, which could affect soil conditions, vegetative health, and water availability in the planning area
- Continuing increases in visitation trends and recreational demands, as indicated by visitor use

# 3.2 Resources and Resource Uses

## *3.2.1 Cultural Resources*

### 3.2.1.1 Affected Environment

*Cultural resources* are past and present expressions of human culture and history in the physical environment. They represent physical locations of human activity, occupation, or use and can refer to historical or architectural objects, sites, structures, or places with potential public and scientific value, including locations of traditional cultural, ethnic, or religious significance to a specific social or cultural group.

As part of this planning effort, the BLM conducted a Class I literature review for the Monument (Seltzer-Rogers 2024). Archaeological remains documented in the area associated with prehistoric peoples include rock imagery (i.e., petroglyphs), rock shelters, shrines, small hunting blinds, chipping stations, ceramics, stone tools, projectile points, ground stone, and the remnants of ancient trails and structures. Archaeological remains associated with historic-period peoples include metal and glass artifacts, ceramics, and other refuse-related artifacts, petroglyphs, homestead features (e.g., root cellars, water-catchment devices), sheep corrals, campsites, roads, and mining features (Seltzer-Rogers 2024). The results of the Class I literature review[3] indicate that 163 previous cultural resource inventories, 926 previously recorded archaeological sites, 23 Historic Cultural Property Inventories (HCPIs), and two properties are listed on the State Register of Cultural Properties and the NRHP that intersect the decision area. Of the 926 previously recorded archaeological sites, 509 have been determined eligible for listing on the NRHP, 193 are recommended for listing on the NRHP or are unevaluated, and the remaining 224 sites have been determined not eligible for listing on the NRHP. Unevaluated sites are treated as eligible for listing on the NRHP until such time as further research can be conducted to determine their eligibility. Of the 23 HCPIs, only two have been determined eligible for listing on the NRHP; the remaining 21 are not eligible for listing. A review of historic records indicates that there are likely additional historical resources within the decision area that have not yet been documented.

### 3.2.1.2 Environmental Consequences

**Issue 1:** How would proposed management actions and land-use allocations affect cultural resources and archaeological sites in the Monument?

The 2011 Taos PRMP/FEIS (BLM 2011:374–379) describes the types of impacts that could affect cultural resources from planning-level decisions. Direct and indirect adverse effects on cultural resources can be characterized as those that result in the loss, degradation, or destruction of NRHP-listed or eligible historic properties, traditional cultural properties, or cultural landscapes. Many effects on cultural resources are permanent because, once

[3] Data sources for the Class I Report (Seltzer-Rogers 2024) include the Archaeological Records Management Section of the New Mexico Cultural Resources Information System, additional reports or other pertinent documents housed at the BLM Taos Field Office, the BLM's Government Land Office database, U.S. Geological Survey historic topographic maps, and historic aerial photographs.

disturbed, a cultural resource cannot be restored to its original context. The 2011 Taos RMP/FEIS (BLM 2011) indicates that potential direct and indirect adverse effects on cultural resources in the Monument could include impacts from land-tenure adjustments, land-use authorizations, livestock grazing, transportation, access, recreation, and the unauthorized removal of cultural resources.

Land disposal and acquisition could lead to direct and indirect adverse effects if lands with significant cultural resources were transferred out of Federal ownership because they would not be subject to the NHPA Section 106 process and, in most cases, cultural resources on private lands lack adequate legal protections. However, under all alternatives, the BLM would retain all lands in the decision area in Federal ownership.

In order for a cultural resource to be eligible for listing on the NRHP, it must retain enough integrity to convey its significance. Effects on cultural resources from land-use authorizations and other surface-disturbing activities are typically direct, permanent, and adverse because they can cause damage to or destruction of a site's ability to convey its significance. Continued use of parts of the Monument for grazing could cause direct, permanent, and adverse effects on cultural resources, including trampling and displacement of artifacts and destabilizing soils through the creation of livestock trails.

Increased visitation and recreation could also cause direct, permanent, and adverse effects on cultural resources. Since 2021, the Monument has seen increases in visitors and recreation (BLM 2021a). Increased access to remote areas through recreational and commercial land use can result in direct, permanent, and adverse effects associated with the resulting increase in human activity, which can lead to a greater potential for illegal artifact collection, vandalism, and trampling. Additionally, activities not subject to a recreational permitting process, such as dispersed recreation, also have the potential to adversely affect cultural resources under all alternatives. Conversely, beneficial effects on cultural resources could result from management decisions that would restrict surface-disturbing activities, acquire lands with significant cultural resources, close or limit travel and access, or establish areas as special designations, which would limit potential commercial use.

All Federal undertakings with the potential to affect historic properties must comply with Section 106 of the NHPA and its regulations at 36 CFR 800. For routine undertakings, the BLM follows the *State Protocol Between the New Mexico Bureau of Land Management and the New Mexico State Historic Preservation Officer* (BLM 2014). In addition to Section 106, other Federal laws and EOs provide some level of consideration and protection for cultural resources, including the Archaeological Resources Protection Act, NEPA, EO 13287, and Section 110 of the NHPA. In the course of managing cultural resources under these authorities, inventories to identify and evaluate cultural resources are often conducted. In the case of undertakings with the potential to affect historic properties, the four steps in the Section 106 process include: (1) defining the area of potential effect; (2) identifying and evaluating historic properties; (3) assessing effects; and (4) resolving adverse effects on historic properties by avoidance, minimization or mitigation. Cultural resource inventories add to the discovery of new sites and knowledge regarding cultural resources within the planning area, which would be a beneficial

effect on cultural resources. These laws also require consultation with federally recognized Native American Tribes and other interested parties. Adverse effects on significant cultural resource from any Federal undertaking would be resolved through NHPA Section 106 process under all alternatives.

**Alternative A: No-Action Alternative**

Under Alternative A, management of cultural resources would not change from the existing management prescribed in the 2012 Taos RMP (BLM 2012a). Direct and indirect impacts would remain the same as those described in the 2012 Taos RMP (BLM 2012a).

**Alternative B: Proposed Action (Proposed Monument Management Plan)**

Under Alternative B, management of cultural resources would change slightly to further protect the Monument and cultural resources. The BLM would protect all cultural resources, including those associated with playas, and would work cooperatively with livestock-grazing permittees to assess the effects of grazing on playas. Cultural landscapes would be defined by their periods of significance and how the cultural resources relate to each other and the natural environment, and then would be considered in implementation-level NEPA decisions, further protecting cultural resources.

Regarding land-use authorizations, Alternative B would manage 100 percent of the decision area as exclusion areas for wind- and solar-energy development. As described in Section 3.2.13, *Land Tenure and Land-use authorizations*, management under Alternative B would result in a 2.8-percent decrease of areas in ROW avoidance, but a 9-percent increase of ROW exclusion areas, compared to Alternative A. This increase in ROW exclusion represents 25.5 percent of the decision area. Surface disturbance associated with ROW development has the potential to damage or destroy cultural resources, causing direct, permanent, and adverse effects on cultural resources. However, because compliance with Section 106 of the NHPA is required prior to any Federal undertaking, Class III cultural resource inventories would often be required as a part of the permitting process, thus enabling avoidance, minimization, or mitigation of any adverse effects on historic properties.

Regarding livestock grazing, under Alternative B, the BLM would make four vacant allotments unavailable for livestock grazing, as described in Section 3.2.14, *Livestock Grazing*. This would reduce the potential for adverse effects on cultural resources from livestock grazing within these allotments, compared to Alternative A. Additionally, the implementation of cultural-resources management actions under Alternative B (see CUL Management Actions 11 and 15 in Appendix C of the Proposed RMPA/EA) would evaluate livestock-grazing allotments for all cultural resources, rather than for only significant cultural sites under Alternative A, and would require that the BLM work cooperatively with livestock-grazing permittees to assess impacts of grazing on playas to protect cultural resources. This would provide greater protection to cultural resources under Alternative B compared to Alternative A.

Regarding transportation and access, under Alternative B, the BLM would close 2.26 miles of previously limited primitive road to motorized use in Cerro de la Olla and would also close this area above 8,200 feet in elevation, consisting of 5,120 acres, in order to protect its primitive

character, as described in Section 3.2.16, *Transportation and Access*, which would reduce the potential for adverse effects from illegal artifact collection, vandalism, and trampling of cultural resources, compared to Alternative A.

Regarding recreation, under Alternative B, the BLM would adjust and remove the existing recreation-management allocations and designate three new SRMAs to focus management on the high-use areas within the Monument, as described in Section 3.2.15, *Recreation*. This would reduce the use of unauthorized roads and trails, which would reduce the potential for adverse effects of destruction or vandalism of Monument objects, including cultural resources, compared to Alternative A.

#### 3.2.1.3 Cumulative Effects

Past, present, and RFFAs with the potential to cause adverse effects on cultural resources in the planning area include land-use authorizations (i.e., leases, permits, and ROW authorizations) and actions that could result in surface disturbance, recreational uses, transportation or trail improvements, and urban expansion. Section 3.1.3, *Cumulative Actions*, describes RFFAs considered in addition to those in the 2011 Taos PRMP/FEIS (BLM 2011). Future trail development could contribute to increased recreation and tourism in the Monument, which could increase access to more remote areas that contain cultural resources. These activities would also increase the amount of human presence in the region, thereby increasing the likelihood of illegal artifact collection, vandalism, displacement, and trampling. However, special designations and restrictions on surface disturbance have the potential to provide cumulative beneficial effects on cultural resources within the planning area and region because they would restrict the frequency and extent of surface-disturbing activities. The potential adverse cumulative effects on cultural resources from Alternative B are anticipated to be slightly less than Alternative A because Alternative B would increase the overall acreage of ROW exclusion areas, make four vacant livestock grazing allotments unavailable, and protect 5,120 acres of the Cerro de la Olla unit. All Federal undertakings are subject to the NHPA Section 106 process.

### *3.2.2 Traditional Uses*

#### 3.2.2.1 Affected Environment

The Monument has a long history of human use (Seltzer-Rogers 2024). The Monument and the Taos vicinity contain the remains of materials from various cultures, including Paleoindian, Archaic, Ancestral Puebloan, Comanche, Apache, Ute, Hispanic, and Anglo/Euro-Americans. Traditional values of living communities can be manifested at locations, called *traditional cultural properties*, Native American sacred sites, or cultural landscapes. *Traditional use* includes subsistence activities, traditional livestock grazing, and a variety of cultural uses. *Traditional resources* can include archaeological sites, structures, topographic features, habitats, plants, wildlife, and minerals that Native Americans, Hispanic, or other groups consider essential for the preservation of traditional culture and traditional values.

The abundance of resources—including wild plants, animals, and rocks and minerals—found along the Rio Grande corridor and surrounding region made the area favorable to hunters and

gathers. Wild plants of known traditional importance include piñon, juniper, sagebrush, amaranth, various grasses, and various wildflowers. Wild animals of known traditional importance include bighorn sheep, elk, mule deer, bears, mountain lions, rabbits, coyotes, and various birds. Evidence associated with traditional hunting includes the construction of hunting blinds and the presence of projectile points and processing tools (e.g., scrapers, knives, bifaces, utilized flakes). Rocks and minerals, including obsidian, dacite, basalt, perlite, limestone, mica, sandstone, and quartzite, were procured for a variety of uses, including flaked-stone and ground-stone tools. Clay for pottery was also procured, and mica was used traditionally as a temper additive to pottery. Often, these traditional uses include ceremonial significance, and some areas within the Monument are considered sacred sites. Representatives of the Jicarilla, Navajo, Ute, Picuris, and Hispano communities, among others, have all identified specific locations within the San Luis Valley that contain plants and animals that have been or are currently used as raw material for cultural items, as well as food, fuel, medicinal, and ceremonial purposes (Wescott et al. 2016). Natural bodies of water also have ritual importance for Puebloan people and are often associated with water shrines (Ellis 1974; Fowles 2009).

Traditional-use resources can be affected by natural and human effects, including erosion, trail maintenance, vegetation treatments, recreational activities, and other construction and development activities. Increased visitation and recreation have caused adverse effects on traditional lands within the Monument, and overcrowding has displaced Tribal, traditional Hispanic, and local communities from popular Monument resource areas, including John Dunn Bridge and Cascabel Trailhead. As a result, traditional use patterns have shifted to undeveloped areas within the Monument, expanding the overall effects on Monument resources, which, along with the population growth of Taos County, has caused shifts in big game migration routes and increased soil erosion (BLM 2021a). Increased off-highway vehicle (OHV) use has also affected traditional resource use by allowing easier access to resources for traditional users and the general public.

#### 3.2.2.2 Environmental Consequences

**Issue 1:** How would proposed management meet the BLM's obligations under the American Indian Religious Freedom Act of 1978 and provide opportunities and access for traditional uses within the Monument while protecting other resources, including Monument objects and values?

Surface-disturbing activities, such as recreational uses, transportation or trail improvements, and ROW development, could directly and permanently adversely affect traditional-use resources and access to them. Land disposal can also lead to direct, indirect, and permanent adverse effects if lands with resources of traditional use were transferred to private ownership, which could limit access to traditional hunting, fishing, or resource-collection areas because no protective measures are required for these resources on private lands. However, under all alternatives, the BLM would retain in Federal ownership all lands in the decision area.

Increased public access to remote areas through recreational and commercial land use can also result in direct, permanent, and adverse effects on traditional-use resources because of the associated increase in human activity, which can lead to a greater potential for illegal artifact

collection, vandalism, and trampling. However, increased public access to remote areas could also provide additional access to traditional-use resources for traditional-use communities, which would be a direct beneficial effect to traditional uses. Beneficial effects on traditional-use resources also could result from management decisions that would restrict surface-disturbing activities or acquire lands with these resources.

#### Alternative A: No-Action Alternative

Under Alternative A, management of the traditional uses would not change from the existing management outlined in the 2012 Taos RMP (BLM 2012a). In addition, the BLM would continue to provide for ongoing consultation with Native American Tribal governments and strategies for protecting recognized traditional uses.

#### Alternative B: Proposed Action

Under Alternative B, specific management for traditional uses would be included that is not provided under Alternative A. The management under Alternative B would seek opportunities for co-stewardship of public lands and waters with Tribal Nations. The BLM would ensure that Native American Tribal members, Hispanic people, and members of other communities would retain access to religious and cultural sites for noncommercial traditional cultural and customary uses. In addition, under Alternative B, the management would identity, define, and delineate cultural landscapes within the Monument, recognizing them as a larger equivalent of cultural resources, and refine the definition and delineation of these cultural landscapes as additional information becomes available. The proposed management would ensure that access remained available to religious or cultural sites in the BLM-administered lands in the Monument by Native American Tribal members to perform ceremonial and traditional rites.

Surface disturbance associated with renewable energy or ROW development would have the potential to damage or destroy traditional-use resources. As described in Section 3.2.13, *Land Tenure and Land-use authorizations*, under Alternative B, the BLM would manage 100 percent of the decision area as exclusion areas for wind- and solar-energy development. Under Alternative B, ROW avoidance areas would decrease by 2.8 percent, and ROW exclusion areas would increase by 9 percent, which would reduce the potential for adverse effects on traditional-use resources compared to Alternative A.

Under Alternative B, the BLM would close 2.26 miles of previously limited primitive road to motorized use in Cerro de la Olla, as described in Section 3.2.16, *Transportation and Access*, which would reduce the potential for illegal artifact collection, vandalism, and trampling of traditional-use resources in this area, as compared to Alternative A.

Under Alternative B, the BLM would adjust and remove the existing recreation-management allocations and designate three new SRMAs to focus management on the high-use areas, as described in Section 3.2.15, *Recreation*. This would reduce the use of unauthorized roads and trails and destruction or vandalism of Monument objects, including traditional-use resources, compared to Alternative A.

#### 3.2.2.3 Cumulative Effects

Past, present, and RFFAs with the potential to cause adverse effects on traditional-use resources in the planning area include any land-use authorizations (i.e., leases, permits, and ROW authorizations) and actions that could result in surface disturbance, recreational uses, transportation or trail improvements, and urban expansion.

Section 3.1.3, *Cumulative Actions*, describes RFFAs considered in addition to those in the 2011 Taos PRMP/FEIS (BLM 2011). Future trail development would contribute to increased recreation and tourism in the Monument, which would increase access to more remote areas that contain traditional-use resources. These activities would also increase the amount of human presence in the region, thereby increasing the likelihood of illegal artifact collection, vandalism, displacement, and trampling. However, increased public access to remote areas could also provide additional access to traditional-use resources for traditional-use communities, which would be a beneficial effect to traditional uses.

Special designations and restrictions on surface disturbance have the potential to provide cumulative beneficial effects on traditional-use resources within the planning area and region because they would restrict the frequency and extent of surface-disturbing activities. The potential adverse cumulative effects on traditional-use resources from Alternative B are anticipated to be slightly less than Alternative A because Alternative B increases the overall acreage of ROW exclusion areas and protects 5,120 acres of the Cerro de la Olla unit under Alternative B.

### *3.2.3 Fish and Wildlife*

#### 3.2.3.1 Affected Environment

The planning area supports a wide variety of aquatic and terrestrial wildlife, as described in the 2011 Taos PRMP/FEIS (BLM 2011:205–220).

##### Fish and Amphibians

Annual fish population surveys are conducted by the BLM Taos Fisheries and Aquatics Program in conjunction with the New Mexico Department of Game and Fish (NMDGF). The Taos Field Office has identified 16 fish species as occurring in the Rio Grande and its tributaries in the planning area, 10 of which are nonnative and introduced species of game fish. Native species include Rio Grande chub (*Gila pandora*), Rio Grande cutthroat trout (*Oncorhynchus clarki virginalis*), longnose dace (*Rhinichthys cataractae*), red shiner (*Cyprinella lutrensis*), fathead minnow (*Pimephales promelas*), flathead chub (*Platygobio gracilis*), and Rio Grande sucker (*Catostomus plebeius*). Baseline amphibian surveys have recorded the spadefoot toad (*Scaphiopodidae multiplicata*) and tiger salamander (*Ambystoma mavortium*) in playas, and Woodhouse's toad (*Anaxyrus woodhousii*) and American bullfrog (*Rana (Aquarana) catesbeiana*) in riparian habitats within the planning area.

### Migratory Birds and Raptors

The Monument is part of the Central Migratory Flyway, which covers the central portion of the US, comprising mostly Great Plains states. A portion of the flyway is concentrated over the Rio Grande ecosystem in New Mexico, where perennial water and adjacent habitats provide resources for millions of migratory birds. Species that are known to migrate along this pathway include sandhill crane (*Antigone canadensis*) and American avocet (*Recurvirostra americana*), along with numerous species of geese, ducks, hummingbirds, raptors, passerines, and shorebirds. The planning area is in Bird Conservation Region 16: Southern Rockies/Colorado Plateau, and the BLM monitors breeding bird populations within the monument through Breeding Bird Surveys, which are conducted yearly.

The Rio Grande Gorge provides important raptor-nesting substrate. The BLM monitors nesting raptors in the Rio Grande Gorge and Rio San Antonio Gorge, located along the eastern boundary of the Monument and northwestern corner of the Monument, respectively. The golden eagle (*Aquila chrysaetos*), great-horned owl (*Bubo virginianus*), peregrine falcon (*Falco peregrinus*), prairie falcon (*Falco mexicanus*), American kestrel (*Falco sparverius*), red-tailed hawk (*Buteo jamaicensis*), and turkey vulture (*Cathartes aura*) nest within the planning area. Bald eagles (*Haliaeetus leucocephalus*) are also known to winter along the Rio Grande and other perennial water resources in the Monument. The Rio Grande provides permanent surface water that attracts waterfowl and supports nesting habitat for several waterfowl species, including ducks, geese, and American coot (*Fulica americana*) (BLM 2011).

### Big Game

The planning area supports seasonal habitats for big-game species. *Seasonal habitats* are those that provide important resources, such as food or cover, for big-game species during different portions of their yearly lifecycles. The planning area also contains wildlife water catchments and livestock-watering systems that provide essential resources for big-game species. Although the Taos Plateau is part of the North-Central Priority Landscape for Winter Range and Big-Game Movement, the NMDGF does not identify the area as a Conservation Opportunity Area in their *New Mexico State Action Plan* (NMDGF 2024). The Monument is part of a greater landscape on the Taos Plateau that provides important winter range for resident and migratory big game, including mule deer (*Odocolileus hemionus*), elk (*Cervus canadensis nelson*), and pronghorn (*Antilocarpa americana*). Within the Taos Plateau, 61,330 acres have been identified as big-game migration corridors, 218,962 acres as winter range, and 100,191 acres as summer range for big-game species (USGS 2022). The area is considered one of the most significant winter habitats for migrating elk. A portion of the North-Central Elk Herd utilizes the Taos Plateau during different times of the year. The highest densities of elk on the Taos Plateau usually occur in winter, when a portion of the migratory segment of the population meets up with elk that are year-round residents of the area. The population estimate for this larger herd is 25,300 to 29,000. However, it is important to note that the range that this herd occupies is far larger than the Taos Plateau and encompasses adjacent mountain ranges to the west. The San Antonio/ Pot Mountain Habitat Management Area (HMA) is located on the Taos Plateau and provides

critical winter habitat for resident and migratory elk. The San Antonio/Pot Mountain HMA also supports habitat for antelope and mule deer on the Taos Plateau.

Rocky Mountain bighorn sheep (*Ovis canadensis*), a native species, were introduced to the Rio Grande corridor in 2006, with the establishment of 23 bighorn sheep on Pueblo land adjacent to the Rio Grande Gorge by the Taos Pueblo. In collaboration with the BLM, NMDGF augmented the herd with an additional 25 sheep released on BLM-administered land in 2007. Habitat within the Rio Grande Gorge north of Taos Junction Bridge was identified by the NMDGF in a 1993 habitat-suitability study as having the second-best suitable habitat of seven low-elevation areas studied in New Mexico. In 2023, bighorn sheep surveys were conducted, which resulted in the estimated numbers of bighorn sheep in the Rio Grande Gorge being between 225 and 275, as compared to the 2021 numbers of 375 to 420, indicating that the Rio Grande Gorge herd could be stable to decreasing (BLM 2021b).These results build on the trend of low and decreasing lamb-to-ewe ratios observed since a February 2020 spillover of *Mycoplasma ovipneumoniae* into the local bighorn sheep population.

#### Other Mammals

The Monument is home to many common other mammal species, including coyotes (*Canis latrans*), foxes (*Vulpes* sp.), black-tailed jackrabbits (*Lepus californicus*), desert cottontails (*Sylvilagus audubonii*), skunks (*Mephitis* sp.), beaver (*Castor canadensis),* and bobcats (*Lynx rufus*). A variety of rodents, such as mice, rats, squirrels, and chipmunks, inhabit the Monument. Extirpated from New Mexico in the 1950s, the NMDGF reintroduced the North American river otter (*Lontra canadensis*) to the upper Rio Grande basin between 2008 and 2010 (Cox and Murphy 2019). Additional otters were released into the upper Rio Grande in 2021 to boost the genetic diversity of the small established population.

Extensive columnar basalt cliff lines along the length of the Rio Grande Gorge provide important bat habitat. Sixteen bat species have been recorded in the Monument, including Mexican free-tailed bat (*Tadarida brasiliensis*), big brown bat (*Eptesicus fuscus*), fringed myotis (*Myotis thysanodes*), spotted bat (*Euderma maculatum*), and Townsend's big-eared bat (*Corynorhinus townsendii*) (North American Bat Monitoring Program 2023).

#### Pollinators

The Monument provides habitat for a variety of terrestrial pollinators. The most common grassland pollinators are solitary ground nesting bees, but flies, beetles, and butterflies are also found in grasslands. Between 2016 and 2020, biologists collected information in the planning area on bee species, recording approximately 187 species.

#### Habitat Trends

Habitat changes resulting from alteration of landcover types are occurring in the planning area. Primary causes of both terrestrial and aquatic habitat conversion are increasing recreational activities, invasive species, climate change, lower river flows, and less precipitation. Historical fire suppression and widespread livestock grazing in the planning area have also resulted in alterations or departures of habitat conditions, such as piñon–juniper encroachment in

shrublands and shrubland encroachment into grassland ecosystems. Habitats in the planning area have been fragmented from construction of roads and recreational trails.

### 3.2.3.2 Environmental Consequences

**Issue 1:** How would proposed management restore, maintain, or enhance priority avian, terrestrial, and aquatic species' populations and their habitat as Monument objects?

**Issue 2:** How would proposed management affect habitat connectivity for terrestrial wildlife, aquatic wildlife, and fish?

#### Alternative A: No-Action Alternative

Under Alternative A, management of fish and wildlife would not change from the existing management prescribed in the 2012 Taos RMP (BLM 2012a). Current management provides protection for aquatic and terrestrial wildlife and habitats, while allowing for other discretionary uses consistent with Proclamation 8946 and restrictions associated with the management of special designations and other resources, including ACECs, WSRs, designated wilderness, and lands with wilderness characteristics. Existing management under Alternative A and application of the BMPs outlined in Appendix D would minimize the potential and intensity of adverse effects from activities on fish and wildlife species and their habitats.

#### Alternative B: Proposed Action (Proposed Monument Management Plan)

Under Alternative B (Proposed Monument Management Plan), management of fish and wildlife and their habitats would continue as prescribed in the 2012 Taos RMP (BLM 2012a), with additional management actions to further restore, maintain, or enhance priority species[4] and their habitats, as described below. Where feasible, adaptive management would be implemented following monitoring, thereby providing additional flexibility to adjust management as needed to reduce, minimize, or avoid adverse effects. Overall, management for fish and wildlife and their habitats under Alternative B would result in greater short- and long-term beneficial effects when compared to Alternative A, as detailed below.

When not a danger to rafters, important habitat for fish and other aquatic species would be enhanced by leaving and protecting LWD in Rio Grande, Red River, Rio Hondo, Arroyo Hondo, Rio San Antonio, and Rio Pueblo de Taos, providing additional direct and long-term beneficial effects on aquatic species when compared to Alternative A. Like Alternative A, the modification of playas and adjacent watersheds would be prohibited, except Alternative B would increase direct beneficial effects on wildlife and their habitat by prohibiting the modification of lentic areas and adjacent uplands, unless for small-scale scientific research activities. Alternative B would also facilitate the restoration of playas and other lentic habitats to proper functioning condition to benefit aquatic wildlife. Seeps and springs would be surveyed for aquatic and riparian habitat and community composition. To maintain aquatic habitat, modification of seeps and springs would be prohibited.

[4] *Priority species* are fish and wildlife species requiring protective measures and management guidelines to ensure their perpetuation.

Buffer zones, seasonal restrictions, and BMPs for recreational use would be applied to maintain the integrity of wildlife habitat and known avian nest sites. These measures would directly and indirectly benefit wildlife by avoiding or minimizing noise, human presence, and related disruptions to wildlife associated with seasonal recreational activities. Under Alternative B, all roads and trails would be located to minimize harassment of wildlife or substantial disruption of wildlife habitats. To reduce potential conflicts between raptors and other resource uses, specific mitigation strategies applicable to the BLM and applicant-generated proposals (e.g., SRPs) would be implemented. These activities would include, but not be limited to, restricting OHV use and rock-climbing activities and avoiding trail development in important raptor breeding, nesting, roosting, and foraging habitat, surveying habitat for raptor use before permit approval, and monitoring dispersed recreation to identify areas where raptor nesting success is affected.

The Proposed RMPA under Alternative B would allow for hot air balloon flights below the rim of the gorge outside of the seasonal closure period (January 1 through August 31), but only in the area between John Dunn Bridge and Manby Hot Springs. Within the John Dunn Bridge RMZ, tours would be allowed throughout the year, except for flights below the rim from January 1 through August 31. Flights below the rim outside of the seasonal closure would be restricted to the area between the John Dunn Bridge and Manby Hot Spring. Launching would be approved at three designated sites above the bridge. A wildlife stipulation would be added to hot air balloon SRPs that would require that wildlife not be pursued if seen from hot air balloons. Pilots would be required to leave the area if wildlife were showing stressed behavior, such as running away from the balloon, cowering, or hiding. These spatial and seasonal restrictions would protect unique and finite wildlife and finite resources within the gorge, resulting in short- and long-term beneficial effects on raptors, migratory birds, and Rocky Mountain Bighorn Sheep, when compared to Alternative A.

SRPs may be subject to adaptive management strategies that apply spatial and timing limitations on activities in order to protect important wildlife habitat, which would provide more flexibility than Alternative A.

Under Alternative B, the BLM would consider using livestock grazing as a vegetation-management/-maintenance tool north of the Cerro del Yuta Wilderness boundary to promote forage growth for wildlife utilization (see Appendix B, Map B.2). This management tool would result in long-term beneficial effects on wildlife and would only be applied to approximately 2,700 acres when determined beneficial by range specialists and wildlife biologists and following site-specific NEPA analysis. Existing livestock exclosures along streams, wetlands, and riparian areas would continue to be maintained per the terms and conditions of existing cooperative agreements; however, additional exclosures may be implemented, as necessary, for riparian areas, wetlands, playas, and watershed health and to protect critical wildlife habitat or other Monument objects, thus providing additional short- and long-term beneficial effects on wildlife when compared to Alternative A.

The BLM is directed by the Instruction Memorandum (IM) 2023-005, *Change 1 – Habitat Connectivity on Public Lands*, to ensure that habitat for wildlife, fish and plants is “sufficiently

inter-connected." The policy further directs BLM offices to consult with State wildlife and fish agencies and Native American Tribes to provide insight into assessing and managing habitat connectivity.

Under Alternative B, wildlife habitat would be managed on a landscape scale, considering the relationship between large wildlife populations and smaller isolated populations, whenever possible and when data become available. To allow for greater terrestrial wildlife movement, newly constructed fences would be built to BLM wildlife-friendly specifications to allow safe wildlife passage, except for fences built specifically to keep native ungulates out of an area (i.e., forage-monitoring plots). Increased habitat connectivity would result from modifying, replacing, or removing fences identified as barriers to wildlife movement. In collaboration with the NMDFG, unnecessary aquatic barriers that do not serve as barriers separating native and nonnative salmonids would be removed to promote aquatic connectivity. Effects from Alternative B on wildlife habitat connectivity would be direct and indirect, beneficial, and long term.

Proposed ROW corridors under Alternative B, particularly the Powerline Falls ROW corridor, would present a long-term collision hazard for birds if new transmission lines were developed. Direct adverse effects would include collision hazards during aerial pursuit of prey and electrocution hazard during perching. All authorizations would be subject to NEPA review, and site-specific mitigation measures would be identified through the environmental review process. Application of BMPs (Appendix D) would also require applicants to incorporate raptor and avian protection in project designs. Therefore, the adverse effects of ROW corridor designations on avian species would be minimized under Alternative B.

Management for other resource programs under Alternative B, specifically lands with wilderness characteristics and land-use authorizations (e.g., ROW exclusion), would also provide greater benefits to fish and wildlife, when compared to Alternative A, by managing more acreage of the decision area subject to surface-disturbing restrictions.

#### 3.2.3.3 Cumulative Effects

Past, present, and RFFAs affecting fish and wildlife, and their habitats, in the planning area include disturbance from recreation and habitat alterations from increased recreational activities, invasive species introduction and spread, climate change, lower river flows, less precipitation, historical fire suppression, and livestock grazing. Habitat fragmentation occurs within the planning area as a result of the current road and trail network; however, mitigation measures through site-specific analysis for future travel-management planning would be applied to minimize fragmentation on the landscape in priority species' habitats. Future land-use authorizations and activities that would result in habitat disturbances (e.g., vegetation treatments, ROW authorizations) would continue to be evaluated on a case-by-case basis to avoid or minimize adverse effects on priority fish and wildlife species and their habitats in the decision area. The contribution of Alternative A and Alternative B to the effects on fish and wildlife and their habitats are anticipated to be similar, with Alternative B offering fewer adverse effects and greater beneficial effects than Alternative A due to additional management to protect fish and wildlife and additional restrictions on surface-disturbing activities over a larger

acreage for the protection of other resources, such as lands with wilderness characteristics and land-use authorizations.

## *3.2.4 Special Status Species*

Special status species include federally listed and proposed species, Federal Candidate species, and BLM sensitive species. Federally Endangered or Threatened species are those that the Secretary of the Interior has officially listed under the ESA and for which a final rule has been published in the FR. According to the ESA, as amended, an *Endangered species* is an animal or plant species in danger of extinction throughout all or a significant portion of its range. A *Threatened species* is likely to become Endangered within the foreseeable future throughout all or a significant portion of its range. Species proposed for listing as Threatened or Endangered are managed with the same level of protection as those already listed. *Proposed species* are those that the Secretary of the Interior has officially proposed for listing as Endangered or Threatened and for which a proposed rule has been published in the FR. Species that have been removed (i.e., delisted) from the ESA receive the same management as an Endangered or Threatened species for 5 years following the delisting decision published in the FR.

Candidate species do not have ESA protection and are managed as BLM Sensitive Species; the BLM policy for candidate species is contained in BLM Manual 6840, *Special Status Species Management* (BLM 2008a). The BLM conducts special status species management consistently with the principles of multiple use for the conservation of candidate species and their habitat. The BLM has two objectives for special status species: (1) to conserve and/or recover ESA-listed species and their habitats; and (2) to initiate proactive conservation measures that reduce or eliminate threats to BLM Sensitive Species to minimize the likelihood of ESA listing. Manual 6840 also requires that BLM-authorized actions do not contribute to the need to list any special status species under the provision of the ESA or contribute to the designation of additional Critical Habitat.

Special status species require specific management action and attention resulting from population or habitat concerns. In addition to the management contained in Section C.2.4 of Appendix C, management guidance for Alternative B specific to special status species occurring within the Monument is provided in Appendix E.

### 3.2.4.1 Affected Environment

Federally listed species that are present or have the potential to be present in the planning area are listed in Table 3-2. The planning area contains designated Critical Habitat for the Endangered southwestern willow flycatcher (*Empidonax traillii extimus*); no other designated or proposed Critical Habitat occurs in the planning area.

**Table 3-2. Federally Listed, Proposed, and Candidate Species and Critical Habitat Documented in or Potentially Occurring in the Planning Area**

| Common Name (Scientific Name) | Habitat | Federal Status | BLM Status | Potential to Occur in the Planning Area |
|---|---|---|---|---|
| Canada lynx (*Lynx canadensis*) | Generally occurs in boreal and montane forests dominated by coniferous or mixed forest with thick undergrowth and downed woody debris (USFWS 2017). | Threatened with Critical Habitat | – | No |
| New Mexico meadow jumping mouse (*Zapus hudsonius luteus*) | Found along permanent water in areas with sedges, forbs, alder, and/or willows; large wet meadows on river floodplains; and along irrigation ditches. Prefers areas with herbaceous vegetation at least 24 inches tall (USFWS 2020a). | Endangered with Critical Habitat | – | No |
| Mexican Spotted Owl (*Strix occidentalis lucida*) | In New Mexico, nests in caves, cliffs, or trees in steep-walled canyons of mixed conifer forests. Habitat consists of remote areas with high canopy closure and high stand diversity that is multilayered with large, mature trees, downed logs, and snags (USFWS 2012). | Threatened with Critical Habitat | – | No |
| Southwestern Willow Flycatcher (*Empidonax traillii extimus*) | Occurs in dense riparian habitats along streams, rivers, and other wetlands. Habitat types for this species include native broadleaf riparian, monotypic exotic, and mixed exotic/native broadleaf. Habitat occurs at elevations below 8,500 feet. This species primarily prefers very dense mid-story (i.e., 6.6 to 9.8 feet tall) stands of riparian vegetation that are at least 33 feet wide (USFWS 2013). | Endangered with Critical Habitat | – | Yes |
| Yellow-Billed Cuckoo (*Coccyzus americanus*) | Breeds in riparian woodlands with developed canopies and dense understory vegetation greater than 12.3 acres in size (USFWS 2014; Halterman et al. 2016). | Threatened | – | Yes |
| Rio Grande Cutthroat Trout (*Oncorhynchus clarkii virginalis*) | Prefers clear mountain streams or lakes with large substrate. In New Mexico, populations are restricted to headwater systems (NMDGF 2022). | Candidate | Sensitive | Yes |

| Common Name (Scientific Name) | Habitat | Federal Status | BLM Status | Potential to Occur in the Planning Area |
|---|---|---|---|---|
| Monarch Butterfly (*Danaus plexippus*) | Occurs throughout New Mexico during the warm season, but is most abundant in southeastern New Mexico. For reproduction, it exploits large milkweed populations during summer. Habitat is generally mesic or wet areas supporting milkweed or other nectar species (USFWS 2020b). | Candidate | Sensitive | Yes |
| Silverspot (*Speryeria nokomis nokomis*) | Known to occur between 5,200 and 8,300 feet. Requires moist habitats in mostly open meadows with a variety of herbaceous and woody vegetation. (USFWS 2021). | Threatened | – | Yes |

Source: USFWS 2024a.

Per the ESA and Manual 6840, lists of special status species are revised every 5 years; consequently, additional special status species may be found to occur within the Monument in future years based on the most recent listing status at that point in time. Since 2012, the U.S. Fish and Wildlife Service (USFWS) has changed the listing status of two species; the yellow-billed cuckoo (*Coccyzus americanus*) and Silverspot (*Speyeria nokomis nokomis* ) have been listed as Threatened.

The Monument provides habitat for aquatic BLM Sensitive Species, including Rio Grande cutthroat trout, Rio Grande sucker, Rio Grande chub*,* and northern leopard frog (*Lithobates pipiens*) (BLM 2024a).

Terrestrial wildlife BLM Sensitive Species occurring or potentially occurring the planning area include Gunnison's prairie dog (*Cynomys gunnisoni*), Townsend's big-eared bat, spotted bat (*Euderma maculatum*), and hoary bat *(Lasiurus xanthinus*). Western bumble bee (*Bombus occidentalis*), American bumble bee (*Bombus pensylvanicus*), monarch butterfly (*Danaus plexippus plexippus*), and Yuma skipper (*Ochlodes yuma anasazi*) are BLM special status insects known to occur in the planning area (BLM 2024a).

BLM sensitive bird species known to occur in the planning area include Bendire's thrasher (*Toxostoma bendirei*), Chestnut-collared longspur (*Calcarius ornatus*), Mexican whip-poor-will (*Antrostomus arizonae*), pinyon jay (*Gymnorhinus cyanocephalus*), Virginia's warbler (*Leiothlypis virginiae,* loggerhead shrike (*Lanius ludovicianus*), and mountain plover (*Charadrius montanus*) (BLM 2024a).

BLM plant Sensitive Species in the planning area include Ripley's milkvetch *(Astragalus ripleyi*)*,* Taos milkvetch (*Astragalus puniceus var. gertrudis*), Taos (or Spellenberg's) springparsley (*Cymopterus spellenbergii*), Taos nailwort (*Paronychia "leucochthonicoloa"*), Bill's neoparrya

(*Neoparrya lithophila*), Rio Chama blazingstar (*Mentzelia conspicua*), and clipped wild buckwheat (*Eriogonum lachnogynum* var. *colobum*) (BLM 2024a).

### 3.2.4.2 Environmental Consequences

The BLM protects federally listed species by requiring site-specific evaluations and clearances and by applying more stringent management prescriptions in areas that have been specially designated to protect these species. Under all alternatives, any action that may affect federally listed species and/or Critical Habitat would require consultation with the USFWS under Section 7 of the ESA. Commitments to avoid adverse effects on special status species would be met by applying appropriate stipulations (e.g., timing or seasonal restriction or site-specific limitations) or by not authorizing the action altogether. Although many resource programs have the potential to affect special status species and their habitats, the analysis in this Proposed RMPA/EA focuses on planning issues identified for the RMPA: recreation and vegetation management. Potential effects on special status species from management of other resource programs would be as described in the 2011 Taos PRMP/FEIS (BLM 2011:403–408).

**Issue 1:** How would proposed management for recreation, livestock grazing, and vegetation management (i.e., vegetation treatments) affect special status species populations and their habitat?

#### Alternative A: No-Action Alternative

Under Alternative A, management for recreation and vegetation treatments would continue to be implemented as prescribed in the 2012 Taos RMP (BLM 2012a), except where necessitated by additional species' listing determinations. For the species evaluated in the 2011 RMP, the types of adverse effects from recreation and vegetation-management decisions under Alternative A would be the same as described in the 2011 Taos PRMP/FEIS (BLM 2011:403–408).

For those species listed since 2012, vegetative treatments would be designed to benefit most special status species. Ongoing and increasing recreational-boating access and fishing opportunities would increase the probability that recreational activities could adversely affect special status species' habitat for yellow-billed cuckoo. Short- and long-term direct and indirect effects on special status species would continue to be avoided or minimized by conducting site-specific evaluations and clearances and implementing protective measures.

#### Alternative B: Proposed Action (Proposed Monument Management Plan)

Recreational activities and their intensity on the landscape would have varying degrees of effects on special status species habitat; however, Alternative B would not increase recreational activity, nor prioritize management of recreational objectives over special status species habitat, when compared to Alternative A. Although the recreational activities themselves would have potential to result in short-term direct and indirect adverse effects on special status species by degrading habitat, increasing stress, or altering wildlife behavior, overall effects under Alternative B would be the same as Alternative A. Under Alternative B, land-use authorization activities (e.g., utility corridors, ROWs) could adversely affect special status

species and their habitats, particularly special status plant species with known occurrences and suitable habitat within the proposed ROW corridors. However, these authorizations would be subject to site-specific NEPA analysis to determine whether special status species or their habitats would be affected. Additionally, implementation of BMPs would minimize the potential for short- and long-term adverse effects by requiring surveys for BLM special status species and their habitat prior to any surface disturbing activity; utility line ROWs or upgrades outside existing utility line ROWs would only be authorized if consistent with the care and management of BLM special status species and Monument objects (see Appendix D).

Under Alternative B, vegetation-management treatments would continue as prescribed in the 2012 Taos RMP (BLM 2012a), with some minor changes intended to allow for more flexibility, as informed by best-available science. Adaptive management principles would be used to evaluate and identify the appropriate treatments to move community types toward proper ecological function. The effects from the Alternative B on special status species from vegetation management treatments would be direct and indirect, and long-term.

#### 3.2.4.3 Cumulative Effects

Past, present, and RFFAs affecting special status species and their habitats in the planning area, including drought, aridification, wildfire frequency and severity, are expected to continue and increase in intensity in the planning area and cumulatively contribute to adverse effects on special status species. Changes to vegetation composition in the planning area are expected from approved vegetation-management and prescribed-fire activities, wildfire, livestock grazing, and other uses. Additionally, recreational and traditional uses are expected to increase and may affect future special status species distributions and habitat suitability. The contribution of Alternative A and Alternative B to the effects on special status species and their habitats are anticipated to be similar, with Alternative B having fewer adverse effects and greater beneficial effects than Alternative A due to additional flexibility for vegetation treatments and application of adaptive management principles.

### *3.2.5 Geology*

#### 3.2.5.1 Affected Environment

Proclamation 8946 identifies the need to maintain the natural and scientific resources of the Monument, which includes features that preserve the geologic history of the Monument. The Monument is located within the Taos Plateau Volcanic Field, which is part of the greater Rio Grande Rift, a north–south trending continental rift zone that separates the Colorado Plateau province to the west from the Great Plains of the interior North American craton to the east (Chapin and Cather 1994; Thompson et al. 2022). The Taos Plateau volcanic field covers an area of approximately 1,800 square miles, making it the largest volcanic field in the Rio Grande Rift. The eruptive volcanism in the region spans 24 million years (from 26 to 2 million years ago), resulting in a high diversity in rock composition and volcanic edifice morphology (Thompson et al. 2022). Thompson and McMillan (1992) identified three unique periods of volcanism within the Taos Plateau volcanic field: Early-rift (late Oligocene to early Miocene), Post-magmatic lull (Miocene), and Late-rift (Pliocene to Pleistocene). The Taos Plateau volcanic

field is particularly unique because it provides a window into the only active continental rift in North America.

The dominant rock units preserved in the Taos Plateau volcanic field are basaltic to andesitic lava flows, and dacite lava flows and domes, including the prominent plateau-forming lavas of the Servilleta Basalt and locally preserved lava flows of the Hinsdale Formation on the western side of the Monument. The dominant Servilleta basalt flows are incised by the Rio Grande River, which formed the Rio Grande Gorge and provides exceptional cross sections of volcanic stratigraphy. The larger dacite volcanoes include San Antonio Mountain (located outside and west of the Monument), Ute Mountain, and the Guadalupe Peaks (including Guadalupe Mountain in the eastern portion of the Monument) (Thompson and McMillan 1992). The peak of Ute Mountain (Cerro del Yuta), a large dacite volcano in the northeastern corner of the Monument, marks the highest point in the Monument.

Small deposits of Santa Fe Group sediments are mapped within the Monument and are often interbedded with lava flows. The Upper Santa Fe Group generally consists of conglomerate, sandstone, and mudstone deposited by alluvial fans and alluvial flats (i.e., piedmont deposits) as well as cross-bedded sandstone deposited in a fluvial environment by the ancestral Rio Grande River (i.e., axial-fluvial deposits), spanning from southern Colorado to southern New Mexico (Strain 1969, 1966; Mack et al. 1993). The Lower Santa Fe Group is predominantly sandstone and conglomerate, with minor contributions of mudstones deposited in bolsons (Baldwin 1956; Connell et al. 2002; Galusha 1966; Galusha and Blick 1971; Maldonado and Kelley 2009; Seager et al. 1971; Woodward and Timmer 1979). Within the Lower Santa Fe Group, the Chamita, Abiquiu, Tanos, Popatosa, and Rincon Valley Formations contain significant tuffs and basalt flows that are used to radiometrically date the formations (Asher-Bolinder 1988; Connell et al. 2002; Koning and Aby 2005; Maldonado and Kelley 2009; McIntosh and Quade 1995; Morgan et al. 1998).

### 3.2.5.2 Environmental Consequences

**Issue 1:** How would proposed management actions and allowable uses affect unique geologic features?

The 2011 Taos PRMP/FEIS (BLM 2011) does not explicitly describe the types of effects that proposed management actions and land-use allocations could have on geologic resources. However, the effects on geologic resources would be broadly analogous to those described for paleontological resources (BLM 2011:397–401). If unique geologic features within the Monument were destroyed, altered, or removed, then they could not be restored, and the effects would be adverse and long-term.

#### Alternative A: No-Action Alternative

Under Alternative A, management of geologic resources would not change from the existing management prescribed in the 2012 Taos RMP (BLM 2012a), which does not include specific management direction for geologic resources. However, existing protective management for special designations, lands with wilderness characteristics, designated wilderness, and other

constraints on development contained in the 2012 Taos RMP and Proclamation 8946 would minimize adverse effects and provide long-term beneficial effects on geologic resources under Alternative A.

**Alternative B: Proposed Action (Proposed Monument Management Plan)**

Under Alternative B, the BLM would apply existing constraints to mineral withdrawal, solar/wind ROW exclusions, and recreation-area restrictions on surface-disturbing activities to protect geologic objects. Alternative B would also implement case-by-case evaluations and site-specific reviews of surface-disturbing activities to determine whether geologic objects would be adversely affected, providing increased short- and long-term beneficial effects on geologic resources when compared to Alternative A. The preservation and protection of geologic objects from surface-disturbing activities would be prioritized under Alternative B, resulting in additional short- and long-term beneficial effects when compared to Alternative A.

#### 3.2.5.3 Cumulative Effects

Past, present, and RFFAs with the potential to result in cumulative adverse effects on geologic resources in the planning area include actions that could result in surface-disturbance, such as land-use authorizations (i.e., leases, permits, and ROW authorizations), and other actions relating to recreational uses and visitation. Section 3.1.3, *Cumulative Actions*, describes RFFAs considered in addition to those in the 2011 Taos PRMP/FEIS (BLM 2011). The BLM anticipates future growth and increased use of the Monument by the public; increased visitation and resource uses could contribute adverse effects on geologic resources within the Monument. OHV use, trail building, and social trail use would bring more of the public into contact with the unique geologic features of the Monument. Natural impacts, such as erosion, would also continue to affect geologic resources. The contributions of Alternative A and Alternative B to the cumulative adverse effects on geologic resources are anticipated to be similar, with Alternative B contributing slightly less than Alternative A because Alternative B prioritizes preservation and protection of geologic objects and places additional restrictions on surface-disturbing activities over a larger acreage for the protection of other resources, such as lands with wilderness characteristics and land-use authorizations. All RFFAs with surface-disturbing potential would be subject to site-specific NEPA analysis to determine whether geologic objects would be affected, which would further reduce potential cumulative effects under Alternative B.

### *3.2.6 Soils*

#### 3.2.6.1 Affected Environment

Soil is a key resource for public land health, and the preservation of topsoil is a high priority for the BLM. The 2011 Taos PRMP/FEIS (BLM 2011:227) gives a general overview of soil types and the relation of soil condition to public land health. US Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) soil survey data lists 53 soil map units within the decision area (NRCS 2024). Luhon–Travelers, extremely stony complex (1- to 9-percent slopes), Stunner–Travelers, extremely stony Luhon association (2- to 8-percent slopes), and Rock outcrop–Raton, very stony complex (15- to 30-percent slopes) are the dominant soil units within

the decision area, comprising 24.5 percent, 17.6 percent, and 12.3 percent of the decision area, respectively. All of these mapped units are classified as well-drained soils (NRCS 2024).

Erosion is the process by which soils are transported by wind or water. Most soils in the decision area are subject to increased wind or water erosion that result from surface disturbances, although some soils have higher susceptibility due to small particle size and/or slope, particularly soils in the southern portion of the Monument (BLM 2011:227). Vegetation departure that has occurred within soil systems with potential for erosion has been documented in rural and shrubland areas of the Taos Plateau (Waltson et al. 2016). Biological soils crusts are composed of cyanobacteria, fungi, and lichen growing in a symbiotic relationship on the soil surface and play an important role in the protection and stabilization of soil surfaces from erosion (Bryce et al. 2012). The location and extent of biological soil crusts within the decision area is not currently known. The *Río Grande del Norte National Monument Science Plan* (BLM 2019a) identifies biological soil crusts as a subject in need of research; surveys, mapping, and/or modeling efforts are anticipated to identify the extent of biological soils crusts over the life of the Monument plan.

### 3.2.6.2 Environmental Consequences

**Issue 1:** How would land-use allocations and discretionary uses affect soil health and productivity?

The 2011 Taos PRMP/FEIS (BLM 2011:401–402) describes the types of effects that could occur to soils from proposed management actions and land-use allocations. Adverse effects would occur where erosive forces, such as wind and water, come into contact with soil surfaces, particularly following surface-disturbing activities. The types of management actions that could adversely affect soil resources include activities from vegetation management, wildland fire management, land tenure and use authorizations, vehicle use, recreation management, and livestock grazing. Livestock waste could adversely or beneficially indirectly affect soil nutrient availability and organic-matter accumulation (Pouyat et al. 2020). Management decisions that would restrict surface-disturbing activities would provide a benefit to soil resources. Under all alternatives, management actions and land-use authorizations would be required to comply with terms and conditions to ensure that they are operating consistently with the management goals in the decision area. The potential for surface disturbance is used as an indicator and analyzed between alternatives due to its relationship to soil health and productivity. For the purposes of this analysis, surface disturbance is considered to reduce short- and long-term soil health and productivity, and management decisions that prohibit or limit surface-disturbing activities are expected to protect soil health and productivity.

#### Alternative A: No-Action Alternative

Under Alternative A, management of soil resources would not change from the existing management prescribed in the 2012 Taos RMP (BLM 2012a). Under Alternative A, large-scale surface disturbance is not anticipated to increase across the decision area. This is primarily due to the types of allowable uses within the Monument and restrictions on development currently

in place under the 2012 Taos RMP and Proclamation 8946 for the protection of resources and Monument objects.

**Alternative B: Proposed Action (Proposed Monument Management Plan)**

Under Alternative B, the BLM would continue to uphold current restrictions to mineral withdrawal, wind- and solar-energy development, and recreation-area limitations on surface-disturbing activities to protect soil resources. However, Alternative B would also place an additional 5,096 acres in ROW exclusion, thereby reducing the potential for surface-disturbing activities and providing direct, indirect, and short- and long-term beneficial effects for soil health and productivity over a larger total area when compared to Alternative A. Designating ROW corridors over an additional 183 acres under Alternatives B would result in short-term direct adverse effects if development were to occur within the corridors themselves, but long-term beneficial effects on soil health and productivity across the Monument by providing for greater opportunity for the co-location of utilities, when compared to Alternative A. Implementation of BMPs (Appendix D) would minimize short-term adverse effects relating to soil erosion and prevent long-term adverse effects on soils within the Monument. The BLM may require design modifications to minimize surface disturbance and impose additional BMPs or mitigation measures during site-specific NEPA analysis for the protection of Monument objects and other resources, including soil resources.

### 3.2.6.3 Cumulative Effects

Past, present, and RFFAs with the potential to result in cumulative adverse effects on soil resources in the planning area include actions that could result in surface disturbance, such as land-use authorizations (i.e., leases, permits, and ROW authorizations), and other actions relating to travel, recreational uses, and visitation. Section 3.1.3, *Cumulative Actions*, describes RFFAs considered in addition to those in the 2011 Taos PRMP/FEIS (BLM 2011). Erosion is a natural phenomenon that would continue to occur in some capacity, regardless of management actions, and which may be exacerbated in the future by climate change–driven drought and aridification. The BLM expects future growth and increases in visitation and recreational demand within the Monument, which would contribute to short- and long-term adverse effects on soil health and productivity. All forms of recreational activities can increase potential for erosion, sedimentation, gully creation, biologic soil-crust damage, and riparian and upland vegetation damage. However, the intensity of cumulative adverse effects varies with the nature and degree of disturbance and site-specific environmental conditions. Larger disturbances typically represent greater potential to damage soils and affect productivity. The contribution of Alternative A and Alternative B to the effects on soil health and productivity are anticipated to be similar, with Alternative B contributing slightly less than Alternative A because of the additional restrictions Alternative B would place on surface-disturbing activities over a larger acreage for the protection of other resources, such as lands with wilderness characteristics and land-use authorizations.

## *3.2.7 Vegetative Communities*

Functional and healthy vegetation communities support a complex web of interactions on which the ecological health of the Monument relies. They stabilize soils and prevent erosion, compartmentalize and redistribute nutrients, moderate air and water quality, promote species diversity, and provide an array of habitats, including habitat for special status species.

### 3.2.7.1 Affected Environment

The Monument is in the Arizona/New Mexico Plateau Ecoregion Level III, which represents a large transitional region between the drier shrublands and wooded, higher-relief tablelands of the Colorado Plateaus in the north, the lower, hotter, less-vegetated Mojave Basin and Range in the west, and forested mountain ecoregions that border the region on the northeast and south (Griffith et al. 2006). The landscape is generally dry, although regional topography may cause variation in precipitation. The Monument encompasses the San Luis Shrublands and Hills, San Luis Alluvial Flats and Wetlands, and Taos Plateau Level IV Ecoregions and is home to a diverse range of vegetation. The area is characterized by shrublands, high-elevation grasslands, forested hills, steep canyon walls, and riparian areas.

#### Riparian Areas

Riparian vegetation in the Monument is diverse, and includes species such as cottonwoods, willows, and cattails. These species play important roles in the ecosystem, providing food and cover for wildlife, stabilizing banks, and improving water quality by filtering pollutants and excess nutrients. Additionally, shade provided by the streamside vegetation helps regulate water temperature and increase habitat complexity, creating conditions to support higher diversity for aquatic and terrestrial species. Riparian habitat comprises less than 1 percent (320 acres) of vegetation in the Monument and primarily provides recreational opportunities and important flyways and nesting areas for migratory birds. Riparian areas, such as the Rio Grande, represent corridors necessary for migration of amphibians, bats, migratory waterfowl, and other wildlife species and are critical to sustaining wildlife diversity and populations. Because of the importance of these areas, management to maintain and enhance properly functioning riparian areas and water-quality parameters are priorities within the Monument.

The vegetation type that comprises most of the riparian areas in the Monument is Rocky Mountain Lower Montane–Foothill Riparian Woodland and Shrubland (approximately 207 acres in the decision area). This ecological system is primarily linear in the Monument, forming narrow bands on small, rocky canyon tributaries, floodplain swales, and irrigation ditches, but also forms large, wide occurrences within the flood zone of rivers and streambanks; these can extend into basins where the adjacent vegetation is sage steppe (NatureServe 2023).

This system is largely intact in the Monument, with high species diversity and quality wildlife habitat. Because of the Monument's remote, inaccessible nature, there is little or no evidence of alteration due to drainage, flood control, irrigation canals, livestock grazing, soil compaction, digging, burning, mining, or vehicle use (Fullerton and Batts 2003; BLM 2012a). However, invasive, nonnative vegetation threatens riparian areas along the Rio Grande. A study that used

remote sensing data (NDVI or *Normalized Difference Vegetation Index*) to examine changes in vegetation health over a 21-year period indicated that the lowest reaches of the Rio Grande in the Lower Gorge ACEC of the Monument experienced a significant decline in vegetative cover (Tala 2022). Additionally, annual average river flows have declined approximately 50 to 100 cubic square feet since 1951 (Llewellyn and Vaddey 2013). Average temperature has increased roughly 1.5 degrees Fahrenheit compared to the 1960–1979 baseline period in the southwestern US, including the planning area (Karl et al. 2009).

### Terrestrial Vegetation

Landscape Fire and Resource Management Planning Tools (LANDFIRE) is a shared program between the wildland fire-management programs of the US Forest Service (USFS) and U.S. Department of the Interior, providing landscape-scale geospatial data to support cross-boundary planning, management, and operations. The LANDFIRE database is used to describe vegetation in the Monument because it provides consistent, comprehensive, and recent data.

According to the LANDFIRE database, five terrestrial vegetation types comprise almost 95 percent (227,854 acres) of the decision area (Table 3-3; USGS EROS 2020a). Table 3-3 lists the vegetation types in the Monument, which represent a mosaic of terrestrial vegetation types that are broadly defined and have substantial overlap. Generally, vegetative communities within the Monument are semi-arid shrub–steppe types, compositionally diverse, but consisting of an open shrub to moderately dense woody layer that often has a very productive herbaceous understory that provides high-quality forage for livestock (NatureServe 2023). Map B.3 (Appendix B) illustrates the vegetation community types across the planning area.

**Table 3-3. Vegetation Types in the Decision and Planning Area**

| Vegetation Community Type | Decision Area (acres) | Decision Area (%) | Planning Area (acres) | Planning Area (%) |
|---|---|---|---|---|
| Inter-Mountain Basins Semi-Desert Shrub–Steppe | 71,842 | 29.6 | 92,541 | 29.8 |
| Inter-Mountain Basins Big Sagebrush Shrubland | 42,523 | 17.5 | 58,467 | 18.8 |
| Southern Rocky Mountain Piñon–Juniper Woodland | 41,113 | 16.9 | 53,953 | 17.4 |
| Inter-Mountain Basins Mixed Salt Desert Scrub | 38,063 | 15.7 | 48,691 | 15.7 |
| Inter-Mountain Basins Montane Sagebrush Steppe | 34,313 | 14.1 | 40,457 | 13.0 |
| Inter-Mountain Basins Semi-Desert Grassland | 3,457 | 1.4 | 3,928 | 1.3 |
| Southern Rocky Mountain Montane–Subalpine Grassland | 1,803 | 0.7 | 1,857 | 0.6 |
| Southern Rocky Mountain Ponderosa Pine Woodland | 1,330 | 0.5 | 1,512 | 0.5 |
| Southern Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest and Woodland | 1,131 | 0.5 | 1,149 | 0.4 |

| Vegetation Community Type | Decision Area (acres) | Decision Area (%) | Planning Area (acres) | Planning Area (%) |
|---|---|---|---|---|
| Rocky Mountain Lower Montane–Foothill Shrubland | 1,114 | 0.5 | 1,211 | 0.4 |
| Rocky Mountain Gambel Oak–Mixed Montane Shrubland | 938 | 0.4 | 1,087 | 0.3 |
| Open Water | 749 | 0.3 | 800 | 0.3 |
| Developed Roads | 576 | 0.2 | 624 | 0.2 |
| Colorado Plateau Mixed Low Sagebrush Shrubland | 498 | 0.2 | 553 | 0.2 |
| Great Basin and Intermountain Introduced Annual and Biennial Forbland | 487 | 0.2 | 637 | 0.2 |
| Western Cool Temperate Urban Shrubland | 474 | 0.2 | 548 | 0.2 |
| Colorado Plateau Piñon–Juniper Woodland | 422 | 0.2 | 678 | 0.2 |
| Southern Rocky Mountain Mesic Montane Mixed Conifer Forest and Woodland | 408 | 0.2 | 410 | 0.1 |
| Interior Western North American Temperate Ruderal Grassland | 308 | 0.1 | 339 | 0.1 |
| Rocky Mountain Subalpine–Montane Mesic Meadow | 162 | 0.1 | 194 | 0.1 |
| Rocky Mountain Lower Montane–Foothill Riparian Woodland | 153 | 0.1 | 212 | 0.1 |
| Rocky Mountain Aspen Forest and Woodland | 104 | <0.1 | 104 | <0.1 |
| Quarries–Strip Mines–Gravel Pits–Well and Wind Pads | 102 | <0.1 | 115 | <0.1 |
| Great Basin and Intermountain Introduced Perennial Grassland and Forbland | 80 | <0.1 | 81 | <0.1 |
| Rocky Mountain Lower Montane–Foothill Riparian Shrubland | 62 | <0.1 | 86 | <0.1 |
| Western Cool Temperate Urban Evergreen Forest | 61 | <0.1 | 69 | <0.1 |
| **Total** | **242,668** | **100.0** | **310,792** | **100.0** |

Source: USGS EROS 2020a.
Note: Vegetation community types comprising less than 50 acres were not included.

Terrestrial vegetation can also be characterized by *Ecological Sites*, a classification system developed by the NRCS that delineates ecological units with similar features, such as plant communities and soil properties, and have similar capabilities to respond to management activities or disturbance. The BLM collects data by ecological site to monitor the status and condition of BLM resources as part of the Assessment, Inventory, and Monitoring (AIM) program. Two types of Ecological Sites are recognized, Forestland sites and Rangeland sites. Forestland sites have at least a 25-percent overstory canopy of trees, defined as a woody-stemmed plant growing to 4 meters in height at maturity. Rangeland sites do not contain a significant overstory tree component.

AIM data have been collected since May 2014 at 375 sites across the Monument. These data indicate that 17 Ecological Sites—2 Forested and 15 Rangeland—occur on the Monument; approximately 14.4 percent of the Planning area and 16.3 percent of the Decision Area are unclassified (see Appendix B, Map B.2). Ecological Sites with sufficient, comparable data generally show an increase in total foliar vegetation cover. These sites also exhibit no changes or a decrease in invasive species cover, indicating a potential increase in desirable species. Gaining areas include those sites that make up a substantial portion of the Planning and Decision areas (74.4 percent and 75.7 percent, respectively) (see Table 3-4). Three sites, Pinyon Upland (F036XA001NM), Gravelly Slopes (R036XA004NM), and Breaks (R036XB001NM), exhibited decreases in vegetation cover since monitoring began at those sites. These data are supported by the remote-sensing study (Tala 2022) which indicates that the areas of greatest terrestrial vegetative decline occur on the slopes of the large dacite volcanic peaks of the Taos Plateau (Ute Mountain and Cerro de la Olla). The Breaks site, unlike Pinyon Upland and Gravelly Slopes, also experienced an increase in invasive species cover.

**Table 3-4. Change in Total Foliar Vegetation Cover and Noxious Weed Cover for Ecological Sites in the Planning and Decision Areas**

| Ecological Site ID | Ecological Site Name | Vegetation Cover Change (percent) | Noxious Species Cover Change (percent) | Dates Compared | Percentage of Planning Area | Percentage of Decision Area (BLM) |
|---|---|---|---|---|---|---|
| R036XB006NM | Loamy | 9.0 | 0.0 | 8/2014 and 8/2023 | 39.7 | 37.1 |
| R036XB018NM | Stony Loam | 1.3 | 0.0 | 8/2014 and 8/2023 | 20.6 | 21.4 |
| R036XB007NM | Malpais | 15.3 | 0.0 | 7/2014 and 7/2023 | 11.6 | 12.5 |
| R048AY005NM | Mountain Malpais | 7.7 | -5.3 | 9/2014 and 9/2023 | 3.8 | 3.4 |
| F036XA001NM | Pinyon Upland | -0.3 | 0.0 | 7/2014 and 7/2023 | 3.1 | 1.7 |
| R036XA004NM | Gravelly Slopes | -21.3 | -0.7 | 9/2015 and 9/2023 | 1.7 | 2.2 |
| R036XB001NM | Breaks | -7.3 | 4.7 | 9/2018 and 9/2023 | 0.9 | 1.0 |

Source: BLM 2024b.
Note: Insufficient data were available to make comparisons between with 2023 for Ecological Sites R051XY317CO Foothill Loam, F048AY015NM Mixed Conifer, F048AY908CO Mixed Conifer, R036XA006NM Loamy, R036XB005NM Limy, R036XB009NM Salt Meadow, R036XB132NM, Gravelly Hills, R051XA005NM Unnamed, R051XA006NM Breaks, R051XA009NM Breaks, and R051XA001NM Loamy.

### 3.2.7.2 Environmental Consequences

**Issue 1**: How would existing and proposed vegetation-management actions and allowable uses affect riparian and terrestrial vegetation, including special status plant species?

**Alternative A: No-Action Alternative**

Under Alternative A, management of terrestrial and riparian vegetation would not change from the existing management prescribed in the 2012 Taos RMP (BLM 2012a). Existing management under Alternative A and application of BMPs outlined in Appendix D would minimize the potential and intensity of adverse effects from activities on vegetation in the decision area.

Current riparian and terrestrial vegetation management practices include the following.

- Maintenance of the health and resilience of the sagebrush–steppe grasslands through a variety of fire-management strategies, including controlled burning, firebreaks, and fire exclusion (BLM 2004)
- Promotion of the proper functioning condition of riparian vegetation communities through implementation of the *Riparian and Aquatic Habitat Management Plan* (BLM 2000b), the *Rio Grande Corridor Final Plan* (BLM 2000a), the *Southwestern Willow Flycatcher Management Plan for the Taos Field Office* (BLM 1998), and the *USFWS Recovery Plan for the Southwestern Willow Flycatcher* (USFWS 2002)
- Removal of invasive plant species, such as cheatgrass (*Bromus tectorum*), and planting native vegetation, which helps increase biodiversity and improves ecosystem function, and implementation of BMPs (e.g., equipment, fill dirt, seed, mulch being clean and free of invasive/noxious weeds) (BLM 2012a, Appendix C)
- Withdrawal of grazing in certain areas, such as riparian areas and wetlands, and limiting and managing grazing to ensure the enhancement of critical elk and pronghorn winter range on the Monument (BLM 2012a)
- Intensive management of fuelwood sales

**Alternative B: Proposed Action (Proposed Monument Management Plan)**

Under Alternative B, management of terrestrial and riparian vegetation would continue as prescribed in the 2012 Taos RMP (BLM 2012a) with additional management actions to refine and focus monitoring methods and schedules, broaden definitions of ecological health, and expand restoration resources. As detailed below, these actions would further restore, maintain, or enhance vegetative communities and ecological diversity across the decision area, which would include habitat for sensitive plant species, resulting in additional long-term beneficial effects, when compared to Alternative A.

Identification and incorporation of more-robust survey schedules and monitoring methodologies under Alternative B that target the ecological drivers of riparian vegetative health, such as soil and hydrology, would allow the BLM to identify and prioritize degraded areas. These additional data, informed by best-available science, would also provide opportunities for adaptive management to address factors contributing to the degradation of riparian vegetation.

Alternative B replaces the concept of *proper functioning condition*, which typically applies to riparian areas, with the concept of *desired ecological conditions and function* for terrestrial

vegetation-management actions. Desired ecological conditions and function would be expected to result if the goals and objectives of the PRMP were fully achieved. This change would more appropriately define the roles of terrestrial vegetation management, such as prescribed burning and conifer removal, to ensure that terrestrial vegetation communities achieve a desired ecological function.

Under Alternative B, the BLM's Seeds of Success program and National Seed Warehouse would provide additional resources for riparian and terrestrial vegetation-restoration management actions. This would benefit the vegetation in the Monument by increasing the quantity and quality of native plant materials available. Much of the seed available in these programs is collected from the field and can be sourced from locally adapted plant populations, conferring genetic resilience and increasing the success of restored ecosystems. Additionally, these resources would support adaptive-management actions under Alternative B by identifying priority seed needs for future riparian- and terrestrial-reclamation projects.

Alternative B as updated for the Proposed Monument Management Plan would close four grazing allotments (totaling 3,587 acres) within the Monument. Closing these allotments would benefit vegetative communities, but the effects would likely be negligible when compared to Alternative A because there has been no grazing in those allotments since the Monument's designation. Allowing grazing as a vegetation-management tool to reduce "wolfy" caespitose grasses north of the Cerro del Yuta wilderness would benefit efforts to promote seed propagation and the establishment of desired species and support adaptive-management actions under Alternative B.

#### 3.2.7.3 Cumulative Effects

Past, present, and RFFAs affecting riparian and terrestrial vegetation and special status plant species in the planning area include climate change, drought, aridification, and wildfire frequency and severity; these factors are expected to continue and increase in intensity in the planning area and cumulatively contribute to adverse effects on vegetation and ecological diversity. Changes to vegetation composition in the planning area are expected from approved vegetation-management and prescribed-fire activities, wildfire, livestock grazing, and other uses. Additionally, recreational and traditional uses are expected to increase and may affect future special status plant species distributions.

The contributions of Alternatives A and B to the cumulative effects on vegetative communities are expected to be similar, although Alternative B would expand adaptive-management criteria and opportunities for resiliency beyond Alternative A through the incorporation of targeted, scheduled monitoring and additional restoration resources grounded in best-available science.

### *3.2.8 Visual Resources*

#### 3.2.8.1 Affected Environment

Visual resources within the Monument range from being highly distinctive to common to the region, highly to moderately valued by the public, minimally developed, and highly intact. In addition to the dramatic and stark beauty of the Monument's landscape, the Monument

contains the Rio Grande and Red River WSRs, Wild Rivers Back Country Scenic Byway, Old Spanish National Historic Trail (OSNHT), and other areas of special designation that draw recreationists and sightseers to the area. In general, high scenic quality within the Monument is a product of the area's diverse vistas and canyons, its extraordinary topography, a scenic river corridor, dramatic, colorful, and unusual geology, cultural history, including prehistoric petroglyphs, pictographs, and structures, and lack of development. Areas with high visual sensitivity are the primary result of the high degree of visitor interest in and public concern for a particular area's visual resources, the area's high degree of public visibility, the level of use of an area by the public, and the type of visitor use that the area receives. For some people (including members of the Taos, Picuris Pueblos, Jicarilla Apache, and Ute Tribes), the portions of the Monument landscape are considered sacred and provide the opportunity to connect to ancestors.

The BLM uses the VRM system (BLM 1984) to classify and manage visual resources on lands under its jurisdiction (Table 3-5), assigning a Visual Resource Inventory (VRI) (BLM 1986) class designation to indicate the relative scenic quality of various areas[5]. The Monument's VRI indicates that approximately 5 percent (12,274 acres) are classified as VRI Class I lands that predominantly surround the Rio Grande and Red River WSR. Approximately 45 percent (108,433 acres) of BLM-administered lands are inventoried as VRI Class II. Similarly, approximately 45 percent (108,122 acres) are inventoried as VRI Class III, which results from combining scenic quality, public sensitivity, and proximity to viewing platforms, such as commonly used roads. Approximately 4 percent (9,753 acres) are inventoried as VRI Class IV (see Appendix B, Map B.4). The 2012 Taos RMP identifies the VRM classifications for the Monument (BLM 2012a), which are provided in Table 3-5 and depicted on Map B.5 (Appendix B). Assignments of VRM classes to support management objectives for resources such as National Historic Trail segments, WSRs, and lands with wilderness characteristics were considered during the 2012 Taos RMP planning process. Approximately 16 percent (39,907 acres) and 83 percent (202,554 acres) of Monument lands are in VRM Class I and Class II, respectively. Less than 0.5 percent (350 acres) of Monument is in VRM Class III (Table 3-5). No BLM-administered lands within the Monument are currently managed as VRM Class IV.

The *Light Pollution Atlas 2020* (Lorenz 2020) provides the fraction of artificial night-sky brightness to natural night-sky brightness. For example, a fraction of natural night-sky brightness of 3.0 means that the artificial night-sky brightness is three times as bright as natural night-sky conditions. Based on the mappings for the Monument, artificial night-sky brightness within much of the Monument is very low and ranges, predominantly, from less than 0.01 to 0.06. However, the easternmost edge and southern portion of the Monument receives greater night-sky illumination from Questa and Taos, and artificial night-sky brightness ranges from 0.06 to 0.11, which is still low. The eastern portion of the Monument, near Questa, receives the

[5] The Visual Resource Inventory (VRI) documents the visual resources in an area, including scenic quality, sensitivity levels, and distance zones. The VRI serves as the primary source of information for Visual Resource Management (VRM) decisions, which establish goals and objectives for managing visual resources, and takes actions to achieve those objectives.

greatest illumination of 0.11 to 0.19 because it is located within close proximity to the village's outskirts.

**Table 3-5. Visual Resource Management Class Descriptions and Acreages within the Río Grande del Norte National Monument Decision Area**

| VRM Class | Description | Acreage |
|---|---|---|
| I | The objective of this class is to preserve the existing character of the landscape. This class provides for natural ecological changes; however, it does not preclude very limited management activity. The level of change to the characteristic landscape should be very low and should not attract attention. | 39,907 |
| II | The objective of this class is to retain the existing character of the landscape. The level of change to the characteristic landscape should be low. Management activities may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape. | 202,554 |
| III | The objective of this class is to partially retain the existing character of the landscape. The level of change to the characteristic landscape should be moderate. Management activities may attract attention, but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape. | 350 |
| IV | The objective of this class is to provide for management activities that require major modifications of the existing character of the landscape. The level of change to the characteristic landscape can be high. These management activities may dominate the view and be the major focus of viewer attention. However, every attempt should be made to minimize the impact of that activity through careful location, minimal disturbance, and repeating the basic elements. | 0 |
| **TOTAL** | – | **242,811** |

Source: BLM 1986, 2012a.
VRM = Visual Resource Management.

### 3.2.8.2 Environmental Consequences

**Issue 1:** How would proposed management preserve or retain the existing visual character of the landscape and protect dark night skies?

The 2011 Taos PRMP/FEIS (BLM 2011:417–421) describes the types of effects that could result on visual resources from planning-level decisions. The inclusion of the visual landscape in Proclamation 8946 establishes the requirement to manage lands in the Monument to protect the visual resources and values associated with the visual landscape. Additionally, the BLM is required to manage lands in a manner that would preserve scenic values by a broad range of authorities, including Federal mandates under FLPMA and NEPA for scenic and aesthetic resources.

As noted in the 2011 PMRP/FEIS (BLM 2011:419), management of visual resources at higher VRM classes than inventoried (i.e., VRI) can result in greater protection to areas more visible

along travel routes and where the topography is less able to absorb larger scale or multiple users. For example, VRM is considered protective of existing visual resources when it assigns VRM Class I and II objectives to inventoried Class II or III lands.

Direct effects from resource programs would occur from vegetation treatments and potential increases in surface-disturbing activities from ROW development and land-use authorizations, which could contribute to potential changes in VRI Classes I, II, and III. In comparison, instituting constraints on resource uses would reduce potential long-term direct and indirect, adverse effects on visual resources.

The potential for adverse effects on dark night skies is driven by the degree of use restrictions, such as the development of facilities and OHV use (both of which can decrease light pollution), and the extent and management of special designations (which may limit future development and associated light pollution).

#### Alternative A: No-Action Alternative

Under Alternative A, approximately 16 percent (39,894 acres) and 83 percent (202,542 acres) of Monument lands would be continued to be managed as VRM Class I and Class II, respectively (see Appendix B, Map B.5). As a result, visual resource management under Alternative A would maintain VRI and existing scenic integrity values across the Monument. Only 350 acres in the area around the Wild Rivers Visitor Center would be managed as VRM Class III, where the current VRI is Class II. Indirect and direct effects from other resource programs would be the same as described in the 2011 Taos PRMP/FEIS (BLM 2011:417–421, Alternative A). There would be no additional management to protect dark night skies; however, existing restrictions on OHV, development, and management of special designations would minimize the potential for new sources of light pollution.

#### Alternative B: Proposed Action (Proposed Monument Management Plan)

Alternative B would manage the same percentage of land in VRM Classes I, II, and III as Alternative A: approximately 16 percent (39,821 acres) and 83 percent (202,425 acres) as VRM Class I and Class II, respectively (see Appendix B, Map B.6). Therefore, the effects from visual-resource management would be the same as described for Alternative B. Under Alternative B, direct and indirect effects of other resource programs would be the same as Alternative A, with the exception of land-tenure and land-use authorizations. Alternative B would increase the amount of designated ROW corridors in the decision area by 183 acres, compared to Alternative A (see Section 3.2.13.2, *Cumulative Effects*), which would potentially increase infrastructure, such as transmission lines, in small portions of the Monument that are currently inventoried as VRI Class I and II and managed as VRM Class I and II. The areas within designated ROW corridors that would be added under Alternative B would be managed to VRM Class III objectives where they are currently in VRM Class II under Alternative A. Therefore, designated ROW corridors under Alternative B would have greater short- and long-term direct adverse effects on visual-resource management than Alternative A. The new Horsethief Mesa ROW corridor under Alternative B would follow an existing overhead electric utility line. Over the long term, designated ROW corridors under Alternative B would increase the opportunity for the

consolidation of utilities and concentrate visible structures in a limited number of areas, resulting in beneficial effects on visual resources.

Alternative B1 designates the Cerro de la Olla unit as a WSA and, compared to Alternatives A and B, increases the amount of land being managed as VRM Class I to approximately 19 percent (44,941 acres) and reduces the amount of VRM Class II to 81 percent (197,306 acres) (see Map B.7, Appendix B). Additionally, the Cerro de la Olla WSA would be managed as ROW exclusion and be closed to motorized travel, which would result in short- and long-term beneficial effects on visual resources by reducing potential changes to the landscape in 5,120 acres of the Cerro de la Olla unit. All other elements of Alternative B1 would be the same as Alternative B.

Effects on dark night skies under Alternatives B and B1 would be similar to Alternative A, except for specific management requiring that lighting minimize illumination and partnerships with local parties to maintain night skies, measure light pollution, and implement artificial-light BMPs, which would reduce effects to a negligible level.

#### 3.2.8.3 Cumulative Effects

Past, present, and RFFAs listed in Section 3.1.3, *Cumulative Actions*, including future growth in the demand for land-use authorizations in the planning area, have affected and would continue to affect visual resources in the Monument. It is anticipated that VRI values would remain stable within the Monument into the future but increases in population and visitation to the Monument may create pressures on the Monument's popular destinations. The resulting effect could lead to visitors to seek out areas that are more remote and less crowded, which would likely result in greater exploration of the landscape and an increase in the number of visitors that place a high value on the Monument's landscape, compared to the existing condition. However, a stable trend for maintaining scenic quality and landscape character has resulted from the Monument's designation, the sparse population density of the planning area, and large, continuous tracts of BLM-administered lands within the Monument.

The contribution of Alternative A and Alternative B to the effects on visual resources and dark night skies are anticipated to be similar, with Alternative B contributing slightly less than Alternative A because of the additional protections for Monument objects and restrictions on development over a larger acreage for the protection of other resources, such as land-use authorizations and lands with wilderness characteristics.

### *3.2.9 Water Resources*

#### 3.2.9.1 Affected Environment

The decision area is located within portions of three Hydrologic Unit Code (HUC) 8 watersheds: Alamosa–Trinchera (HUC 13010002), Conejos (HUC 13010005), and Upper Rio Grande (HUC 13020101). The Conejos subbasin drains into the Conejos River, which flows into the Rio Grande north of the planning area. The Alamosa–Trinchera subbasin also drains into the Rio Grande north of the planning area. The Upper Rio Grande subbasin comprises the vast majority of the planning area and includes water draining from the Tusas Mountains to the east and the

Sangre De Cristo Mountains to the west. The largest tributaries to the Rio Grande in the planning area include Rio San Antonio, Latir Creek, Rio Hondo, and Rio Pueblo de Taos (see Map B.8, Appendix B).

The Monument encompasses approximately 1,034 miles of mapped streams and rivers, with 813 miles occurring on BLM-administered lands (USGS 2024). Within the Monument, 128 waterbodies (i.e., lakes and ponds) have been mapped, 83 of which are located in the decision area. Waterbodies in the planning area are characterized as perennial (10 total, 3 in the decision area) or intermittent (118 total, 80 in the decision area). According to the National Wetlands Inventory (NWI), approximately 4,436 mapped acres of wetlands occur within the Monument, 3,430 acres of which are in the decision area (USFWS 2024b), as are numerous seeps and springs. Map B.8 (Appendix B) depicts surface-water resources that occur within the planning area.

The BLM, USGS, and New Mexico Environment Department (NMED) conduct water-quality and streamflow monitoring programs, including within the decision area. The BLM monitors water quality on a bimonthly basis at eight sites within the Monument, at the Colorado-New Mexico state line, Red River, Rio Grande near Cerro Chiflo, John Dunn Bridge (below and above), Rio Hondo, Taos Junction bridge, and the Rio Pueblo de Taos. Monitoring sites were chosen because of their position with the Rio Costilla, Red River, Rio Hondo, and Rio Pueblo de Taos tributaries of the Rio Grande River and allow for monitoring of the Rio Grande above and below several significant confluences. Several NMED assessment units cross into the decision area; Table 3-6 identifies the assessment units in the decision area that are Clean Water Act (CWA) Section 303(d)-listed[6] waterbodies and their cause for impairment.

**Table 3-6. New Mexico's 303(d) List of Waters for Reporting Year 2022**

| Assessment Unit Name | Current Impairments | Miles of Waterbody within Decision Area |
|---|---|---|
| Costilla Creek (Rio Grande to CO border) | Flow regime modification | 2.28 |
| Red River (Rio Grande to Placer Creek) | Turbidity | 3.19 |
| Rio de los Pinos (New Mexico Reaches) | Aluminum, temperature | 0.22 |
| Rio Grande (Embudo Creek to Rio Pueblo de Taos) | Turbidity | 5.14 |
| Rio Grande (Red River to CO border) | Temperature | 28.17 |
| Rio Grande (Rio Pueblo de Taos to Red River) | Temperature, pH | 12.37 |
| Rio Hondo (Rio Grande to USFS-administered lands) | Temperature | 0.46 |
| Rio San Antonio (CO border to Montoya Canyon) | Aluminum, total dissolved oxygen, temperature | 4.53 |

[6] Section 303(d) of the CWA authorizes the US Environmental Protection Agency to assist states, territories, and authorized Tribes in listing impaired waters for these waterbodies and developing Total Maximum Daily Loads, which establish the maximum amount of a pollutant allowed in a waterbody and serve as the starting point or planning tool for restoring water quality (EPA 2024).

| Assessment Unit Name | Current Impairments | Miles of Waterbody within Decision Area |
|---|---|---|
| **TOTAL** | **–** | **56.34** |

Source: NMED 2022. The 2022 reporting year is the most current available dataset for 303(d)-listed waters. The Draft 2024–2026 Integrated List is pending US Environmental Protection Agency approval at time of this publication.
Notes: CO = Colorado; USFS = US Forest Service.

The AIM National Aquatic Monitoring Framework (BLM 2021c) was developed by the BLM to monitor the conditions and trends of aquatic systems as part of the AIM strategy. Within the Monument, are 20 AIM lotic sites are monitored using the AIM framework (see Map B.8, Appendix B[7]). Data are collected about the chemical, ecological geomorphic, and anthropogenic characteristics of a stream reach and are available from 2016 to 2022, with another cycle to be collected in 2026 and 2027. The data are applicable across many agencies and aid in management decisions that promote the proper function of stream and river ecosystems.

BLM Aquatic Habitat Management personnel have surveyed 123 springs and seeps within the Monument to provide baseline information of spring and seeps function and recharge for the Rio Grande. To date, the BLM has completed assessments of 77 springs within the Monument; 73 springs (95 percent of springs in the Monument) were found to be in proper functioning condition, 3 were determined to be functional, but at risk, and 1 spring was determined to be in nonfunctioning condition. A total of 51 playa lakes also occur on BLM-administered lands within the Monument. Of those, five have associated earthen tanks.

### 3.2.9.2 Environmental Consequences

**Issue 1:** How would the proposed management and land-use allocations affect the health of the Rio Grande River corridor, perennial and intermittent streams, playa lakes, seeps, and springs within the Monument?

#### Alternative A: No-Action Alternative

Under Alternative A, the management of water resources would not change from the existing management prescribed in the 2012 Taos RMP (BLM 2012a). The types of effects on water resources would be the same as described in the 2011 Taos PRMP/FEIS (BLM 2011:421–428). However, under Alternative A, large-scale surface disturbance would not be anticipated to increase across the decision area. This is primarily due to the types of allowable uses within the Monument and restrictions on development currently in place under the 2012 Taos RMP and Proclamation 8946 for the protection of resources and Monument objects.

#### Alternative B: Proposed Action (Proposed Monument Management Plan)

Compared to Alternative A, Alternative B would result in additional protections for the streams, playa lakes, seeps, and springs located within the Monument. The implementation of the best-available science and methods to prioritize restoration efforts would result in long-term

[7] BLM AIM data is also available online at https://gbp-blm-egis.hub.arcgis.com/pages/aim.

beneficial effects by focusing on areas of potential degradation, while developing shared protocols with NMED for implementing ONRWs protection for water resources within the Monument. Any proposed project would comply with NMED's antidegradation policy and adaptive-management strategies, thus ensuring that watershed health priorities are achieved by promoting an improved strategy to address 303(d)-listed impairments within the Monument. Long-term beneficial effects on water resources would also result from the use of AIM data, benchmarks, proper-functioning-condition evaluations, and other monitoring efforts to determine sites of potential degradation, identify actions to reduce or eliminate factors when objectives are not being met, and inform the prioritization of restoration sites.

Short- and long-term beneficial effects on playas and springs would also result under Alternative B from management actions that increase survey efforts and the prohibition of modifications to playas, wetlands, and surrounding uplands. Alternative B would also result in long-term water-quality benefits from 5,096 acres in ROW exclusions and the closure of an additional 5,120 acres to OHV travel, which would reduce surface erosion and subsequent sedimentation impacts on surface water quality.

#### 3.2.9.3 Cumulative Effects

Past, present, and RFFAs would continue to affect water resources within the planning area. Specifically, adverse effects on water quality from sedimentation would result from management activities due to increased erosion. Increased erosion is possible from any surface-disturbing activity, including vegetation alteration or removal, motorized vehicle travel, or recreational uses that affect vegetative cover on the landscape. The BLM expects future growth and increased use by the public within the Monument. An increase in the number of visitors and land-use authorizations would contribute cumulative adverse effects on water quality and water resources within the Monument.

Erosion is a natural phenomenon that would continue to occur in some capacity, regardless of management actions. Climate change could cause an increase in temperatures and variations in precipitation that could exacerbate the effects of drought and aridification. Cumulative effects would occur to water resources as result of natural events, such as drought and erosion, and from any actions outside of the Monument that would result in large water withdrawal and sedimentation, or allow other sources of pollution to enter the water system. The contributions of Alternative A and Alternative B to cumulative adverse effects on water resources are anticipated to be similar, with Alternative B contributing less than Alternative A because of the additional restrictions on surface-disturbing activities over a larger acreage for the protection of other resources, such as lands with wilderness characteristics and land-use authorizations.

### *3.2.10 Lands with Wilderness Characteristics*

#### 3.2.10.1 Affected Environment

Section 201 of FLPMA (43 USC 1711) requires the BLM to maintain. on a continuing basis. an inventory of all public lands and their resources and other values, which includes wilderness characteristics. On December 22, 2010, the Secretary of the Interior issued Order No. 3310,

*Protecting Wilderness Characteristics on Lands Managed by the Bureau of Land Management*, which resulted in development and issuance of BLM policies relating to lands with wilderness characteristics (BLM Manuals 6310 and 6320). From the fiscal-year end of 2011 until the passing of the Consolidated Appropriations Act of 2018, Congress included appropriations riders in every appropriations bill that prohibited the use of funds to implement or enforce Secretarial Order No. 3310. In January 2021, Secretarial Order 3393 rescinded Secretarial Order 3310. Also in January 2021, the BLM issued updated guidance and general procedures for conducting wilderness-characteristics inventories, as outlined in BLM Manual 6310.

The first inventory for wilderness characteristics on lands now designed as the Monument was conducted in the late 1970s and resulted in designation of the Rio San Antonio WSA. The BLM completed an inventory of lands with wilderness characteristics in 2006, prior to the implementation of the 2012 Taos RMP. The 2006 inventory identified approximately 23,300 acres of lands with wilderness characteristics across two units: (1) San Antonio East (9,830 acres); and (2) Ute Mountain (13,172 acres).

Following the designation of the Monument in 2013, the BLM completed a follow-up wilderness-characteristics inventory in 2017, utilizing the inventory processes outlined in BLM Manual 6310. The inventory included desktop and field-based reviews, along with input from livestock permittees pertaining to roads and range improvements. The BLM also reviewed citizen inventories prepared by Friends of the Río Grande del Norte; the 2017 inventory tentatively identified 11 units as having wilderness characteristics (BLM 2017a) (see Table 3-7). The Rio San Antonio WSA and the Ute Mountain lands with wilderness characteristics unit were designated as Wilderness in 2019 (see Section 3.2.17, *Special Designations*). Currently, only the San Antonio East unit (9,855 acres) is managed to protect wilderness characteristics.

**Table 3-7. 2017 Lands with Wilderness Characteristics Inventory**

| Name | Acreage (Decision Area)[1] |
|---|---|
| Central Playas | 8,339 |
| Cerro de la Olla | 12,236 |
| Guadalupe Mountains | 7,131 |
| La Junta Rim | 9,335 |
| Llano | 6,588 |
| North Chiflo | 34,452 |
| Plover Prairie | 32,636 |
| Punche Valley | 25,772 |
| San Antonio East[2] | 9,855 |
| San Antonio North | 5,841 |
| Ute Mountain[3] | 13,921 |
| **TOTAL** | **166,106** |

Source: BLM 2017a.
[1] The BLM notes slight discrepancies in acreages reported between the 2017 *Lands with Wilderness Characteristics Inventory Report* and geographic information system data.

[2, 3] Units were identified as part of the 2012 RMP Update Process. The Ute Mountain unit was designated as the Cerro del Yuta Wilderness in 2019.

The *Horsethief Mesa Travel Management Plan* (TMP) was approved in December 2021, designating specific routes and determining route closures across 2,060.5 acres within the Monument (BLM 2021d). Lands considered under the TMP did not meet the criteria for having wilderness characteristics; thus, no adverse effects on wilderness characteristics were anticipated from the approval of the 2021 TMP.

### 3.2.10.2 Environmental Consequences

**Issue 1:** How would land-use allocations, proposed management, and recreational uses affect the existing and inventoried values of lands with wilderness characteristics within the Monument?

The 2011 Taos PRMP/FEIS (BLM 2011:422–428) describes the types of effects that could result to lands with wilderness characteristics from planning-level decisions. Lands with wilderness characteristics can be affected by a wide range of management decisions and environmental factors. Actions that create surface disturbance could adversely affect the natural character of these areas and diminish the setting for experiences of solitude and primitive recreational activities. Similarly, the noise and presence of people in these areas from activities relating to motorized uses, prescribed burns, and vegetation treatment could result in short-term adverse effects by detracting from opportunities for both solitude and primitive forms of recreation. Decisions to manage units with lands within wilderness characteristics to maintain or protect their wilderness characteristics, such as limiting surface disturbance through ROW exclusion, would result in short- and long-term beneficial effects. All alternatives would provide for some amount of protective management to areas identified as having wilderness characteristics.

#### Alternative A: No-Action Alternative

Under Alternative A, only the San Antonio East unit (9,855 acres) would be managed to protect and maintain wilderness characteristics through management decisions that would eliminate allowable uses that may affect naturalness, opportunities for solitude and unconfined recreation, and other supplemental values (see Map B.9, Appendix B). These management decisions include the exclusion of land-use authorizations, VRM Class I, and closing the area to OHV travel and would result in beneficial effects on lands with wilderness characteristics within the San Antonio East unit. Under Alternative A, other inventoried areas identified as having lands with wilderness characteristics would not be managed separately to protect wilderness characteristics. Alternative A would maintain the existing ACECs and provide no new protections nor beneficial effects on lands managed as lands with wilderness characteristics. However, protections provided by the Monument's designation (e.g., mineral withdrawal) and management of other resources and resource uses under Alternative A (i.e., existing ACEC management to protect relevant and important values, OHV limits, and ROW-avoidance and -exclusion areas) would protect or mitigate adverse effects on the criteria for which inventoried lands with wilderness characteristics are evaluated (e.g., size, naturalness, solitude, primitive

unconfined recreation). Therefore, areas with wilderness characteristics would likely retain much of the wilderness qualities identified in the 2017 inventory (BLM 2017a). Wood cutting and the ancillary use of vehicles for access to these sites, particularly in the Cerro de la Olla unit, could potentially lead to impairment of naturalness and the loss of opportunities for solitude. However, as noted in the 2011 Taos PRMP/FEIS, the inaccessible nature of the terrain around Cerro de la Olla reduces the potential for these adverse effects (BLM 2011:427).

**Alternative B: Proposed Action (Proposed Monument Management Plan)**

Alternative B would carry forward management from Alternative A for the San Antonio East lands with wilderness characteristics unit (9,855 acres) and manage 5,120 acres of the Cerro de la Olla unit to protect and maintain wilderness characteristics (see Map B.10, Appendix B). The BLM identified this portion of the Cerro de la Olla unit using the 8,200-foot elevation contour line to account for existing access, wildlife-habitat improvements, and other resource uses within the boundary proposed in the legislation to designate the area as Wilderness (Senate Bill 593). Management of the 5,120-acre area for Cerro de la Olla under Alternative B would apply to only the decision area (i.e., to BLM-administered lands). Overall, the types of effects on lands with wilderness characteristics would be the same as Alternative A, except for managing 5,120 acres of the Cerro de la Olla unit to protect wilderness characteristics, which would reduce the likelihood for impairment or loss of its identified wilderness qualities over the long term. Specifically, Alternative B would close 5,491 acres to motorized travel and exclude the area from ROW development, whereas current Alternative A would manage the area as OHV-limited and ROW-avoidance.

Under Alternative B, vegetation treatments and wildland fire management would be similar to current management and would not result in measurable effects on lands with wilderness characteristics beyond those discussed in the 2011 Taos PRMP/FEIS (BLM 2011:425–426). Vegetation management to protect communities, improve natural character of an area, or control noxious and invasive plants would result in short-term adverse effects from the presence of vehicles and the occasional use of heavy equipment, but would result in beneficial effects on wilderness characteristics over the long term by providing a more naturally appearing mix of vegetation types. Similarly, prescribed burning would result in short-term effects on naturalness and solitude in lands with wilderness characteristics, but could help maintain or re-create a more naturally appearing mosaic of vegetation in the long term. Additionally, wildlife management under Alternative B that allows safe wildlife passage by modifying, replacing, or removing existing fences identified as barriers to wildlife movement, and managing the entirety of the Taos Plateau as a migration corridor for big game, would provide more opportunity for wildlife viewing in a primitive setting, when compared to Alternative A.

**Alternative B1: Designate Cerro de la Olla WSA**

The types of effects under Alternative B1 would be the same as Alternative B, except that the 5,120-acre area of the Cerro de la Olla unit would be designated as a WSA (see Map B.11, Appendix B) and specifically managed in a manner so as not to impair the suitability of the area for preservation as wilderness (see Section 3.2.17, *Special Designations*, for an analysis of WSAs across the alternatives).

#### 3.2.10.3 Cumulative Effects

Past actions, particularly the Monument's designation in 2013 and the designation of the Cerro del Yuta Wilderness (13,420 acres) and Rio San Antonio Wilderness (8,120 acres) in 2019 (see Section 3.2.17, *Special Designations*) have contributed to cumulative beneficial effects by providing long-term protection for lands with wilderness characteristics within the Monument. Present and RFFAs, such as continued recreational use, increased visitation to the Monument, traditional and other resource uses, and vegetation treatments, have the potential to cumulatively affect the naturalness of lands with wilderness characteristics. Continued growth in visitation may also shift traditional use patterns away from more popular monument sites to undeveloped areas, expanding the overall adverse effects on Monument resources (BLM 2021a). Under all alternatives, increasing recreational use and shifts in use patterns throughout the Monument may alter the landscape over time and affect naturalness, thereby contributing to adverse effects on wilderness characteristics by reducing opportunities for solitude and primitive recreational activities. The contributions of Alternative A and Alternative B to the effects on lands managed to protect and those with wilderness characteristics are anticipated to be similar, with Alternative B contributing slightly less than Alternative A because of the additional protections afforded to 5,120 acres of the Cerro de la Olla unit.

### *3.2.11 Wildland Fire*

#### 3.2.11.1 Affected Environment

The 2012 Taos RMP directed completion of a BLM Taos Field Office Fire Management Plan (FMP), which describes management priorities for wildfire response, prescribed fire, non-fire fuels treatments, and community protection/assistance. The FMP provides specific implementation strategies, evaluation criteria, and accomplishment reporting. Cooperation would be carried out with adjacent landowners (Federal, State, Tribal, and private) for fire-management activities across jurisdictional boundaries (BLM 2012a).

Fire-management planning has identified current vegetation conditions using the fire-regime condition-class concept, which describes vegetation communities by their degree of departure from "historic" conditions (USGS EROS 2020a, 2022b). Before the initiation of effective fire suppression in the late 1800s, foothill grasslands were maintained free of invading trees and shrubs by periodic fires. With fire suppression, many grasslands are becoming shrublands or woodlands, and many shrublands are being converted to woodlands. This extent of departure from the natural state can be used to prioritize areas for treatment. Additionally, available data indicate that the greatest terrestrial vegetative decline within the Monument has occurred on the slopes of Ute Mountain and Cerro de la Olla (see Section 3.2.7). The lowest reaches of the Rio Grande in the Lower Gorge have also experienced a significant decline in vegetative cover (Tala 2022; see Section 3.2.7).

Fire Regime Groups characterize the presumed historical fire regimes within landscapes, based on interactions between vegetation dynamics, fire spread, fire effects, and spatial context. The groups incorporate data about presumed pre-Colombian vegetation as a reference condition and model changes to the current vegetation type from field data, historical weather data, and

successional processes (USGS 2014). The majority of the vegetation zones in the Monument are considered as having a high fire-return interval or have variability that may include a high fire-return interval. Approximately 70 percent of the decision area and 73 percent of the planning area are mapped as Fire Regime Group IV-A, meaning that these lands experience fires that are moderately frequent (occurring every 36 to 100 years) and severe (where fire kills all or most of more than 80 percent of the vegetation). Table 3-8 lists acreages of the decision area and planning area for each Fire Regime Group. Map B.12 (Appendix B) depicts the Fire Regime Groups across the planning area.

**Table 3-8. Fire Regime Groups in the Decision Area and Planning Area**

| Group | Fire Frequency (years) | Severity | Acres in Decision Area (%) | Acres in Planning Area (%) |
|---|---|---|---|---|
| I-B | 6–15 | Low, percentage of replacement fire less than 66.7% | 5,913 (2.4%) | 6,296 (2.0%) |
| I-C | 16–35 | Low | 20,858 (8.6%) | 22,701 (7.3%) |
| II-B | 6–15 | Stand replacement, percentage of replacement fire, greater than 66.7% | 354 (0.1%) | 500 (0.2%) |
| II-C | 16–35 | Stand replacement | 356 (0.1%) | 512 (0.2%) |
| III-A | 36–100 | Mixed, percentage of replacement fire less than 80% | 7,076 (2.9%) | 8,573 (2.8%) |
| III-B | 101–200 | Mixed, percentage of replacement fire less than 66.7% | 25,570 (10.5%) | 29,913 (9.6%) |
| IV-A | 36–100 | Stand replacement, percentage of replacement fire greater than 80% | 168,447 (69.4%) | 226,466 (72.9%) |
| IV-B | 101–200 | Stand replacement, percentage of replacement fire greater than 66.7% | 12,585 (5.2%) | 14,247 (4.6%) |
| V-A | 201–500 | Any severity | 828 (0.3%) | 876 (0.3%) |
| V-B | 500+ | Any severity | 435 (0.2%) | 462 (0.1%) |
| NA | NA | NA | 246 (0.1%) | 246 (0.1%) |
| **TOTAL** | – | – | **242,668 (100%)** | **310,792 (100%)** |

Source: USGS 2014; NWCG 2023.

### 3.2.11.2 Environmental Consequences

**Issue 1:** How would proposed management affect fuel treatments that could further increase human safety and protect structures within and adjacent to the Monument?

Generally, wildland fire management is intertwined with vegetation-management practices associated with wildlife, livestock grazing, and forestry and woodlands. Vegetation and fuel conditions are affected, in part, by management of such resources on BLM-administered lands, but are also greatly influenced by broader trends in climate, present and past land uses, and the presence of invasive plant species. Management decisions to conduct vegetation and fuel treatments generally result in long-term beneficial effects on wildland fire management by making ecosystems more resilient to subsequent fires. Decisions that restrict the ability to

conduct or manage fuel treatments, manage wildfire, or prescribed fire, would have adverse effects on wildland fire management. Restrictions on access, development, and visitation could reduce the potential for unplanned ignitions. Similarly, restrictions on new infrastructure development or land-use authorizations would reduce the need for protection through fire suppression. Access and visitation are anticipated to be the same under all alternatives, and there would be no OHV-open areas under the alternatives, resulting in the same limited risk of unplanned ignitions from visitors and recreation within the decision area. Under all alternatives, the potential adverse effects on wildland fire for any authorization could be reduced by BMPs (Appendix D) or proposed mitigation, depending on site-specific surveys and project design.

Under all alternatives, and where appropriate, managed wildfire, prescribed fire, and other fuel-treatment projects would have the long-term beneficial effect of moving areas to desired vegetation condition classes (VCC) and Fire Regime Groups, proactively reducing fuel loading around developed areas and sensitive resources, and meeting other resource objectives.

#### Alternative A: No-Action Alternative

Under Alternative A, management of wildland fire would not change from the existing management prescribed in the 2012 Taos RMP (BLM 2012a). Direct and indirect effects on wildland fire management would be the same as described in the 2011 Taos PRMP/FEIS (BLM 2011:428–429).

#### Alternative B: Proposed Action (Proposed Monument Management Plan)

Wildland fire management under Alternative B would be similar to Alternative A, except that the BLM would utilize partnerships with State agencies and private entities to conduct fuels treatments, community assistance, education/mitigation programs, and rehabilitation/ restoration actions to meet management objectives. Additionally, Alternative B would result in long-term beneficial effects on wildland fire management through the utilization of unplanned fire ignitions for the purpose of resource benefits and to meet objectives for landscape-scale fuels and fire regimes and by using prescribed burning as a tool to remove heavy fuel loading in woodlands and reduce woodland encroachment in grasslands and shrublands. When compared to Alternative A, management under Alternative B would increase the potential for vegetative communities to move toward proper functioning condition and desired VCC and Fire Regime Groups, resulting in reduced potential for severe, stand-replacing fires and providing long-term beneficial effects.

Compared to Alternative A, Alternative B would place an additional 5,096 acres in ROW exclusion and provide for an additional 183 acres of designated ROW corridors, thereby reducing the potential for human-caused fire ignitions due to the possibility of fewer authorized projects and associated operations.

### 3.2.11.3 Cumulative Effects

Past, present, and RFFAs with the potential to alter the condition of vegetation and natural fire regimes across the landscape include wildfire response, vegetation treatments, grazing, noxious and invasive weed spread, and drought. In general, areas have become more prone to

large intense fires over the short term, but long-term susceptibility for fires would decrease as areas within the planning area are burned. Climate change is expected to result in the increase in the severity, frequency, and size of wildfires at a global scale. Additionally, other climate-driven landscape-scale changes may increase wildfire risk, including the establishment and proliferation of invasive species and forest disease or pests, resulting in tree die-offs.

The BLM Taos Field Office has proposed the implementation of a landscape-scale fuels-management program (the Cones Fire Project) in the Monument, which would reduce the quantity of hazardous fuels that threaten public health, safety, and property and protect and enhance the ecological diversity recognized in the Presidential Proclamation 8946 (BLM 2020). The Cones Fire Project would be managed to utilize unplanned wildfire starts—referred to as *wildfire for resource benefit*—to meet objectives for landscape-scale fuels and fire regimes. That is, in the event of a wildfire anywhere within 106,634-acre Cones Fire Project within the Monument, naturally ignited wildfires would be evaluated as potential opportunities to be managed in order to meet the objectives for the hazardous-fuels reduction and restoration project.

Recreational activities and visitation to the Monument, as well as population growth in adjacent communities, are expected to increase, creating additional potential ignition sources and increasing the likelihood of wildland-fire occurrence. The contributions of Alternative A and Alternative B to cumulative adverse effects on wildland fire and fire management are anticipated to be similar, with Alternative B contributing slightly less than Alternative A because of treatments that would provide more potential for moving toward desired VCC and Fire Regime Groups and by excluding ROW over a larger acreage.

## *3.2.12 Invasive Species/Noxious Weeds*

### 3.2.12.1 Affected Environment

Controlling undesirable noxious weeds and invasive nonnative species can be one of the most difficult challenges and most-significant problems facing land managers. Noxious weeds and invasive nonnative plants disrupt or have the potential to disrupt or alter natural ecosystem function, composition, or diversity of areas where they become established. These plant species complicate natural resource use and may interfere with management objectives.

These undesirable plant species are nonnative and can persist on many sites, grow quickly, and spread to the point of disrupting native plant communities or ecosystems. If their future establishment and growth is not controlled by management interventions, then these plant species have the potential to become a dominant or codominant species in an area. Early successional native plant species that become dominant following cyclical events (e.g., a short-term response to drought or wildfire) are not considered invasive plants (BLM 2008b).

Noxious weeds are a subset of invasive plants. These are plant species designated by a Federal or State law as generally possessing one or more of the following characteristics: aggressive and difficult to manage; parasitic; a carrier or host of serious insects or disease; or nonnative, new, or not common in the US (BLM 2008b). Noxious weeds are designated by State and

County entities. The New Mexico Department of Agriculture (NMDA) maintains a New Mexico Noxious Weed List by class (NMDA 2020).

The NMDA noxious weed list classifications of species are as follows.

- **Class A** species are currently not present in New Mexico or have limited distribution. Preventing new infestations of these species and eradicating existing infestations is the highest priority.
- **Class B** species are limited to portions of New Mexico. In areas with severe infestations, management should be designed to contain the infestation and stop any further spread.
- **Class C** species are widespread in New Mexico. Management decisions for these species should be determined at the local level, based on feasibility of control and level of infestation.

At the time the 2012 Taos RMP was approved, no comprehensive weed surveys had been completed within the Taos Field Office; however, individual infestations were known within the Orilla Verde Recreation Area (BLM 2012a).

In 2017, the Taos Field Office initiated a weed-mapping effort for the Monument, whereby the locations and size of noxious weed infestations, as well as areas that have been treated for noxious weeds on the Monument, would be captured in digital format (BLM 2019a). The program was built to be compatible with the National Invasive Species Information Management System (NISIMS), and data are collected and pushed to NISIMS at the end of each fiscal year. Since that time, NISIMS has been replaced with the Vegetation Management Action Portal. The purpose of the weed mapping project is to: (1) track the presence and potential spread of noxious weeds on the Monument (as well as other areas within the Taos Field Office); (2) guide treatment efforts and learning; and (3) help monitor the effectiveness of noxious-weed treatments (BLM 2019a). Noxious weeds and invasive nonnative plants have been found in various locations and habitat types within the Monument, with waterways and transportation systems being the major vectors of spread. Other vectors include vehicle use, wind, wildlife, livestock, and humans.

The NMDA New Mexico Noxious Weed List currently designates 41 plant species as noxious weeds to be targeted for control or eradication and 6 watch list species (NMDA 2020). To date, 15 of the 41 plant species designated by NMDA as noxious weeds have been documented in the decision area since commencement of the 2017 weed-mapping effort; these species and their NMDA classifications are listed in Table 3-9.

**Table 3-9. New Mexico Noxious Weeds with Documented Occurrences in the Monument**

| Common Name | Scientific Name |
|---|---|
| *Class A Species* | – |
| Black Henbane | *Hyoscyamus niger* |
| Canada Thistle | *Cirsium arvense* |
| Hoary Cress Spp. | *Cardaria spp.* |

| Common Name | Scientific Name |
|---|---|
| Yellow Toadflax | *Linaria vulgaris* |
| *Class B Species* | – |
| Bull Thistle | *Cirsium vulgare* |
| Perennial (broadleaf) pepperweed | *Lepidium latifolium* |
| Poison Hemlock | *Conium maculatum* |
| Teasel (Fuller's) | *Dipsacus fullonum* |
| *Class C Species* | – |
| Cheatgrass | *Bromus tectorum* |
| Jointed Goatgrass | *Aegilops cylindrica* |
| Musk Thistle | *Carduus nutans* |
| Russian Knapweed | *Acroptilon repens* |
| Russian Olive | *Elaeagnus angustifolia* |
| Saltcedar | *Tamarix* spp. |
| Siberian Elm | *Ulmus pumila* |

Source: BLM 2019a; NMDA 2020; Reitsma 2021.

### 3.2.12.2 Environmental Consequences

**Issue 1:** How would proposed management affect the spread of noxious weeds/invasive nonnative plants and protect species and habitat?

#### Alternative A: No-Action Alternative

Under Alternative A, management of invasive species and noxious weeds in the Monument would not change from the existing management prescribed in the 2012 Taos RMP (BLM 2012a). Guidelines implemented from the 2012 Taos RMP to control the spread of noxious weeds would continue under Alternative A (see Appendix C, Table C-13, and BLM 2012a:30–32).

#### Alternative B: Proposed Action (Proposed Monument Management Plan)

Under Alternative B, management of invasive species and noxious weeds would continue as prescribed in the 2012 Taos RMP (BLM 2012a), with additional management actions to achieve consistency across policy and guidance documents, emphasize coordination with State and local land managers, and establish a certification process for ensuring weed-free sources of fill, mulch, seed, hay, and other livestock feed. When compared to Alternative A, these actions would result in long-term beneficial effects by further limiting the spread of noxious weeds and increasing opportunities to identify and treat new infestations of noxious weeds that already occur in the decision area and NMDA-designated species new to the decision area.

In addition to guidance contained in the *Final Vegetation Treatments Herbicides Programmatic EIR*, Alternative B would tier management to more recent programmatic EIRs for vegetation treatments using various herbicides (BLM 2017b, 2023b). This would result in direct short- and long-term benefits for the management of invasive species and noxious weeds by ensuring

project- or site-specific step-down NEPA analyses consistent with IM 2017-07 prior to project implementation of chemical vegetation treatments.

The Monument comprises approximately 310,793 acres, 39,125 of which are under jurisdiction of the New Mexico State Land Office (i.e., State Trust Land), and 29,000 acres are privately held. Alternative B would emphasize identification of existing invasive species and noxious-weed populations on and off public lands through data sharing with State and local land managers, including in partnership with the New Mexico State Land Office. Compared to Alternative A, this would provide long-term benefits to the Monument by identifying potential source populations of invasive species and noxious weeds and providing additional resources for control before they become established on Monument lands managed by the BLM.

Alternative B would also employ a method by which fill, mulch, seed, hay, and other livestock feed can be certified "weed-free." This confers distinct short-term and long-term benefits to the management of invasive species and noxious weeds, when compared to Alternative A, by providing a prescriptive standard, such as the New Mexico State University Seed Certification and Noxious Weed Free Program, or similar standard approved by the BLM, with which vendors, project proponents, and land managers can comply.

Management actions for other resource programs under Alternative B, including placing an additional 5,096 acres in ROW exclusion, would reduce the potential for surface-disturbing activities and the potential spread of noxious weeds over a larger total area when compared to Alternative A. Similarly, designating ROW corridors over an additional 183 acres under Alternative B would result providing greater opportunity for the co-location of utilities and reduce the potential spread of noxious weeds, when compared to Alternative A.

### 3.2.12.3 Cumulative Effects

Past, present, and RFFAs affecting invasive species and noxious weeds in the planning area include climate change, drought, aridification, and wildfire frequency and severity, which are expected to continue and increase in intensity in the planning area and cumulatively contribute to impacts on invasive species and noxious weeds. Changes to vegetation composition in the planning area are expected from approved vegetation-management and prescribed-fire activities, wildfire, livestock grazing, and other uses. Additionally, recreation and traditional uses are expected to increase and may affect the future distribution of invasive plant and weed species.

As a result of natural and anthropogenic introductions, established noxious weed or invasive nonnative plant populations would likely continue to expand, and new noxious weed or invasive nonnative plant species would continue to appear in the decision area. The degree to which these plant species spread is directly correlated to human activities, disturbances, and control or treatment efforts. Recreational equipment, such as rafts, sleeping bags, bicycles, tents, and clothing, contribute to noxious weed and invasive nonnative plant species population increases. Vehicular travel and other land-use activities contribute to noxious weed proliferation, although natural elements, such as wind and wildlife, would likely also continue to contribute.

Cheatgrass and tamarisk (*Tamaricaceae*) are known to alter ecosystem processes, such as fire regimes and hydrologic processes; they have the potential to expand their distribution, despite human and natural disturbances, and to adapt and shift their range in response to climate change. Invasive vegetation often outcompetes native species by using soil nutrients and water at a greater rate or earlier in the season and regularly producing greater biomass (Walston et al. 2016). Invasive annual plant species, such as cheatgrass, would continue to alter fire regimes by facilitating increases in fire frequency and size. This would occur due to increasing fine fuel loads and continuity in areas that were once fuel-limited or had less to burn. As fires burn these areas, cheatgrass or other invasive plant species would replace desired native vegetation, reinforcing this feedback cycle.

The contributions of Alternatives A and B to the cumulative effects on invasive species and noxious weeds are expected to be similar, although Alternative B would further limit the introduction and spread of invasive species and noxious weeds by providing for additional project- or site-specific analysis of herbicide treatments, a robust "weed-free" certification standard for materials brought into the Monument, and identification of extant threats on State-managed and private lands within the Monument by data sharing.

## *3.2.13 Land Tenure and Land-use authorizations*

### 3.2.13.1 Affected Environment

The BLM's Lands, Realty, and Cadastral Survey program (BLM 2024c) facilitates commercial, noncommercial, recreational, and conservation activities to ensure that public lands are working landscapes managed for the use and enjoyment of current and future generations. This program mission encompasses a wide range of public land transactions, such as acquisitions, sales, exchanges, and withdrawals. Leases, permits, and ROW authorizations support renewable-energy development, film permitting, and other economic activities. Cadastral survey services establish official BLM-administered land boundaries, and land records document all activities and authorizations (BLM 2023c). The BLM anticipates that the demand for ROWs in the planning area could increase with time. The rate of increase is tied to the rate of population growth and associated private-land development, access needs, and utilities development. Demand for ROWs is also tied to renewable energy development in the planning area. Proclamation 8946 dictates that

> Nothing in this Proclamation shall be construed to preclude the Secretary from renewing or authorizing the upgrading of existing utility line ROWs within the physical scope of each such ROW that exists on the date of this Proclamation. Additional utility line ROWs or upgrades outside the existing utility line ROWs may only be authorized if consistent with the care and management of the objects identified above.

The establishment of the Monument under Proclamation 8946 also dictates that

> All Federal lands and interests in lands within the boundaries of this Monument are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, leasing, or other disposition under the public land laws, including withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of this Proclamation. The

> establishment of this Monument is subject to valid existing rights. Lands and interests in lands within the Monument's boundaries not owned or controlled by the United States shall be reserved as part of the Monument upon acquisition of ownership or control by the United States."

Therefore, any land-tenure adjustments would occur by exchange, acquisition, or donation.

The 2012 Taos RMP identified lands for potential acquisition within the Monument, described as all private and State lands from willing sellers within the Taos Plateau ACEC (approximately 222,500 acres). The 2012 Taos RMP also set forth the consideration to acquire private and State lands from willing sellers within 5 miles of the Rio Grande, if the acquisition would provide protection to Rocky Mountain bighorn sheep (BLM 2018). Since 2013, 29,371 acres have been acquired within the Monument.

According to the BLM Case Recordation, 20 land-use authorizations and land-tenure adjustments are pending in the Monument (BLM Legacy Rehost 2023). The majority of pending cases are land-tenure adjustments (i.e., acquisitions and exchanges), totaling approximately 71,005 acres within the Monument. One of these pending land exchanges is the 43,000-acre agreement with the New Mexico State Land Office to initiate a land exchange in the Monument and Sabinoso Wilderness, which was paused in 2018.

The BLM typically issues communication use leases for communication facilities on BLM-administered land. One such communication site (Serial Number 0309477) is currently authorized within the Monument on approximately 10.2 acres within the Wild Rivers Recreation Area. Other authorizations predate the Monument designation and continue under the valid existing-rights language contained in Proclamation 8946. Land-use authorizations predating the Monument primarily consist of ROWs and grants for roads, pipelines, powerlines, telephone/ fiber optics, and water facilities. Few mineral-material authorizations (approximately 116 acres) occur within the Monument; however, 10 placer mining claims (all held by the same claimant) exist in the Monument. Six of the placer claims were filed in 1982, and four were filed in 1997. The total area of quadrants associated with these placer claims is approximately 480 acres, although a portion of some of these claims may extend outside of the Monument boundary (BLM Mineral and Land Records System 2023).

### 3.2.13.2 Environmental Consequences

**Issue 1:** How would proposed management affect land-use authorizations in the decision area?

The 2011 Taos PRMP/FEIS (BLM 2011:431–436) describes the types of effects that could result on the lands and realty program from planning-level decisions. All alternatives would provide for some amount of land-use authorizations, such as grants, leases, permits, or easements, in a manner that protects Monument objects, which can have direct and indirect long- and short-term effects on lands and realty. Each land-use authorization would be required to comply with terms and conditions to ensure that they are managed consistently with the management goals in the decision area.

Under all alternatives, the BLM would retain all lands in the decision area in Federal ownership, which would improve overall public and resource values of those lands. Land exchanges and acquisitions would help consolidate the public land-ownership patterns within the decision area

and allow for better management of Monument lands and the beneficial protection of Monument objects over the long term. Consolidating public land holdings would improve access to public lands, thereby reducing the number of access easements needed and miles of boundary to be managed and helping to reduce encroachment.

Designations of ROW exclusion and avoidance areas affect the BLM's ability to site new ROWs on public land. The alternatives would implement slightly different restrictions on ROWs in the decision area and provide varying opportunity to co-locate utilities within designated ROW corridors.

#### Alternative A: No-Action Alternative

Under Alternative A, management of the lands and realty program would not change from the existing management prescribed in the 2012 Taos RMP (BLM 2012a). Alternative A would continue to manage 185,319 acres as ROW-avoidance areas and 56,850 acres as ROW-exclusion areas within the Monument (see Appendix B, Map B.13). The BLM would continue to prioritize the use of existing ROWs (60 acres) whenever possible. Renewable-energy development would continue to be excluded on 242,447 acres (99.9 percent) of Monument lands. Land-tenure adjustments in the form of exchanges, acquisitions of private and State inholdings, and donations would continue to occur with willing sellers.

#### Alternative B: Proposed Action (Proposed Monument Management Plan)

Alternative B would manage 100 percent of the decision area as exclusion areas for wind- and solar-energy development. Additionally, to manage for the protection of their wilderness characteristics, the Cerro de la Olla (5,120 acres) and San Antonio East (9,855 acres) lands with wilderness characteristics units would be managed as ROW-exclusion areas. In total, Alternative B would manage 180,041 acres (74.2 percent of the decision area) and 61,946 acres (25.5 percent of the decision area) as ROW-avoidance and -exclusion areas, respectively, which would be a 2.8 percent decrease of areas in ROW avoidance, but a 9.0 percent increase of ROW-exclusion areas, compared to Alternative A. Managing more acres as exclusion areas for land-use authorizations under Alternative B would provide long-term benefits because these lands would receive the greatest level of protection for Monument objects and resources. Minor adverse effects would occur under Alternative B because of the decrease in opportunities for new authorizations in the decision area, when compared to Alternative A. Although no formal application has been accepted by the BLM, a local electric cooperative has expressed interest in crossing the gorge at Powerline Falls. Under Alternative B, the proposed expansion of the existing Powerline Falls ROW from 190 feet to 600 feet would result in a reasonable corridor to accommodate an additional potential transmission-line crossing at this location when considering design and engineering requirements, including adequate separation from existing infrastructure. Consistently with Proclamation 8946, additional utility-line ROWs or upgrades outside the existing utility-line ROWs would only be authorized if they were consistent with the care and management of Monument objects. Applications for transmission/utility facilities and ROWs would be analyzed during site-specific NEPA analysis and subject to BMPs and mitigation, as necessary, for the protection and care of Monument objects, special status species, wildlife, and other resources (see Appendix D). New ROWs or new installations on

existing structures would only be granted if subsequent site-specific NEPA analysis determines that Monument objects and outstandingly remarkable values of the Rio Grande would not be affected. The widening of the existing Powerline Falls ROW corridor from 190 feet to 600 feet, and the designation of the new Horsethief Mesa ROW corridor (450-foot width), as proposed under Alternative B, would add 183 acres to the amount of designated ROW corridors in the decision area, resulting in long-term beneficial effects on the lands and realty program by providing for greater opportunity for the co-location of utilities within designated corridors (see Appendix B, Map B.14). Land-tenure adjustments would be the same as described under Alternative A.

#### 3.2.13.3 Cumulative Effects

Past, present, and RFFAs with the potential to result in cumulative effects on the lands and realty program primarily include ongoing updates, replacement, or modifications to existing transmission and distribution lines and land-use authorizations. The BLM expects future growth in demand for land-use authorizations, including commercial-filming permits and renewable-energy and utility development, which would contribute cumulative effects on the lands and realty program, as well as resources within the Monument. Additional future development of adjacent lands would likely result in additional requests for, and approval of, these land-use authorizations.

### *3.2.14 Livestock Grazing*

#### 3.2.14.1 Affected Environment

The primary laws that govern grazing on public lands include the Taylor Grazing Act of 1934, as amended, EOs that implement the Bankhead–Jones Farm Tenant Act of 1937, FLPMA, and the Public Rangelands Improvement Act of 1978. The BLM manages grazing lands under 43 CFR Part 4100 (version October 1, 2005) and BLM Handbooks 4100–4180, and it conducts grazing management practices through BLM Manual H-4120-1, *Grazing Management* (BLM 1987). The BLM administers livestock grazing in accordance with the *New Mexico Standards for Public Land Health and Guidelines for Livestock Grazing Management* (BLM 2001). These standards are based on the analysis of rangeland conditions through monitoring, analysis of data, and the history of allotments to ensure that range health standards are met.

An *allotment* is a designated area or management unit that allows grazing and can comprise multiple pastures and various land ownership. *Permitted use* is defined as the forage allocated by, or under the guidance of, an applicable land-use plan for livestock grazing in an allotment under a permit or lease and is expressed in Animal Unit Months (AUMs). An AUM is equal to the approximate amount of forage needed to sustain one cow, cow-calf pair, five sheep, five goats, or one horse or mule for one month.

A total of 62 allotments fall within or overlap the Monument, all of which are managed by the BLM and are located on 205,328 acres of BLM-administered land (see Appendix B, Map B.15, and Table 3-10). In total, the Monument provides 16,626 permitted AUMs across all allotments (BLM 2024d). The terms and conditions for grazing on BLM-administered lands are set forth in

grazing permits and leases with permittees and lessees. These terms and conditions outline management of the allotment and may include items such as "livestock grazing may be delayed, discontinued, or modified to allow for the protection of rangeland resources and values when there is a lack of plant growth as outlined in the Taos Field Office range readiness and monitoring plan for grazing allotments." A grazing permit or lease is typically in place for a 10-year period, and the terms and conditions are reevaluated during permit renewal. IM 2018-024 provides guidance for prioritizing the review and processing of grazing permits, as well as monitoring the effectiveness of livestock grazing management and progress toward achieving land health standards (BLM 2017c).

Table 3-10 lists the most recent land health evaluations and management status categories for the 62 allotments within the Monument. A land health evaluation of "A" indicates that rangelands are meeting all standards or making significant progress toward meeting the standards. An evaluation of "B" indicates that that rangelands are not meeting all standards or are making significant progress, but appropriate action has been taken to ensure significant progress toward meeting the standards (and livestock is a significant factor). Category "D" evaluations indicate that rangelands are not meeting all standards nor making significant progress toward meeting the standards due to causes other than livestock grazing. Management status categories of Improve, Maintain, and Custodial are defined as follows.

- **Category I (Improve)**: Allotments where current livestock grazing management or level of use on public land is, or is expected to be, a significant causal factor in the non-achievement of land health standards, or where a change in mandatory terms and conditions in the grazing authorization is or may be necessary.
- **Category M (Maintain)**: Allotments where land health standards are met or where livestock grazing on public land is not a significant causal factor for not meeting the standards, and current livestock management is in conformance with guidelines developed by the State Directors in consultation with Resource Advisory Councils.
- **Category C (Custodial**): Allotments where public lands produce less than 10 percent of the forage in the allotment or are less than 10 percent of the land area.

Based on the most recent land-health evaluations, 55 allotments, or 89 percent of allotted land within the Monument, are in land health evaluation category "A" and are meeting all standards or making significant progress toward the standards (see Table 3-10). The remaining seven allotments within the Monument have either not been evaluated[8] (four allotments) or are in category "B" (two allotments) or category "D" (one allotment).

**Table 3-10. Livestock Grazing Allotment Land Health Evaluations and Management Status Category**

| Map Key[1] | Allotment Name (Number)[2] | Land Health Evaluation Category[3] | Management Status Category |
|---|---|---|---|
| 1 | Rio West (00646) | A | Improve |

[8] The BLM has not evaluated these allotments because of their vacant status.

| Map Key[1] | Allotment Name (Number)[2] | Land Health Evaluation Category[3] | Management Status Category |
|---|---|---|---|
| 2 | Brownie Peaks (00592) | A | Improve |
| 3 | Rio East (00645) | A | Improve |
| 4 | Wild River (00606) | A | Improve |
| 5 | Cerrito Negro (00648) | A | Improve |
| 6 | Reserve Common Allotment (00610) | Unevaluated | Improve |
| 7 | Common Use Area (00641) | A | Improve |
| 8 | Guadalupe Allotment (00608) | A | Maintain |
| 9 | Sunshine Valley (00650) | A | Maintain |
| 10 | Guadalupe Mountain (00640) | A | Improve |
| 11 | Wild River (00606) | A | Improve |
| 12 | East Rio Grande (00621) | B | Maintain |
| 13 | Narrow Gauge Community (00585) | A | Improve |
| 14 | Roadside (00601) | A | Improve |
| 15 | Carson Road (00624) | A | Custodial |
| 16 | South Ute (00651) | A | Maintain |
| 17 | Tres Piedras (00629) | A | Maintain |
| 18 | North San Antone (00649) | A | Improve |
| 19 | East Montoso (00630) | Unevaluated | Maintain |
| 20 | South San Antone (00581) | A | Improve |
| 21 | Ute Mountain (00594) | A | Improve |
| 22 | Los Cerritos (00639) | A | Improve |
| 23 | De La Cruz (00599) | A | Custodial |
| 24 | So. Montoso Community (00635) | A | Custodial |
| 25 | Cerro Mountain (00604) | A | Custodial |
| 26 | Campo Borrego (00622) | B | Custodial |
| 27 | West Rio San Antonio (00632) | A | Improve |
| 28 | Carson (00626) | A | Maintain |
| 29 | Arroyo Petaca (00600) | A | Custodial |
| 30 | Arroyo Hondo (00628) | D | Maintain |
| 31 | Los Pinos Allotment (00584) | A | Improve |
| 32 | Hot Spring (00623) | A | Maintain |
| 33 | Hondo (00517) | A | Custodial |
| 34 | No Agua (00647) | A | Improve |
| 35 | Little Atencio Place (00643) | A | Improve |
| 36 | Two-Eighty-Five (00587) | A | Improve |
| 37 | South Chiflo (00603) | A | Improve |
| 38 | La Segita Community (00602) | A | Improve |
| 39 | Stateline (00582) | A | Improve |
| 40 | Reserve Common Allotment (00596) | Unevaluated | Improve |

| Map Key[1] | Allotment Name (Number)[2] | Land Health Evaluation Category[3] | Management Status Category |
|---|---|---|---|
| 41 | Dun Bridge (00627) | A | Maintain |
| 42 | San Cristobal Community (00633) | A | Maintain |
| 43 | San Antone Mountain (00589) | A | Improve |
| 44 | Llano (00593) | A | Improve |
| 45 | East Rio San Antonio (00583) | A | Improve |
| 46 | Punche Place (00644) | A | Improve |
| 47 | Trailing Stop-Over (00576) | A | Custodial |
| 48 | Pinabetoso (00586) | A | Improve |
| 49 | One Eleven (00615) | A | Maintain |
| 50 | East San Antone (00598) | A | Maintain |
| 51 | Cerro Aire (00625) | Unevaluated | Maintain |
| 52 | North Pinnabetoso (00575) | A | Improve |
| 53 | Mendius (00959) | A | Improve |
| 54 | Largo (00591) | A | Improve |
| 55 | North Pot (00642) | A | Improve |
| 56 | East Punche (00605) | A | Improve |
| 57 | La Segita Ne (00578) | A | Improve |
| 58 | Punche (00597) | A | Improve |
| 59 | Wissmath (00607) | A | Improve |
| 60 | Aire (00588) | A | Improve |
| 61 | Espinosa (00590) | A | Improve |
| 62 | Trujillo Peak (00595) | A | Improve |

Source: BLM 2024e.
[1]Map key number as shown on livestock grazing maps in Appendix B.
[2]Allotments 00596 and 00610 are combined into the Reserve Common Allotment and allotments 00612 and 00630 are combined into the East Montoso allotment but are shown separately on maps in Appendix B.
[3]Evaluation category is based on the most recent land health evaluation as of 2024.

### 3.2.14.2 Environmental Consequences

**Issue 1:** How would proposed management affect livestock grazing and rangeland, while also providing for the protection and preservation of Monument objects and values?

The 2011 Taos PRMP/FEIS (BLM 2011:436–441) describes the types of effects on livestock grazing that could result from management actions and other resource programs. Direct and indirect adverse effects on livestock and livestock operations can include loss of AUMs, the introduction and spread of invasive and noxious weed species, and overall compromised rangeland health. Beneficial effects can result from management actions that increase AUMs and water, reduce or eradicate invasive and noxious weed species, and resolve conflicts with other resources and resource uses, such as recreation and wildfire.

The primary management actions of the alternatives that could affect the availability of BLM-administered lands to grazing are allotment closures and modifications or restrictions to

season of use within allotments. Modifications or restrictions on duration of livestock use and modifications to authorized AUMs would only result from allotment-specific evaluations. Existing timing and spatial restrictions for livestock grazing from the 2012 Taos RMP for the protection of seasonal critical ranges, migratory corridors for big game, and special status species would apply to all alternatives and are not analyzed further in this section.

Under all alternatives, the Taos Field Office would authorize grazing to comply with the fundamentals of rangeland health (USDI-BLM Grazing Regulations, 43 CFR Part 4100 § 4180.1) and the New Mexico Statewide RMPA/EIS (BLM 2001), which adopted statewide standards for public land health and guidelines for livestock-grazing management. The assessment and adjustment process for authorized livestock grazing occurs on an allotment basis and is conducted through trend monitoring, AIM, and a land-health evaluation, followed by appropriate NEPA analysis, in compliance with the Grazing Regulations at 43 CFR Part 4100, Subparts 4110, 4120, 4130, 4160, and 4180. Allotment evaluations usually occur prior to permit/lease expiration, where permits and leases are typically issued on a 10-year basis. Implementation-level management, site-specific NEPA analyses, and Section 106 of the NHPA (i.e., compliance for livestock grazing) would consider compatibility and the impacts of grazing on objects of scientific and historical interest. Monument objects would be protected through the implementation of tools, including exclosures, as well as adjustments to permitted use (i.e., AUMs), seasonal use, and class of livestock.

#### Alternative A: No-Action Alternative

Under Alternative A, management of livestock grazing would not change from the existing management prescribed in the 2012 Taos RMP (BLM 2012a). All 62 allotments within the decision area would remain available for grazing (see Appendix B, Map B.15), and 16,626 permitted AUMs across all allotments would be unaffected.

#### Alternative B: Proposed Action (Proposed Monument Management Plan)

Management of livestock grazing would be the same as Alternative A, except that under Alternative B (as updated for the Proposed Monument Management Plan), four vacant grazing allotments (East Rio Grande, Arroyo Hondo, Dunn Bridge, and Hot Spring) would become unavailable for livestock grazing (see Appendix B, Map B.16). Recreational uses within the Horsethief Mesa and Black Rock Rim RMZs and their associated recreation-management objectives where these vacant allotments overlap present a potential conflict with livestock grazing (see Section 3.2.15.2). As a result, Alternative B would result in long-term adverse effects on grazing by removing an additional 3,587 acres available acres for grazing, when compared to Alternative A. However, because these allotments have not been applied for since Monument designation, permitted AUMs under Alternative B would remain the same as Alternative A.

Unlike Alternative A, Alternative B would allow consideration of livestock grazing as a vegetation-management and -maintenance tool in the area north of the Cerro del Yuta Wilderness boundary to promote seed propagation, reduce “wolfy” caespitose grasses, and promote new forage growth for wildlife utilization (see Appendix B, Map B.2). As shown in

*Synthesis Paper: Targeted Livestock Grazing: Prescription for Healthy Rangelands*, targeted grazing to remove decadent vegetation for the goal of enhancing wildlife forage quantity and quality is an effective tool (Bailey et al. 2019). Targeted grazing would provide long-term benefits to the wildlife program by maintaining a treatment that was performed on approximately 2,700 acres of private land before the BLM acquired the property. Consistent with Alternative A, this area is not proposed as an allotment. The BLM would determine design features and monitoring of this treatment through an implementation-level site-specific NEPA analysis and Section 106 of the NHPA compliance process. Range improvements for grazing management would be utilized throughout the Monument, consistently with the protection, preservation, and restoration of Monument objects through site-specific NEPA analyses.

Alternative B1 would be the same as Alternative B, but would result in slightly increased short- and long-term adverse effects on livestock grazing by prohibiting new range improvements or changes to existing range improvements that could impair wilderness characteristics within 5,120 acres of the Cerro de la Olla unit.

### 3.2.14.3 Cumulative Effects

Past, present, and RFFAs with the potential to result in cumulative effects on livestock grazing include activities that affect forage availability and livestock-grazing operations, including vegetation- and weed-management activities, recreational uses, and land-use authorizations. Cumulative adverse effects would include alteration of natural trends that comprise healthy rangeland conditions, such as drought, aridification, wildfire, the spread of noxious and invasive weeds, and human-related activities, such as dispersed camping and trail use from increased visitation. Climate change is expected to exacerbate the intensity of and duration of wildfire, drought, and aridification, while also influencing the establishment and proliferation of invasive species. These trends are expected to continue and increase in intensity and contribute to the degradation of forage vegetation. Recreation and traditional uses are expected to increase and may affect grazing allotments, AUMs, and available forage quality and quantity through trampling from concentrated and dispersed pedestrian-based activities and fugitive-dust deposition on vegetation from motorized activities.

Changes to vegetation composition in the planning area would result from allotment-management plans, approved vegetation-management and prescribed-fire activities, wildfire, erosional processes, management strategies for livestock grazing, and other uses. The incremental contribution of Alternative B (as updated for the Proposed Monument Management Plan) on the cumulative effects on livestock grazing include making an additional 3,587 acres unavailable to grazing. However, the contribution of Alternative B to cumulative adverse effects would be negligible because these areas proposed for closure are not currently being grazed, likely due to lack of access and range improvements, and contain minimal acreage in relation to the scale of available grazing within the decision area.

Additional activities that could contribute cumulative effects include land-use authorizations, such as ROWs. Restrictions to renewable-energy development and ROW authorizations on BLM-administered lands under the alternatives would reduce adverse effects on livestock forage from those types of activities. Revegetation and BMPs, such as those requiring stabilization and

vegetation practices designed to minimize erosion, would provide an improved forage conditions (see Appendix D).

## *3.2.15 Recreation*

### 3.2.15.1 Affected Environment

Recreational opportunities within the Monument encompass various activities, such as rafting on the Rio Grande, enjoying developed campgrounds with river access in the Orilla Verde Recreation Area, boating, fishing, and exploring remote hiking locations for solitude within Cerro de Yuta and Rio San Antonio Wildernesses. The Rio Grande Gorge serves as a recreational destination for local families and visitors from Colorado, New Mexico, Texas, and beyond. In addition to boating, hiking, and fishing, the Monument provides diverse recreational options, such as picnicking, scenic drives, stargazing, rock climbing, hiking, heritage tourism (i.e., petroglyphs), horseback riding, wildlife viewing, mountain biking, cross-country skiing, hot springs, and hunting.

#### Recreation Management Areas

Recreation Management Areas (RMAs) serve as BLM planning-level tools to oversee recreational use on BLM-administered lands. These lands are designated as either SRMAs or Extensive Recreation Management Areas (ERMAs), with non-RMA lands encompassing those not assigned as either. SRMAs focus on enhancing specific recreational values and managing targeted activities, experiences, benefits, and setting characteristics. ERMAs acknowledge existing recreational uses, aligning management with other resources to sustain principal recreational activities. RMAs may be further divided into RMZs, specifying recreational opportunities and defining their own objectives. SRMA/RMZ objectives define the specific recreational opportunities (i.e., activities, experiences, and benefits derived from those experiences) that help define the BLM's management of these areas. Non-RMA lands meet basic recreational needs and visitor services, with an emphasis on resource stewardship and limited recreational activities. The BLM may also designate Backcountry Conservation Areas to protect, conserve, restore, and enhance lands containing habitat for recreationally important fish and/or wildlife species and that are generally intact and undeveloped. A more detailed description of the BLM's RMAs can be found in Appendix F.

#### Visitation

The BLM utilizes the Recreation Management Information System, an internal database, to calculate estimates of recreational visitation. This system assesses participation in 65 types of recreational activities at BLM sites and areas, drawing insights from registrations, permit records, observations, and best professional judgment. National BLM data indicate that visitation to BLM-administered lands in New Mexico has steadily increased over the past 10 years (BLM 2023d). The visitation trend dipped slightly in 2020, likely due to the COVID-19 pandemic, but quickly resumed a steady increase the following year. Based on the 2021 *Annual Managers Report* (BLM 2021a), the Monument had an estimated 288,655 visits in 2021. Table 3-11, below, provides visitation data at popular sites within the Monument for both pre- and

post-COVID-19 pandemic years (2019 and 2023). The La Junta Point Campground and Rio Grande Gorge Visitor Center have seen the largest increases in visitation since 2019 (193 percent increase and 153 percent increase, respectively) (see Table 3-11). The John Dunn Bridge site also remains a popular recreation destination, with 205, 273 visits in 2023—a 20 percent increase from 2019 levels. The BLM anticipates an increasing demand for day-use activities, such as hiking, mountain biking, rafting, and visiting easily accessible interpretive sites. Areas such as Wild River and Orilla Verde Recreation Areas and visitor hot spots, including the John Dunn Bridge, High Bridge, and hot springs, have continued to see higher levels of use since Monument designation.

**Table 3-11. Visitation to Popular Recreation Sites in the Monument (2019 and 2023)**

| Recreation Site | Number of Visitors by Year | | Percentage of Change from 2019–2023 |
|---|---|---|---|
| | 2019 | 2023 | |
| John Dunn Bridge | 171,070 | 205,273 | 20 |
| La Junta Point Campground | 3,617 | 10,589 | 193 |
| Taos Junction Bridge | 5,612 | 9,208 | 64 |
| Taos Junction Campground | 1,793 | 2,727 | 52 |
| Wild Rivers Zimmermann Visitor Center | 12,556 | 12,222 | -3 |
| Rio Grande Gorge Visitor Center | 250,862 | 635,711 | 153 |
| Rio Bravo Campground | 5,601 | 4,459 | -20 |

**Source:** BLM 2023d.

#### Special Recreation Permits

The Federal Lands Recreation Enhancement Act requires SRPs for five types of uses: (1) commercial; (2) competitive; (3) vending; (4) individual or group use in special areas; and (5) organized group activity and event use. SRPs are issued to outfitters, guides, vendors, recreation clubs, and commercial competitive-event organizers that provide recreational opportunities or services without using permanent facilities. The permits are issued to manage visitor use, protect natural and cultural resources, accommodate commercial recreational uses, and provide guided and organized recreation opportunities. SRP activities often offer a specialized opportunity for public recreational users to experience activities that they themselves do not have the skills, equipment, or resource knowledge to perform independently.

### 3.2.15.2 Environmental Consequences

**Issue 1:** How would proposed management affect the BLM's ability to provide for diverse, equitable, and inclusive increased recreational opportunities and use to meet demand, while preserving other resources within the Monument, including Monument objects and values?

**Issue 2:** How would proposed management affect the BLM's ability to accommodate increasing visitation, while mitigating the effects of overcrowding and unauthorized uses and their impact on recreational experience and opportunities?

**Issue 3:** How would proposed management of SRPs, including hot-air balloon launching, be consistent with the care of Monument objects?

### Alternative A: No-Action Alternative

#### *Recreation Management Areas*

Under Alternative A, recreation management would not change from the existing management outlined in the 2012 Taos RMP (BLM 2012a). Within the Monument boundary, the BLM currently manages three ERMAs and one SRMA, comprising eight RMZs, as displayed on Map B.17 (Appendix B) and outlined in Table 3-12, below. Within the Monument boundary, all lands would be designated as an RMA, comprising 194,039 acres of ERMA (80 percent), and 48,190 acres would be designated as SRMAs (20 percent). The management for these RMAs is outlined in Appendix F.

**Table 3-12. Existing Recreation Management Areas within the Monument**

| Recreation Management Area | Acres |
|---|---|
| Taos Plateau ERMA | 168,889 |
| Ute Mountain ERMA | 17,784 |
| San Antonio Gorge ERMA | 7,366 |
| Rio Grande Gorge SRMA | 48,190 |
| *Rio Del Norte RMZ* | *10,334* |
| *Taos Box RMZ* | *3,323* |
| *Wild Rivers Rim RMZ* | *749* |
| *Guadalupe Mountain RMZ* | *10,573* |
| *Orilla Verde and Lower Gorge RMZ* | *3,950* |
| *Taos Valley Overlook RMZ* | *2,314* |
| *Río Grande Rim and Cooper Hill RMZ* | *16,947* |
| **TOTAL** | **290,419** |

Source: BLM 2024f.
ERMA = Extensive Recreation Management Area; RMZ = Recreation Management Zone; SRMA = Special Recreation Management Area.

Because the RMAs were established prior to Proclamation 8946 and extend beyond the Monument boundary, current management actions are less detailed and less aligned with current conditions and trends within the Monument. Consequently, Alternative A would not foresee or adequately plan for future increases in visitation and population growth. The broad approach of current management may result in adverse effects on desired recreational settings and experiences, as well as other Monument objects and values.

#### Camping

Under Alternative A, the entire decision area would remain open to dispersed recreation, including camping. Dispersed camping would remain closed in John Dunn bridge and developed recreation areas, the Taos Valley Overlook RMZ, within 300 feet of descent points into the Rio

Grande or Costilla Creek in the Ute Mountain ERMA, and in the Guadalupe Mountain RMZ, except in designated campsites along the Wild Rivers rim. Camping would be limited to 14 days, as outlined by BLM policy. The effects on recreational opportunities would not change. Other resources throughout the Monument would continue to be affected by camping in high-use areas that are available to camping.

#### Special Recreation Permits and Vendors

The BLM would continue to consider the administration of SRPs for commercial, noncommercial, and competitive events on a case-by-case basis. Under Alternative A, only SRPs for commercially guided angling would continue, with seasonal restrictions in the Ute Mountain segment from April 1 to May 31 to protect sensitive wildlife-breeding areas. Boating management would follow the prescriptions set forth in the 2012 Taos RMP and the *2000 Rio Grande Corridor Final Plan* (BLM 2000a). SRPs and recreational sites would be managed in a manner that supports Monument objects and values, as determined by the BLM. The BLM's ability to approve the issuance of SRPs on a case-by-case basis would allow for flexibility in management. The effects associated with SRP use would continue to affect resources, such as wildlife, in areas and times of high use.

#### Rock Climbing

Under Alternative A, the BLM would continue to manage rock climbing throughout the Monument, requiring BLM preapproval for the installation of new rock-climbing routes or hardware and the replacement of existing hardware. This management would limit the development of rock-climbing routes or the installation of hardware throughout the Monument. Effects from climbing would remain limited to the areas of current use, unless otherwise approved by the BLM.

#### Access

The BLM would continue to utilize the management outlined in the 2012 Taos RMP to meet the needs associated with increased visitation and recreational access. The BLM would continue to manage and maintain recreational sites and established trails. Access and trails within the Horsethief Mesa area would be managed as outlined in the Horsethief Mesa TMP (BLM 2021d).

### Alternative B: Proposed Action (Proposed Monument Management Plan)

#### *Recreation Management Areas*

Under Alternative B, the BLM would adjust and remove the existing recreation-management allocations. The ERMA designation would be removed from the Taos Plateau, Ute Mountain, San Antonio Gorge RMAs (194,039 acres), and the BLM would designate three new SRMAs to focus management on the high-use areas within the Monument. Table 3-13, below, outlines the new SRMAs and their associated RMZs. These areas are illustrated on Map B.18 in Appendix B, and their detailed management is outlined in Appendix F.

**Table 3-13. Special Recreation Management Areas under Alternative B**

| Recreation Management Area | Acres |
|---|---|
| *Wild Rivers SRMA* | *11,322* |
| Wild Rivers Rim RMZ | 749 |
| Guadalupe Mountain RMZ | 10,573 |
| *Black Rock SRMA* | *4,664* |
| Horsethief Mesa RMZ | 1,742 |
| John Dunn Bridge RMZ | 394 |
| Black Rock Rim RMZ | 2,529 |
| *Orilla Verde SRMA* | *6,264* |
| Orilla Verde and Lower Gorge RMZ | 3,950 |
| Taos Valley Overlook RMZ | 2,314 |
| **TOTAL** | **22,250** |

Source: BLM 2024f.
RMZ = Recreation Management Area; SRMA = Special Recreation Management Area.

Under Alternative B, the ERMA designation would be removed from all lands within the Monument. These lands would continue to meet basic recreational and visitor-service needs, while emphasizing stewardship of Monument objects and values. Therefore, this action would have no direct effects on the public recreational opportunities available on these lands.

Within the Wild Rivers SRMA, both RMZs would carry forward the management from the 2012 Taos RMP (see Appendix F). Similarly, the management for the Orilla Verde, Lower Gorge, and Taos Valley Overlook RMZs would remain the same as Alternative A. The newly designated Black Rock SRMA and its associated RMZs would be managed under new guidance, as outlined in Appendix F. These three new RMZs would overlap portions of the current Río Del Norte RMZ, Rio Grande Rim and Copper Hill RMZ, Taos Box RMZ, and Taos Plateau ERMA. The Proposed RMPA under Alternative B would close four vacant allotments to livestock grazing within the Black Rock SRMA: the East Rio Grande and Arroyo Hondo allotments within the Horsethief Mesa RMZ; and the Hot Spring and Dunn Bridge allotments within the Black Rock Rim RMZ (see Appendix B, Maps B.16 and B.18). The allotments have not been applied for since the designation of the Monument. The Horsethief Mesa RMZ portion of the Black Rock SRMA is primarily used for trail-based recreation, including hiking, mountain biking, and OHV use; management objectives under Alternative B for this RMZ would include providing enhanced opportunities for trail-based recreation in accordance with the Horsethief Mesa TMP. Similarly, management objectives under Alternative B for the Black Rock Rim RMZ would include providing enhanced opportunities for trail-based recreation, including pedestrian access from the gorge rim to the bridge area. Managing the four vacant allotments as unavailable to livestock grazing would avoid potential conflicts between grazing and recreational users in the Horsethief Mesa and Black Rock Rim RMZs and result in long-term direct benefits to recreational user experiences and opportunities.

The restructuring of RMA and RMZ allocations would result in direct short- and long-term beneficial effects by providing management that focuses on providing access and development

of recreational opportunities in the areas where concentrated recreational use occurs. Additional management would allow the BLM to monitor effects on Monument objects and values and implement adaptive-management strategies such as seasonal and spatial timing restrictions that would reduce long-term adverse effects when compared to Alternative A. The ability for the BLM to adaptively manage effects from recreation would reduce potential effects on special status species, raptors, and other resources.

The focused management provided by SRMA designation could help provide long-term direct and indirect beneficial effects through the preservation of recreational settings and experiences. The focused management of recreation in the Monument's high-use areas has the potential to provide greater understanding of the Monument's resources, while reducing the use of unauthorized roads and trails and decreasing the potential for destruction or vandalism of Monument objects. The framework outlines essential components of the proposed RMZs, such as activities, experiences, outcomes, and permissible uses on BLM-administered lands. Designating RMZs would yield long-term beneficial effects on managing and safeguarding recreational opportunities and experiences by regulating the extent and nature of activities permitted, in line with public input and the sensitivity of natural and cultural resources.

#### Camping

Similar to Alternative A, the entire decision area would continue to permit dispersed recreation, including camping. However, under Alternative B, the high-use John Dunn Bridge RMZ would remain closed. Additionally, to safeguard special status species and wildlife, the Black Rock Rim and Horsethief Mesa RMZs would prohibit dispersed camping from January 1 to April 1. Conversely, the Guadalupe Mountain RMZ would be open to dispersed camping under Alternative B. This alternative would allow the BLM to manage camping more effectively in the high-use areas of the Monument, while providing for additional backcountry camping opportunities in the Guadalupe Mountain RMZ, which would result in direct short- and long-term beneficial effects on recreational experiences, while also providing indirect beneficial effects on other resources throughout the Monument.

#### SRPs and Vendors

The management of SRPs in Alternative B would remain the same as Alternative A, with the exception that, under Alternative B, SRPs may be subject to adaptive-management strategies that apply spatial and timing limitations on activities to protect Monument Objects and values, such as wildlife and habitat. Within the proposed Black Rock SRMA, to avoid direct and indirect adverse effects on wildlife, no large-group SRPs would be permitted within the Black Rock Rim and Horsethief Mesa RMZs between January 1 and April 1.

The Proposed RMPA under Alternative B would allow hot air balloon flights below the rim of the gorge outside of the seasonal closure period (January 1 through August 31), but only in the area between John Dunn Bridge and Manby Hot Springs. Additional stipulations would be added to SRPs, disallowing the pursuit and incidental take of wildlife from any hot air balloon. The Proposed RMPA under Alternative B would also allow hot air balloon tours throughout the year, except for flights below the rim from January 1 through August 31. Within the John Dunn Bridge

RMZ, flights below the rim outside of the seasonal closure would be restricted to the area between the John Dunn Bridge and Manby Hot Spring. Three designated sites above the bridge would be approved for launching hot air balloons. The proposed management would reduce direct and indirect adverse effects on wildlife and special status species caused by the presence of hot air balloons below the rim. The Proposed RMPA under Alternative B would allow permittees to continue flights below the rim within the allotted windows and provide long-term benefits to both vendors and wildlife. See Section 3.2.3 for additional discussion regarding fish and wildlife. The Proposed RMPA under Alternative B would provide both short-term and long-term benefits to recreational users seeking solitude and primitive recreational experiences outside of the John Dunn Bridge RMZ. Additional short- and long-term benefits would be provided to Monument resources through the better management of visitor use and protection of natural and cultural resources. The proposed management would provide these beneficial effects, while providing for commercial recreational use and events within the Monument.

#### Rock Climbing

Alternative B would also provide additional clarifications regarding the use of rock-climbing hardware. Under Alternative B, new rock-climbing routes requiring fixed hardware and routes requiring replacement hardware would require pre-approval by the BLM through site-specific NEPA analysis and would be subject to NHPA Section 106. Additionally, climbing would be prohibited within raptor-nesting areas during specified timeframes and within 50 feet of cultural resources, such as petroglyphs. This management would provide long-term direct beneficial effects on the cultural resources within the Monument and slight direct adverse effects on recreational climbing opportunities. Under the Proposed Action, any existing routes that are determined to be in conflict with Monument objects and values would be subject to removal. Overall, Alternative B would reduce the long-term adverse effects on Monument objects and values by providing additional protections to cultural resources and wildlife from recreational use.

#### Access

Alternative B aims to expand recreational infrastructure, such as trails, trailheads, parking, and facilities, as necessary, within SRMAs and would provide direct beneficial effects on visitor access to desired recreational experiences and settings, including connections to urban and riverfront trail systems. Under Alternative B, recreation management would protect Monument objects and values and minimize direct and indirect adverse effects on ecological resources through site-specific NEPA analysis prior to the implementation of recreation improvements. The BLM would balance management efforts to protect Monument objects and values by implementing appropriate levels of use, facilities, management services, and administrative controls in each recreation area. Specifically, Alternative B would prioritize providing various access points in the SRMAs, including trail connections from rim areas to the John Dunn Bridge area, thus facilitating nonmotorized access to the bridge area. This proposed management would provide short-term and long-term beneficial effects on recreational users through improved access, compared to Alternative A. Additionally, the BLM would establish thresholds for managing motorized access to the John Dunn Bridge area. The creation of trails and

associated parking from both the Black Rock Rim RMZ and Horsethief Mesa RMZ to the John Dunn Bridge area could provide indirect beneficial effects on the recreational experience of Monument visitors through the reduction of traffic and vehicle presence in this high-use area.

#### 3.2.15.3 Cumulative Effects

Past, present, and RFFAs with the potential to result in cumulative effects on recreation may arise from activities in neighboring communities, recreational visits to nearby BLM-administered lands, and resource-use activities. RFFAs outlined in Section 3.1.3, *Cumulative Actions*, describe potential activities related to travel, recreational uses, and visitation considered in addition to those in the 2011 Taos PRMP/FEIS (BLM 2011). Development of connectors with the Rio Grande Trail to the John Dunn Bridge and development of the Red River Trail Corridor would contribute long-term beneficial cumulative effects on the Monument and surrounding BLM-administered lands accessible to recreational users. Long-term direct beneficial effects could occur as a result of projects that improve access to the Monument and provide additional recreational opportunities to users. Improved access and recreational use in the Monument could result in indirect adverse effects on Monument resources and values as a result of increased use. Continued growth and development in northern New Mexico and the urban areas surrounding the Monument would also result in increased demand for recreational opportunities. In addition to those RFFAs outlined in Section 3.1.3, the BLM is actively finalizing its evaluation of a programmatic process—independently of the Monument planning process—to authorize the placement of fixed hardware for rock climbing.

### *3.2.16 Transportation and Access*

#### 3.2.16.1 Affected Environment

Current transportation and access routes into and through the planning area consist of Federal and State highways, BLM and USFS roads (i.e., those adjacent to the Monument), County road systems, and ROW access roads (see Map B.19, Appendix B). The current transportation system in the panning area creates access for a variety of current uses on the Monument, including recreational activities, access for traditional uses, and range management, and is expected to provide access for future use.

Two Travel Management Areas (TMAs) were established under the 2012 Taos RMP and overlap nearly all of the Monument: (1) the Taos Plateau TMA, and (2) Lower Rio Gorge/Copper Hill TMA. Motorized travel within these TMAs is currently managed under the following categories in consideration of natural resource protection, route utility, and public safety: (1) limited to designated routes; and (2) closed to motorized use. TMA information is available in the 2012 Taos RMP and the 2017 Taos Plateau TMA (BLM 2012a). Based on these TMAs, approximately 538 miles of BLM-administered roads are present within the Monument, the majority consisting of primitive, unpaved OHV roads (approximately 533 miles). Primary BLM-administered roads account for approximately 4 miles of roadways within the Monument. An additional, approximately 89 miles of inventoried primitive roads under USFS-administration or the ownership of Pueblos, private landowners, or the State of New Mexico, occur within the Monument (see Map B.19, Appendix B).

In 2021, the BLM approved a TMP for Horsethief Mesa, which encompasses 2,060.5 acres within the Monument (BLM 2021d). The TMP established a comprehensive travel network to meet current and future access needs to the public lands in this area of the Monument, while minimizing effects on sensitive resources. The travel network identified in the approved TMP comprises both motorized and nonmotorized routes.

Under Proclamation 8946, all motorized-vehicle use in the Monument is limited to designated routes. Nonmotorized mechanized vehicle use is limited to designated roads and trails. Exceptions would be allowed for emergency or authorized administrative purposes.

### 3.2.16.2 Environmental Consequences

**Issue 1:** How would proposed management affect access, ingress, egress, parking, and user conflicts, while also providing for resource protection within the Monument?

#### Alternative A: No-Action Alternative

Under Alternative A, transportation and access management would not change from the existing management outlined in Proclamation 8946 and the 2012 Taos RMP, 2017 Taos Plateau TMA, and the Horsethief Mesa TMA. The management under these documents is illustrated on Map B.19 in Appendix B and includes the following.

- San Antonio and Ute Mountain zones would remain closed to mechanized travel.
- Motorized vehicle use and nonmotorized-mechanized vehicle use would remain limited to designated routes (except for emergency or authorized administrative purposes).
- To improve riparian conditions, certain sites in the Lower Gorge would remain closed to vehicles.

Under Alternative A, approximately 216,551 acres (89 percent) would be designated as limited, and 25,822 acres (11 percent) would be closed to mechanized and motorized travel. Road designations within the Monument under Alternative A are outlined in Table 3-14.

**Table 3-14. Alternative A Travel Designation**

| Designation | Miles |
|---|---|
| *Limited to Designated Roads and Trials* | *603.88* |
| Primary Road | 26.76 |
| Primitive Road | 576.22 |
| Trail | 0.90 |
| *Closed to Motorized and Mechanized* | *10.13* |
| Primary Road | 0.98 |
| Primitive Road | 9.07 |
| Trail | 0.80 |
| **TOTAL** | **614.01** |

Source: BLM 2024f.

Under Alternative A, increasing visitation and use of transportation routes and trails within the boundaries of the Monument may lead to increased effects on the surrounding environment and a higher demand for road and trail maintenance. Current management provides limited guidance for areas outside of the Horsethief Mesa and Taos Plateau TMAs. Under Alternative A, issues with access, ingress, egress, and parking would continue to create user conflicts and result in adverse effects on resources throughout the Monument.

#### Alternative B: Proposed Action (Proposed Monument Management Plan)

Under Alternative B, the BLM would provide additional goals and objectives to guide the management of transportation and access. Alternative B would provide for the development of a TMP for the Monument and prioritize management of parking and travel opportunities and protection of sensitive resources throughout the Monument.

As designated in Presidential Proclamation 8946, except for emergency or authorized administrative purposes, motorized-vehicle use in the Monument is limited to designated roads, and nonmotorized mechanized-vehicle use is limited to designated roads and trails. Additionally, Cerro de la Olla would also be closed above 8,200 feet in elevation; this area consists of 5,120 acres of BLM-administered lands under both Alternative B and Alternative B1. The closure of these roads would provide long-term beneficial effects on Cerro de la Olla, compared to Alternative A, by protecting its primitive characteristics. Administrative/authorized use of motor vehicles would only be allowed within this area. Under Alternatives B and B1, travel management under the Proposed Action within the Monument would result in an additional 2.26 miles of previously limited primitive roads being designated as closed to motorized vehicle use as a result of the Cerro de la Olla closure to motorized use. Travel management designations under Alternative B are illustrated on Map B.20 (Appendix B). Table 3-15 compares travel management under Alternatives A, B, and B1. Travel management designations under Alternative B1 would be the same as Alternative B, and, therefore, the effects under Alternative B1 would be the same as described below for Alternative B.

**Table 3-15. Alternatives Travel Designations**

| Designation | Alternative A | Alternative B and Alternative B1 |
|---|---|---|
| Limited to Designated Roads and Trails | 216,551 | 211,431 |
| Closed to Motorized and Mechanized Use | 25,822 | 25,822 |
| Closed to Motorized Use | 0 | 5,120 |
| **TOTAL** | **242,373** | **242,373** |

Source: BLM 2024f.

The closure of Cerro de la Olla to motorized use above 8,200 feet would reduce direct and indirect adverse effects on Monument objects relating to wildlife and vegetation through the reduction in vehicle presence and associated effects. Beneficial effects would include the long-term preservation of the primitive nature of the area, compared to Alternative A. The remainder of the Monument would continue to be managed similarly to Alternative A, as designated under Proclamation 8946. Additional goals, objectives, and management decisions outlined in

Alternative B would allow the BLM to provide additional planning and resources toward travel management to account for the anticipated increase in visitation to the Monument. The additional planning and analysis that the BLM would conduct would reduce long-term indirect adverse effects within the Monument that could result from increased visitation. The BLM's emphasis on coordination with State and local agencies would provide direct beneficial effects on potential visitors to the Monument by improving access and protecting Monument objects and values.

#### 3.2.16.3 Cumulative Effects

In addition to being identified and discussed in the 2011 Taos PRMP/FEIS (BLM 2011), cumulative effects on the transportation and road networks bordering BLM-administered lands within the planning area and RFFAs are accounted for in Section 3.1.3, *Cumulative Actions*, of this RMPA/EA and describe potential activities related to travel and visitation. This network encompasses routes overseen by various Federal, State, and County entities, as well as those owned by private landholders. Past, present, and RFFAs could include other ongoing Federal, State, and local TMPs or associated planning actions. Enhancements to Federal and State highways, along with their ongoing maintenance, would provide beneficial long-term effects on travel and access throughout the Monument by improving connectivity with BLM-administered roads and County-managed routes, facilitating improved access across the Monument and surrounding area. The improved access throughout the Monument could result in indirect adverse effects on Monument resources as a result of increased traffic and visitation. Potential traffic surges resulting from development, local residency, and the anticipated rise in visitors across the planning area could collectively influence traffic patterns and road conditions.

### *3.2.17 Special Designations*

#### 3.2.17.1 Affected Environment

##### National Landscape Conservation System

BLM NLCS lands are managed by the BLM under its mission to conserve, protect, and restore nationally significant landscapes and places that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations. NLCS (as defined by the Omnibus Public Land Management Act of 2009) includes the following areas administered by the BLM: National Monuments, National Conservation Areas, National Wilderness Areas, WSAs, National WSRs, National Scenic, Historic, or Recreational Trails Designated as Components of the National Trails System, and any area designated by Congress to be administered for conservation purposes (BLM 2012a). The *National Landscape Conservation System 15-Year Strategy, 2010 to 2025,* provides national-level guidance for managing BLM's National Conservation Lands (BLM 2010a). The BLM New Mexico implementation strategy was designed to facilitate and support the implementation of planning decisions at the unit level and ensure consistency with the national strategy. The decision area is part of the NLCS in New Mexico and, therefore, is subject to the National- and State-level strategies (BLM 2010b).

### Areas of Critical Environmental Concern

*ACECs* are areas where special management attention is required to protect and prevent irreparable damage to important historical, cultural, or scenic values, fish and wildlife resources, or other natural systems or processes or to protect life and ensure safety from natural hazards. To be designated an ACEC, the area must meet criteria for both relevant and important (R&I) values, as defined in 43 CFR 1610.7 and in BLM Manual 1613, *Areas of Critical Environmental Concern* (BLM 1988).

As part of the 2012 Taos RMP process, the BLM reviewed and evaluated all recommended areas for ACECs, consistently with 43 CFR 1610.7-2 and BLM Manual 1613. Two ACECs, the Taos Plateau ACEC (222,500 acres) and the Lower Gorge ACEC (21,190 acres), currently overlap the Monument decision area in their entirety, as shown on Map B.21 (Appendix B). 2012 Taos RMP Section 2.2.10, *Special Designations*, and Appendix A, *Management Prescriptions for Special Designations*, set forth the direction and prescriptions for these two ACECs, which are also summarized in Appendix C, Table C-18, of this Proposed RMPA/EA. The Taos Plateau ACEC was established to protect R&I values associated with wildlife habitat, special status species, water quality and quantity, wetlands, and scenic quality. The Lower Gorge ACEC was established to provide direct management of R&I riparian vegetation, special status species and wildlife habitat, and cultural values. Management of the Lower Gorge ACEC also includes an emphasis on recreation.

### Wilderness and Wilderness Study Areas

A *BLM wilderness area* is an area of public lands that Congress has designated for the BLM to manage as a component of the National Wilderness Preservation System, in accordance with the Wilderness Act of 1964 (PL 88-577). With the passage of FLPMA in 1976, Congress directed the BLM to inventory, study, and recommend which public lands under its administration should be designated as wilderness. In 1991, the BLM made wilderness recommendations to Congress for 50 WSAs in the State of New Mexico (BLM 2019b). The 2012 Taos RMP directed management of the San Antonio WSA (7,371 acres) to be consistent with the BLM's *Interim Management Policy for Lands Under Wilderness Review* (BLM 2012a)[9].

On March 12, 2019, President Trump signed Senate Bill 47 into law as PL 116-9, also known as the John D. Dingell, Jr., Conservation, Management, and Recreation Act (Dingell Jr. Act). The Dingell Jr. Act designated two wilderness areas within the Monument boundary, the Cerro del Yuta Wilderness (13,420 acres) and Rio San Antonio Wilderness (8,120 acres) (see Map B.21, Appendix B). The Dingell Jr. Act released all remaining acreage previously deemed a WSA, including the San Antonio WSA, which was the only WSA within the Monument (BLM 2024g). Therefore, no WSAs currently exist within the Monument.

The Cerro del Yuta Wilderness consists of an isolated volcanic cone rising starkly out of the high desert plains. Reaching 10,093 feet in elevation, Cerro del Yuta is the highest point in the

[9] The purpose of WSAs is to identify areas that Congress can consider for inclusion in the National Wilderness Preservation System. The BLM manages WSAs to preserve their natural conditions until Congress makes a decision.

Monument. The Cerro del Yuta Wilderness overlaps lands previously identified as lands with wilderness character (i.e., the Ute Mountain unit). The Rio San Antonio Wilderness consists of a meandering gorge lined with Douglas-fir (*Pseudotsuga menziesii*) and spruce (*Picea*) cutting across the sagebrush plains and highland mesas. Interest in special designations, including wilderness preservation, within the Monument has and continues to be a national and regional focus over the last decade. Additional proposed wilderness legislation for Cerro de la Olla (12,898 acres) is pending Congressional action as of 2024 (Senate Bill S.593 2023).

**Wild and Scenic Rivers**

*WSRs* are streams or segments of streams designated by Congress under the authority of the Wild and Scenic Rivers Act of 1968 (PL 90-542, as amended; 16 USC 1271–1287) for the purpose of protecting the stream or stream section in its free-flowing condition, water quality, and its ORVs, which are identified on a segment-specific basis and may include scenic, recreational, geological, fish and wildlife, historical, cultural, or other similar values.

The Rio Grande WSR was designated as part of the original Wild and Scenic Rivers Act legislation signed into law in 1968 (PL 90-542; 16 USC 1271 *et seq*.). It includes 74 miles of the river as it passes through the Rio Grande Gorge and 4 miles of the Red River (BLM 2024h) (see Map B.21, Appendix B). The ORVs for the Rio Grande and Red River WSRs include cultural, fish and wildlife habitat, geological, recreational, riparian, and scenic values. The river gorge is home to numerous species of wildlife, including big horn sheep, river otter, and the Rio Grande cutthroat trout. The Rio Grande and Red River WSRs provide a wide variety of recreational opportunities, luring anglers, hikers, artists, and whitewater-rafting enthusiasts. Two developed recreation areas are located along the river: (1) Wild Rivers in the north; and (2) Orilla Verde in the south. In addition to these recreation areas, a spectacular vista of the gorge is viewable from the High Bridge Overlook, where Highway 64 crosses (BLM 2024h).

The public use of the area contained in the Rio Grande and Red River WSR corridor Is managed to preserve the rivers' natural and primitive conditions. The entire length of the Rio Grande within the Monument is designated as ONRWs, which are defined as streams, lakes, and wetlands that receive enhanced protection against degradation under the State of New Mexico's Standards for Interstate and Intrastate Surface Waters and the Federal Clean Water Act. An ONRW designation is the highest level of protection against degradation that can be afforded for a waterbody under the State's Water Quality Standards (NMED 2024). No other ONRWs are currently designated within the Monument.

The *Rio Grande Corridor Plan,* finalized In January 2000, completed the requirement for a comprehensive river-management plan, as required under the Wild and Scenic River Act, to manage public land along 94 miles of the Rio Grande and 42.7 miles of Rio Grande tributaries (DOI 2000). As part of the planning process for this Plan, and the 2012 Taos RMP, the BLM undertook WSR-eligibility and -suitability studies; the following segments were determined eligible for the National Wild and Scenic Rivers System: Arroyo Hondo (1.3 miles), Red River (1.0 mile), and Rio San Antonio (4.5 miles). A 1.1-mile segment of the Rio Pueblo de Taos was also determined to be suitable. Suitability status of Arroyo Hondo, Red River, and Rio San Antonio were deferred by the BLM in 2012, pending suitability studies initiated by the Carson National

Forests as part of their forest plan revision. During the summer of 2022, the Carson National Forest issued a final decision for their updated Forest Plan (USFS 2022). As part of that planning process, USFS completed a Wild and Scenic Rivers eligibility study, finding the Arroyo Hondo, Red River, and Rio San Antonio eligible for inclusion in the WSR system. However, the planning process did not include a suitability study (USFS 2022). Instead, a suitability study is required for any proposed project or activity on Carson National Forest lands that would conflict with the river's eligibility requirements (USFS 2022).

#### National Trails

The National Trail System includes congressionally designated historic and scenic trails and administratively designated recreational trails. *Scenic trails* are established "for maximum outdoor recreation potential, and for the conservation and enjoyment of the nationally significant scenic, historic, natural, or cultural qualities of the areas through which such trails may pass"; *historic trails* are "extended trails which follow as closely as possible and practicable the original route or routes of travel of national historical significance" and are designated for "the identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment" (PL 90-543, as amended through 117-345, January 5, 2023). Section 4 of the National Trails System Act establishes that administrative units, including the BLM, may establish National Recreational Trails for "a variety of compatible outdoor recreation uses in or reasonably accessible to urban areas or high-use areas." Although similar to historic and scenic trails, National Recreation Trails therefore do not require congressional approval.

The OSNHT, designated on December 4, 2002, by the Old Spanish Trail Recognition Act of 2002, parallels the Monument on its eastern boundary from the Colorado State Line to the Rio Hondo, where it crosses into the Monument for approximately 1.5 miles before continuing south (see Map B.21, Appendix B). In 1981, 12 miles of the Wild Rivers Recreation Area trails were designated as National Recreation Trails.

### 3.2.17.2 Environmental Consequences

**Issue 1:** How would proposed management affect designated wilderness?

**Issue 2:** How would proposed management affect waterway segments previously found as suitable for inclusion in the National Wild and Scenic River System, preservation of Monument objects and values, and the ability of visitors to access diverse recreational experiences?

**Issue 3:** How would proposed management affect and consider ONRWs within the Monument?

**Issue 4:** How would proposed management affect the OSNHT?

The 2011 Taos PRMP/FEIS (BLM 2011:467–472) describes the types of effects that could result on special designations from planning-level decisions. The potential effects on the resource values driving each special designation addressed in this section are summarized below. The analysis focuses on the planning issues listed above; however, additional analysis can be found elsewhere in this Proposed RMPA/EA, where adverse effects on resource values

associated with special designations are described in more detail (e.g., Section 3.2.3, *Fish and Wildlife*; Section 3.2.5, *Geology*; Section 3.2.15, *Recreation*).

Management of the Rio Grande and Red River WSR corridor would not vary by alternative and would continue to be managed according to BLM policy, Wild and Scenic Rivers Act direction, and the existing 2000 *Rio Grande Corridor Plan*. All alternatives would include management direction to protect the ORVs, free-flowing conditions, and the classification of Wild and Scenic River corridors. Maintaining the conditions that characterize the Rio Grande and Red River WSRs would uphold the standards set forth in the Wild and Scenic Rivers Act and benefit present and future generations through the enjoyment of these areas. Managing these areas to maintain their free-flowing nature and ORVs would help protect water quality, scenic integrity, areas of cultural or historic significance, recreational opportunities, and wildlife species' health and diversity. No other effects are anticipated on designated Wild and Scenic Rivers from other resources or resource uses under the alternatives.

Under all alternatives, the BLM would continue to work in partnership with the National Park Service to manage the OSNHT and apply protective-management prescriptions for the trail corridor on BLM-administered lands, which would result in short- and long-term beneficial effects. Management actions for other resources and resource uses are not expected to affect the values of the OSNHT. Existing legal statutes, policies, and administrative procedures would be implemented to stop, limit, or mitigate any adverse effects.

#### Alternative A: No-Action Alternative

Under Alternative A, management of special designations would not change from the existing management prescribed in the 2012 Taos RMP (BLM 2012a). Alternative A would maintain the Taos Plateau ACEC (22,500 acres) and Lower Gorge ACEC (21,190 acres) and would manage the areas to protect and enhance identified R&I values consistently with Proclamation 8946 and relevant BLM policies. Although management for these ACECs would be largely consistent with the purposes of the Monument's designation, Alternative A would not specifically prescribe management for the restoration, protection, and preservation of Monument objects.

The Cerro del Yuta Wilderness (13,420 acres) and Rio San Antonio Wilderness (8,120 acres) were previously managed as a land with wilderness characteristics and a WSA, respectively, under the 2012 Taos RMP, pursuant to guidelines consistent with the Wilderness Act of 1964, the enabling-legislation regulations for wilderness management at 43 CFR 6300, and the BLM's guidance and policies for wilderness management. However, the BLM manages these designated wilderness areas according to direction in the Dingell Jr. Act, as well as BLM Manual 6340, *Management of Designated Wilderness Areas* (BLM 2012b). Proclamation 8946 also withdrew all Monument lands from all forms of entry and location under the public land laws. Therefore, designated wilderness under Alternative A would be managed as ROW-exclusion areas (including for renewable-energy development), VRM Class I, and closed to motorized travel. Management of other resources and resource uses under Alternative A would not affect designated wilderness.

Alternative A would not affect eligible and suitable WSRs (see Map B.22, Appendix B) and would continue management actions to protect the WSRs' identified ORVs, tentative classification, and free-flowing character.

**Alternative B (Proposed Action/Proposed Monument Management Plan) and Alternative B1 (Designate Cerro de la Olla WSA)**

The BLM would not designate ACECs under Alternative B because Monument protections are substantially equivalent to ACEC designation (see Map B.23, Appendix B). Under Alternative B, the management of R&I values for the Lower Gorge ACEC and Taos Plateau ACEC would be the same as Alternative A, except where updated to provide for additional protective management. Generally, Alternative B would result in additional protections for R&I values and Monument objects by managing more acres for the protection of lands with wilderness characteristics, closing an additional 3,587 acres to livestock grazing, and reducing the potential for land-use authorizations through the designation of an additional 5,096 acres as ROW exclusion, when compared to Alternative A.

Under Alternative B, management and the effects on designated wilderness would be the same as Alternative A. Alternative B would not designate new WSAs, but would manage 5,120 acres of the Cerro de la Olla unit to protect and maintain its wilderness characteristics (see Section 3.2.10.2, *Environmental Consequences*). Unlike Alternative B, Alternative B1 would designate 5,120 acres of the Cerro de la Olla unit as a WSA and manage the area pursuant to the BLM's non-impairment standard (BLM Manual 6330) (see Map B.24, Appendix B). Activities permissible within the Cerro de la Olla unit under Alternative B1 would be generally the same as Alternative B, except that Alternative B1 would manage the area to VRM Class I objectives, instead of VRM Class II, and new range improvements or changes to existing range improvements that could impair suitability for wilderness designations would not be allowed. As a result, Alternative B1 would result in greater long-term beneficial effects on wilderness characteristics by allowing very low level of change to the existing character of the landscape, when compared to the No Action Alternative and Alternative B. Additionally, using the 8,200-foot contour line to delineate the boundary of the Cerro de la Olla WSA would reduce future conflicts with multiple-use management, while providing for continued access to traditional uses in the vicinity of the WSA, such as fuelwood harvest (the use of chainsaws for fuelwood harvest could not be accommodated by cherry-stemmed roads into a larger area designated as a WSA). If the Cerro de la Olla unit were to be released from wilderness consideration, then the 5,120 acres would be managed under Alternative B1 in a manner that would ensure wilderness-designation suitability, unless otherwise specified by Congress in its releasing legislation. Overall, Alternatives B and B1 would result in similar effects on naturalness and outstanding opportunities for solitude or primitive and unconfined types of recreation; however, over the long term, Alternative B1 would reduce the likelihood for impairment of wilderness suitability to a slightly greater extent than Alternative B.

Management of eligible and suitable WSRs would be similar to Alternative A; however, specific, interim protective-management guidelines would clarify how these river segments would be protected and provide more comprehensive management, maintenance, and protections of

free-flowing conditions, ORVs, classifications, and water quality. As the area population and visitation to the Monument increase, the value of managing these areas in their natural, free-flowing condition could increase user satisfaction and contribute to the increased wellbeing of visitors who spend time in these areas. Conversely, increased visitation to WSR areas could have some detrimental ecological effects, such as increased refuse or discarded items, the introduction or spread of nonnative species, reduced fish populations (through increased fishing pressure), or aquatic-habitat degradation. Management under Alternative B would apply protective measures to prohibit new or increased degradations and provide for restoration to protect and promote water quality (Appendix C, Table C-22). Additionally, management of designated ONRWs within the Monument under Alternative B would include coordination with NMED's Surface Water Quality Bureau to develop shared protocols for implementing ONRW protections and would decrease the potential for water-quality degradation, when compared to Alternative A.

Under Alternative B, management decisions for the OSNHT would be similar to Alternative A, except that new strategies and updated information would be incorporated to increase agency coordination and consistency for OSNHT management the across the planning area. Overall, incorporation of the *OSNHT Comprehensive Strategy* (BLM and NPS 2017), the *Multi-Agency National Trails System Memorandum of Understanding* (NPS 2017), and recent BLM policies and technical references relating to the management of National Historic Trails provide greater beneficial effects, when compared to Alternative A.

### 3.2.17.3 Cumulative Effects

Past, present, and RFFAs that can affect special designations include grazing, recreation, vegetation management, and travel management. Continued recreational uses, increased visitation to the Monument, traditional and other resource uses, and vegetation treatments have the potential to affect designated wilderness, WSRs (i.e., designated, eligible, and suitable segments) and National Historic Trails, including the OSNHT. Designated wilderness areas would be primarily affected by the number and proximity of adjacent motorized-travel corridors, the volume and type of traffic on those corridors, the sights and sounds of human activities near or on the borders of wilderness, and the quantity and type of recreational users. Similarly, increased visitation within and around the OSNHT could contribute to adverse effects on the trail’s integrity. Cumulative effects would occur to designated, eligible, and suitable WSR segments as a result of natural events, such as drought and erosion, and from any action outside of the Monument that would result in large water withdrawals, sedimentation or other sources of pollution entering the water system, a noticeable increase in human presence, or adverse effects on visual resources.

The contribution of Alternative A and Alternative B to the effects on special designations are anticipated to be similar, with Alternative B contributing slightly fewer adverse effects than Alternative A because of the additional protections afforded by closing 3,587 acres to livestock grazing and the reduction of potential for land-use authorizations that would be achieved by designating an additional 5,096 acres as ROW exclusion, when compared to Alternative A. Alternative B1 would provide greater long-term protections for wilderness by managing 5,120

acres of the Cerro de la Olla unit as a WSA and would therefore contribute the least to overall adverse cumulative effects.

## *3.2.18 Socioeconomic Context and Environmental Justice*

### 3.2.18.1 Affected Environment

This section evaluates the existing demographic, economic, and environmental-justice conditions around the Monument and assesses the economic role of activities that rely on BLM-administered resources in the region. Refer to Appendix G for additional information supporting this section.

The Monument is within Rio Arriba and Taos counties, New Mexico. The socioeconomic and environmental-justice analysis areas extend not only to Rio Arriba and Taos counties, but also to two bordering counties in Colorado—Conejos and Costilla. Most of the demographic and economic data presented in this analysis (see Appendix G) are presented at the place level, which references statewide conditions and trends for context. Although County-level data may mask variation within the counties, the block-group, or place-level data, particularly in rural areas, is scarce and contains large margins of error. Therefore, County-level data is considered a sufficiently granular geographic scale for demographic and socioeconomic analysis. For environmental justice–population identification, place-level data is used to better identify specific populations that could be disproportionately and adversely affected by the management of resources in the region.

#### Socioeconomic Context

As Appendix G details, residents of the socioeconomic analysis area engage with and rely on the resources the Monument offers. The potential socioeconomic effects of management decisions on those resources are detailed in Section 3.2.18.2, *Environmental Consequences*.

#### Environmental Justice Context

As detailed in Appendix G, the analysis area comprises many potential environmental-justice communities. Most inhabited portions of the study area are considered environmental-justice communities, compared to their corresponding reference values. The only communities in the study area that are not considered environmental-justice communities within New Mexico include the Conjilon, Canova, Coyote, Lyden, Ojo Caliente, Truchas, Arroyo Hondo (Taos County), Arroyo Seco, Questa Village, San Cristobal, and Talpa Census Designated Places.

The adjacent counties in Colorado were screened for potential environmental-justice populations because it is possible that nearby communities may have a cultural or historical link to the planning area. Based on this analysis, all communities within Costilla and Conejos Counties are considered environmental-justice communities because they fall above the threshold for minority and/or low-income status.

As Appendix G details, residents of the environmental justice–analysis area engage with and rely on the resources that the Monument offers.

### 3.2.18.2 Environmental Consequences

**Issue 1:** How would the alternatives affect socioeconomic status in the analysis area? Would alternatives result in beneficial or adverse impacts on resource stakeholders?

**Issue 2:** How would proposed management affect environmental-justice populations?

**Issue 3:** How would proposed management affect minority or low-income populations or Tribal Nations?

The 2011 Taos PRMP/FEIS (BLM 2011:472–479) describes the types of effects that could result on socioeconomic and environmental-justice communities from planning-level decisions. The potential effects on the groups and communities addressed in this section are summarized below. The analysis focuses on the planning issues listed above; however, additional analysis can be found elsewhere in this Proposed RMPA/EA. where adverse and beneficial effects on resource values associated with socioeconomics and environmental justice are described in more detail (i.e., Section 3.2.1. *Cultural Resources*; Section 3.2.2, *Traditional Uses;* Section 3.2.3, *Fish And Wildlife;* Section 3.2.8, *Visual Resources;* Section 3.2.13, *Land Tenure and Land-Use Authorizations;* Section 3.2.14, *Livestock Grazing;* Section 3.2.15, *Recreation; and* Section 3.2.16, *Transportation and Access*).

#### Alternative A: No-Action Alternative

Under Alternative A, no changes are anticipated from the baseline conditions described above and in Appendix G.

#### Alternative B: Proposed Action (Proposed Monument Management Plan)

Under Alternative B, the anticipated changes to resources are outlined in Appendix C. Key resources with potential socioeconomic or environmental-justice effects are detailed in this RMPA/EA in Section 3.2.1, *Cultural Resources*; Section 3.2.2, *Traditional Uses*; Section 3.2.3, *Fish and Wildlife*; Section 3.2.8, *Visual Resources*; Section 3.2.13, *Land Tenure and Land-use authorization*; Section 3.2.14, *Livestock Grazing*; Section 3.2.15, *Recreation*; and Section 3.2.16, *Transportation and Access*. Across those key resources, Alternative B would not result in short- or long-term effects on the socioeconomic or environmental justice conditions of the analysis area.

### 3.2.18.3 Cumulative Effects

Past, present, and RFFAs would continue to affect the socioeconomic and environmental-justice conditions of the analysis area. As described throughout the cumulative effects analysis for the resource programs above, the BLM is expecting many trends to continue for future growth in socioeconomic conditions around the Monument, as well as protection of cultural heritage practices and sites. Additional future changes to these underlying resources would contribute to the cumulative socioeconomic and environmental-justice status.

# 4 Consultation and Coordination

This chapter documents the BLM's public outreach, consultation, and coordination efforts throughout the preparation of this Proposed RMPA/EA. The CEQ's regulations (40 CFR 1506.6) provide guidance for ensuring public involvement in land-use planning, in accordance with NEPA. Title II, Section 202 of FLPMA directs the BLM to coordinate its land-use planning with other Federal agencies, State and local governments, and Tribes to the extent that those external plans are consistent with the laws governing BLM-administered surface lands. Presidential Proclamation 8946 also directs the BLM to undertake Monument planning with maximum public involvement, including, but not limited to, consultation with State, local, and Tribal governments, as well as community land-grant and acequia associations.

## 4.1 Public Participation

When creating an RMP/EIS, public involvement is not only vital, but legally mandated (BLM 2005). The BLM's public outreach and collaboration for this project are ongoing and would continue throughout the development of this RMPA/EA.

### *4.1.1 Scoping*

*Public scoping* is the process through which the public has an opportunity to provide comments on the identification of issues (43 CFR 1610.2(f)(1)) and proposed planning criteria (43 CFR 1610.2(f)(2)). Through the process of public and internal scoping, the BLM determined the scope and significant issues to be analyzed in depth in this Proposed RMPA/EA, identified and eliminated from detailed study the issues that are not significant, and identified a range of reasonable alternatives to be analyzed in this Proposed RMPA/EA (40 CFR 1610.4). In accordance with 43 CFR 1610.2(d), the results of the public-scoping process are documented in a scoping report (BLM 2023a).

The BLM formally initiated the external scoping process for the RMPA/EA on August 11, 2023, with publication of an NOI in the FR (88 FR 54660). The NOI defined the end date of scoping as September 11, 2023, or 15 days after the last public meeting, whichever occurred later. The last public meeting was held on September 5, 2023, and public scoping closed on September 20, 2023. The public scoping period lasted a total of 40 days.

Outreach efforts conducted by the BLM included publication of the NOI, distribution of news releases on August 11, August 22, and August 24, 2023, that identified the start of the public scoping period, meeting dates, locations, and methods by which interested parties could comment, and the public-scoping meetings. The BLM hosted two public-scoping meetings, two in-person and one virtual (Table 4-1). The purpose of these meetings was to provide the public with an opportunity to be informed about the project, ask any questions they may have, and. in the case of the in-person meetings, to provide an opportunity to accept handwritten and hand-delivered comments.

**Table 4-1. Scoping Meeting Information**

| Meeting Date and Time | Meeting Location | Approximate Number of Attendees |
|---|---|---|
| August 28, 2023, 6:00 to 8:00 p.m. | Sagebrush Inn and Suites, Taos, New Mexico | 39 |
| August 29, 2023, 6:00 to 8:00 p.m. | BLM New Mexico State Office, Santa Fe, New Mexico | 4 |
| September 5, 2023, 6:00 to 8:00 p.m. | Virtual via Zoom | 19 |
| **TOTAL** | **–** | **62** |

The BLM received a total of 316 submissions during the scoping period. Most submissions were form letters, but 67 letters were unique submissions. Comments received were coded according to issue categories. The issue categories that were identified most frequently were: (1) recreation use and visitor services; (2) wildlife and fisheries; (3) rangeland health and livestock-grazing management; (4) travel, transportation, and access management; (5) cultural-resources management, Native American religious concerns, and Tribal use; and (6) hydrology (e.g., groundwater, surface water, wetlands, riparian areas, floodplains, water quality). Refer to Scoping Report Section 3, *Issue or Concern Statement and Comment Summaries* (BLM 2023a), for a summary of public comments; Table A.2 in Appendix A of the Scoping Report (BLM 2023a) provides all individual, substantive comments, sorted by topic. The Scoping Repot is available on the project website (https://eplanning.blm.gov/eplanning-ui/project/2024165/570).

## 4.2 Consultation and Coordination with Federal, State, and Local Agencies and Tribes

### *4.2.1 Cooperating Agencies*

Cooperating agencies include Federal, State, or local government agencies or Native American Tribes that entered into formal agreements with the BLM to help develop the environmental analysis for this RMPA/EA. The BLM invited 45 groups, comprising agencies and Tribes, to be cooperating agencies; of these, 11 signed, or are in the process of signing, formal Memoranda of Understanding with the BLM to share knowledge and resources throughout development of this RMP/EA, as shown in Table 4-2.

The BLM held an initial cooperating-agency meeting during the scoping period for the RMPA/EA to familiarize cooperators with the RMP-development process. The BLM held four meetings with the cooperating agencies in October and November 2023, giving time to these cooperators for them to comment on the preliminary alternatives and identify concerns or issues. The BLM provided the cooperating agencies with the opportunity to review the preliminary Draft RMPA/EA in February 2024 and revised the preliminary alternatives and analysis in the RMPA/EA based on those comments prior to releasing the Draft RMPA/EA to the public on April 23, 2024. Changes to create this Proposed RMPA/EA were made in response to public

comments received on the Draft RMPA/EA, cooperating agency input, USFWS consultation, and internal BLM reviews of the Proposed RMPA/EA.

**Table 4-2. Cooperating Agencies and Statuses**

| Invited Agency or Tribe | Response | MOU Status |
|---|---|---|
| All Pueblo Council of Governors | No response | – |
| Cochiti Pueblo | No response | – |
| Comanche Nation of Oklahoma | No response | – |
| East Rio Arriba Soil and Water Conservation District | Yes | Signed by both parties |
| Hopi Tribe | No response | – |
| Jicarilla Apache Nation | Never signed MOU | – |
| Kiowa Indian Tribe of Oklahoma | No response | – |
| National Park Service – Intermountain Region | No response | – |
| Navajo Nation | No response | – |
| New Mexico Department of Agriculture | Yes | Signed by both parties |
| New Mexico Department of Energy, Minerals, and Natural Resources | No response | – |
| New Mexico Department of Game and Fish | Yes | Signed by both parties |
| New Mexico Department of Transportation | No response | – |
| New Mexico Land Grants Council | Never signed MOU | – |
| New Mexico Outdoor Recreation Division | Yes | Signed by both parties |
| New Mexico State Historic Preservation Office | No response | – |
| New Mexico State Land Office | No response | – |
| Ohkay Owingeh Pueblo | No response | – |
| Pueblo of Isleta | No response | – |
| Pueblo of Nambe | No response | – |
| Pueblo of Picuris | No response | – |
| Pueblo of Pojoaque | No response | – |
| Pueblo of San Ildefonso | No response | – |
| Pueblo of Sandia | No response | – |
| Pueblo of Santa Clara | Never signed MOU | – |
| Pueblo of Santo Domingo | No response | – |
| Pueblo of Taos | No response | – |
| Pueblo of Tesuque | No response | – |
| Rio Arriba County | No response | – |
| Rio Arriba County Planning Department | No response | – |
| Southern Ute Tribe | No response | – |
| Taos County | No response | – |
| Taos County Chamber of Commerce | No response | – |

| Invited Agency or Tribe | Response | MOU Status |
|---|---|---|
| Taos County Commission | No response | – |
| Taos Soil & Water Conservation District | Yes | Signed by both parties |
| Town of Taos | Yes | Signed by both parties |
| U.S. Environmental Protection Agency – Region 6 | No response | – |
| U.S. Fish and Wildlife Service – Southwest Region | No response | – |
| U.S. Forest Service – Carson National Forest | Yes | Signed by both parties |
| U.S. Geological Survey | Yes | Signed by both parties |
| U.S. Geological Survey – Core Research Center | No response | – |
| Village of Questa | No response | – |
| Zia Pueblo | No response | – |
| Zuni Pueblo | No response | – |

MOU = Memorandum of Understanding.

### *4.2.2 Consultation with Tribes*

Government-to-government consultation for the RMPA/EA began in March 20, 2023, when the BLM sent preliminary letters to 21 Native American Tribes and Pueblos informing them of the BLM's intentions to prepare a plan for the Monument and seeking input on preliminary evaluation of potential issues to be addressed in the planning process. These letters were sent to the All Pueblo Council of Governors and the following Tribes and Pueblos: Cochiti Pueblo, Comanche Nation of Oklahoma, Hopi Tribe, Pueblo of Isleta, Jicarilla Apache Nation, Kiowa Indian Tribe of Oklahoma, Navajo Nation, Ohkay Owingeh Pueblo, Pueblo of Nambe, Pueblo of Picuris, Pueblo of Pojoaque, Pueblo of San Ildefonso, Pueblo of Sandia, Pueblo of Santa Clara, Pueblo of Santo Domingo, Pueblo of Taos, Pueblo of Tesuque, Southern Ute Tribe, Zia Pueblo, and Zuni Pueblo.

BLM also sent formal invitations to the above-listed Tribal Nations/Pueblos to be cooperating agencies on May 26, 2023, as well as formal invitations to consult under Section 106 of the NHPA on June 23, 2023. The BLM invited Tribal Nations/Pueblos to participate under the provisions of Section 106 of the NHPA and as co-stewards per Secretarial Order 3403. After multiple follow-up attempts, no Tribes signed a Memorandum of Understanding to be a cooperating agency for the RMPA/EA under NEPA. The Jicarilla Apache Nation, the Comanche Nation of Oklahoma, the Pueblo of Tesuque, the Pueblo of Isleta, and the Pueblo of Santa Clara participated in the NHPA Section 106 process as consulting parties for this undertaking. The BLM hosted a NHPA Section 106 Consulting Parties meeting on October 16, 2023, providing an overview of the project, discussing the planning process, and providing an overview of the *Class I Cultural Resources Report* (Seltzer-Rogers 2024), which provides an overview of existing cultural-resources information and site-record data in the decision area. This report was also provided to the consulting Tribes for review on January 19, 2024. No comments were received on the report. The BLM held a government-to-government informational meeting with representatives of the Taos Pueblo on July 29, 2024, to provide an overview of the RMPA/EA and planning process. The BLM will continue to work closely with Tribes and Pueblos throughout research for and implementation of this project.

### *4.2.3 National Historic Preservation Act Section 106 Consultation*

The BLM began formal NHPA Section 106 consultation for the RMPA/EA on June 23, 2023, by inviting 23 Federal, State, and local agencies and organizations with a demonstrated interest in the project, as well as the All Pueblo Council of Governors and the 20 Tribes and Pueblos listed above in Section 4.2.1, *Consultation with Tribes*. Seven groups confirmed with the BLM that they would like to participate as NHPA Section 106 consulting parties: the New Mexico SHPO, the Jicarilla Apache Nation, the Comanche Nation of Oklahoma, the Pueblo of Tesuque, the Pueblo of Isleta, the Pueblo of Santa Clara, the New Mexico State Land Office, the Archaeological Society of New Mexico, and the Taos County Historical Society. As described in Section 4.2.1, *Cooperating Agencies*, the BLM hosted a NHPA Section 106 Consulting Parties meeting on October 16, 2023, and provided the *Class I Cultural Resources Report* (Seltzer-Rogers 2024) to the seven parties that accepted consulting party status on January 19, 2024. No comments were received on the report ,and it was determined that the Proposed RMPA/ Final EA would have no adverse effect on historic properties, as defined by NHPA Section 106. Any future site-specific actions would be subject to Section 106 of the NHPA and all applicable Federal historic preservation laws, including NEPA, EO 13287, and Sections 106 and 110 of the NHPA.

### *4.2.4 Endangered Species Act Section 7 Consultation*

The BLM initiated informal consultation with USFWS in compliance with Section 7 of the ESA on August 1, 2024, via email, and shared the Draft Biological Assessment (BA) to evaluate the potential effects of this Proposed RMPA/EA on species listed as Threatened or Endangered under the ESA. The BLM also shared the biological opinion completed for the 2012 Approved Taos RMP with the USFWS. The USFWS provided comments on the Draft BA on August 12, 2024, and the BLM returned a revised BA that addressed USFWS comments on August 23, 2024. Consultation with the USFWS is ongoing.

## 4.3 List of Preparers

The individuals involved in the preparation of this Proposed RMPA/EA are listed in Table 4-3.

**Table 4-3. List of Preparers**

| Name | Role |
|---|---|
| *Bureau of Land Management* | |
| Pamela Mathis | Taos Field Office Manager |
| Eric Valencia | Acting Taos Field Office Manager |
| Brad Higdon | Assistant Field Manager – Recreation |
| David Peters | Assistant Field Manager – Resources |
| David Alderman | State Planning Lead |
| Chris Anderson | Cultural Resources Specialist |
| Cameron Cox | Archaeologist |
| Sage Dunn | Fisheries and Aquatic Habitat Biologist, Science Coordinator |

| Name | Role |
|---|---|
| Paul Leatherbury | GIS Specialist |
| Pam Herrera-Olivas | Wildlife Specialist |
| Hebin Lin | Socioeconomic Specialist |
| Teddy Lucero | Recreation Specialist |
| Mark Lujan | Realty Specialist |
| Brianna Martinez | Range Management Specialist |
| Randy Roch | Recreation Specialist |
| Alex Stubberfield | Planning and Environmental Coordinator |
| Carl Thomson | Range Management Specialist |
| Tami Torres | Outdoor Recreation Planner |
| CJ Vialpando | Natural Resource Specialist (Fuels) |
| Sami Naibauer | Botanist/Ecologist |
| Barry Weinstock | Recreation Specialist |
| Chris Wenman | Geology Specialist |
| *Contracting Team* | |
| ICF | – |
| Chronicle Heritage | – |
| Barr Engineering Co. | – |

# APPENDIX A: PRESIDENTIAL PROCLAMATION 8946 AND OTHER LAWS, REGULATIONS, POLICIES AND PLANS

## A.1 PROCLAMATION 8946 – ESTABLISHMENT OF THE RÍO GRANDE DEL NORTE NATIONAL MONUMENT

Administration of Barack Obama, 2013
Proclamation 8946—Establishment of the Río Grande del Norte National Monument
March 25, 2013
By the President of the United States of America

A Proclamation

In far northern New Mexico, the Río Grande Wild and Scenic River flows through a deep gorge at the edge of the stark and sweeping expanse of the Taos Plateau. Volcanic cones, including the Cerro de la Olla, Cerro San Antonio, and Cerro del Yuta, jut up from this surrounding plateau. Canyons, volcanic cones, wild rivers, and native grasslands harbor vital wildlife habitat, unique geologic resources, and imprints of human passage through the landscape over the past 10,000 years. This extraordinary landscape of extreme beauty and daunting harshness is known as the Río Grande del Norte, and its extraordinary array of scientific and historic resources offer opportunities to develop our understanding of the forces that shaped northern New Mexico, including the diverse ecological systems and human cultures that remain present today.

For millennia, humans have seasonally passed through the Río Grande del Norte, gathering resources and finding spiritual meaning in its dramatic geologic features. Although few have attempted to live year-round in this harsh landscape, the images carved into the gorge's dark basalt cliffs and the artifacts scattered across the forested slopes of the volcanic cones bear ample testimony to the human use of the area.

The Río Grande gorge lies within the traditional area of the nearby Taos and Picuris Pueblos, as well as the Jicarilla Apache and Ute Tribes, and hosts a dazzling array of rock art. Carved into the boulders and cliffs are hundreds of images ranging from seemingly abstract swirls and dots to clear depictions of human and animal figures. Dense collections of petroglyphs are found near the hot springs that bubble up in the deep heart of the gorge, with some dating back to the Archaic Period (ca. 7,500 B.C.–500 A.D.). In addition to petroglyphs, these lands harbor small hunting blinds, pit houses, chipping stations, potsherds, tools and projectile points, as well as large ceramic vessels. The area is home to a rich array of archaeological resources that represent diverse cultural traditions. Archeological resources are found throughout the proposed monument, with its rugged terrain serving as the focal point for ongoing

archaeological research. More recent artifacts and images mark the passage of settlers and Hispanic explorers dating back to the early 18th century. Ongoing explorations and inquiries of this unique cultural landscape have resulted in continuous discoveries that further illuminate northern New Mexico's human history.

Separated from the Río Grande Wild and Scenic River by a broad swath of sagebrush and grassland, the Río San Antonio gorge is another area of concentrated artifact and petroglyph sites. People were drawn to this area by the flowing water, hunting opportunities, and nearby San Antonio Mountain, which is thought to have been a major regional source for the dacite used by nomadic peoples to create stone tools thousands of years ago. This corner of the Río Grande del Norte landscape was traversed by traders and other travelers during the 18th and 19th centuries, who traded furs and other goods and later brought woolen articles from New Mexico's sheep grazing communities to markets throughout the Southwest.

Between the Río Grande gorge and the Río San Antonio gorge stretches a sweeping and austere expanse of the Taos Plateau. The Río Grande del Norte landscape is a testament to the geologic past of New Mexico and the 70 million year tectonic history of the Río Grande Rift, one of the world's major rift systems. Composed of Servilleta lava basalts and rhyolites, the Taos Plateau has long been a center of research in geology and volcanology. Rising in stark contrast from the plateau's broad expanse, Cerro de la Olla, Cerro San Antonio, and other volcanic cones provide visible reminders of the area's volatile past. Cerro del Yuta, or Ute Mountain, the tallest of these extinct volcanoes, rises above the plateau to an elevation topping 10,000 feet. Springs within the Río Grande gorge have been measured emitting 6,000 gallons of water per minute into the river bed and are thought to be part of a flooded lava tube system.

This northern New Mexico landscape also exhibits significant ecological diversity in these different geologic areas. From the cottonwood and willows along the Río Grande corridor, to the expansive sagebrush plains above the gorge on the Taos Plateau, the piñons at the base of Ute Mountain, and the spruce, aspen, and Douglas fir covering the mountain's northern slopes, the diversity of both ecosystems and species allows for, and has been the subject of, substantial scientific research.

The Río Grande gorge connects the northern reaches of the river's watershed with its middle and lower stretches. Deep within the gorge, beneath soaring cliffs that rise hundreds of feet above the river, stands of willow and cottonwood thrive in riparian and canyon ecosystems that have been present since the river first appeared in the Río Grande Rift Valley. The river provides habitat for fish such as the Río Grande cutthroat trout as well as the recently reintroduced North American river otter. The Río Grande del Norte is part of the Central Migratory Flyway, a vital migration corridor for birds such as Canada geese, herons, sandhill cranes, hummingbirds, and American avocets. Several species of bats make their home in the gorge, which also provides important nesting habitat for golden eagles and numerous other raptor species, as well as habitat for the endangered southwestern willow flycatcher.

Bald eagles roost above the river in winter and fly out over the Taos Plateau's sagebrush shrub habitat and native grasslands, which stretch for thousands of acres to the west. The vast plateau harbors a significant diversity of mammals and birds, from the eagles, hawks, falcons,

and owls soaring above the plateau to the small mammals on which they prey. Many other bird species, including Merriam's turkey, scaled quail, mourning dove, mountain plover, and loggerhead shrike, can be seen or heard on the plateau. Large mammals, including the Rocky Mountain elk, mule deer, pronghorn, and Rocky Mountain bighorn sheep, find their winter homes on the plateau alongside a population of rare Gunnison's prairie dogs. The Río Grande del Norte also provides habitat for many species of predators, including the ringtail, black bear, coyote, red fox, cougar, and bobcat.

While diverse peoples have used this area intermittently for thousands of years, its challenging conditions make it inhospitable for permanent settlement. In an area near the forested slopes of Cerro Montoso, however, a group of eastern homesteaders attempted to make a living in the years immediately following World War I. The nearly forgotten story of this fleeting community, recently revealed through detailed historical research, is written on the landscape by the remnants of homes, root cellars, cistern-style water catchments, and cast metal toys. At one site, researchers have found several World War I brass uniform buttons, evidence of the veterans who once made their homes on this rugged land.

The protection of the Río Grande del Norte will preserve its cultural, prehistoric, and historic legacy and maintain its diverse array of natural and scientific resources, ensuring that the historic and scientific values of this area remain for the benefit of all Americans.

*Whereas* section 2 of the Act of June 8, 1906 (34 Stat. 225, 16 USC 431) (the "Antiquities Act"), authorizes the President, in his discretion, to declare by public proclamation historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest that are situated upon the lands owned or controlled by the Government of the United States to be national monuments, and to reserve as a part thereof parcels of land, the limits of which in all cases shall be confined to the smallest area compatible with the proper care and management of the objects to be protected;

*Whereas* it is in the public interest to preserve the objects of scientific and historic interest on the Río Grande del Norte lands;

*Now, Therefore, I, Barack Obama*, President of the United States of America, by the authority vested in me by section 2 of the Antiquities Act, hereby proclaim, set apart, and reserve as the Río Grande del Norte National Monument (monument), the objects identified above and all lands and interest in lands owned or controlled by the Government of the United States within the boundaries described on the accompanying map, which is attached to and forms a part of this proclamation. These reserved Federal lands and interests in lands encompass approximately 242,555 acres, which is the smallest area compatible with the proper care and management of the objects to be protected.

All Federal lands and interests in lands within the boundaries of this monument are hereby appropriated and withdrawn from all forms of entry, location, selection, sale, leasing, or other disposition under the public land laws, including withdrawal from location, entry, and patent under the mining laws, and from disposition under all laws relating to mineral and geothermal leasing, other than by exchange that furthers the protective purposes of this proclamation.

The establishment of this monument is subject to valid existing rights. Lands and interests in lands within the monument's boundaries not owned or controlled by the United States shall be reserved as part of the monument upon acquisition of ownership or control by the United States.

The Secretary of the Interior (Secretary) shall manage the monument through the Bureau of Land Management (BLM) as a unit of the National Landscape Conservation System, pursuant to applicable legal authorities, including the Wild and Scenic Rivers Act (82 Stat. 906, 16 USC 1271 et seq.), to implement the purposes of this proclamation.

For purposes of protecting and restoring the objects identified above, the Secretary, through the BLM, shall prepare and maintain a management plan for the monument and shall provide for maximum public involvement in the development of that plan including, but not limited to, consultation with tribal, State, and local governments as well as community land grant and acequia associations.

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 designated roads and trails.

Nothing in this proclamation shall be construed to preclude the Secretary from renewing or authorizing the upgrading of existing utility line rights-of-way within the physical scope of each such right-of-way that exists on the date of this proclamation. Additional utility line rights-of-way or upgrades outside the existing utility line rights-of-way may only be authorized if consistent with the care and management of the objects identified above.

Nothing in this proclamation shall be deemed to enlarge or diminish the rights of any Indian tribe or pueblo. The Secretary shall, in consultation with Indian tribes, ensure the protection of religious and cultural sites in the monument and provide access to the sites by members of Indian tribes for traditional cultural and customary uses, consistent with the American Indian Religious Freedom Act (92 Stat. 469, 42 USC 1996) and Executive Order 13007 of May 24, 1996 (Indian Sacred Sites).

Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on lands under its jurisdiction shall continue to apply with regard to the lands in the monument, consistent with the purposes of this proclamation.

Nothing in this proclamation shall be construed to alter or affect the Río Grande Compact between the States of Colorado, New Mexico, and Texas, or to create any reservation of water in the monument.

Nothing in this proclamation shall be deemed to enlarge or diminish the jurisdiction of the State of New Mexico with respect to fish and wildlife management.

Nothing in this proclamation shall be construed to preclude the traditional collection of firewood and piñon nuts in the monument for personal non-commercial use consistent with the purposes of this proclamation.

Nothing in this proclamation shall be deemed to revoke any existing withdrawal, reservation, or appropriation; however, the monument shall be the dominant reservation.

Warning is hereby given to all unauthorized persons not to appropriate, injure, destroy, or remove any feature of the monument and not to locate or settle upon any of the lands thereof.

*In Witness Whereof*, I have hereunto set my hand this twenty-fifth day of March, in the year of our Lord two thousand thirteen, and of the Independence of the United States of America the two hundred and thirty-seventh.

BARACK OBAMA

[Filed with the Office of the Federal Register, 8:45 a.m., March 27, 2013]

NOTE: This proclamation was published in the *Federal Register* on March 28.

*Categories*: Proclamations : Río Grande del Norte National Monument, establishment.

*Subjects*: New Mexico: Río Grande del Norte National Monument; Río Grande del Norte National Monument.

*DCPD Number*: DCPD201300186.

# A.2 OTHER LAWS, REGULATIONS, POLICIES, AND PLANS

In preparing this Resource Management Plan Amendment (RMPA) and associated Environmental Assessment (EA), the BLM evaluated the proposed management relative to the following relevant laws, regulations, policies, and plans listed, as they apply to the proposed undertaking.

## A.2.1 Federal Laws

- Clean Air Act, as amended (42 U.S. Code [USC] 7418 et seq.)
- Clean Water Act, as amended (33 USC 23 et seq.)
- Endangered Species Act of 1973, as amended (16 USC 1531–1544)
- Omnibus Public Land Management Act of 2009 (16 USC 7201 et seq.)
- American Indian Religious Freedom Act of 1978 (42 USC 1996 et seq.)
- National Trails System Act of 1968, as amended (Public Law [PL] No. 90-543)
- Farm Bill of 2018 (PL No. 115-334)
- Archaeological Resources Protection Act of 1979, as amended (16 USC 470 et seq.)
- Healthy Forests Restoration Act of 2003 (PL No. 108–148)
- International Migratory Bird Treaty Act of 1918 (16 USC 703–711)

- John D. Dingell, Jr., Conservation, Management, and Recreation Act (PL No. 116-9)
- National Historic Preservation Act, as amended (16 USC 470 et seq.)
- Native American Graves Protection and Repatriation Act of 1990 (25 USC 3001 et seq.)
- Paleontological Resources Preservation Act: Title VI, Subtitle D, of the 2009 Omnibus Public Land Management Act (16 USC 7202 et seq.)
- Taylor Grazing Act of 1934 (43 USC 315 et seq.)
- Wild and Scenic Rivers Act, as amended (16 USC 1271 et seq.)

## A.2.2 Other Federal Plans and Policies

- *BLM New Mexico Guide for the Use of Wildland Fire for* Resource Benefit or Multiple Objectives (2017)
- *Old Spanish National Historic Trail Comprehensive Administrative Strategy* (2017)
- *Pescado/Red River Fault Loop Trails Links Environmental Assessment* (2006)
- *Carson National Forest Land Management Plan* (USFS 2022)
- *Rio Grande Corridor Final Plan* (DOI 2000)
- Executive Order (EO) 11514 (Protection and Enhancement of Environmental Quality) (1970)
- EO 11593 (Protection and Enhancement of Cultural Environment) (1971)
- EOs 11644 and 11989 (Off-Road Vehicles) (1977)
- EO 11990 (Protection of Wetlands) (1977)
- EO 11987 (Exotic Organisms) (1977)
- EO 12898 (Federal Action to Address Environmental Justice in Minority Populations and Low-Income Populations) (1994)
- EO 12962 (Recreational Fisheries) (1995)
- EO 13007 (Indian Sacred Sites) (1996)
- EO 13175 (Consultation and Coordination with Indian Tribal Governments) (2000)
- EO 13186 (Conservation of Migratory Birds) (2001)
- EO 13287 (Preserve America) (2003)
- EO 13443 (Facilitation of Hunting Heritage and Wildlife Conservation) (2007)
- BLM Handbook H-2930-1, *Recreation Permit and Fee Administration*
- BLM Handbook 1601, *Land-use Planning*
- BLM Handbook 1790, *National Environmental Policy Act*

- BLM Manual 1780, *Tribal Relations*
- BLM Manual 1626, *Travel and Transport Management*
- BLM Manual 6220, *National Monuments, National Conservation Areas, and Similar Designations*
- BLM Manual 6340, *Management of Designated Wilderness Area*
- Bureau Manual 8120-1, *Guidelines for Conducting Tribal Consultation*
- BLM Manual 8100, *The Foundations for Managing Cultural Resources*
- BLM Manual 8110, *Identifying and Evaluating Cultural Resources*
- BLM Manual 8130, *Planning for Uses of Cultural Resources*
- BLM Manual 8140, *Protecting Cultural Resources*
- BLM Manual 8150, *Permitting Uses of Cultural Resources*
- BLM Manual 6840, *Special Status Species*
- BLM Manual 8320, *Planning for Recreation and Visitor Services*
- BLM Handbook H-8320-1, *Planning for Recreation and Visitor Services*
- BLM Handbook 8342, *Travel and Transportation Handbook*
- Secretarial Order 3376 (Increasing Recreational Opportunities through the use of Electric Bikes)
- Secretarial Order 3175 (Departmental Responsibilities for Indian Trust Resources)

## A.2.3 Relevant State and Local Plans, Policies and Programs

- *New Mexico Smoke Management Program Guidance Document* (New Mexico Environment Department 2005)
- New Mexico's Green Belt Law (1976)
- Taos County Ordinance 2018-2 (Land Use Regulations) (2018)
- Taos County Ordinance 2019-04 (Taos County Land Use Regulations Amendment) (2019)
- Taos County Ordinance 2003-1 (Taos County Land Use Ordinance Amendment) (2007)
- Taos County Ordinance 2003-7 (Land Use Ordinance) (2007)
- Taos County Ordinance 2006-9 Night Sky Protection Act) (2006)
- Taos County Resolution 2017-6 (Economic Plan for Taos County) (2017)
- Taos County Resolution 2017-7 (Comprehensive Plan Update) (2017)
- Taos County Resolution 2017-58 (Community Conservation Plan for TC) (2017)

- Rio Arriba 1993-03 (County Road Ordinance) (1993)
- Rio Arriba 1998-05 (Timber Harvest Ordinance) (1995)
- Rio Arriba 2002-69 (Historical Roads, Trails & FED of Private Lands Resolution) (2002)
- Rio Arriba 2009-02 (Night Sky Ordinance) (2009)
- Rio Arriba 2011-02 (Rio Arriba County Design and Development Regulation System Ordinance) (2011)
- Rio Arriba 2011-003 (Rio Arriba County Comprehensive Plan
- Village of Questa Night Sky Ordinance

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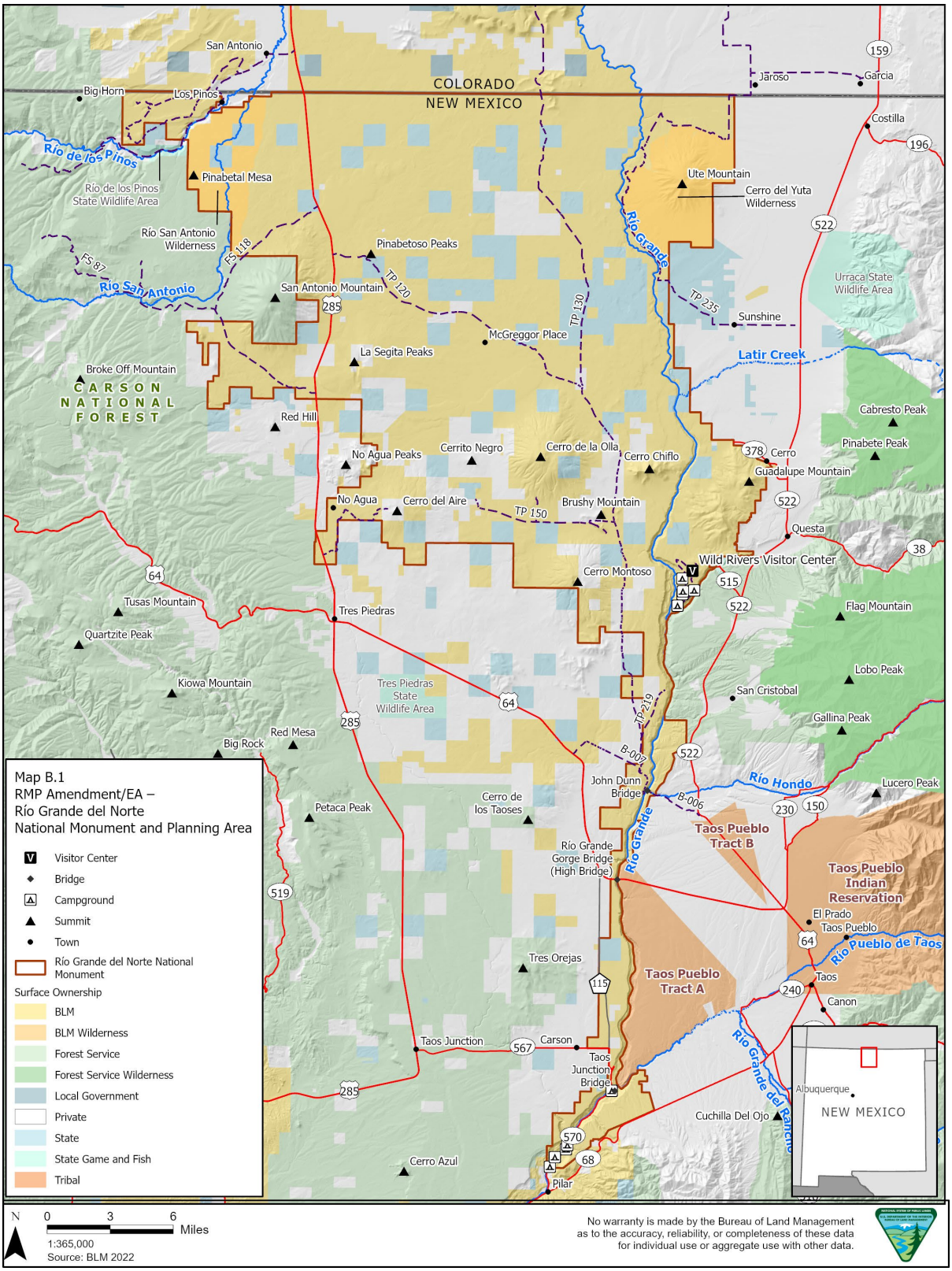

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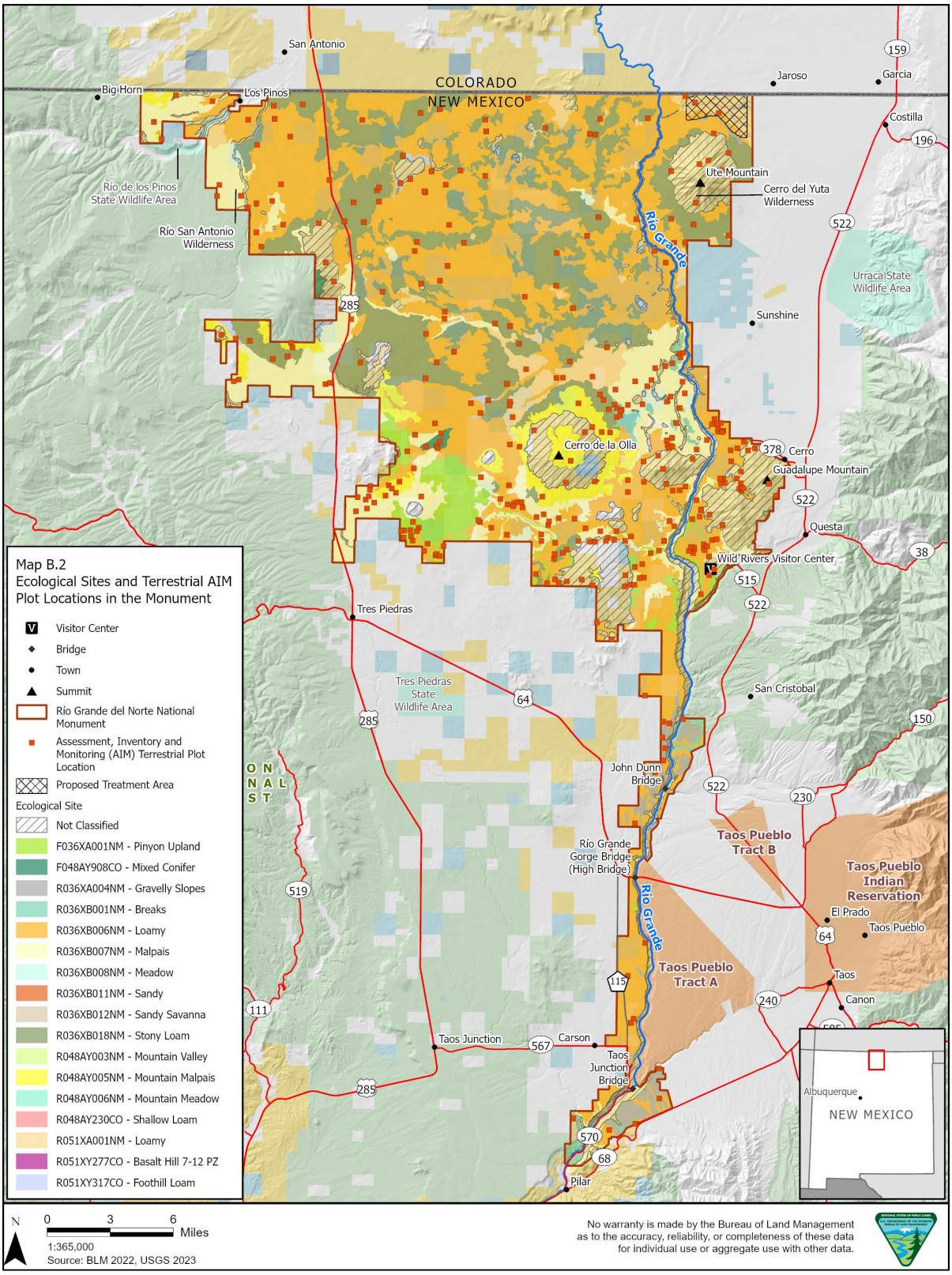
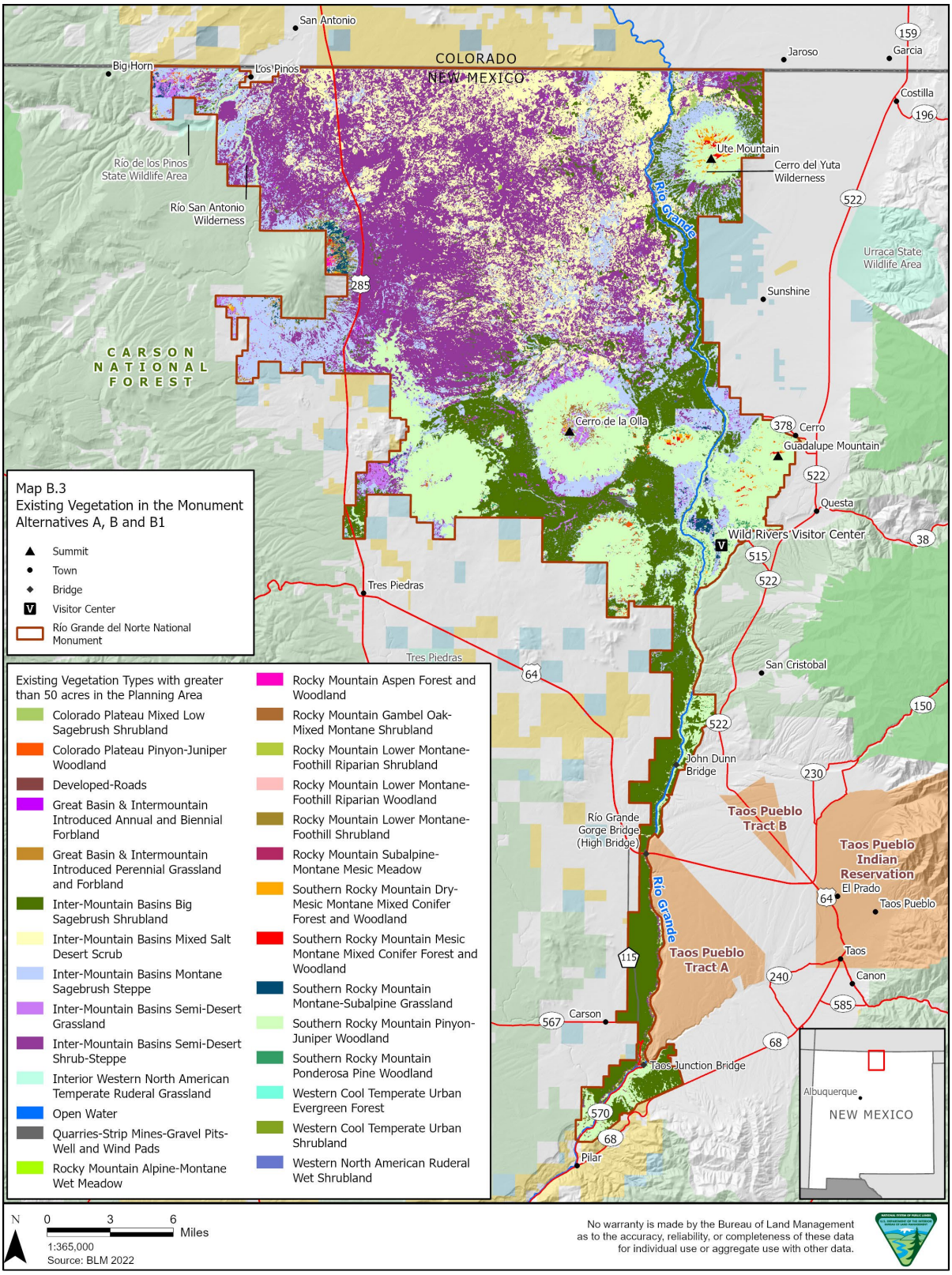
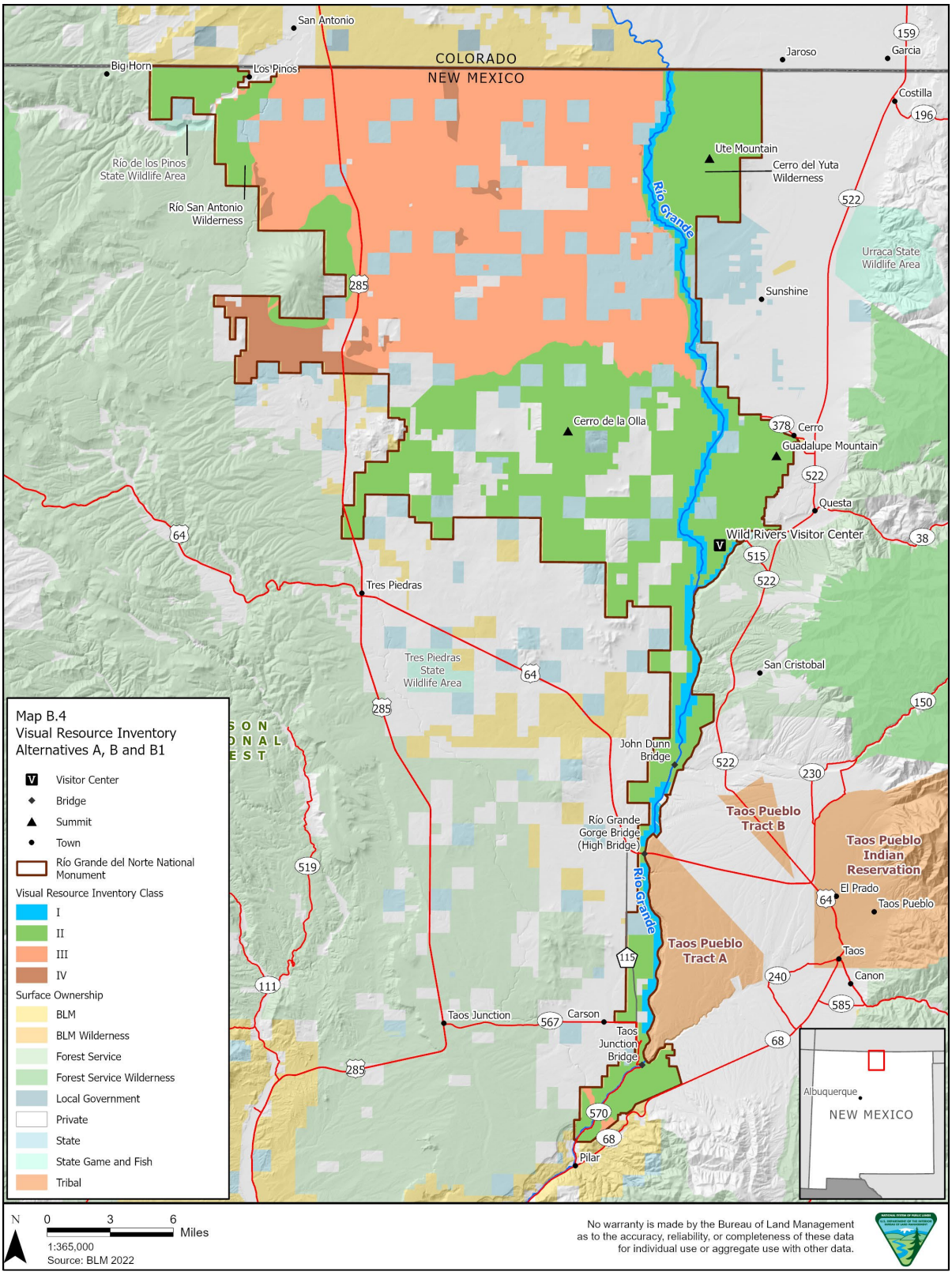


## Map B.3. Vegetation Types in the Monument



## Map B.4. Visual Resource Inventory Alternatives A, B, and B1



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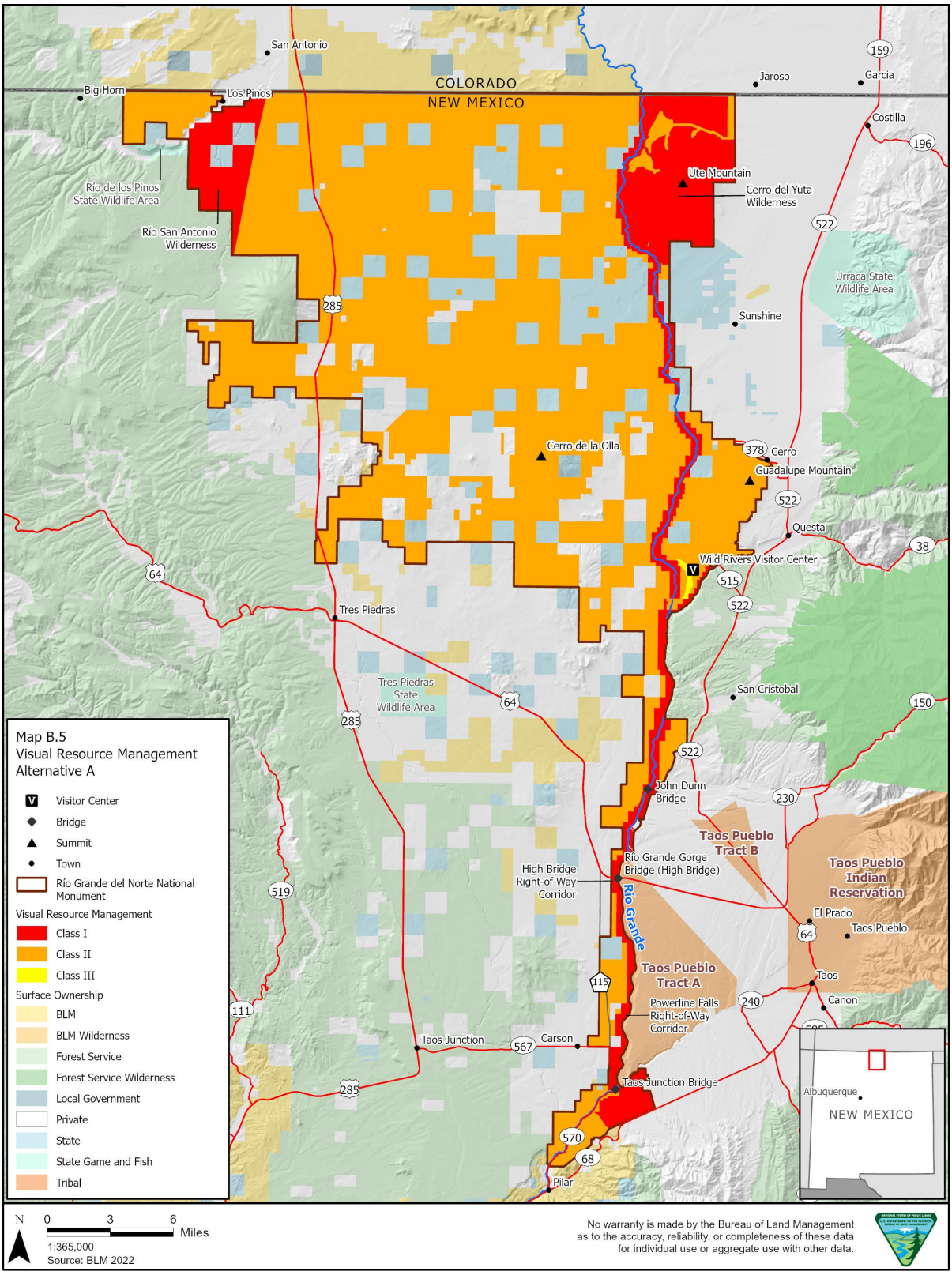

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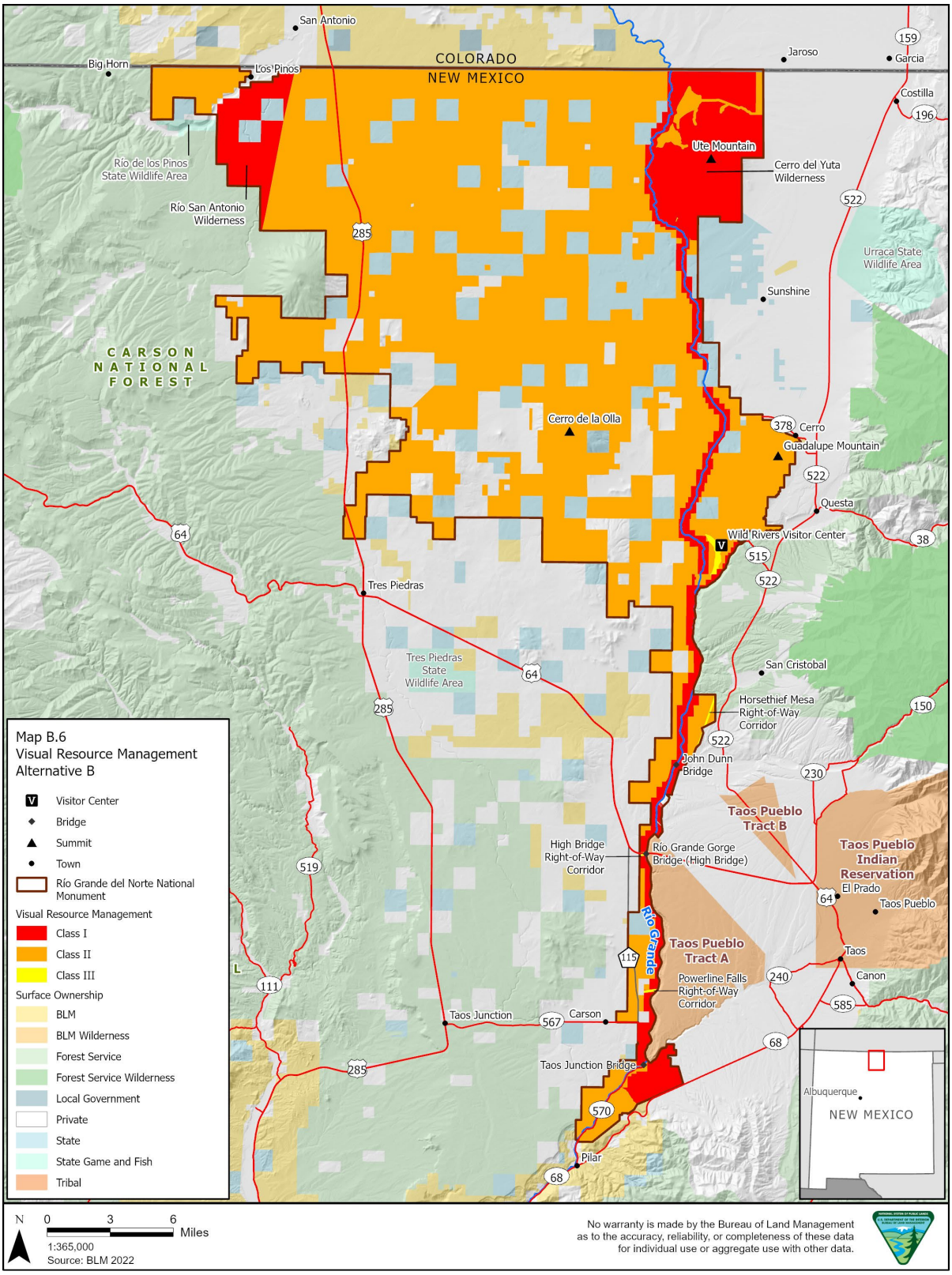

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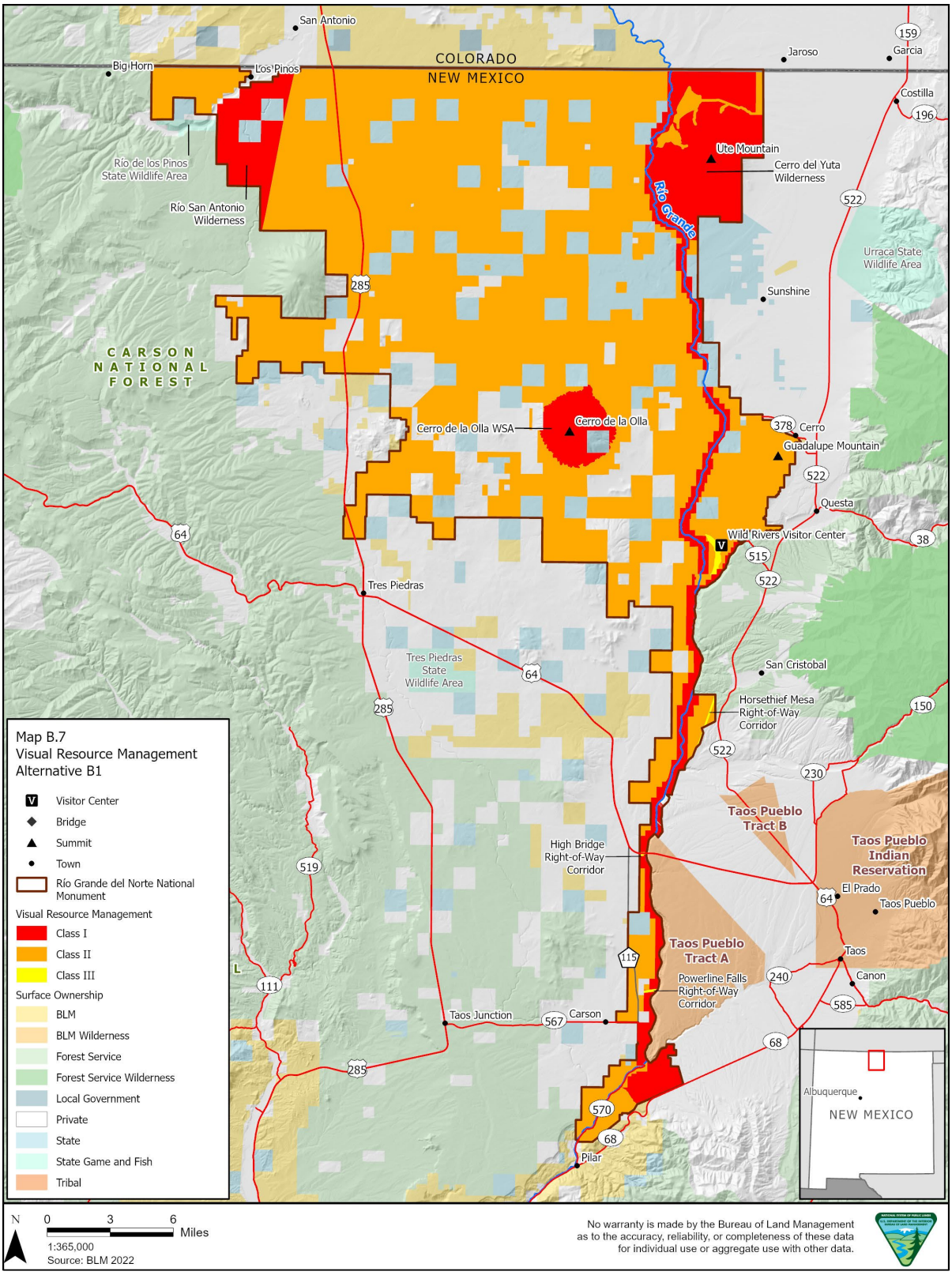
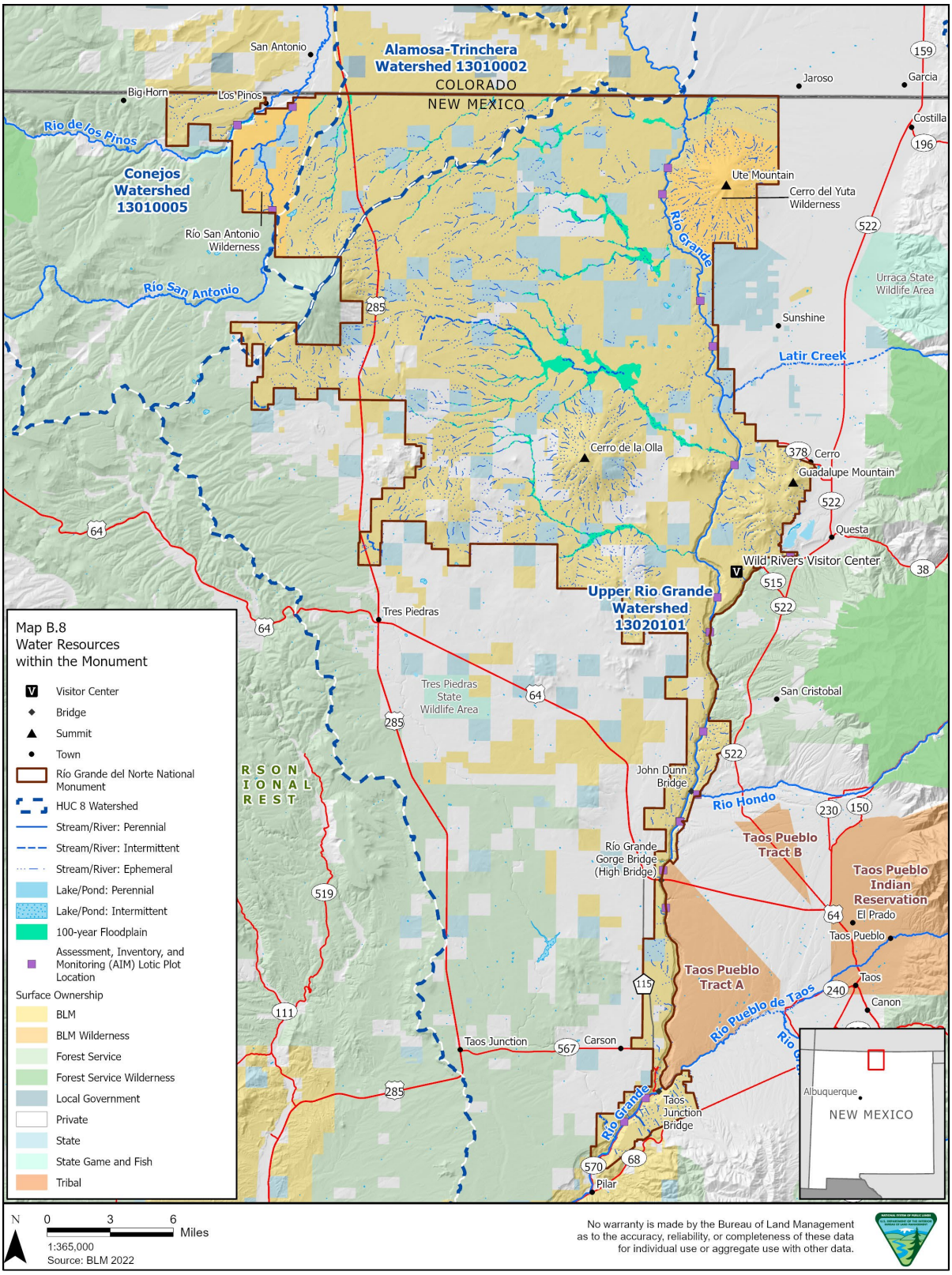
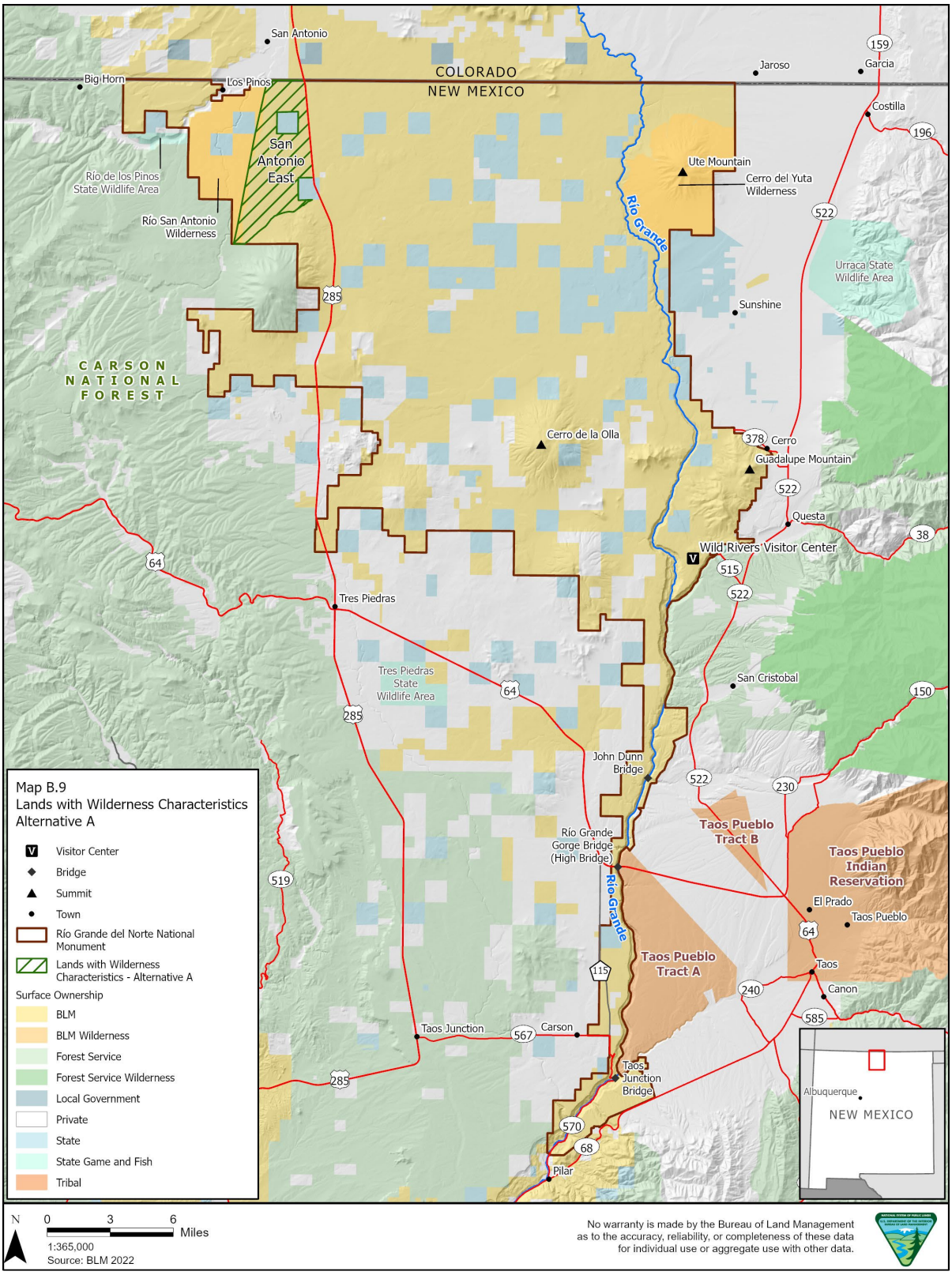


## Map B.8. Water Resources and AIM Lotic Plots within the Monument



## Map B.9. Lands with Wilderness Characteristics Alternative A



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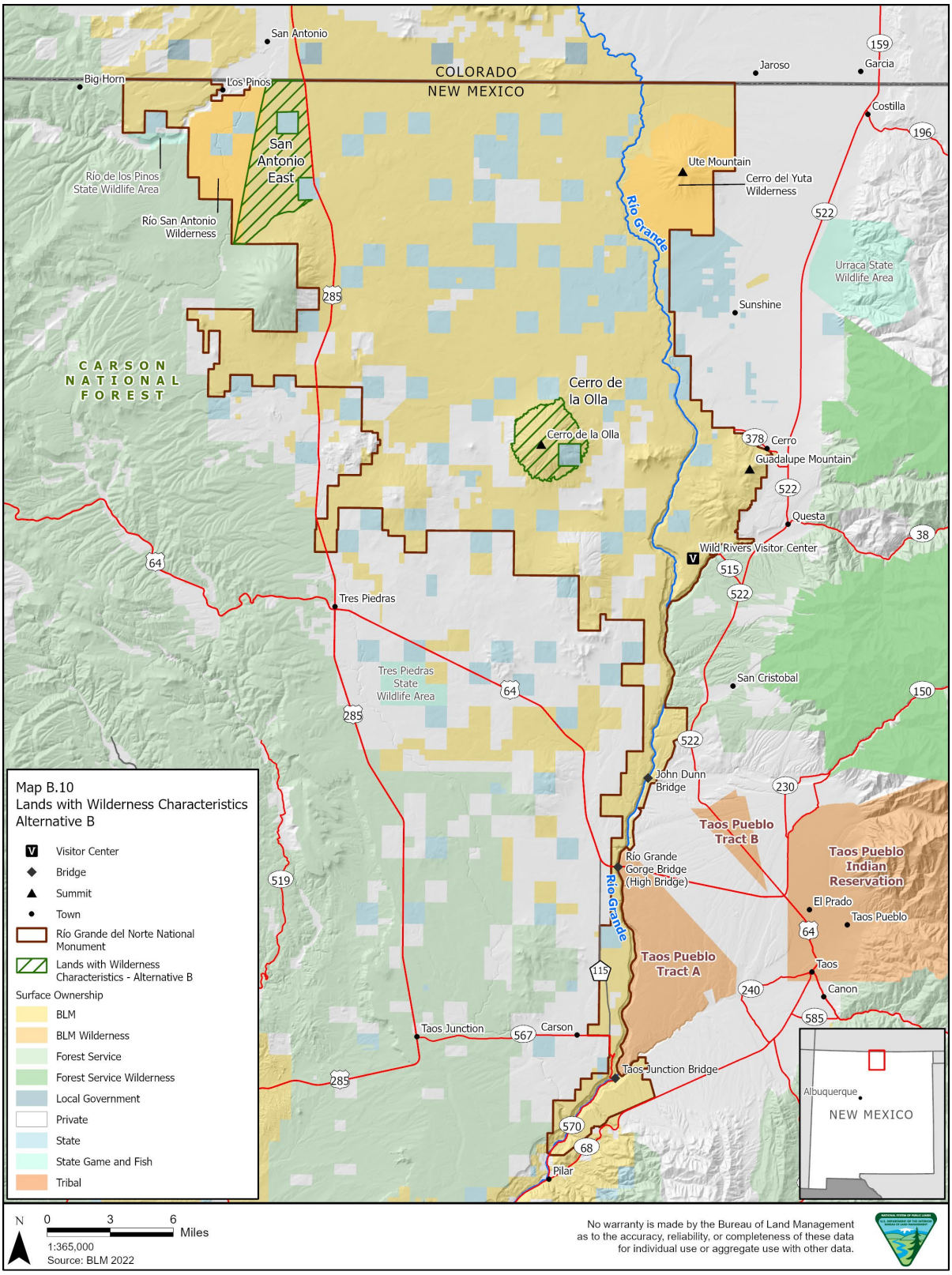
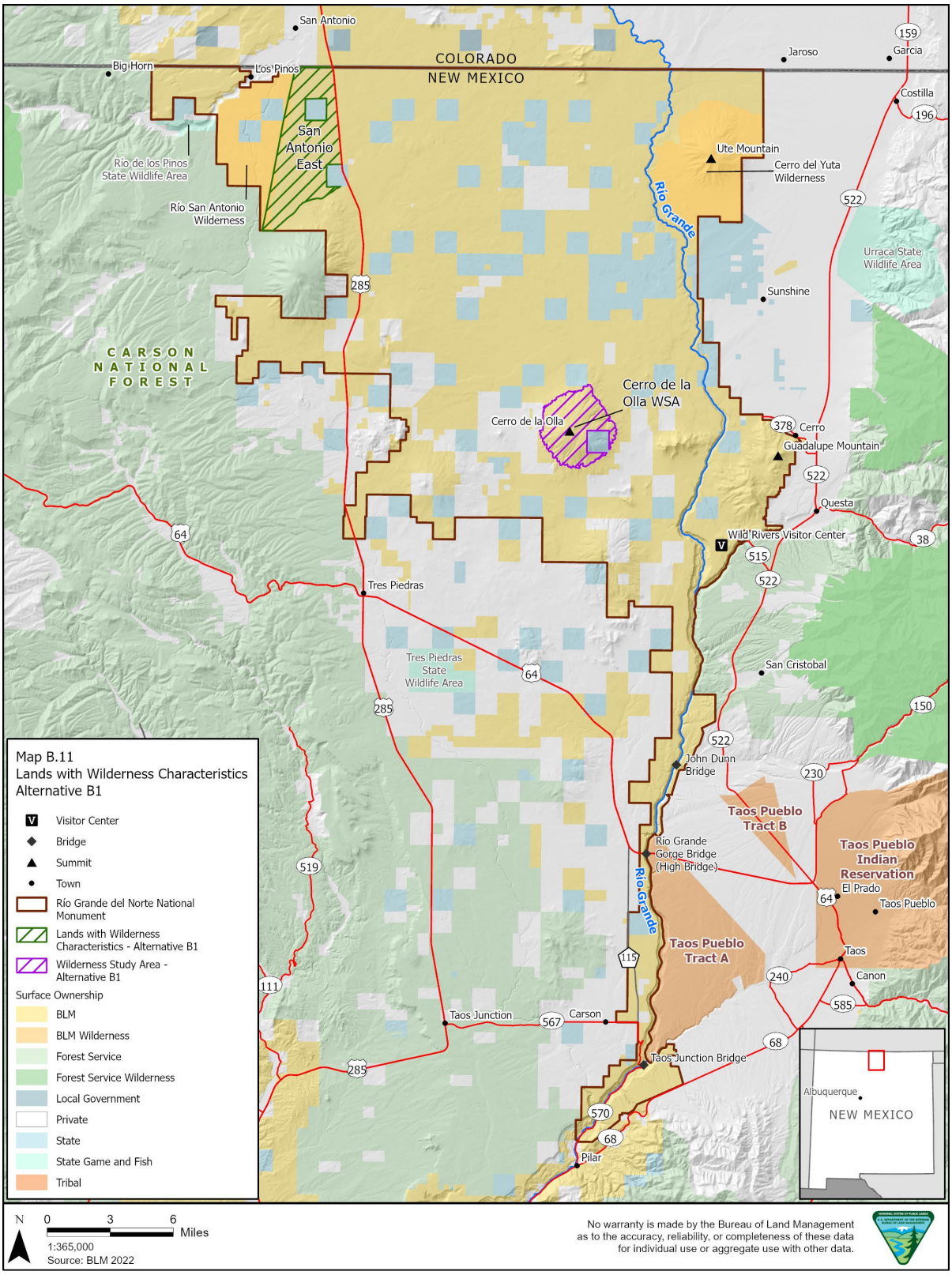
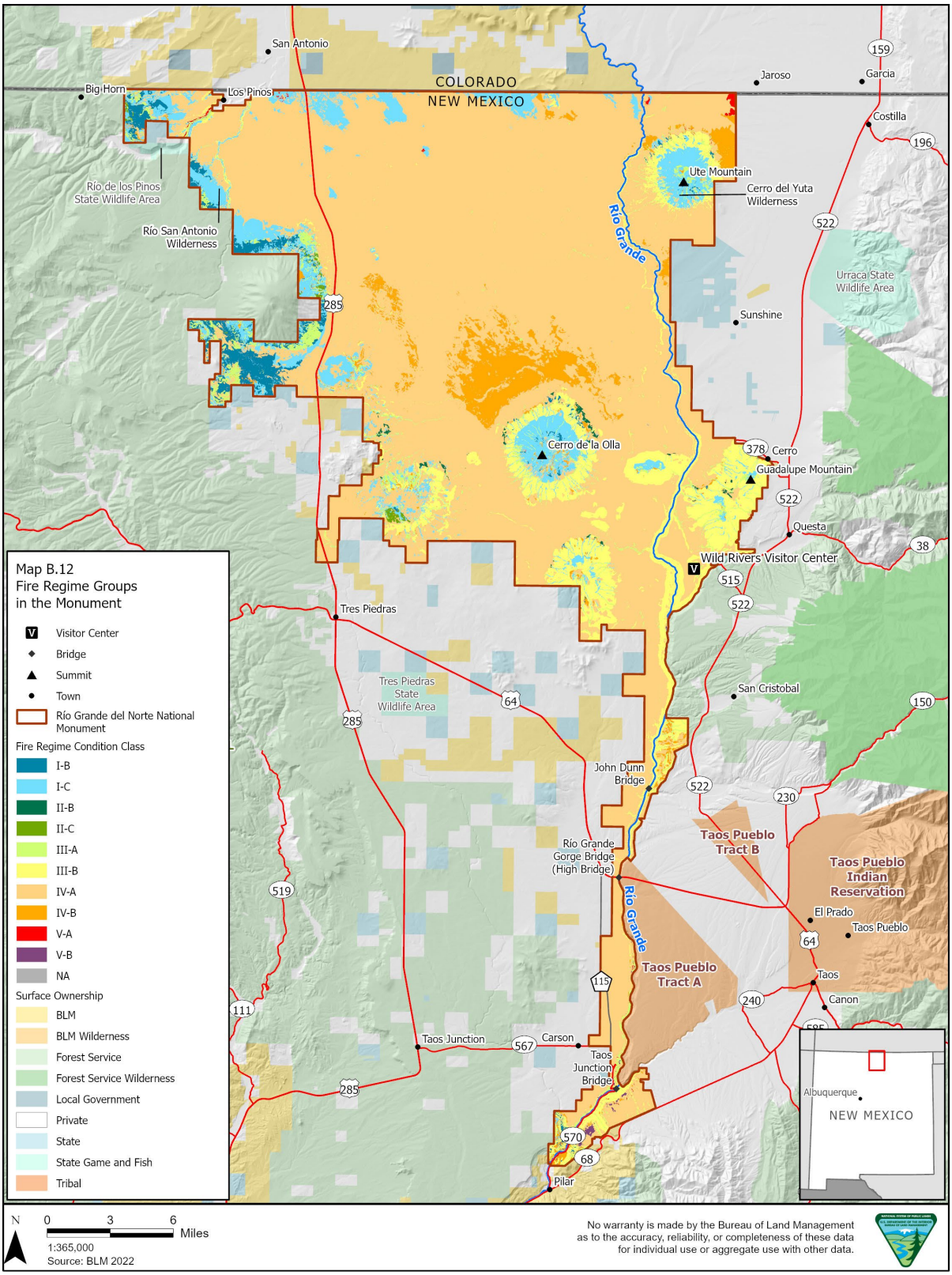


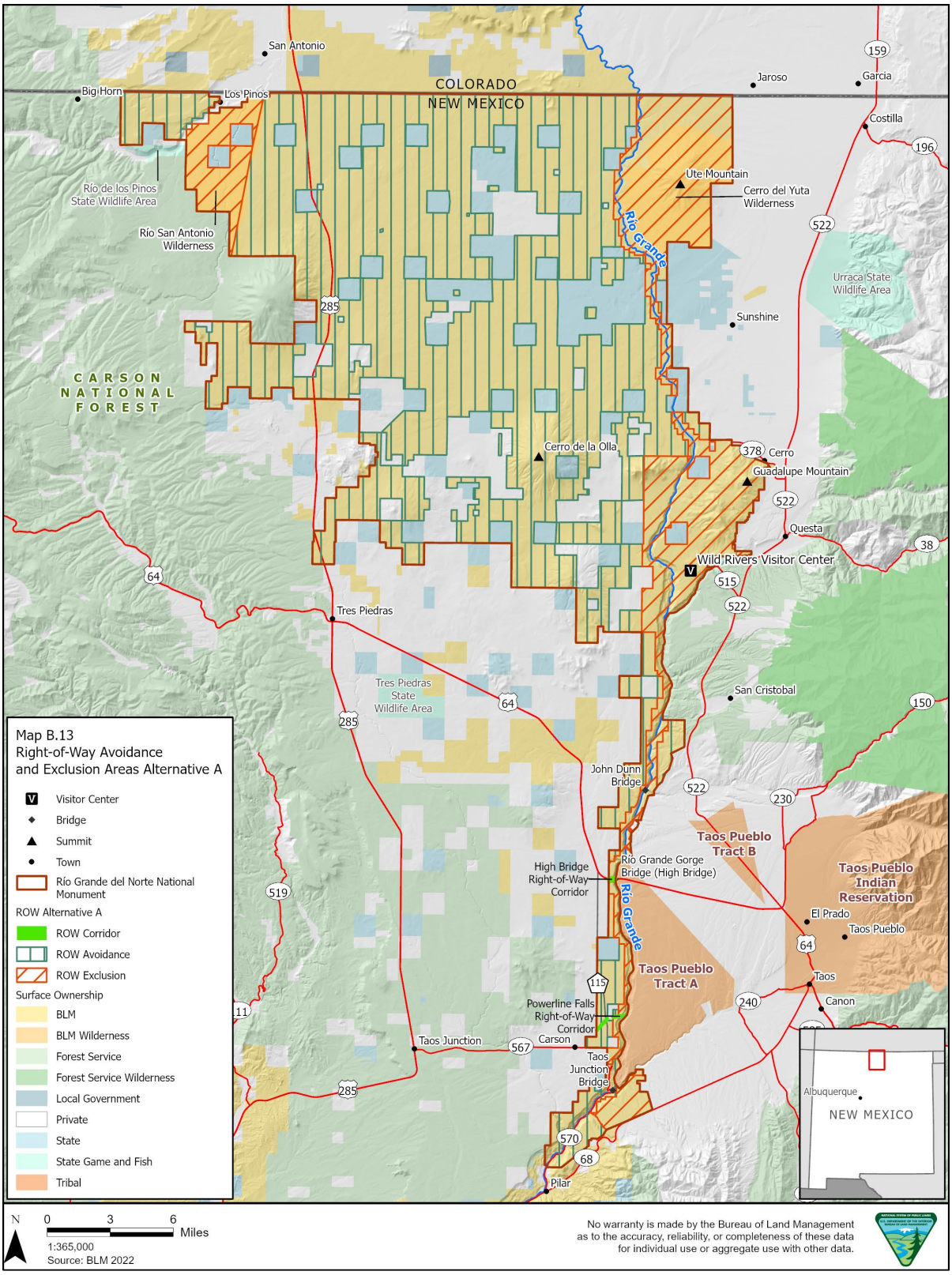
## Map B.11. Lands with Wilderness Characteristics Alternative B1



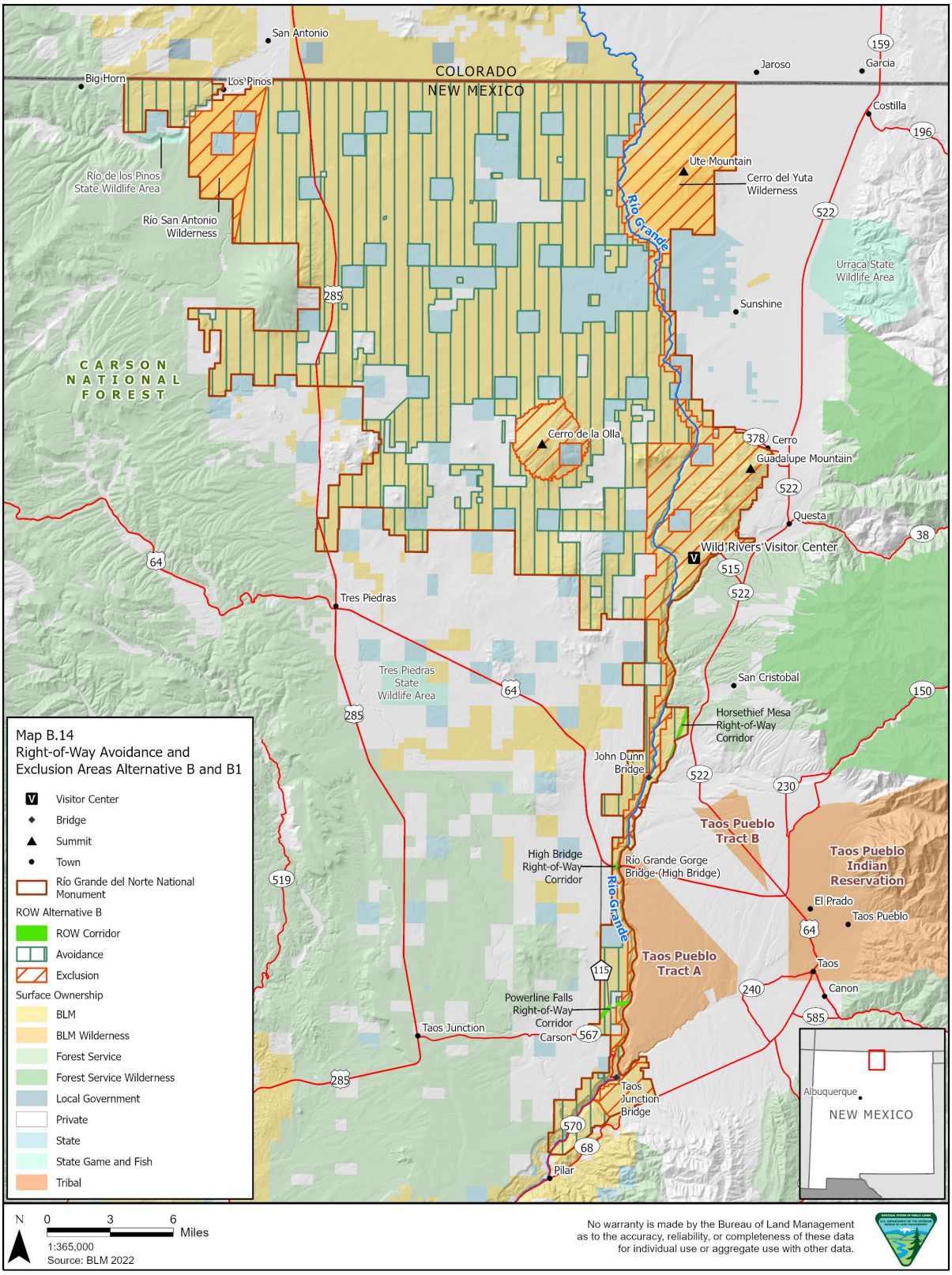
## Map B.12. Fire Regime Groups in the Monument



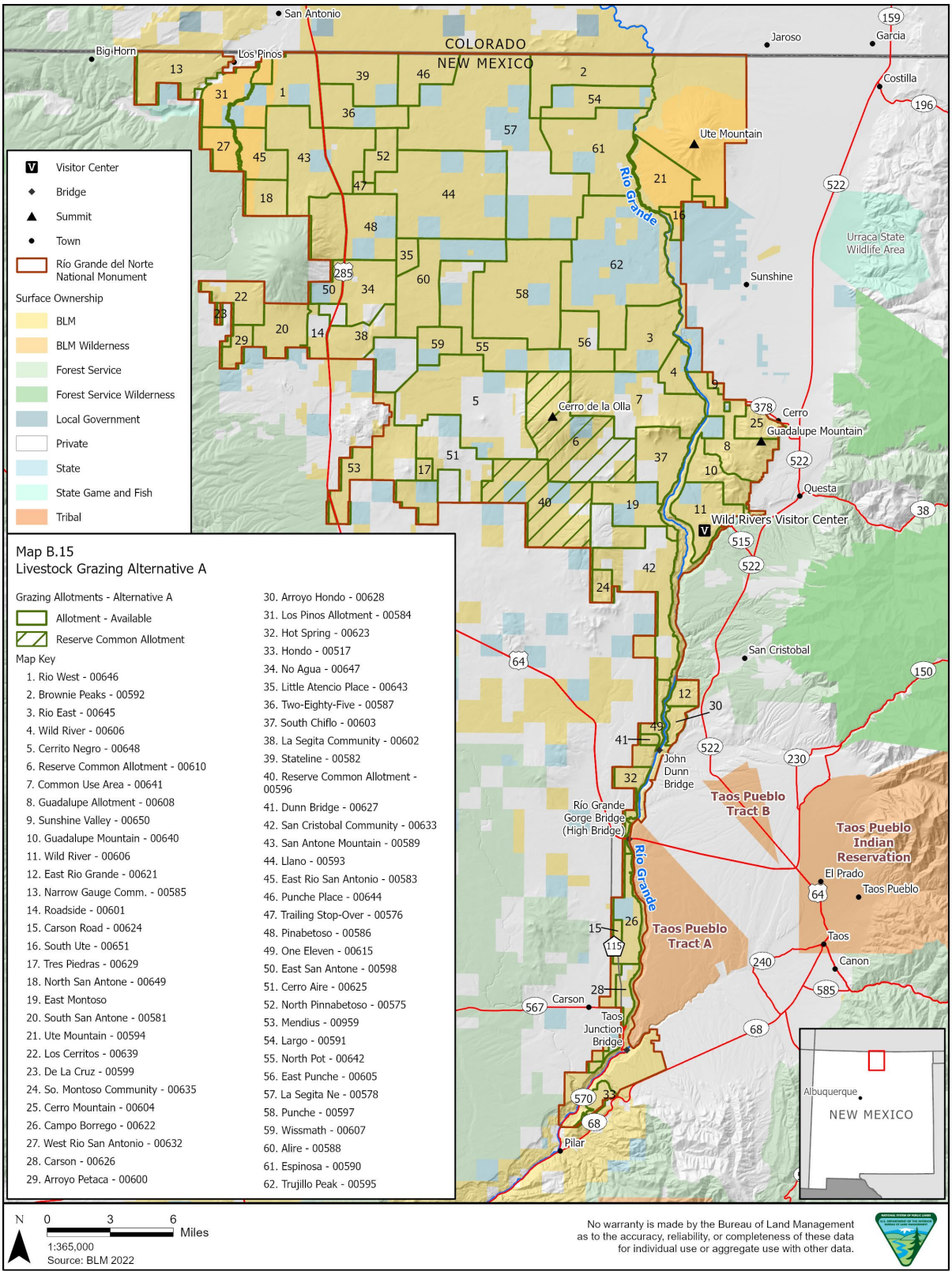
## Map B.13. Right-of-Way Avoidance and Exclusions Areas Alternative A



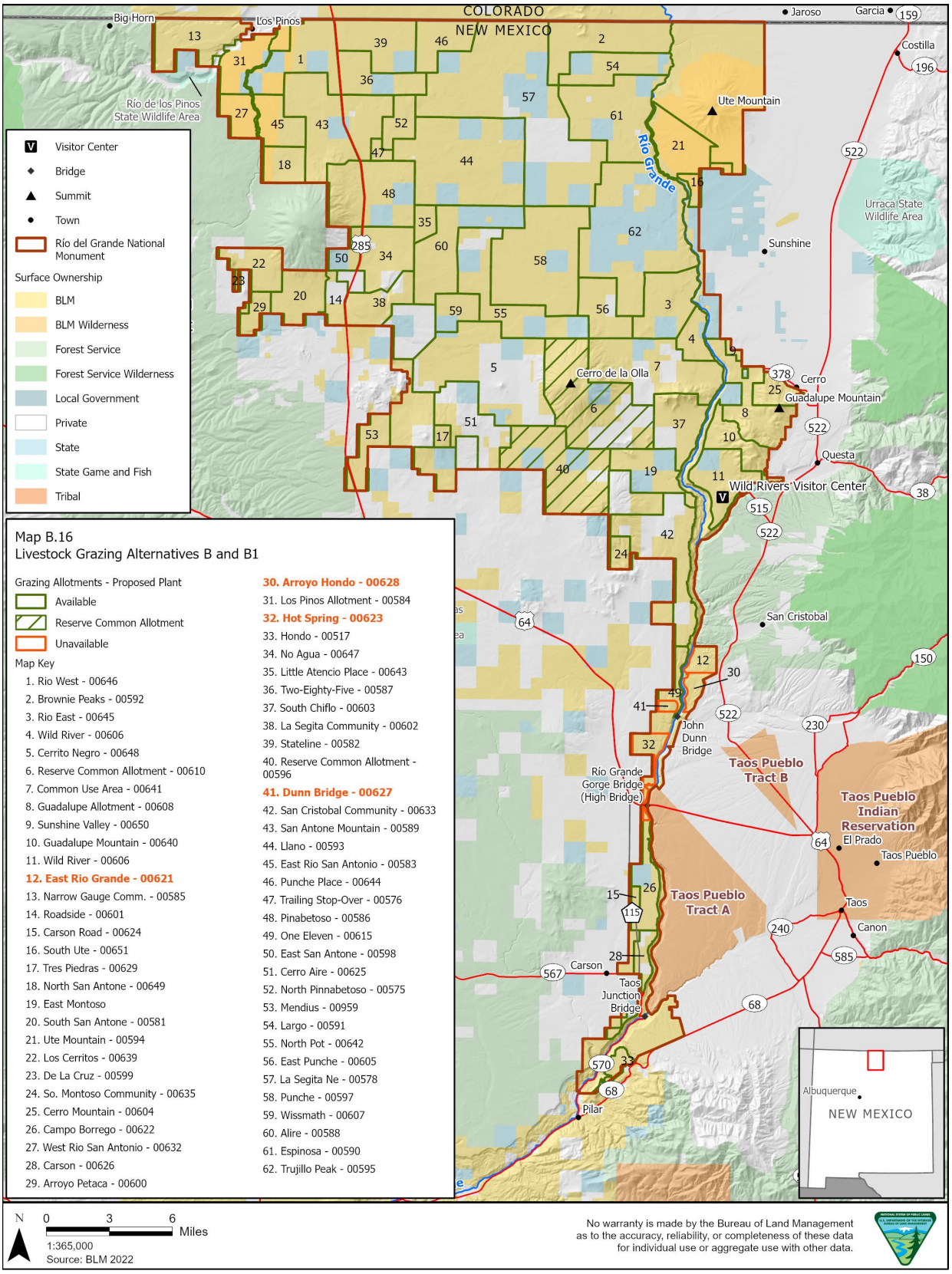
## Map B.14. Right-of-Way Avoidance and Exclusions Areas Alternatives B and B1



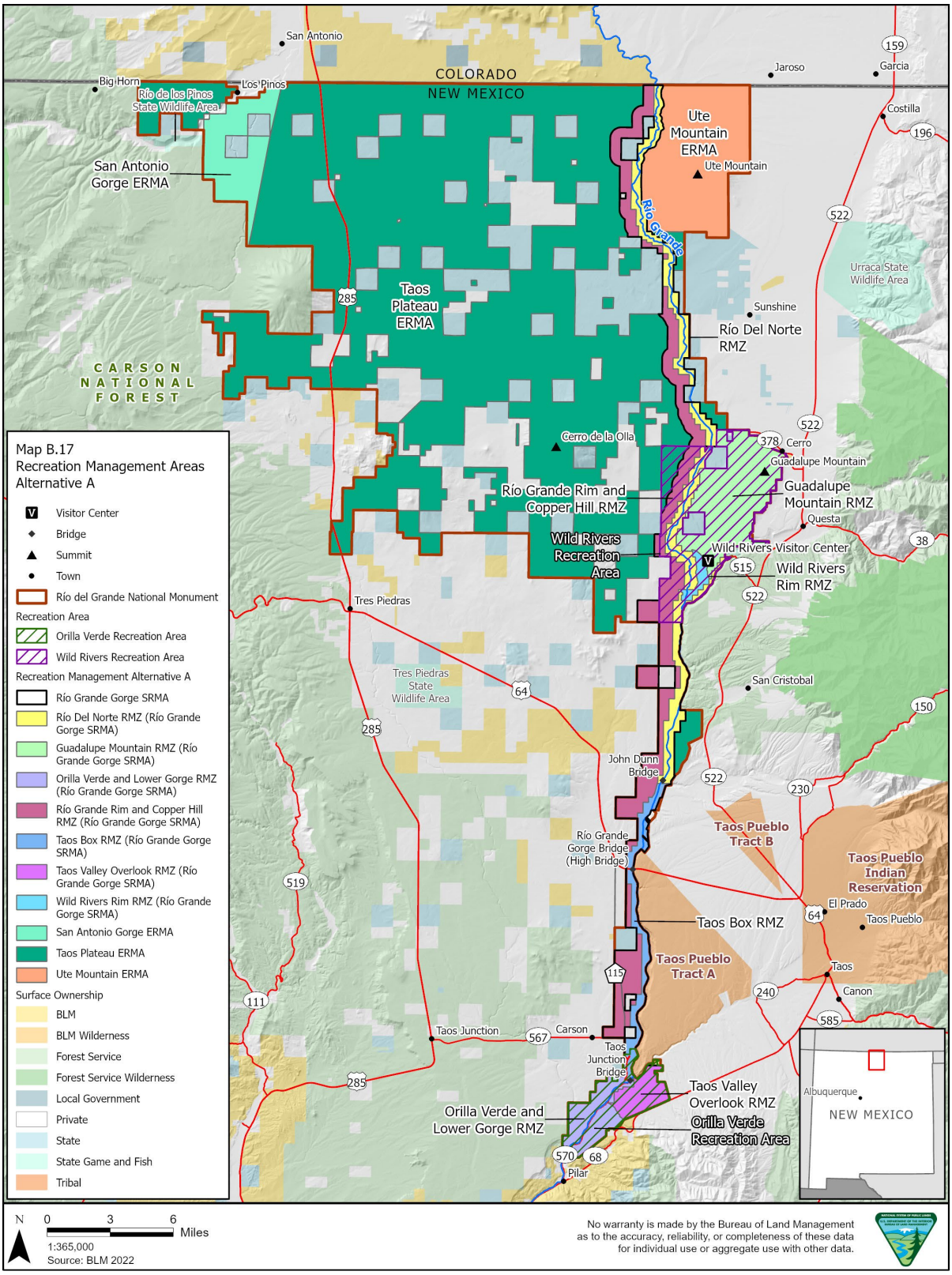
## Map B.15. Livestock Grazing Alternative A



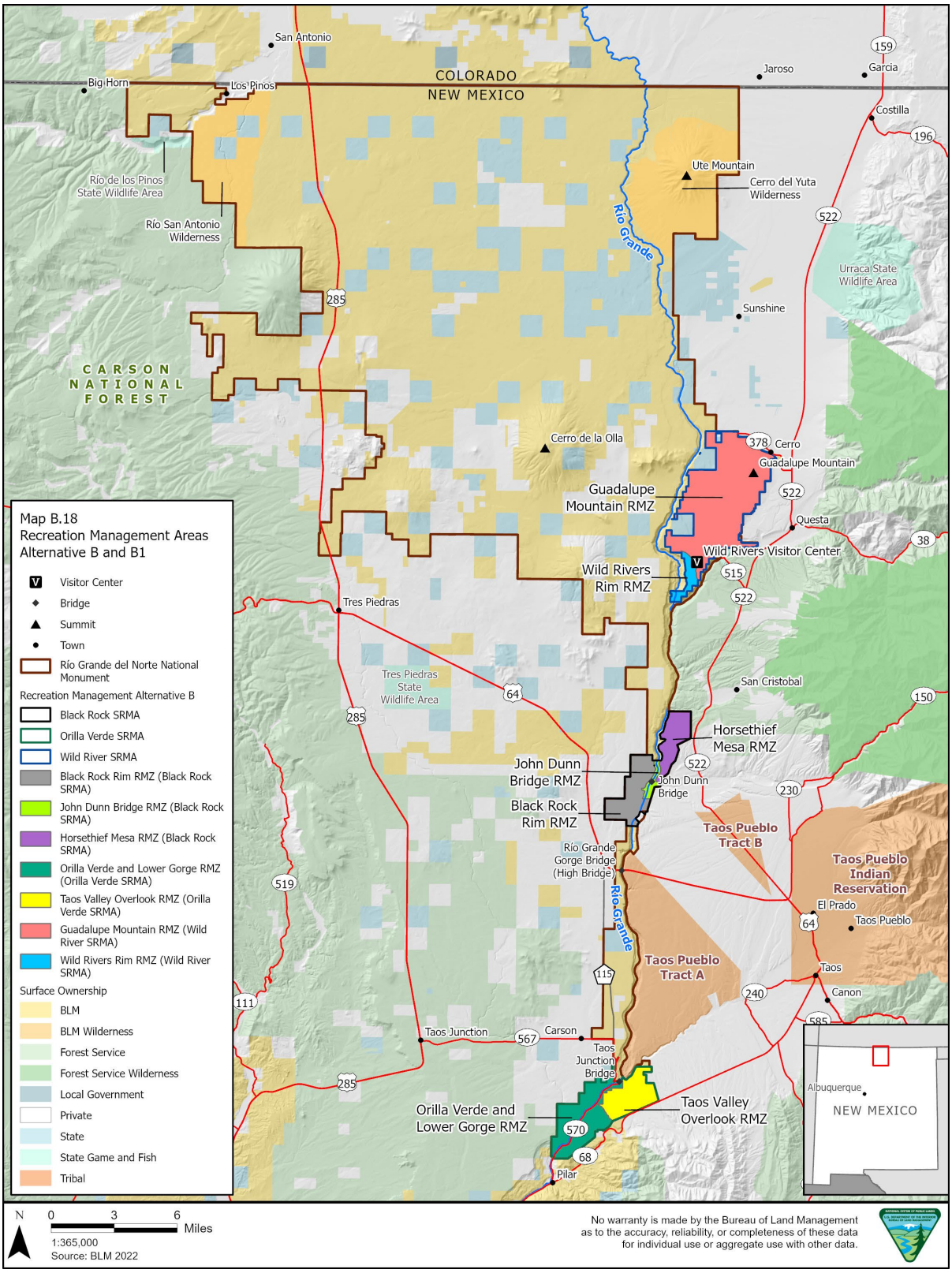
## Map B.16. Livestock Grazing Alternatives B and B1



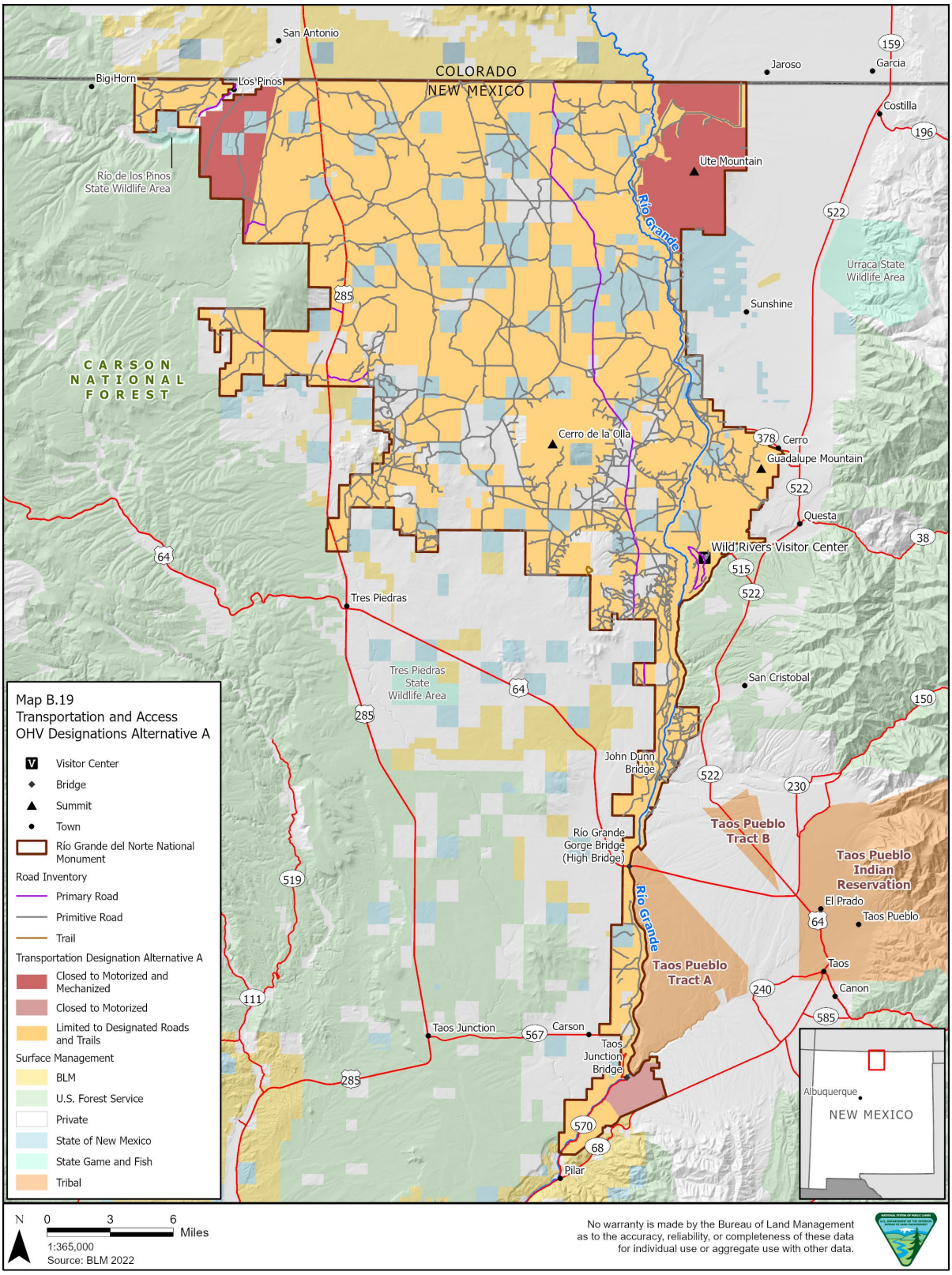
## Map B.17. Recreation Management Areas Alternative A



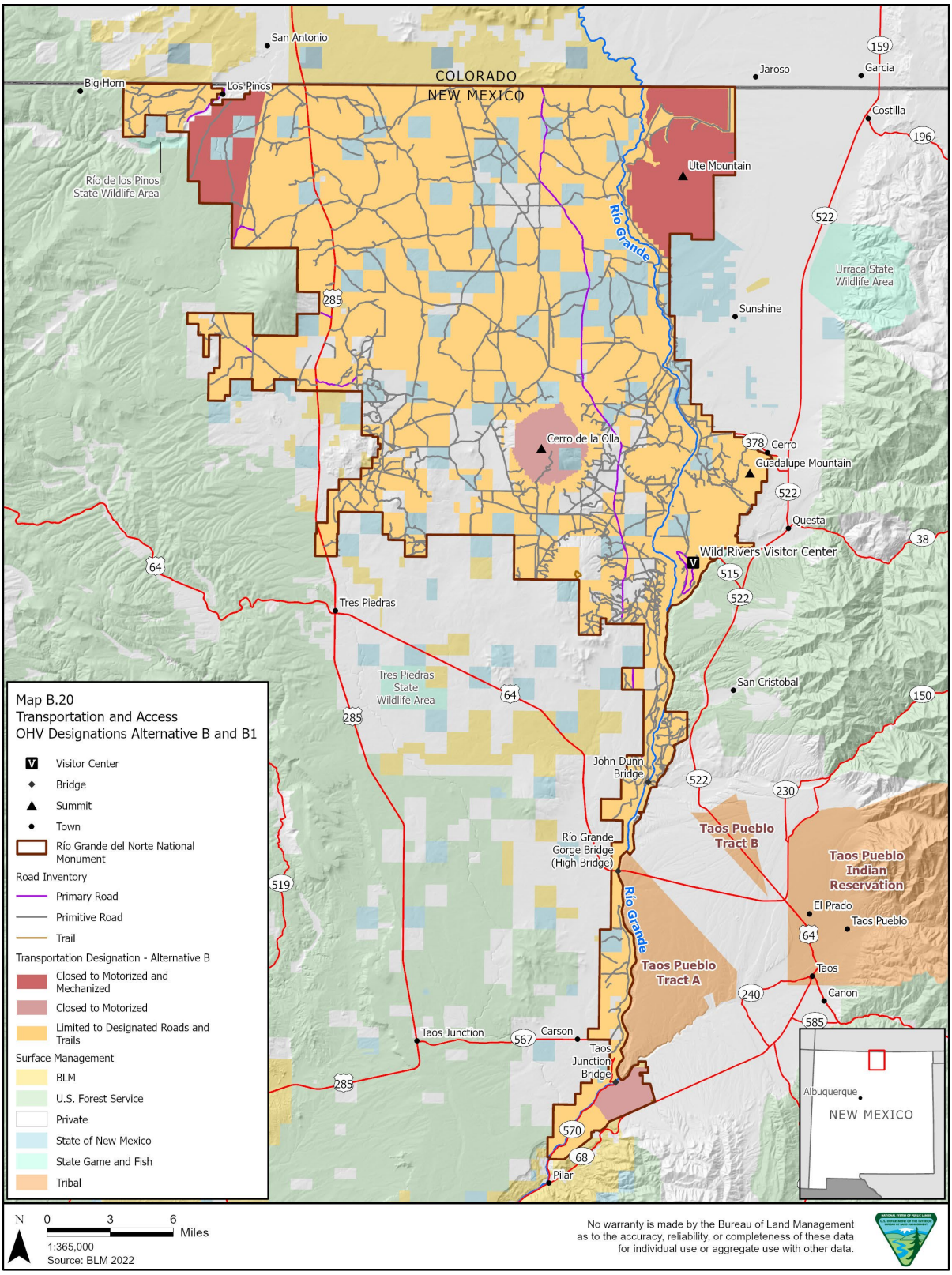
## Map B.18. Recreation Management Areas Alternatives B and B1



## Map B.19. Transportation and Access Off-Highway Vehicle Designations Alternative A



## Map B.20. Transportation and Access Off-Highway Vehicle Designations Alternatives B and B1



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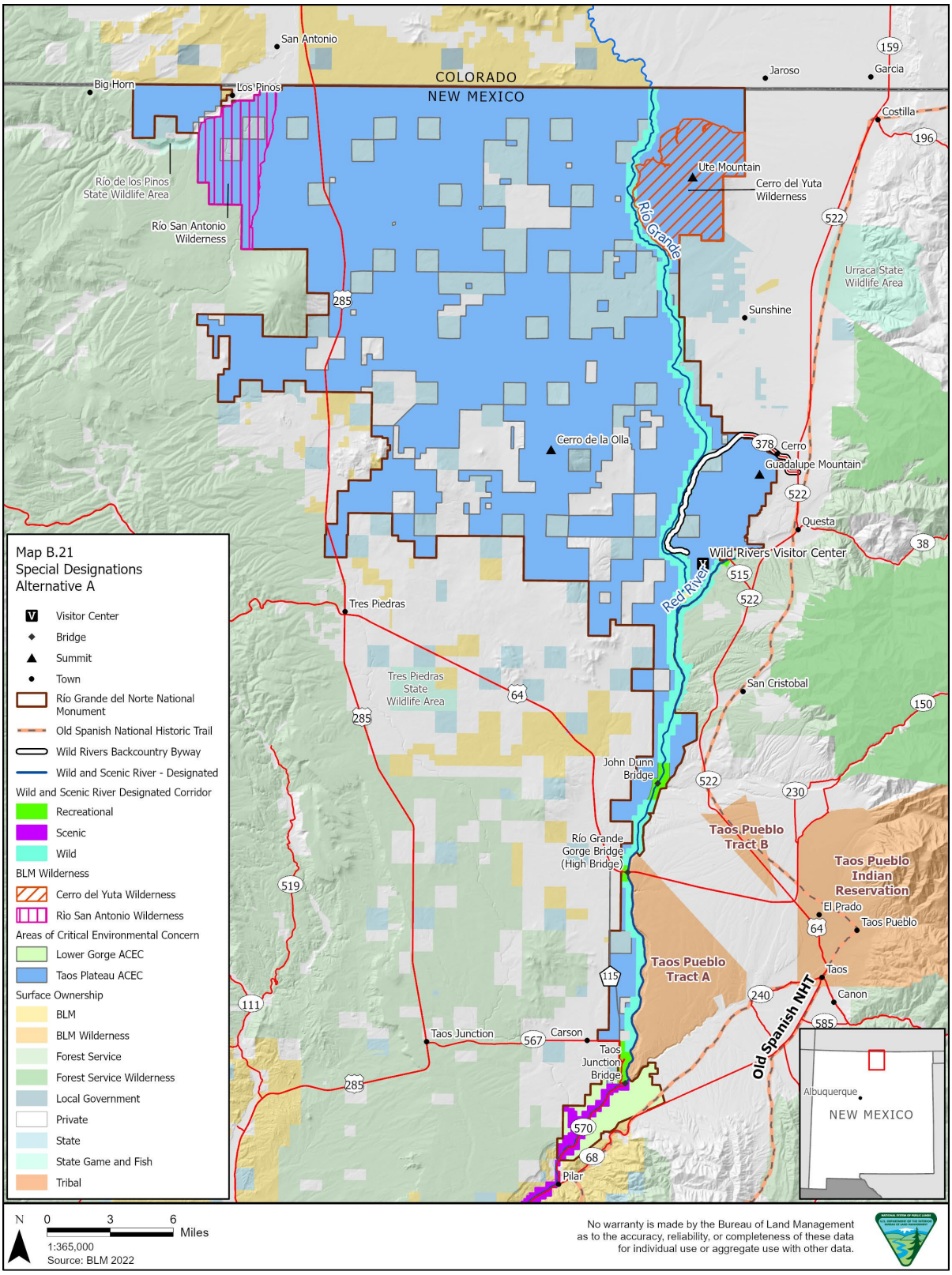
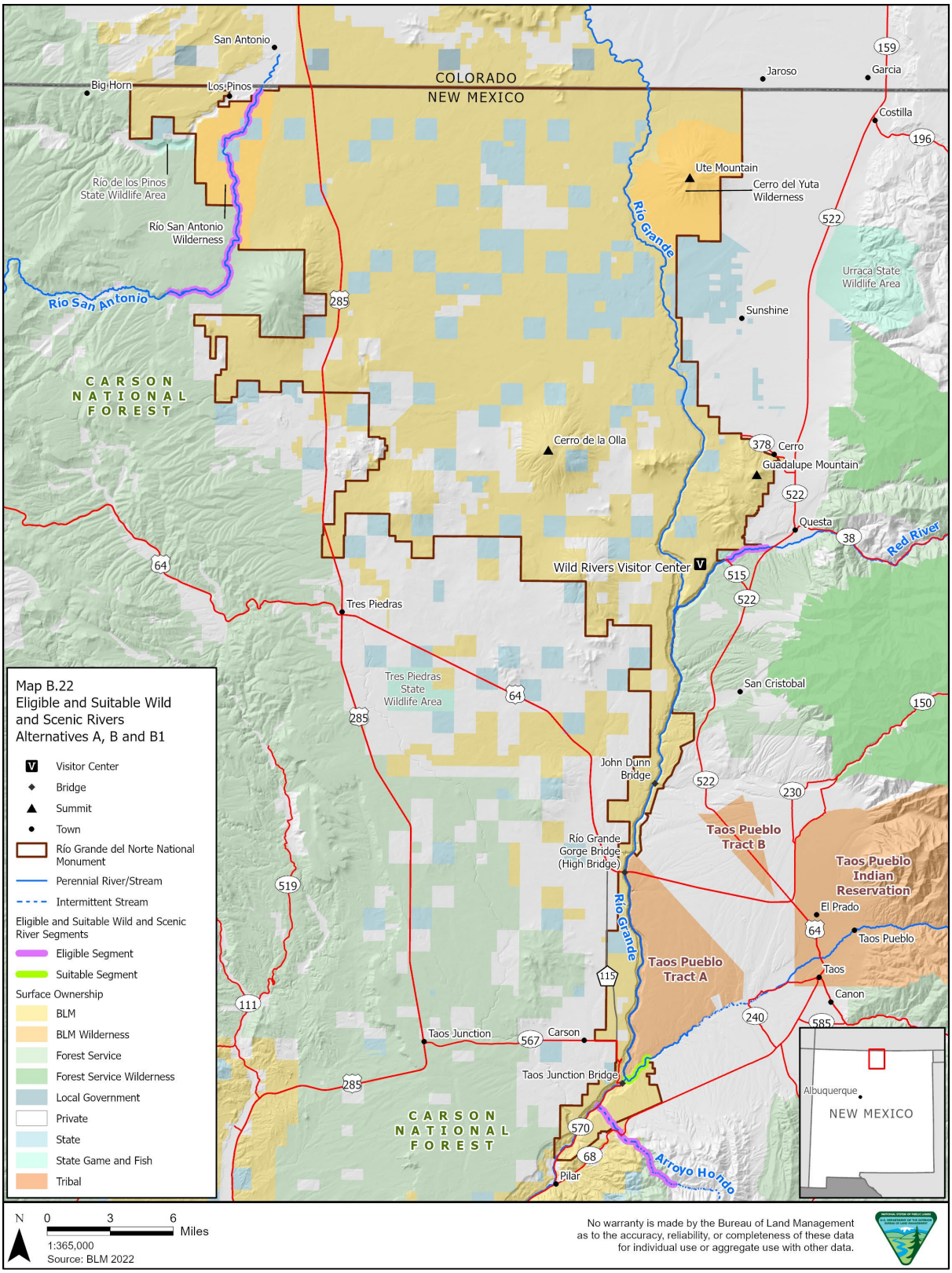


## Map B.22. Eligible and Suitable Wild and Scenic Rivers Alternatives A, B, and B1



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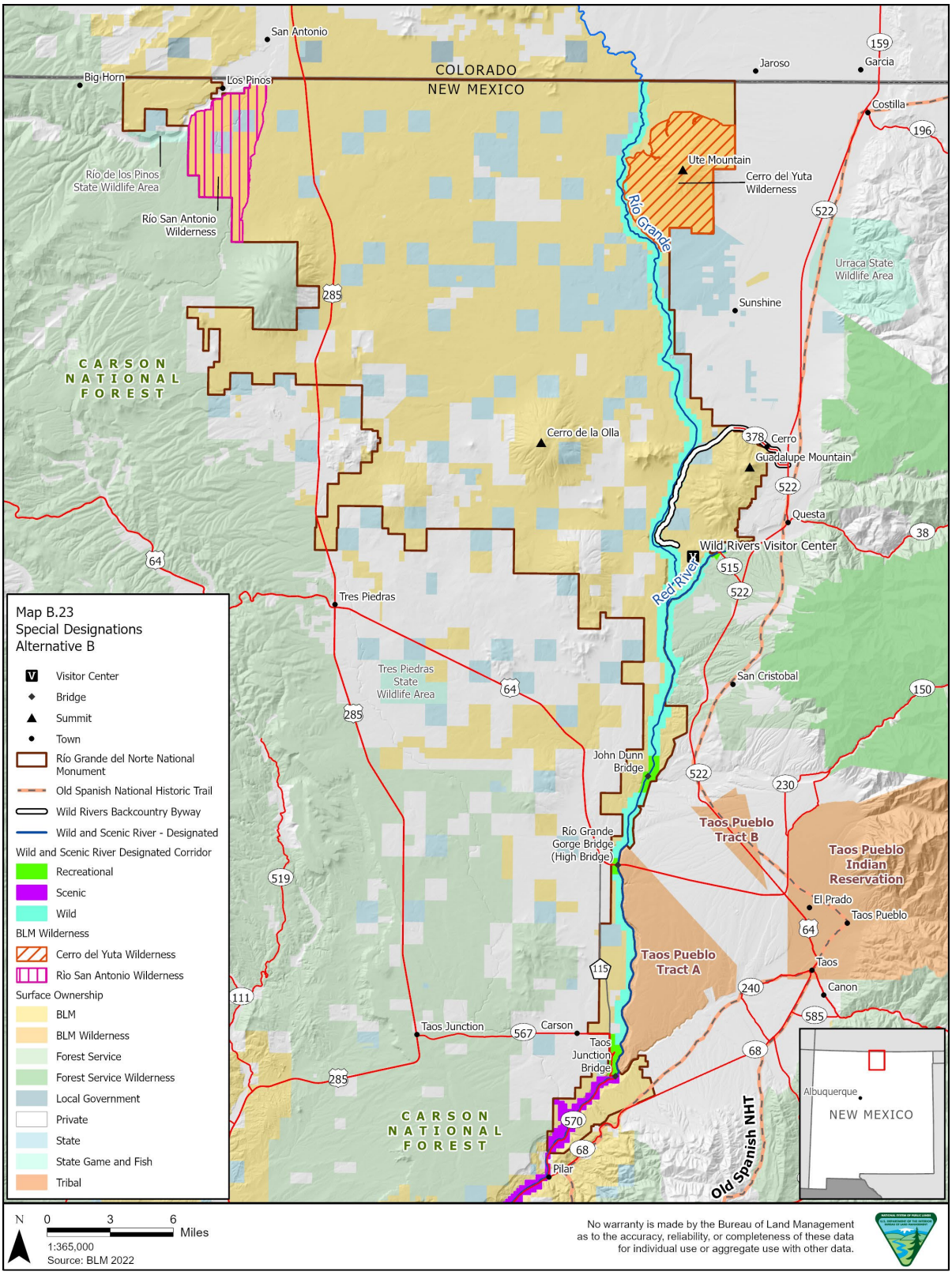
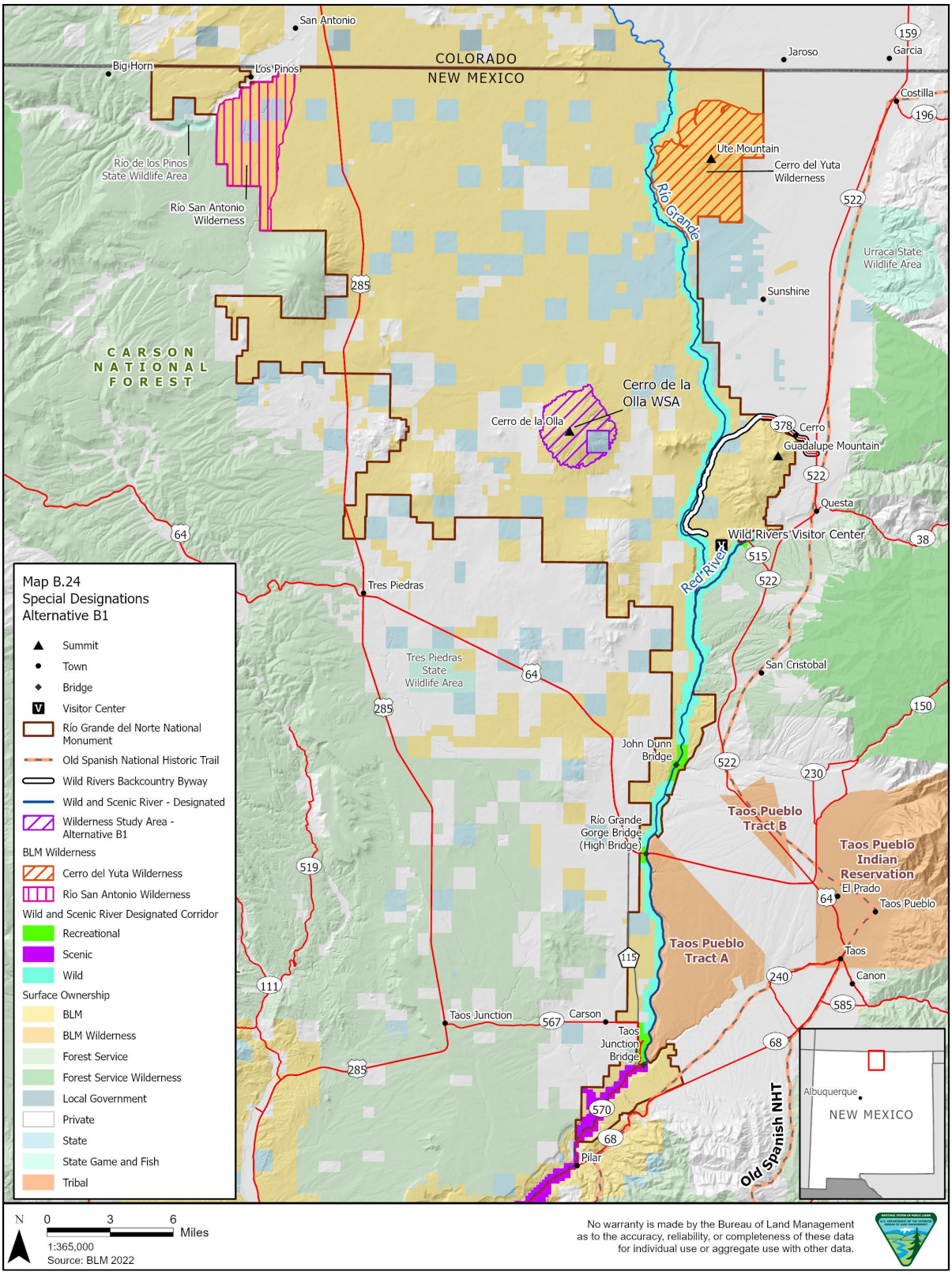


## Map B.24. Special Designations Alternative B1



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## Acronyms

| Term | Definition |
|---|---|
| 2012 Taos RMP | *2012 Approved Taos Resource Management Plan* |
| ACEC | Area of Critical Environmental Concern |
| AIM | Assessment, Inventory, and Monitoring |
| AUM | animal unit month |
| BLM | Bureau of Land Management |
| BMP | best management practice |
| CFR | Code of Federal Regulations |
| CWMAs | cooperative weed management areas |
| DOI | U.S. Department of Interior |
| EA | Environmental Assessment |
| EIS | Environmental Impact Statements |
| ERMA | Extensive Recreation Management Area |
| ESA | Endangered Species Act |
| FLPMA | Federal Land Policy and Management Act of 1976 |

| Term | Definition |
|---|---|
| HMP | Habitat Management Plan |
| IM | Instruction Memorandum |
| IPM | integrated pest management |
| IWM | integrated weed management |
| JDB | John Dunn Bridge |
| Monument | Río Grande del Norte National Monument |
| Monument Management Plan | *Río Grande del Norte National Monument Management Plan* |
| NEPA | National Environmental Policy Act |
| NHPA | National Historic Preservation Act |
| NMDGF | New Mexico Department of Game and Fish |
| NMDOT | New Mexico Department of Transportation |
| NMED | New Mexico Environment Department |
| NMSHPO | New Mexico Historic Preservation Division |
| NRHP | National Register of Historic Places |
| OHV | off-highway vehicle |
| ONRW | Outstanding National Resource Waters |
| ORV | outstandingly remarkable value |
| OSNHT | Old Spanish National Historic Trail |
| PFC | proper functioning condition |
| R&I | relevant and important |
| RMP | Resource Management Plan |
| RMPA | Resource Management Plan amendment |
| RMZ | Recreation Management Zone |
| ROW | right of way |
| SRMA | Special Recreation Management Area |
| State | State of New Mexico |
| SWAP | *State Wildlife Action Plan* |
| TJB | Taos Junction Bridge |
| TMP | Travel Management Plan |
| USFWS | U.S. Fish and Wildlife Service |
| VRM | visual resource management |
| WSA | Wilderness Study Area |
| WSR | Wild and Scenic River |

# C.1 Introduction and Overview

This appendix presents the detailed alternatives tables for each resource and resource use with the goals, objectives, management actions, allowable uses, and administrative designations listed for each alternative. In the tables below, Alternative A provides management direction from the *2012 Approved Taos Resource Management Plan* (RMP) (2012 Taos RMP) (BLM 2012), and Alternative B presents the Proposed Action to amend the 2012 Taos RMP for the *Río Grande del Norte National Monument Management Plan* (Monument Management Plan). The Bureau of Land Management (BLM) made changes to the Proposed Action based on public comments received on the Draft Resource Management Plan amendment (RMPA)/Environmental Assessment (EA) and from additional input from cooperating agencies, Tribes, and the BLM Interdisciplinary Team. The BLM also made revisions for clarity, consistency, and accuracy. The management tables contained in this appendix list these changes under the "Proposed Monument Management Plan" column. Resource programs from the 2012 Taos RMP that are being amended to provide management guidance for ensuring that Río Grande del Norte National Monument (Monument) objects are preserved, protected, and restored include the following.

- Resources
  - Section C.2.1, *Cultural Resources* (p. C-8)
  - Section C.2.2, *Traditional Uses* (p. C-15)
  - Section C.2.3, *Fish and Wildlife* (p. C-16)
  - Section C.2.4, *Special Status Species* (p. C-42)
  - Section C.2.5, *Geology* (p. C-52)
  - Section 0, *Soils* (p. C-54)
  - Section C.2.7, *Vegetative Communities* (p. C-58)
  - Section C.2.8, *Visual Resources* (p. C-71)
  - Section C.2.9, *Water Resources* (p. C-75)
  - Section C.2.10, *Lands with Wilderness Characteristics* (p. C-86)
  - Section C.2.11, *Wildland Fire* (p. C-89)
  - Section C.2.12, *Invasive Species/Noxious Weeds* (p. C-94)
- Resources Uses
  - Section C.3.1, *Land Tenure and Land-Use Authorizations* (p. C-99)
  - Section C.1.1, *Livestock Grazing* (p. C-104)
  - Section C.3.3, *Recreation* (p. C-112)
  - Section C.3.4, *Transportation and Access* (p. C-121)
  - Section C.3.5, *Special Designations* (p. C-126)

The BLM has reviewed the 2012 Taos RMP and found existing management for the following resources and resource uses to be adequate for the protection and care of Monument objects. Therefore, although some goals and objectives from the 2012 Taos RMP may be updated for

these resource programs in the Monument Management Plan, management guidance contained in the 2012 Taos RMP for the resource programs identified below would not be amended as part of this planning effort.

- Resources
  - Air and Atmospheric Values
  - Paleontology
  - Forestry and Woodland Products

## C.1.1 Components of Alternatives

The alternatives consist of goals, objectives, management actions, allowable uses, and administrative designations.

- ***Goals*** are broad statements of desired outcomes and are not quantifiable or measurable.
- ***Objectives*** are specific, measurable, desired conditions or outcomes intended to meet goals.

Goals and objectives can vary across alternatives, resulting in different allowable uses and management actions for some resources and resource uses.

Management actions and allowable uses are designed to achieve goals and objectives.

- ***Management actions*** are measures that guide day-to-day and future activities.
- ***Allowable uses*** are permitted, restricted, or prohibited, and they may include stipulations or restrictions; allowable uses also identify lands where specific uses are excluded to protect resource values, or where certain lands are open or closed in response to legislative, regulatory, or policy requirements.
- ***Administrative designations*** communicate the BLM's intent to prioritize specific resource values or uses when making future management decisions in an area. Administrative designations are limited to those that the BLM may establish through the land use planning process.

## C.1.2 Comparative Summary of Alternatives

Table C-1 provides a comparative summary of resource use allocations and administrative designations between the alternatives.

## Table C-1. Summary of Resource Use Allocations and Administrative Designations in the Decision Area

| Resource/Resource Use | Alternative A No Action (acres)[1] | Alternative B Proposed Action (acres)[1] | Alternative B1 Designate Cerro de la Olla WSA | Proposed Monument Management Plan |
|---|---|---|---|---|
| ***ACECs*** | | | | |
| Taos Plateau ACEC | 222,500 | – | – | – |
| Lower Gorge ACEC | 21,190 | – | – | – |
| ***Lands with Wilderness Characteristics***[2] | | | | |
| San Antonio East | 9,855 | 9,855 | 9,855 | 9,855 |
| Cerro de la Olla | – | 5,120 | – | 5,120 |
| ***Wilderness Study Areas*** | | | | |
| Cerro de la Olla | – | – | 5,120 | – |
| ***Visual Resources*** | | | | |
| VRM Class I | 39,894 | 39,821 | 44,941 | 39,821 |
| VRM Class II | 202,541 | 202,425 | 197,306 | 202,425 |
| VRM Class III | 350 | 540 | 540 | 540 |
| VRM Class IV | – | – | – | – |
| ***Recreation Designations*** | | | | |
| Taos Plateau ERMA | 168,889 | – | – | – |
| Ute Mountain ERMA | 17,784 | – | – | – |
| San Antonio Gorge ERMA | 7,366 | – | – | – |
| Río Grande Gorge Recreation Area SRMA | 48,190 | – | – | – |
| *Guadalupe RMZ* | *10,573* | – | – | – |
| *Orilla Verde and Lower Gorge RMZ* | *3,950* | – | – | – |
| *Río Del Norte RMZ* | *10,334* | – | – | – |
| *Río Grande Rim and Copper Hill RMZ* | *16,947* | – | – | – |
| *Taos Box RMZ* | *3,323* | – | – | – |
| *Taos Valley Overlook RMZ* | *2,314* | – | – | – |
| *Wild Rivers Rim RMZ* | *749* | – | – | – |
| Wild River SRMA | 0 | 11,322 | 11,322 | 11,322 |
| *Wild River RMZ* | *0* | 749 | 749 | 749 |
| *Guadalupe Mountains RMZ* | *0* | 10,573 | 10,573 | 10,573 |
| Black Rock SRMA | 0 | 4,664 | 4,664 | 4,664 |
| *Horsethief Mesa RMZ* | *0* | 1,742 | 1,742 | 1,742 |
| *John Dunn Bridge RMZ* | *0* | 394 | 394 | 394 |
| *Black Rock Rim RMZ* | *0* | 2,529 | 2,529 | 2,529 |

| Resource/Resource Use | Alternative A No Action (acres)[1] | Alternative B Proposed Action (acres)[1] | Alternative B1 Designate Cerro de la Olla WSA | Proposed Monument Management Plan |
|---|---|---|---|---|
| Orilla Verde SRMA | 0 | 6,264 | 6,264 | 6,264 |
| *Orilla Verde and Lower Gorge RMZ* | *0* | 3,950 | 3,950 | 3,950 |
| *Taos Valley Overlook RMZ* | *0* | 2,314 | 2,314 | 2,314 |
| ***Transportation and Access*** | | | | |
| OHV Open | – | – | – | – |
| OHV Limited | 216,551 | 211,431 | 211,431 | 211,431 |
| OHV Closed to Motorized | – | 5,120 | 5,120 | 5,120 |
| Closed to Motorized and Mechanized | 25,822 | 25,822 | 25,822 | 25,822 |
| ***Livestock Grazing[3]*** | | | | |
| Available for Livestock Grazing | 205,328 | 203,556 | 203,556 | 201,741 |
| Unavailable for Livestock Grazing | 37,340 | 39,112 | 39,112 | 40,927 |
| ***ROWs*** | | | | |
| Exclusion | 56,850 | 61,946 | 61,946 | 61,946 |
| Avoidance | 185,319 | 180,041 | 180,041 | 180,041 |
| Designated ROW Corridors | 60 | 243 | 243 | 243 |

[1] Total acreage discrepancies in this table are due to rounding.
[2] Lands with Wilderness Characteristics acreage for the San Antonio East unit uses the 2017 Lands with Wilderness Characteristics data, which was completed after the 2012 Taos RMP and Monument designation. The acreage for the Cerro de la Olla unit is based on the boundary in the proposed Wilderness legislation (S.593 2023), but clipped to the 8,200-foot elevation contour and BLM-administered lands.
[3] Available livestock grazing totals include reserve common allotments, which apply to both alternatives.
ACEC = Area of Critical Environmental Concern; OHV = off-highway vehicle; ERMA = Extensive Recreation Management Area; RMP = Resource Management Plan; RMZ = Recreation Management Zone; ROW = right of way; RMA = Special Recreation Management Area; VRM = Visual Resource Management.

# C.2 Resources

## C.2.1 Cultural Resources

General management guidance from the 2012 Taos RMP for cultural resources would apply for all alternatives unless noted differently below (see BLM 2012:6–7). Additionally, known cultural resources and sites identified in the future would be evaluated for placement in one of six use categories, which are listed in the 2012 Taos RMP in Table 2-1 (see BLM 2012:33).

**Table C-2. Comparison of Alternatives: Cultural Resources**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **CUL GOAL 1** | Identify, preserve, and protect significant cultural resources and ensure that they are available for appropriate uses by present and future generations. | Same as Alternative A, except protect all cultural resources and objects of value. The BLM would also consult with Native American Tribes and other interested parties to identify traditional cultural properties and culturally significant resource sites. | Same as Alternative B. |
| 2 | **CUL GOAL 2** | Seek to reduce imminent threats and resolve potential conflicts from natural or human-caused deterioration or potential conflict with other resource uses by ensuring that all authorizations for land and resource use would comply with National Historic Preservation Act (NHPA) Section 106. | Same as Alternative A. | Same as Alternative B. |
| 3 | **CUL GOAL 3** | Identify and protect national historic trail routes and historic settings, remnants, and artifacts for public use and enjoyment. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **4** | **CUL GOAL 4** | Promote stewardship, conservation, and appreciation of cultural resources through education and public outreach programs. | Same as Alternative A, and seek opportunities for co-stewardship of public lands and waters with Tribal Nations | Same as Alternative B. |
| **5** | **CUL GOAL 5** | N/A | Identify, define, and delineate cultural landscapes within the Monument, recognizing them as a larger equivalent of cultural resources, and refine the definition and delineation of these cultural landscapes as additional information becomes available. | Same as Alternative B. |
| **6** | **CUL GOAL 6** | N/A | Maintain and enhance the integrity of cultural landscapes within the Monument at levels that approximate their historic condition. | Same as Alternative B. |
| **7** | **CUL OBJECTIVE 1** | Preserve and protect significant cultural resources through designation of Areas of Critical Environmental Concern (ACECs) with cultural management prescriptions. | No similar objective. Presidential Proclamation 8946 established nondiscretionary protection and preservation of cultural resources. | Same as Alternative B. |
| **8** | **CUL OBJECTIVE 2** | Support public awareness and interest in cultural resources through interpretive sites, archaeological tours, presentations, and literature. | Same as Alternative A. | Same as Alternative B. |
| **9** | **CUL OBJECTIVE 3** | Encourage scientific research. | Facilitate scientific research. | Same as Alternative B. |
| **10** | **CUL OBJECTIVE 4** | Promote site stewardship. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **11** | **CUL OBJECTIVE 5** | Identify traditional cultural properties and culturally significant resource sites through Tribal consultation. | Same as Alternative A, except continue to inventory, record, and evaluate cultural resources within the Monument under Sections 106 and 110 of the NHPA. | Same as Alternative B. |
| **12** | **CUL OBJECTIVE 6** | National Historic Trails: Preserve the associated high-potential historic sites and high-potential historic route segments, physical remnants, and contributing features, interpret the historic aspects of the trails for the protection of the resource, and enhance understanding and enjoyment of these trails in cooperation with trail-administering agencies and nonprofit partners. | Same as Alternative A. | Same as Alternative B. |
| **13** | **CUL OBJECTIVE 7** | N/A | Complete a comprehensive Class I regional overview, as defined in BLM Manual Supplement H-8100-1, and refine this overview as new information accumulates or as needed. | Same as Alternative B. |
| **14** | **CUL OBJECTIVE 8** | N/A | Sponsor the completion of a comprehensive ethnographic study to identify traditional cultural properties, culturally significant resources, and past land-use patterns and land-use related cultural values for all ethnicities that possess a demonstrable, traditional relationship to the Monument's environment. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **15** | **CUL Management Action 1** | Permit appropriate research, including data recovery, for scientific use and research until research potential is realized. | Same as Alternative A. | Same as Alternative B. |
| **16** | **CUL Management Action 2** | Propose protective measures/ designations regarding conservation for future use until conditions for use are met | Same as Alternative A. Protection measures may include, but are not limited to, avoidance, fencing, netting, burial, erosion control, and closure to preserve archaeological material *in situ*. | Same as Alternative B. |
| **17** | **CUL Management Action 3** | Consult with Tribes to determine limitations for traditional use for long-term preservation. | Same as Alternative A. | Same as Alternative B. |
| **18** | **CUL Management Action 4** | Determine limitations and permitted uses for public use for long-term preservation and onsite interpretation. | Same as Alternative A. | Same as Alternative B. |
| **19** | **CUL Management Action 5** | Determine nature of experiment for experimental use for research, followed by interpretation. | Same as Alternative A. In consultation with the New Mexico Historic Preservation Division (NMSHPO), Tribal entities, and other interested parties, research proposals would be evaluated on a case-by-case basis to ensure that experimental use is non-destructive and minimally invasive so as not to adversely affect the integrity of cultural resources. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **20** | **CUL Management Action 7** | A balanced approach to site treatment would be implemented through excavation and data recovery, versus avoidance of sites that are subject to natural deterioration (e.g., erosion), depending on site-specific factors. | Same as Alternative A. | Same as Alternative B. |
| **21** | **CUL Management Action 8** | An extensive consultation program would be developed to identify traditional cultural properties and culturally significant economic resource sites throughout the management area, and identified properties would be protected and ecologically restored if deteriorated. | Same as Alternative A. Consultation parties would include, but are not limited to, , NMSHPO, Tribal entities, and other Federal and State of New Mexico (State) agencies. Tribal consultation would be derived from the State of New Mexico Department of Cultural Affairs Historic Preservation Divisions' county-by-county Native American consultation list. | Same as Alternative B. |
| **22** | **CUL Management Action 9** | Native American Tribes would be consulted on proposed projects that may affect traditional cultural properties or significant areas and Tribal access to BLM-managed public lands. They would also be consulted concerning heritage tourism projects. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **23** | **CUL Management Action 10** | The BLM would continue to carry out research through partnerships with students and professors from academic institutions. These projects add a great deal to the knowledge of cultural resources on public lands and help the BLM develop strategies for the management and interpretation of these resources. | Same as Alternative A. | Same as Alternative B. |
| **24** | **CUL Management Action 11** | Livestock-grazing allotments would be evaluated for significant cultural sites. Conflicts with cultural resources would be eliminated or minimized. | Livestock-grazing allotments would be evaluated for cultural sites. Conflicts with cultural resources would be eliminated or minimized. | Same as Alternative B. |
| **25** | **CUL Management Action 12** | BLM law enforcement would regularly monitor and patrol listed, eligible, and potential National Register of Historic Places (NRHP) sites and other areas of high cultural significance to discourage illegal artifact collecting and site disturbance. The Site Stewards Program would continue to monitor site condition, and increase BLM presence at sites. | Same as Alternative A. | Same as Alternative B. |
| **26** | **CUL Management Action 13** | The BLM would educate the public through heritage tourism projects as outlined in Executive Order 13287. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **27** | **CUL Management Action 14** | The BLM would continue to work with the Taos Archaeological Society on archaeological projects, including petroglyph recording, site mapping and recording, and archaeological inventory. | N/A. | Same as Alternative B. |
| **28** | **CUL Management Action 15** | Protect cultural resources associated with playas, among others. | Protect cultural resources associated with playas and work cooperatively with livestock-grazing permittees to assess impacts of grazing on playas. | Same as Alternative B. |

## C.2.2 Traditional Uses

General management guidance from the 2012 Taos RMP for cultural resources as applicable to Traditional Uses would apply for all alternatives unless noted differently below (see BLM 2012:6–7).

**Table C-3. Comparison of Alternatives: Traditional Uses**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **TU GOAL 1 (2012 Taos RMP CUL GOAL 5)** | Consult with Native American Tribes to identify any cultural values or religious beliefs that may be affected by BLM authorizations or actions. Provisions would be made for Native American use of traditional cultural properties. | Ensure that access is available to religious and cultural sites by Native American Tribal members and Hispanic communities for noncommercial traditional cultural and customary uses, consistent with Presidential Proclamation 8946, as well as all applicable laws and regulations. | Same as Alternative B. |

## C.2.3 Fish and Wildlife

General management guidance from the 2012 Taos RMP for Fish and Wildlife would apply for all alternatives unless noted differently below (see BLM 2012:9–10).

### C.2.3.1 General Management Guidance Common to all Alternatives

#### C.2.3.1.1 Fisheries and Aquatic Resources

Management would emphasize conserving populations of native aquatic species, providing angling opportunities for game fish, and identifying aquatic-habitat conservation and restoration opportunities. The fisheries program would work closely with the New Mexico Department of Game and Fish (NMDGF) to attain goals and would develop a cooperative network through affiliation with Western Native Trout Initiative and Desert Fish Habitat Initiative. All actions would comply with all Federal and State of New Mexico rules, regulations, guidance, plans, and other directives associated with fish and aquatic resources use and management. Native species would be monitored to prevent population declines that could result in listing under the Endangered Species Act (ESA). Priority species of interest include those identified as BLM Special Status Species and those listed under the New Mexico Wildlife Conservation Act by the State of New Mexico.

Management guidance from the *Standards for Public Land Health and Guidelines for Livestock Grazing Management in New Mexico* (BLM 2001a) that affects fisheries is also consistent with current program direction and provides direct and indirect management guidance. The *Biotic Communities Standard* is directly relevant to fish and other aquatic species and provides specific direction to manage ecological processes for species. The *Riparian Site Standard* is directly relevant to aquatic habitat and provides stream-channel indicators related to physical aspects of aquatic resources. The *Upland Sites Standard* is indirectly relevant to aquatic resources through minimization of upland damage that could result in not meeting the two standards above.

**Adaptive Management**

Implementation of the alternatives, goals, and objectives of the Monument Fisheries program relies on adaptive management. The operational definition of *adaptive management* provided by the U.S. Department of Interior (DOI) for land managers characterizes adaptive management as an iterative learning method, producing improved management and understanding over time (Williams and Brown 2012):

> Adaptive management [is a decision process that] promotes flexible decision-making that can be adjusted in the face of uncertainties as outcomes from management actions and other events become better understood. Careful monitoring of these outcomes both advances scientific understanding and helps adjust policies or operations as part of an iterative learning process. Adaptive management also recognizes the importance of natural variability in contributing to ecological resilience and productivity. It is not a 'trial and error' process, but rather emphasizes learning while doing. Adaptive management does not

> represent an end in itself, but rather a means to more effective decisions and enhanced benefits. Its true measure is in how well it helps meet environmental, social, and economic goals, increases scientific knowledge, and reduces tensions among stakeholders.

Adaptive management is built on clearly identifiable and measurable objectives. A rigorous monitoring protocol is critical for determining whether the management objectives are being met and implementing changes if they are not (Williams and Brown 2012).

#### C.2.3.1.2 Wildlife

Although the BLM is responsible for protecting and improving wildlife habitat on public land, population management of resident fish and wildlife species is under the authority of NMDGF. Wherever practicable, the BLM would coordinate and cooperate with NMDGF to mitigate adverse impacts on wildlife and their habitats.

As part of environmental review processes, wildlife habitat would be evaluated to identify methods for reducing impacts and ensuring compatibility of projects with management objectives for wildlife habitat, including stipulations for seasonal restrictions, mitigation and/or appropriate best management practices (BMPs). See Section C.2.4, *Special Status Species,* for more decisions regarding special status wildlife.

Management activities focus on monitoring species or habitat conditions, habitat restoration or enhancement, and conservation actions to protect Critical Habitat. The BLM also monitors native species to prevent population declines that could result in listing under the ESA. Focal wildlife species include big game, waterfowl, shorebirds, migratory birds, species listed as Threatened or Endangered by the State of New Mexico, and those identified as BLM Special Status Species, including those listed by the U.S. Fish and Wildlife Service (USFWS).

Creation and implementation of citizen science groups would assist with data collection to monitor focal wildlife species and habitat, using BLM-approved protocols. A coalition of interested public would advance the education, perception, and appreciation for the Monument and supplement available biological data to inform adaptive resource management. The BLM would encourage citizen science groups to be open, inclusive, and transparent.

As data become available, BLM-administered lands would be managed to consider the functional connectivity between large wildlife populations and smaller, isolated populations whenever possible. The intent would be to maintain connectivity and corridors for movement of wildlife and enhance the function and diversity of all habitats in large areas, or patches, across the landscape to minimize long-term human disturbance to wildlife and provide for movement, dispersal, and connectivity to home ranges. In the context of wildlife habitat fragmentation, the size of the patch would be relative to the size of the BLM parcel(s) and adjacent landowner status (i.e., Federal, State, or private lands).

## Table C-4. Comparison of Alternatives: Fish and Wildlife

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| *Fish (F)* | | | | |
| 1 | **F GOAL 1** | Manage streams within the planning area to ensure that the natural diversity of aquatic biota is consistent with habitat. | Same as Alternative A. | Same as Alternative B. |
| 2 | **F GOAL 2** | Manage streams within the planning area to ensure that the natural integrity of aquatic ecosystems are protected, restored, and/or managed in an ecologically sound manner. | Manage streams within the planning area to ensure that the natural integrity of aquatic ecosystems is protected, restored, and/or managed in support of the connectivity of diverse, self-sustaining biotic communities. | Same as Alternative B. |
| 3 | **F GOAL 3** | Expand recreational fisheries while protecting native fish populations and their habitat by developing and enhancing partnerships. | Maintain or improve fisheries within the Monument as described in the *2022 Statewide Fisheries Management Plan* (NMDGF 2022). Restore and maintain native fish populations, their habitats, and food sources, while expanding recreational fisheries through partnerships. Prevent conflicts with native species from introduced nonnative species whenever possible. Prevent further introductions and/or expanded ranges of non-salmonid, nonnative aquatic species and prevent conflicts with native species from introduced nonnative species whenever possible. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 4 | **F GOAL 4** | Protect aquatic habitats and manage BLM-administered streams to meet water quality standards established by the New Mexico Environment Department (NMED) and protect streams from impairment or degradation. | Same as Alternative A. | Same as Alternative B. |
| 5 | **F GOAL 5** | Ensure that aquatic habitats would support a diversity of self-sustaining biotic communities that are appropriate to the given environment. | Same as Alternative A. | Same as Alternative B. |
| 6 | **F OBJECTIVE 1** | Manage all BLM-administered perennial stream reaches to have, at a minimum, fish populations consisting of 50% native fish species as measured by catch per unit effort (e.g., number per minute). | Maintain stable or increasing populations of native aquatic species (including amphibians, aquatic invertebrates, and other aquatic dependent species) within the Monument whenever possible. | Same as Alternative B. |
| 7 | **F OBJECTIVE 2** | Eliminate or control populations of undesirable nonnative fish species in all waters managed by the BLM. | In cooperation with NMDGF, inventory, eliminate/control, and monitor populations of undesirable non-salmonid, nonnative aquatic species, and aquatic invasive species. | Same as Alternative B. |
| 8 | **F OBJECTIVE 3** | Continue to work with NMDGF to stock trout species in BLM-managed waters for recreational fishing opportunities. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **9** | **F OBJECTIVE 4** | Complete fish-habitat quality and quantity surveys on all streams within the planning area on a 10-year rotating cycle. | Same as Alternative A, and monitor Critical Habitat of native fish species: Rio Grande cutthroat trout (*Oncorhynchus clarki virginalis*), Rio Grande chub (Gila pandora), flathead chub (*Platygobio gracilis*), longnose dace (*Rhinichthys cataractae*), and Rio Grande sucker (*Catostomus plebeius*). | Same as Alternative B. |
| **10** | **F OBJECTIVE 5** | Develop and/or implement one project per year to conserve, enhance, or restore fish populations and habitats, based on survey results. | Develop and implement projects to conserve, enhance, and/or restore native and nonnative salmonid fish, amphibian, aquatic invertebrate, and other aquatic-dependent species populations, their food sources, and habitats based on survey results. Protect Rio Grande flows and springs to enable the riparian habitat to maintain the health of fisheries and wildlife in the monument. Protect, restore, maintain, or enhance fish and wildlife species (including Special Status Species) and their habitats, while managing impacts from increased visitation, fragmentation, climate change, invasive species, wildfire, and grazing. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **11** | **F Management Action 1** | Consider areas for introduction, augmentation, or reestablishment of fish and wildlife species consistent with NMDGF plans | Consider areas for introduction, augmentation, or reestablishment of fish and wildlife species consistent with NMDGF plans. Remove unnecessary aquatic barriers that do not serve as barriers separating native and nonnative salmonids to promote aquatic connectivity. | Same as Alternative B. |
| **12** | **F Management Action 2** | Assess wildlife uses of and needs for playas | Same as Alternative A. | Same as Alternative B. |
| **13** | **F Management Action 3** | Complete fish habitat quality and quantity surveys on all streams on a 10-year cycle. Assess aquatic habitat and develop restoration or enhancement plans to meet management goals for fish and other species. | Same as Alternative A. | Same as Alternative B. |
| **14** | **F Management Action 4** | Survey playas for aquatic diversity, frequency of inundation, and relationship to precipitation events. Prohibit modification of playa surfaces and adjacent watershed. | Survey playas for aquatic diversity, frequency of inundation, and relationship to precipitation events, using this data to prioritize playas for restoration. Prohibit modification of playa surfaces and other lentic area surfaces and adjacent uplands unless for small-scale scientific research activities. Facilitate the restoration of playa and other lentic habitats to proper functioning condition. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **15** | **F Management Action 5** | Employ mechanical removal methods to reduce nonnative fish species in the Rio Grande and tributaries. | In cooperation with NMDGF, and if necessary on a case-by-case basis, employ removal methods to reduce nonnative, non-salmonoid fish species, and other aquatic nonnative species in the Rio Grande, Red River, Rio San Antonio, Rio Hondo, Arroyo Hondo, and Rio Pueblo de Taos. | Same as Alternative B. |
| **16** | **F Management Action 6** | No similar action. | Survey seeps and springs for aquatic and riparian habitat and community composition. Prohibit modification and degradation of seep and spring areas and adjacent habitats. | Same as Alternative B. |
| **17** | **F Management Action 7** | No similar action. | To provide important fish habitat, protect and leave large woody debris in the Rio Grande (when not a danger to rafters), Red River, Rio Hondo, Arroyo Hondo, Rio San Antonio, and Rio Pueblo de Taos. | Same as Alternative B. |
| ***Wildlife (WL)*** | | | | |
| **18** | **WL GOAL 1** | Manage public lands to achieve healthy watersheds and landscapes, sustained biological communities, and an improved understanding of ecosystems and resources through integrated, multiparty, and interdisciplinary assessment. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **19** | **WL GOAL 2** | Ensure optimum populations and a natural abundance and diversity of wildlife resources on public lands by restoring, maintaining, and enhancing habitat conditions. | Same as Alternative A. | Same as Alternative B. |
| **20** | **WL GOAL 3** | Determine the status and trends in selected indicators of the condition of BLM-administered lands to allow managers to make informed decisions and work more effectively with other agencies and individuals for the benefit of wildlife resources. | Determine the status and trends in selected indicators of the habitat condition of BLM-administered lands to allow managers to make informed decisions and work more effectively with other agencies and individuals for the benefit of wildlife resources. | Same as Alternative B. |
| **21** | **WL GOAL 4** | Provide early warning of abnormal conditions of selected resources to help develop effective mitigation measures and reduce costs of management. | Same as Alternative A. | Same as Alternative B. |
| **22** | **WL GOAL 5** | Provide data to better understand the dynamic nature and condition of BLM-administered lands and provide reference points for comparisons with other altered environments. | Same as Alternative A and in alignment with *Río Grande del Norte National Monument Science Plan* (BLM 2019). | Same as Alternative B. |
| **23** | **WL GOAL 6** | Provide data to meet certain legal and congressional mandates related to natural resource protection and public enjoyment. | Same as Alternative A. | Same as Alternative B. |
| **24** | **WL GOAL 7** | Provide a means of measuring progress toward performance goals. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **25** | **WL OBJECTIVE 1** | Restore, protect, and enhance the resources necessary for supporting native wildlife species and their associated habitats, including monitoring and maintenance of wildlife water developments to improve design and/or retire/relocate to appropriate sites. | Restore, protect, and enhance the resources necessary for supporting native wildlife species and their associated habitats, including monitoring and maintenance of wildlife water developments to improve design. | Same as Alternative B. |
| **26** | **WL OBJECTIVE 2** | Management priorities focus on big-game winter and summer ranges by protecting and improving approximately 50,000 acres in the Taos Plateau and Chama planning units. | In coordination, consultation, and cooperation with NMDGF, management priorities focus on maintaining and enhancing migration corridors, habitat connectivity, and important seasonal areas for big game by protecting and improving habitat within the entirety of the Monument. | Same as Alternative B. |
| **27** | **WL OBJECTIVE 3** | Manage sagebrush habitat, including mapping of current condition and extent of habitat for sagebrush-obligate species, to provide a range of self-sustaining sagebrush cover containing a variety of age classes and structures. | Same as Alternative A. | Same as Alternative B. |
| **28** | **WL OBJECTIVE 4** | Map and assess priority habitats for migratory birds in the Chama, Taos Plateau, Lower Gorge/Copper Hill, Ojo Caliente, and West Santa Fe planning units, and develop habitat-management recommendations and/or plans within 7 years after approval of the RMP. | Map and assess priority habitats for migratory birds in the Taos Plateau and Lower Gorge/Copper Hill planning units and develop habitat-management recommendations and/or plans within 7 years after approval of the Management Plan. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **29** | **WL OBJECTIVE 5** | Protect and improve big-game winter range in the Taos Plateau unit by managing for low road density in transportation plans, implementing vegetation treatments to increase structural and compositional diversity, and constructing projects to improve water availability and wildlife movement inside migratory corridors. | In accordance with IM-2023-005, Change 1 (Habitat Connectivity on Public Lands), consult with State fish and wildlife agencies and Tribes to assess habitat connectivity in order to manage as best as possible for intact, connected habitat. Proactively collaborate, coordinate, and consult with agencies, Tribal governments, universities, conservation partners and landowners to improve wildlife habitat and wildlife-habitat connectivity by removing unnecessary non-wildlife-friendly fencing and replacing it with wildlife-friendly or virtual fencing, as needed. Protect and improve big-game winter range in the Monument by managing for low road density in transportation plans, implementing vegetation treatments to increase structural and compositional diversity, and constructing projects to improve water availability and wildlife movement. Assess recreational uses, trends, impacts/wildlife conflicts, barriers, fragmentation, and barriers to movement. Work with partners and interested parties to facilitate passage of big-game animals and implement wildlife passages across highways that create barriers to wildlife movement within the Monument. Support | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | | NMGFD and New Mexico Department of Transportation (NMDOT) efforts to implement project recommendations and wildlife-corridor projects identified in the *Wildlife Corridors Action Plan* (NMDOT 2022) and Secretarial Order 3362. | |
| **30** | **WL OBJECTIVE 6** | Determine long-term trends in vegetation species composition, distribution, abundance, and community structure (e.g., cover and density by height class of woody species) of selected plant communities for focal wildlife species. | Determine long-term trends in vegetation species composition, distribution, abundance, and community structure (e.g., cover and density by height class of woody species) of terrestrial and riparian plant communities for wildlife species in the Monument. Assess forage resource quality, quantity, distribution, and abundance of ecologically rare habitat resource types. | Same as Alternative B. |
| **31** | **WL OBJECTIVE 7** | Determine long-term trends in species composition and abundance of native and nonnative migratory birds. | Same as Alternative A. | Same as Alternative B. |
| **32** | **WL OBJECTIVE 8** | Improve understanding of breeding bird–habitat relationships and the effects of management actions, such as invasive plant and animal control, by compiling existing data and/or researching the effects of these management actions on changes in bird species composition and abundance in relation to changes in specific habitat variables. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **33** | **WL OBJECTIVE 9** | Determine long-term trends in the distribution and abundance of bats in the Monument. | Same as Alternative A. | Same as Alternative B. |
| **34** | **WL OBJECTIVE 10** | Determine long-term trends in the distribution and abundance of prairie dogs in the Monument. | Same as Alternative A. | Same as Alternative B. |
| **35** | **WL OBJECTIVE 11** | Determine long-term trends in the distribution and abundance of river otters in the Rio Grande or any other areas of relocation, as appropriate. | Same as Alternative A. | Same as Alternative B. |
| **36** | **WL OBJECTIVE 12** | Use imagery or other techniques to estimate trends in the areal extent and configuration of land-cover types in the planning area. | Same as Alternative A. | Same as Alternative B. |
| **37** | **WL OBJECTIVE 13** | Determine annual nesting success of breeding raptors on BLM-administered lands as measured by territories occupied, number of chicks produced, and number of chicks fledged. | Same as Alternative A. | Same as Alternative B. |
| **38** | **WL OBJECTIVE 14** | Determine annual status and trends in prey base for raptor species in the Taos Plateau, as measured by abundance and species composition of small mammals and rodents. | Same as Alternative A. | Same as Alternative B. |
| **39** | **WL OBJECTIVE 15** | N/A | Protect wildlife habitat, including migratory and stopover habitat, and important seasonal ranges, and maintain landscape connectivity for native wildlife. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **40** | **WL OBJECTIVE 16** | N/A | Identify, conserve, and restore priority habitats and areas of habitat connectivity, | Same as Alternative B. |
| **41** | **WL OBJECTIVE 17** | N/A | Consider areas of habitat connectivity in planning efforts to inform land-use decisions and guide project implementation. Review existing decision records and spatial data to identify priority habitats and areas of habitat connectivity for inclusion in a BLM standardized national habitat-connectivity dataset. | Same as Alternative B. |
| **42** | **WL OBJECTIVE 18** | N/A | Minimize stress and disturbance to migratory birds during the primary nesting season in association with any surface-disturbing activity or occupancy within priority habitats. | Same as Alternative B. |
| **43** | **WL OBJECTIVE 19** | N/A | Monitor and protect known nesting sites according to USFWS recommendations and the Survey Protocol for the *Western Distinct Population Segment of the Yellow-Billed Cuckoo* (Halterman et al. 2016). | Same as Alternative B. |
| **44** | **WL OBJECTIVE 20** | N/A | Monitor and protect known nesting sites according to USFWS recommendations and the *Recovery Plan for the Southwestern Willow Flycatcher* (USFWS 2002). | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **45** | **WL OBJECTIVE 21** | N/A | As required by the ESA, monitoring would be required on listed and nonlisted Special Status Species and their habitat that may be affected by agency authorization of any activities within that habitat. | Same as Alternative B. |
| **46** | **WL Management Action 1** | Consider areas for introduction, augmentation, or reestablishment of fish and wildlife species, as consistent with NMDGF plans | Consider areas for introduction, augmentation, or reestablishment of fish and wildlife species, as consistent with NMDGF plans. Work with NMDGF and USFWS to support monitoring, augmentation, and reintroduction efforts for native fish and wildlife species and desired nonnative fish species. | Same as Alternative B. |
| **47** | **WL Management Action 2** | Wildlife habitat improvement projects would continue to be planned and implemented throughout the Taos Plateau. | Same as Alternative A. | Same as Alternative B. |
| **48** | **WL Management Action 3** | Wildlife habitat would be protected or enhanced by conforming to the *Standards for Public Land Health and Guidelines for Livestock Grazing Management in New Mexico* (BLM 2001a), allotment-management plans, and cooperative agreements. | Wildlife habitat would be protected or enhanced by conforming to the *Standards for Public Land Health and Guidelines for Livestock Grazing Management in New Mexico*, allotment-management plans, cooperative agreements, and coordination with grazing permittees and NMDGF. | Same as Alternative B. |
| **49** | **WL Management Action 4** | Wildlife habitat–improvement projects would continue to be planned and implemented. Water availability and distribution would be improved accordingly, per the *San Antonio/Pot Mountain Habitat* | Wildlife habitat–improvement projects would be considered on a case-by-case basis. In addition, an assessment would be made on wildlife use of and dependence on playas. The BLM would continue to | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | *Management Plan* (HMP): For big game, have at least one adequate water source per 2 square miles; pronghorn would require one water source per 4 square miles. In turkey and other small-game areas, have at least one adequate water source per .05 mile. Stabilize water flows. Increase the number, size, and depth of water improvements. Develop upland water at higher elevations to reduce utilization of key species in riparian zones. In addition, an assessment would be made on wildlife use of and dependence on playas. The BLM would continue to cooperate and collaborate with Federal, Tribal State, and Tribal wildlife-management agencies and private landowners to improve habitat for wildlife and would continue to implement existing activity-level plans to improve wildlife habitat, including the *San Antonio/Pot Mountain HMP*, *The Rio Grande Corridor Final Plan and Record of Decision* (BLM 2000a) and the *Riparian and Aquatic HMP* (BLM 2000b). | cooperate and collaborate with Federal, State, and Tribal wildlife-management agencies and private landowners to improve habitat for wildlife and would continue to implement existing activity-level plans to improve wildlife habitat, including the *San Antonio/Pot Mountain HMP*, the *Final Rio Grande Corridor Plan,* and the *Riparian and Aquatic HMP*, to be consistent with the Monument's objects and values. | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **50** | **WL Management Action 5** | Biotic and other public land-health standards would be attained through management emphasis placed on key habitats identified by the NMDGF's *State Wildlife Action Plan* (SWAP) and through continued implementation of existing HMPs and other plans, development of new HMPs—as might be developed for portions of the Taos Plateau—and management protection afforded by the Taos Plateau ACEC. | Biotic and other public land-health standards would be attained through management emphasis placed on key habitats identified by the NMDGF's SWAP and through continued implementation of existing HMPs, other plans, and development of new HMPs. | Same as Alternative B. |
| **51** | **WL Management Action 6** | No livestock conversions from cattle to domestic sheep or goats would be allowed in allotments in occupied bighorn sheep habitat because of the potential for transmission of disease and subsequent mortality of bighorn sheep. New sheep and goat allotments, or conversions from cattle to sheep or goats, would be permitted a minimum of 9 air miles from known bighorn sheep habitat. This distance would be greater if deemed necessary through site-specific analysis or a cooperative agreement with other Federal or State agencies. | Same as Alternative A. | Same as Alternative B. |
| **52** | **WL Management Action 7** | To prevent competition for forage with resident pronghorn, elk, and other wildlife species of special emphasis in the Taos Plateau planning unit, livestock grazing would be unavailable in the portions | Same as Alternative, except that the BLM would consider utilizing domestic livestock grazing as a vegetation-management and -maintenance tool, to promote seed propagation, reduce "wolfy" | To prevent competition for forage with resident pronghorn, elk, and other wildlife species of special emphasis in the Taos Plateau planning unit, livestock grazing would be unavailable in the portions |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | of Ute Mountain acquired in 2003 and 2005. After consultation with adjacent private landowners in this area regarding vegetation treatments, it has been determined that wildlife displaced from public lands onto adjacent agricultural lands results in a negative impact on private landowners. Therefore, establishing a noncompetitive forage base for wildlife in the Ute Mountain area would benefit wildlife and minimize impacts on adjacent landowners. Any additional animal unit months (AUMs) for grazing in the Taos Plateau planning unit would be apportioned to either wildlife or livestock, based on site-specific conditions, including, but not limited to, Special Status Species or wildlife habitat and watershed conditions. | caespitose grasses, and promote new growth to be utilized by wildlife, particularly in the seeded portion of the Ute Mountain area, north of the wilderness boundary. | of Ute Mountain acquired in 2003 and 2005. After consultation with adjacent private landowners in this area regarding vegetation treatments, it has been determined that wildlife displaced from public lands onto adjacent agricultural lands results in a negative impact on private landowners. Therefore, establishing a noncompetitive forage base for wildlife in the Ute Mountain area would benefit wildlife and minimize impacts on adjacent landowners. Any additional AUMs for grazing in the Taos Plateau planning unit would be apportioned to either wildlife or livestock, based on site-specific conditions, including, but not limited to, Special Status Species or wildlife habitat and watershed conditions.<br>To promote seed propagation, reduce "wolfy" caespitose grasses reduce undesired grasses, and promote new forage growth for wildlife utilization, the BLM would allow consideration of livestock grazing as a vegetation-management and -maintenance tool in the area north of the Cerro del Yuta Wilderness boundary (see Appendix B, Map B.2) The BLM would determine design features and monitoring of this treatment through implementation-level site-specific National Environmental |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | | | Policy Act (NEPA) analysis and Section 106 of the NHPA compliance process. |
| **53** | **WL Management Action 8** | To allow wildlife passage, fences would be built to standard BLM wildlife specifications, with the exception of fences built specifically to keep native ungulates out of an area (i.e., forage-monitoring plots). Fences identified as barriers to wildlife movement would be considered for removal or reconstruction. In addition, the BLM would seek to acquire State or private lands within 5 miles of the Rio Grande if acquisition would provide protection to Rocky Mountain bighorn sheep habitat. | To allow safe wildlife passage, newly constructed fences would be built to BLM wildlife-friendly specifications, with the exception of fences built specifically to keep native ungulates out of an area (i.e., forage-monitoring plots). As funding allows, existing fences identified as barriers to wildlife movement would be modified, replaced, or removed. In addition, the BLM would seek to acquire State or private lands within 5 miles of the Rio Grande if acquisition would provide protection to Rocky Mountain bighorn sheep habitat. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **54** | **WL Management Action 9** | Transportation plans would consider opportunities to reduce fragmentation in the Taos Plateau and Lower Gorge ACECs. Determining the existing degree of habitat fragmentation would provide an accurate baseline against which to assess the potential impact of travel management decisions and assist in developing a Travel Management Plan (TMP) that can provide a road network that would preserve or create sufficient core habitat and linkages to support wildlife. In elk winter range and migratory corridors, road densities managed for 0.5 mile per square mile would reduce disturbance to these species during critical periods. Within a 0.25-mile buffer along the Rio Grande, where roads or trails may affect bighorn sheep, actions would be implemented to prevent or minimize disturbance to bighorn sheep. | Transportation plans would consider opportunities to reduce fragmentation in the Monument by closing unnecessary, redundant, and user-created roads and trails. Determining the existing degree of habitat fragmentation would provide an accurate baseline against which to assess the potential impact of travel management decisions and assist in developing a TMP that can provide a road network that would preserve or create sufficient core habitat and linkages to support wildlife. The entirety of the Taos Plateau would be considered as a migration corridor for big-game summer and winter ranges as well as important seasonal ranges. Within a 0.25-mile buffer along the Rio Grande Gorge (including the John Dunn Bridge [JDB] area), where roads or trails may affect bighorn sheep and raptor nesting, actions would be implemented to prevent or minimize disturbance to bighorn sheep and raptors. | Same as Alternative B. |
| **55** | **WL Management Action 10** | The BLM would ensure that off-highway vehicle (OHV) route designations are located to minimize harassment of wildlife or significant disruption of wildlife habitats. When data becomes available, BLM-administered lands | Habitat would be considered on a landscape scale, and, when data becomes available, BLM-administered lands would be managed to consider the relationship between large wildlife populations and smaller, isolated | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | would be managed to consider the relationship between large wildlife populations and smaller, isolated populations whenever possible. The intent would be to maintain the function and diversity of all habitats in large areas, or patches, across the landscape and minimize long-term human disturbance to wildlife to provide for movement, dispersal, and home ranges. In the context of wildlife habitat fragmentation, the size of the patch would be relative to the size of the BLM parcel(s) and adjacent landowner status (Federal, State, or private lands). | populations whenever possible. All roads and trails would be located to minimize harassment of wildlife or significant disruption of wildlife habitats. Specific strategies would be developed to reduce or eliminate potential conflicts between raptors and other resource uses; these strategies would apply to BLM and applicant-generated proposals. OHV use would be located to avoid important nesting, roosting, or foraging habitat for raptors. OHV use would be limited to designated roads, per Presidential Proclamation 8946. When proposals for OHV events are received, the area affected that would be affected would be surveyed by a qualified wildlife biologist to determine whether it is utilized by raptors. Potential conflicts would be identified and either avoided or mitigated prior to the issuance of any permit. Development of trails near raptor-nesting areas would be avoided. Rock-climbing activities would be authorized only in areas where there were no conflicts with cliff-nesting raptors. Dispersed recreation would be monitored to identify where these uses may be affecting nesting success of raptors. | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **56** | **WL Management Action 11** | Timing restrictions would be applied to surface-disturbing activities in priority species' Critical Habitat to avoid or minimize disturbance during their seasons of use, particularly the breeding and winter season. The critical wildlife habitat and time periods to which the restrictions would apply are elk, mule deer, pronghorn, and bighorn sheep critical winter habitat (i.e., January 1–April 30), and bighorn sheep–calving range/habitat (i.e., May 1–June 30). Restrictions would also apply to pronghorn fawning areas from May 1 to July 15. Exceptions to these timing restrictions may be granted by the authorized officer as new data become available or if warranted by seasonal conditions. | Same as Alternative A, except that timing restrictions would be applied to surface- and habitat-disturbing activities (including disturbances from noise) in priority species' Critical Habitat[1] to avoid or minimize disturbance during their seasons of use, particularly the breeding and winter season. To maintain the integrity of wildlife habitat and known nest sites, BMPs, buffer zones, and seasonal restrictions for recreational use would be applied to avoid, minimize, or otherwise mitigate wildlife and seasonal recreational activities BMP. | Same as Alternative B. |

[1] *Priority species* are fish and wildlife species requiring protective measures and management guidelines to ensure their perpetuation. *Critical Habitat* in this context means habitat determined to be essential to these species' life cycles.

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **57** | **WL Management Action 12** | Portions of the Taos Plateau and Lower Gorge ACECs, where seasonal critical ranges or migratory corridors for big game are present (including the Rio Grande for bighorn sheep), contain habitat where these timing restrictions may be applied. Potential uses that may be restricted include actions related to transportation, recreation, solid- and fluid-mineral development, livestock grazing, and land-use authorizations. | Same as Alternative A. | Same as Alternative B. |
| **58** | **WL Management Action 13** | To protect golden eagles (*Aquila chrysaetos*), peregrine falcons (*Falco peregrinus*), prairie falcons (*Falco mexicanus*), other raptor species, and mountain plover (*Charadrius montanus*), spatial and timing restrictions would be applied to surface-disturbing activities. Prior to surface-disturbing activities, surveys would be conducted in potential nesting habitat to identify any active nests (i.e., any nest occupied in the past 7 years). Spatial and seasonal buffers are based on the best-available recommendations for protecting nesting birds under a wide range of activities. However, they are necessarily site-specific to proposed projects. When determining site-specific buffers, a | Same as Alternative A, except that during the primary nesting season for migratory birds (May 1–July 31), surface-disturbing activities and vegetation-altering projects would be avoided or minimized in priority migratory-bird habitat. Surveys for nesting birds may be required during this timing restriction. Adaptive management would be applied to adjust the dates for the primary nesting season, if necessary. | Same as Alternative B, except that the red-tailed hawk seasonal buffer (February 1–July 15) would be 0.25 mile. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | BLM wildlife biologist would evaluate the type and duration of the proposed activity, the position of topographic and vegetative features, the sensitivity of the affected species, the habituation of breeding pairs to existing activities in the proposed project area, and the local nesting density. The BLM would informally coordinate with USFWS and State agencies whenever a site-specific analysis showed that an action may have an adverse impact on nesting birds. The coordination would determine if the impact could be avoided or must be otherwise mitigated and, if so, determine appropriate and effective mitigation strategies. In general, the following species would have spatial and seasonal buffers applied accordingly.<br>• **Bald eagle**: 0.5-1.0 mile (January 1–August 31)<br>• **Golden eagle**: 0.5 mile (January 1–August 31)<br>• **Peregrine falcon**: 1.0 mile (February 1–August 31)<br>• **Prairie falcon**: 0.5 mile (April 1–August 31)<br>• **Osprey**: 0.25 mile (April 1–August 31)<br>• **Cooper's hawk**: 0.25 mile (March 15–August 31) | | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | • **Northern goshawk**: 0.5 mile (March 1–July 31)<br>• **Red-tailed hawk**: 0.125 mile (February 1–July 15)<br>• **Ferruginous hawk**: 1.0 mile (February 1–July 15)<br>• **Mountain plover**: 1.0 mile (March 1–August 1)<br>Long-term projects would avoid active nests by implementing the abovementioned species-specific distances.<br>These restrictions may be adjusted or waived if impacts can be adequately mitigated, based on a site-specific evaluation by the authorized officer. Short-duration activities (i.e., those that would begin outside of a given breeding season and end prior to the next breeding season) would avoid active nests by these distances during the respective seasonal periods. These restrictions may be adjusted or waived if impacts can be adequately mitigated, based on a site-specific evaluation by the authorized officer. In addition, greater species-specific restrictions may be applied to wind-energy projects. | | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **59** | **WL Management Action 14** | Prior to surface-disturbing activities, surveys would be conducted in potential black-tailed prairie dog habitat to identify any occupied prairie dog towns. Long-duration activities would avoid occupied towns by 0.25 mile. Short-duration activities (i.e., those that would begin outside of a given breeding season and end prior to the next breeding season) would avoid occupied towns by 0.25 mile between April 1 and September 15. These restrictions may also be adjusted or waived if impacts can be adequately mitigated, based on a site-specific evaluation by the authorized officer. | No similar action. Black-tailed prairie dogs do not occur in the Monument. Refer to Section C.2.4, *Special Status Species*, *Management Action 10*, for Gunnison's prairie dog management. | Same as Alternative B. |
| **60** | **WL Management Action 15** | Management would emphasize protecting and restoring special habitat components or features that contribute to the conservation of bat species. These features include, but are not limited to, caves, cliffs, riparian areas, wetlands, snags, and downed wood. Caves would be surveyed and assessed for bat use. Areas within 200 yards of features found to support significant bat populations would be closed to any surface-disturbing activities (this limitation would not apply to maintenance of existing infrastructure, such as roads and other developments). Bat gates or | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | other suitable measures would be used to protect bat habitat when significant bat use of caves is determined. Public health and safety would take precedence over protection of bat habitat if hazardous mine openings could not be remediated with installation of bat gates. Efforts would be made to safely remove resident bats prior to closure. Because it has been determined that the Black Rock Springs cave does not contain significant bat habitat, this cave would not be closed for bat protection purposes. | | |
| **61** | **WL Management Action 16** | Noise disturbance and management activities would be avoided or minimized within one mile of raptor nests during the nesting and brood rearing period. Unoccupied raptor nests would be protected from removal or destruction, including year-round protection of a 0.25-mile buffer of suitable habitat around any known occupied and unoccupied nests. | Same as Alternative A. | Noise-disturbance and management activities would be avoided or minimized up to 1 mile of raptor nests (species dependent) during the nesting and brood-rearing period. Unoccupied raptor nests would be protected from removal or destruction, including year-round protection of a 0.25-mile buffer of suitable habitat around any known unoccupied nests.<br>The BLM would practice adaptive management with this determination, if circumstances were to change. |

## C.2.4 Special Status Species

General management guidance from the 2012 Taos RMP for Special Status Species would apply for all alternatives, unless noted differently below (see BLM 2012:18–19).

**Table C-5. Comparison of Alternatives: Special Status Species**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **SSS GOAL 1** | Prevent the Federal listing of federally Proposed and BLM Sensitive Species, which include both Federal Candidate species and delisted species within 5 years of delisting, through management prescriptions that would conserve, enhance, or restore habitat and minimize adverse effects from actions. | Reduce the likelihood and need for the Federal listing of federally Proposed and BLM Sensitive Species, which include both Federal Candidate species and delisted species within 5 years of delisting, through management prescriptions that would conserve, enhance, or restore habitat, and minimize adverse effects from actions. | Same as Alternative B. |
| 2 | **SSS GOAL 2** | Facilitate the delisting of existing Special Status Species so that their populations and the habitat on which they depend are restored to the point where the provisions of the ESA are no longer necessary. | Same as Alternative A. | Same as Alternative B. |
| 3 | **SSS GOAL 3** | Minimize or eliminate threats affecting BLM Sensitive Species and improve conditions of the species habitat, including ecosystem management and conservation of native biodiversity to reduce the chance of native species requiring BLM Sensitive Species status. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **4** | **SSS OBJECTIVE 1** | Achieve no-net loss of Special Status Species habitats. | Determine appropriate measures to avoid and minimize effects on Special Status Species and their habitats. | Determine appropriate measures to avoid Special Status Species and their habitats. When avoidance is not possible, determine measures to minimize effects on Special Status Species and their habitats. |
| **5** | **SSS OBJECTIVE 2** | Determine long-term trends in distribution, abundance, and threats or other limiting factors of selected Special Status Species on BLM-administered lands, and evaluate the significance of those lands in the conservation of the species. | Same as Alternative A. | Same as Alternative B. |
| **6** | **SSS OBJECTIVE 3** | Ensure compliance with the statutory requirements of the ESA. | Same as Alternative A. | Same as Alternative B. |
| **7** | **SSS OBJECTIVE 4** | Incorporate BMPs, standard operating procedures, conservation strategies and measures, and design criteria to mitigate specific threats during planning and implementation, including the use of *Standards for Public Land Health and Guidelines for Livestock Grazing Management in New Mexico* (BLM 2001a) until site-specific management plans or conservation strategies are developed. | Same as Alternative A. | Same as Alternative B. |
| **8** | **SSS OBJECTIVE 5** | Assist in the preparation and implementation of recovery or other Special Status Species management plans. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **9** | **SSS OBJECTIVE 6** | Monitor populations and habitats to ensure that objectives for Special Status Species–habitat development and protection are being met, including additional surveys for southwestern willow flycatcher. | Same as Alternative A. | Same as Alternative B. |
| **10** | **SSS OBJECTIVE 7** | Incorporate objectives and actions identified by the USFWS in authorized recovery plans into BLM plans and documents, as appropriate. | Same as Alternative A. | Same as Alternative B. |
| **11** | **SSS OBJECTIVE 8** | Conduct Special Status Species habitat inventories and studies to provide data for multiple-use planning, HMPs, and resolution of conflicts involving resource-development and protection activities. | Same as Alternative A. | Same as Alternative B. |
| **12** | **SSS OBJECTIVE 9** | Prepare and implement HMPs to address Special Status Species habitat development and protection needs, including riparian needs, giving priority to the Rio Grande corridor. | Same as Alternative A. | Same as Alternative B. |
| **13** | **SSS OBJECTIVE 10** | Monitor habitat management plans and/or cooperative agreements with other State, local or nongovernmental entities to determine whether positive changes in trends for habitat development and protection are being met in such plans or agreements. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **14** | **SSS OBJECTIVE 11** | Where feasible, acquire lands containing habitat for Special Status Species. | Same as Alternative A. | Same as Alternative B. |
| **15** | **SSS OBJECTIVE 12** | Cooperate with other Federal agencies to foster positive working relationships that promote the conservation of listed species. | Same as Alternative A. | Same as Alternative B. |
| **16** | **SSS OBJECTIVE 13** | Cooperate with State and local agencies, including participation on watershed councils and weed-management areas and coordination with State natural heritage programs and State wildlife agency strategic plans, providing technical assistance where possible. | Same as Alternative A. | Same as Alternative B. |
| **17** | **SSS OBJECTIVE 14** | Provide data to the BLM New Mexico State Office to assist with maintaining a current BLM Sensitive Species List. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **18** | **SSS Management Action 1** | Under the ESA, as amended, an *Endangered* species is an animal or plant species in danger of extinction throughout all or a significant portion of its range. A *Threatened* species is a species likely to become endangered within the foreseeable future throughout all or a significant portion of its range. A *Proposed* species is a species of animal or plant that is proposed in the *Federal Register* to be listed under Section 4 of the ESA, whereas a *Candidate* species is one about which the USFWS (or the National Oceanic and Atmospheric Administration's Fisheries Service) has sufficient file information regarding its biological vulnerability and threats to support a proposal for listing as Endangered or Threatened. | Same as Alternative A. | Same as Alternative B. |
| **19** | **SSS Management Action 2** | The BLM maintains a list of Special Status Species that includes species listed or proposed for listing under the ESA and species requiring special management consideration to promote their conservation and reduce the likelihood and need for future listing under the ESA. These latter are designated as BLM Sensitive Species by the respective State Director. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **20** | **SSS Management Action 3** | The BLM would protect federally listed species by requiring site-specific evaluations and clearances and applying more-stringent management prescriptions in areas that have been specially designated to protect target species. Any action that may affect federally listed species and/or their designated Critical Habitat requires consultation with the USFWS under Section 7 of the ESA. Commitments to avoid adverse impacts on BLM Special Status Species are met by applying appropriate stipulations (e.g., timing, seasonal, or spatial restriction or site-specific limitations) or by not authorizing the action altogether. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **21** | **SSS Management Action 4** | The BLM would continue to collaborate with Federal, State, and local governments, Tribal governments, and landowners to manage BLM Special Status Species' habitats. Management prescriptions would be attached to authorized actions to minimize negative effects. Where possible, habitats for species listed as Proposed, Threatened, or Endangered by the USFWS, habitat designated as critical by the USFWS, and species listed by the BLM State Director or BLM Manual 6840 as sensitive species would be enhanced. | Same as Alternative A. | Same as Alternative B. |
| **22** | **SSS Management Action 5** | The BLM would implement recovery activities for listed species by complying with and adopting current and future recovery plans developed by USFWS, such as the *Recovery Plan for the Southwestern Willow Flycatcher* (USFWS 2002), and manage habitat for BLM sensitive terrestrial and aquatic species in a manner consistent with future restoration and conservation agreements. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **23** | **SSS Management Action 6** | Populations of Special Status Species would be monitored to assess their abundance and trend. Field inspections would be conducted to identify Special Status Species' habitat prior to authorizing surface-disturbing activities. Waivers for on-the-ground inventory may be granted in areas determined to have low potential based on previous research. | Same as Alternative A. | Same as Alternative B. |
| **24** | **SSS Management Action 7** | Management prescriptions and restrictions described in *The Rio Grande Corridor Final Plan and Record of Decision* (BLM 2000a) and the *Riparian and Aquatic HMP* (BLM 2000b) that improve or protect habitat for other species would continue to be implemented. | Same as Alternative A. | Same as Alternative B. |
| **25** | **SSS Management Action 8** | As part of the NEPA process, Special Status Species habitat would be evaluated to reduce potential impacts, as identified, to assure compatibility of projects with management objectives for wildlife habitat, including stipulations for conservation strategies and measures, design criteria, seasonal, spatial, and timing restrictions, mitigation, and/or appropriate BMPs. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **26** | **SSS Management Action 9** | To protect southwestern willow flycatcher habitat, shoreline access is restricted in designated areas and closed on selected side channels in the Orilla Verde Recreation Area. In addition, approximately 1.5 miles (totaling 1.4 acres) of riparian habitat is closed to vehicle use, whereas the recreation area is closed to new rights of way (ROWs)—except for underground utilities and NMDOT road-maintenance activities—livestock grazing, mineral material development, and mining.<br>Additional roads throughout the planning area may be closed permanently or seasonally, relocated, maintained, and/or designed to reduce sedimentation and restore or maintain Special Status Species habitat. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **27** | **SSS Management Action 10** | Prior to surface-disturbing activities, surveys would be conducted in potential Gunnison prairie dog habitat to identify any occupied prairie dog towns. Long-duration activities would avoid occupied towns by 0.25 mile. Short-duration activities (i.e., those which would begin outside of a given breeding season and end prior to the next breeding season) would avoid occupied towns by 0.25 mile between April 1 and September 15. These restrictions may also be adjusted or waived if impacts can be adequately mitigated, based on a site-specific evaluation by the authorized officer. | Prior to surface-disturbing activities, surveys would be conducted in potential Gunnison and other prairie dog habitat to identify any burrows occupied by prairie dogs and/or burrowing owls. Long-duration activities would avoid occupied towns by 0.25 mile. Short-duration activities (i.e., those which would begin outside of a given breeding season and end prior to the next breeding season) would avoid occupied towns by 0.25 mile between April 1 and September 15. These restrictions may also be adjusted or waived if impacts can be adequately mitigated, based on a site-specific evaluation by the authorized officer. | Same as Alternative B. |
| **28** | **SSS Management Action 11** | Where Santa Fe cholla and grama grass cactus are known to occur, habitat would be inventoried, monitored, and protected from surface-disturbing activities. Lands would be retained where these species are found to exist. | Where special status plant species are known or have the potential to occur, habitat would be inventoried, monitored, and protected from surface-disturbing activities. Lands would be retained where these species are found to exist. | Same as Alternative B. |

## C.2.5 Geology

The 2012 Taos RMP (BLM 2012) did not provide management guidance for geological resources. However, general management is broadly analogous to those described for paleontological resources (BLM 2012:15–16). For the protection of Monument objects relating to geological resources, management direction is proposed under Alternative B below.

**Table C-6. Comparison of Alternatives: Geology**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **GEO GOAL 1** | N/A | Identify, protect, and preserve the geological objects for which the Monument was designated, including hot springs and lava tubes. | Identify, protect, and preserve the geological objects for which the Monument was designated, including hot springs and lava tubes.<br>Evaluate impacts on and threats to geological features, including springs, playas, lava tubes, and other objects of historic or scientific interest. Identify and pursue actions for their protection during implementation-level planning. |
| 2 | **GEO GOAL 2** | N/A | Promote the interpretation and scientific research of geological resources in the Monument. | Same as Alternative B. |
| 3 | **GEO GOAL 3** | N/A | Support public awareness and interest in geology through interpretive programs and educational opportunities. | Same as Alternative B. |
| 4 | **GEO OBJECTIVE 1** | N/A | Map geological features, including springs, playas, lava tubes, and other features of interest, and monitor their conditions for the identification and resolution of any conflicts. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **5** | **GEO OBJECTIVE 2** | N/A | Provide maps and interpretation of geological resources through interpretive sites, tours, the availability of published materials, and other public outreach programs. | Same as Alternative B. |
| **6** | **GEO OBJECTIVE 3** | N/A | Evaluate and monitor groundwater for quality, volume, and changes as a component of geological resources. | Same as Alternative B. |
| **7** | **GEO Management Action 1** | No similar action. | Apply existing constraints on development from the 2012 Taos RMP and Presidential Proclamation 8946 relating to mineral withdrawal, solar/wind ROW exclusions, and recreation-area restrictions on surface-disturbing activities to protect geological objects. Implement case-by-case evaluations and site-specific NEPA analysis in the review of surface-disturbing activities to determine whether geological objects would be affected. The BLM would prioritize the preservation and protection of geological objects from surface-disturbing activities, while allowing for recreation/visitation. | Same as Alternative B. |

## C.2.6 Soils

General management guidance from the 2012 Taos RMP for Soils would apply for all alternatives unless noted differently below (see BLM 2012:16).

**Table C-7. Comparison of Alternatives: Soils**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **1** | **SOL GOAL 1** | Maintain or improve soil health by preventing or minimizing soil erosion and compaction. | Same as Alternative A. | Same as Alternative B. |
| **2** | **SOL GOAL 2** | Prevent or minimize threats to public health and safety, damages to natural site characteristics, or economic losses resulting from accelerated runoff and erosion. | Same as Alternative A. | Same as Alternative B. |
| **3** | **SOL GOAL 3** | N/A | Protect and restore biological soil crusts to prevent damage to and degradation of soil resources. | Same as Alternative B. |
| **4** | **SOL GOAL 4** | Prevent impairment of soil productivity resulting from accelerated loss or physical/ chemical degradation. | Same as Alternative A. | Same as Alternative B. |
| **5** | **SOL GOAL 5** | N/A | Pursue agreements with external agencies to promote research, share data, and better understand soil resources within the Monument. | Same as Alternative B. |
| **6** | **SOL GOAL 6** | N/A | Over the life of the plan, update ecological site descriptions, associated data, and mapping for soil resources. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **7** | **SOL GOAL 7** | N/A | Promote scientific research on soil resources throughout the planning area, focusing on areas tied to Monument objects, such as playas. | Same as Alternative B. |
| **8** | **SOL OBJECTIVE 1** | Over the life of the plan, begin restoration of all areas identified as having impaired soils within 5 years of assessment. | Over the life of the plan, begin restoration of all areas identified as having impaired soils, including biological soil crusts, within 5 years of assessment. | Same as Alternative B. |
| **9** | **SOL OBJECTIVE 2** | Over the life of the plan, prevent any increases in acreage of impaired soils resulting from management activities. | Same as Alternative A. | Same as Alternative B. |
| **10** | **SOL OBJECTIVE 3** | Manage all projects and authorized activities to maintain or improve soil conditions. | Same as Alternative A. | Same as Alternative B. |
| **11** | **SOL OBJECTIVE 4** | N/A | For the purposes of coordinated soil resource management, continue pursuing cooperative agreements with external agencies to share data, update ecological site descriptions and soil surveys, and employ new technologies, such as digital soil mapping and remote-sensing tools. Emphasize research, surveys, and mapping that build understanding and improves management of soil resources and biological soil crusts. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **12** | **SOL Management Action 1** | Many Federal laws and Executive Orders affect soil management because soil resources are fundamental to all other resources and resource uses. Guidance for management of soil resources is published in BLM Manuals 7000–7100. Primary authority for management includes the Taylor Grazing Act and the Public Rangelands Improvement Act, both of which address use of Federal rangelands, including assessment, conservation, and improvement of soil resources. | Same as Alternative A. | Same as Alternative B. |
| **13** | **SOL Management Action 2** | The Clean Water Act indirectly affects soil management by controlling the release of nonpoint sources of pollution, such as sedimentation caused by erosion. The U. S. Department of Agriculture is responsible for development of soil surveys, which the BLM uses to determine soil types and characteristics when assessing management actions. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **14** | **SOL Management Action 3** | The Taos Field Office monitors and assesses soil resource conditions, primarily through the range program, during reauthorization of livestock grazing permits. Project-level impacts on soils are assessed during the development of Environmental Impact Statements (EIS) or EAs for proposed projects and use authorizations. The soils program works to reduce impacts on soils and associated vegetation resources through allocation of uses, such as transportation and grazing, and mitigation of project impacts. The soils program also works with other programs to implement restoration projects. | Same as Alternative A. | Same as Alternative B. |
| **15** | **SOL Management Action 4** | Under the existing Riparian and Aquatic HMP and standards and guidelines for grazing, soils would be provided protection through vegetation management. | Same as Alternative A. | Same as Alternative B. |

## C.2.7 Vegetative Communities

General management guidance from the 2012 Taos RMP for Vegetative Communities would apply for all alternatives unless noted differently below (see BLM 2012:20–21).

**Table C-8. Comparison of Alternatives: Vegetative Communities**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| ***Vegetation – Riparian (VEGR)*** | | | | |
| **1** | **VEGR GOAL 1** | Provide for healthy watersheds and landscapes, sustained biological communities, and an improved understanding of ecosystems and resources through integrated interdisciplinary assessments. | Same as Alternative A. | Same as Alternative B. |
| **2** | **VEGR GOAL 2** | Provide for proper functioning condition (PFC) of vegetative communities by managing for viable and resilient native wildlife species and their associated habitats. | Provide for the proper functioning condition of all riparian vegetative communities by managing for viable and resilient native wildlife species and their associated habitats such that vegetation captures sediment, improves water quality, and allows for stable soils to store and release water slowly in appropriate systems. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **3** | **VEGR GOAL 3** | For riparian and wetland communities to move toward and/or remain in PFC such that riparian communities would be sustainable, provide physical stability and adequate habitat for a wide range of wildlife species, and support healthy, diverse, and abundant populations of fish and associated aquatic and riparian-dependent species. | For riparian and wetland communities to move toward and/or remain in PFC such that riparian communities would be sustainable, provide physical stability and adequate habitat for a wide range of wildlife species, provide habitat connectivity and movement corridors for riparian wildlife, and support healthy, diverse, and abundant populations of fish and associated aquatic and riparian-dependent species. | Same as Alternative B. |
| **4** | **VEGR OBJECTIVE 1** | Manage all riparian zones that have hydrophilic plant species as priority habitats. | Same as Alternative A. | Same as Alternative B. |
| **5** | **VEGR OBJECTIVE 2** | Manage riparian areas with an emphasis on protection and restoration, and focus treatments on reestablishment of willows and cottonwoods, as well as other riparian vegetation, to stabilize stream banks and promote sinuosity and width/depth ratios appropriate to the site. | Same as Alternative A. | Same as Alternative B. |
| **6** | **VEGR OBJECTIVE 3** | Give consideration to the restoration and protection of riparian areas as part of the BLM's decision-making process for land-use authorizations. | Prioritize the restoration and protection of riparian areas as part of the BLM's decision-making process for land-use authorizations. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **7** | **VEGR OBJECTIVE 4** | Monitor riparian areas and conduct rangeland health assessments to document progress toward achieving and maintaining PFC. | Monitor and conduct lotic/lentic Assessment, Inventory, and Monitoring (AIM) surveys in riparian areas, and conduct rangeland health assessments to document progress toward achieving and maintaining PFC. | Same as Alternative B. |
| **8** | **VEGR Management Action 1** | The BLM management decisions in riparian areas throughout the planning area would be guided by the Riparian and Aquatic HMP (BLM 2000b), *The Rio Grande Corridor Final Plan and Record of Decision* (BLM 2000a), the *Southwestern Willow Flycatcher Management Plan for the Taos Field Office* (BLM 1998), and the USFWS *Recovery Plan for the Southwestern Willow Flycatcher* (USFWS 2002). | Same as Alternative A. | Same as Alternative B. |
| **9** | **VEGR Management Action 2** | The BLM management decisions in riparian areas would be guided by the *Southwestern Willow Flycatcher Management Plan* for the Taos Field Office (BLM 1998), the USFWS *Recovery Plan for the Southwestern Willow Flycatcher* (USFWS 2002), and other plans referenced in the Taos RMP. | Same as Alternative A. | Same as Alternative B. |
| **10** | **VEGR Management Action 3** | Riparian and wetland areas would be assessed and monitored for PFC and other specific objectives by using appropriate stream-survey methodologies and protocols. Riparian areas functioning at risk would be high priority for | Same as Alternative A, except that lotic and lentic AIM data, benchmarks, PFC evaluations, Springs Stewardship Institute spring surveys, playa biological and hydrological functionality surveys, fish population surveys, | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | restoration. Restoration priorities include invasive vegetation species control and active restoration to allow native plants to re-establish and prosper, as well as restoring functionality to impaired riparian areas. | macroinvertebrate sampling, U.S. Geological Survey gage-flow data, rapid recreational surveys, water-level loggers, thermographs, and water quality data would be used to determine sites of potential degradation and priority restoration sites, document overall health and trends, and identify factors contributing to unacceptable conditions within management control. More-concerted efforts would be made to adapt management to address these factors and progress toward PFC, as documented by the more-robust surveys. Surveys should be conducted on a 3-year rotational basis. The BLM would encourage the public to protect riparian vegetation resources through interpretation, education, and outreach. Adaptive management would be applied to achieve riparian vegetation health priorities. | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **11** | **VEGR Management Action 4** | Using the *Standards for Public Land Health and Guidelines for Livestock Grazing Management*, along with ecological site descriptions, functionality would be assessed to determine whether goals were being met. Site-specific objectives and management strategies would be developed and applied through activity plans to meet the land-health standards and move toward riparian PFC. | Same as Alternative A. | Same as Alternative B. |
| **12** | **VEGR Management Action 5** | Actions designed to conserve or restore riparian ecosystem functionality can continue to be implemented. Projects identified within riparian areas—not related to conservation, restoration, or recreation—that may have a detrimental effect on riparian functionality would not be authorized. When projects cannot be located outside of riparian areas, short-term effects would be minimized by the use of BMPs, and long-term effects would be mitigated to recover the lost riparian functionality. | Actions designed to conserve or restore riparian ecosystem functionality can continue to be implemented. Actions identified within riparian areas—not related to conservation, restoration, or recreation—that may have a detrimental effect on riparian functionality would not be authorized. When projects cannot be located outside of riparian areas, short-term effects would be minimized by the use of BMPs, and long-term effects would be monitored and mitigated to recover the lost riparian function. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **13** | **VEGR Management Action 6** | Existing livestock exclosures along streams, wetlands, and riparian areas would continue to be maintained per the terms and conditions of existing cooperative agreements as long as necessary to meet management objectives and accomplish PFC. | Same as Alternative A, except that additional exclosures may be implemented as necessary for riparian, wetland, and watershed health and to protect critical wildlife habitat. | Existing livestock exclosures along streams, wetlands, and riparian areas would continue to be maintained per the terms and conditions of existing cooperative agreements as long as necessary to meet management objectives and accomplish PFC.<br>Additional exclosures may be implemented as necessary for riparian areas, wetlands, playas, and watershed health and to protect critical wildlife habitat or other Monument objects. |
| **14** | **VEGR Management Action 7** | All riparian areas within the planning area would be included within the Riparian and Aquatic HMP. *Wetlands* include both natural and intentionally created areas adjacent to and influenced by streams (perennial, ephemeral, and intermittent), springs, seeps, lake shores, marshes, wet meadows, and stock tanks and are identified using a three-parameter test that includes hydrology, soil, and vegetation indicators. *Riparian areas* are a form of transitional zone between permanently saturated wetlands and uplands. | All riparian areas within the planning area would be included within the Riparian and Aquatic HMP. *Wetlands* include both natural and intentionally created areas adjacent to and influenced by streams (perennial, ephemeral, and intermittent), springs, seeps, lake shores, marshes, wet meadows, and stock tanks and are identified using a three-parameter test that includes hydrology, soil, and vegetation indicators. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| ***Vegetation – Terrestrial (VEGT)*** | | | | |
| **15** | **VEGT GOAL 1** | Restore and/or maintain the health and productivity of public forests, including the support of watershed, wildlife, and other values, while providing for the use of forest and woodland resources. | Restore and/or maintain the health and productivity of public forests, including the support of watershed, wildlife, and other values, while providing for the personal, noncommercial use of forest and woodland resources, consistently with Proclamation 8946. | Same as Alternative B. |
| **16** | **VEGT GOAL 2** | Maintain and/or improve ecological site potential of woodland communities for sustainability and diversity. | Same as Alternative A. | Same as Alternative B. |
| **17** | **VEGT GOAL 3** | Manage upland vegetation communities, including a full range of herbaceous and shrub species, to move toward or remain in PFC. | Manage upland vegetation communities to meet or exceed New Mexico standards and guidelines for land health for upland sites and biotic communities, including providing for the persistence of a full range of native herbaceous and shrub species. | Same as Alternative B. |
| **18** | **VEGT GOAL 4** | Manage forest resources to provide a sustained flow of local economic benefits and protect nonmarket economic values. | Manage forest resources to provide for the sustained traditional collection of firewood, piñon nuts, and culturally/ traditional herbal plants for personal, noncommercial use, consistently with the purposes of Presidential Proclamation 8946. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **19** | **VEGT OBJECTIVE 1** | Manage forest types to contain healthy stands that combine for a diversity of age classes, densities, and structure, including dead and downed material. | Same as Alternative A. | Same as Alternative B. |
| **20** | **VEGT OBJECTIVE 2** | Inventory and manage old-growth structures in a sustainable manner. | Inventory and manage old-growth structures in a way that protects and maintains ecosystem services, habitat, biodiversity, and resources that meet human needs and safety. | Same as Alternative B. |
| **21** | **VEGT OBJECTIVE 3** | Manage forest types to contain healthy stands of site-appropriate species. | Same as Alternative A. | Same as Alternative B. |
| **22** | **VEGT OBJECTIVE 4** | Maintain or enhance communities of priority species or habitats to provide desired ecological functions and values. | Same as Alternative A. | Same as Alternative B. |
| **23** | **VEGT OBJECTIVE 5** | N/A | Utilize the terrestrial AIM program to assess current vegetative conditions, effectiveness of management activities, and authorizations of permitted uses per BLM Technical Note 453 (BLM 2020). | Same as Alternative B. |
| **24** | **VEGT Management Action 1** | Prohibit modification of playa surfaces and adjacent uplands. | Same as Alternative A. | Same as Alternative B. |
| **25** | **VEGT Management Action 2** | Vegetation transects may be used to determine total available forage. | Total available forage would be determined using best scientific methods used for evaluating vegetation conditions and considering livestock and wild ungulate usage. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **26** | **VEGT Management Action 3** | The BLM would implement vegetation-treatment actions to meet the resource goals and objectives identified in the land-use plan. The BLM would choose from various treatment methods, including unplanned natural fire and prescribed fire, herbicides, and mechanical, or a combination of the three, to accomplish work. | The BLM would implement vegetation-treatment actions to meet the resource goals and objectives identified in the land-use plan. The BLM would choose from various treatment methods, including unplanned natural fire and prescribed fire, herbicides, biological, and mechanical, or a combination of the four, to accomplish work. | Same as Alternative B. |
| **27** | **VEGT Management Action 4** | Vegetation-manipulation projects would be designed to minimize impacts on wildlife habitat and improve habitat when possible. Existing and developing old-growth forests would be retained and managed to reduce the potential effects of uncharacteristically severe natural disturbances, such as stand-replacing wildland fire and insect and disease epidemics.<br>The BLM would design fire restoration/rehabilitation standards on a case-by-case basis, ensuring that standards were compatible with landscape resource management objectives, long-term vegetation health protection, and fuel management.<br>Natural-disturbance regimes would be maintained or mimicked so that plant communities are resilient when periodic outbreaks of insects, disease, and wildland fire occur. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **28** | **VEGT Management Action 5** | Where restoration, rehabilitation, or reclamation efforts (including BLM-authorized actions, such as ROW implementation) require reseeding activities or use of other plant materials (e.g., potted plants. poles), nonnative plant species would be used only if native species were not readily available in sufficient quantities. Care would be taken in selecting nonnative species not likely to become invasive. If nonnative plant species were used or identified for use in restoration, rehabilitation, or reclamation projects, then the BLM, through the BLM's Plant Conservation Program and partner organizations, would work to identify and develop native replacements for the nonnative species. Additionally, seed mixes used in these actions would consist of the closest locally adapted selections, varieties, or cultivars of native species available to improve success of the seeding effort. | Where restoration, rehabilitation, or reclamation efforts (including BLM-authorized actions, such as ROW implementation) require reseeding activities or use of other plant materials (e.g., potted plants, poles), native plant species would be prioritized over similarly ecological-functioning nonnative and non-invasive species. Available native resources from BLM Seeds of Success program and the National Seed Warehouse would be considered. When available, seed mixes would consist of locally adapted selections, varieties, or cultivars of native species. Seed sources from lower elevations would be used when appropriate so that established plants would be resilient to climate change. | Where restoration, rehabilitation, or reclamation efforts (including BLM-authorized actions, such as ROW implementation) require reseeding activities or use of other plant materials (e.g., potted plants, poles), native plant species would be prioritized over similarly ecological-functioning nonnative and non-invasive species. Seed sources would be procured from native species that best match the existing environmental and climatic conditions of the site. Available native resources from BLM Seeds of Success program and the National Seed Warehouse would be considered. When appropriate, seed may be sourced from other sites using projected future climatic conditions following best-available science at the time. |
| **29** | **VEGT Management Action 6** | The BLM would design fire restoration/rehabilitation standards on a case-by-case basis, compatible with landscape resource-management objectives and long-term vegetation-health protection and fuel management. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **30** | **VEGT Management Action 7** | Prescribed burning would be used to treat forest, grassland, or shrubland vegetation types to move communities toward desired ecological conditions and PFC. If these habitat types were not in PFC as a result of management activities, then management would be modified to improve conditions. | Prescribed fire would be used to treat forest, grassland, or shrubland vegetation types to move communities toward desired ecological conditions and function. If these habitat types were not in desired ecological conditions and function, then management activities would be informed by best-available science. | Same as Alternative B. |
| **31** | **VEGT Management Action 8** | Grassland and shrubland vegetation types would be treated to remove conifer encroachment and move toward the more-desired ecological condition of open grasslands and shrublands with a low density of tree species.<br>Grasslands and shrublands would also be assessed to ensure that uplands are in properly functioning condition. If these habitat types were not in properly functioning condition as a result of management activities, then management would be modified to improve conditions. | Grassland and shrubland vegetation types would be treated to remove conifer encroachment and move toward the more-desired ecological condition of open grasslands and shrublands with a low density of tree species.<br>Grasslands and shrublands would also be assessed to ensure that uplands are in desired ecological condition and functionality. If these habitat types were not in desired ecological condition or function as a result of management activities, then treatments would be informed by best-available science to improve condition or functionality. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **32** | **VEGT Management Action 9** | All terrestrial vegetation management would follow the *Standards and Guidelines for Rangeland Health* per Handbook 4180-1 (BLM 2001b). | Same as Alternative A. | Same as Alternative B. |
| **33** | **VEGT Management Action 10** | Prescribed burning would be used to treat forest, grassland, or shrubland vegetation types. In grasslands or shrublands, prescribed burning would be used to kill encroaching conifers, remove dead finer fuels created by years of grass or shrub growth, and stimulate grass and shrub regrowth.<br>In forests, prescribed burning would be used to eliminate slash generated by mechanical treatments, thin understories, recycle nutrients, eliminate "ladder" fuels, and/or create and maintain a more savannah-like habitat in stands dominated by medium-and large-sized trees. | Prescribed burning would be used to treat forest, grassland, or shrubland vegetation types. In grasslands or shrublands, prescribed burning would be used to inhibit encroaching conifers, remove dead finer fuels created by years of grass or shrub growth, and stimulate grass and shrub regrowth.<br>In forests, prescribed burning would be used to eliminate accumulated heavy fuels (i.e., heavy dead and down, slash), thin under stories, recycle nutrients, eliminate "ladder" fuels, and/or create and maintain a more savannah-like habitat in stands dominated by medium- and large-sized trees. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **34** | **VEGT Management Action 11** | Changing grazing management or prescription grazing may also be used as a vegetative treatment. Management may include changing the season of use, the intensity of the use, or the kind of livestock. Grassland and shrubland vegetation types would be treated to remove conifer encroachment and move toward the more-desired ecological condition of open grasslands and shrublands with a low density of tree species. Grasslands and shrublands would also be assessed to ensure that uplands are in properly functioning condition. If these habitat types were not in properly functioning condition as a result of management activities, then management would be modified to improve conditions. | Changing grazing management or prescription grazing may also be used as a vegetative treatment. Management may include changing the season of use, the intensity of the use, or the kind of livestock. Grassland and shrubland vegetation types would be treated to remove conifer encroachment and move toward the more-desired ecological condition of open grasslands and shrublands with a low density of tree species. Grasslands and shrublands would also be assessed to ensure that uplands are desired ecological condition and function. If these habitat types were not in desired ecological condition and functionality as a result of management activities, then management would be modified to improve condition and function. | Same as Alternative B. |

## C.2.8 Visual Resources

General management guidance from the 2012 Taos RMP for visual resources would apply for all alternatives unless noted differently below (see BLM 2012:24–25).

**Table C-9. Comparison of Alternatives: Visual Resources**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **VRM GOAL 1** | Manage public lands in a manner that would maintain the overall visual quality of the area's cultural and natural open-space landscapes, undisturbed views, and other high-quality visual resources. | Same as Alternative A. | Same as Alternative B. |
| 2 | **VRM OBJECTIVE 1** | Visual resources would be managed according to the following objectives per visual resource management (VRM) class (*Visual Resource Inventory Handbook* H-8410-1; BLM 1986), where applicable:<br>• **Class I**: Preserve the existing character of the landscape. The level of change should be very low and must not attract attention.<br>• **Class II**: Retain the existing character of the landscape. The level of change should be low. Management activities may be seen, but should not attract the attention of the casual observer.<br>• **Class III**: Partially retain the existing character of the | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | landscape. The level of change should be moderate. Management activities may attract attention, but should not dominate the view of the casual observer.<br>• **Class IV:** Allow management activities requiring major modifications to the existing character of the landscape. The level of change may be high. Management activities may dominate the view. However, every attempt would be made to minimize the impact and aim to repeat the basic elements in the landscape. | | |
| **3** | **VRM Management Action 1** | The Taos Field Office would manage scenic quality and viewsheds according to the guidance and indicators presented in Handbook H-8410-1, *Visual Resource Inventory*. The handbook would continue to be used regarding all guidance and activities related to management of visual resources. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **4** | **VRM Management Action 2** | Steps in the contrast-rating process for projects adjacent to the Old Spanish National Historic Trail (OSNHT) should include selection of a key observation point from the trail and preparation of a viewshed analysis using geographic information system to determine visibility of a project from the trail. | Same as Alternative A. | Same as Alternative B. |
| **5** | **VRM Management Action 3** | VRM Classes would be applied to the following areas accordingly.<br>• Class I<br>– Rio San Antonio Wilderness and Cerro del Yuta Wilderness (25,741 acres)<br>– Rio Grande and Red River WSR corridors (Wild segment)<br>– Taos Valley Overlook area<br>– Lower Gorge ACEC (2,460 acres)<br>• Class II<br>– Taos Plateau ACEC (196,439 acres)<br>– Lower Gorge ACEC (18,760 acres)<br>• Class III<br>– 320 acres (applied to developed areas at Wild Rivers and the Taos Junction Bridge (TJB) and JDB areas)<br>See Map B.5, Appendix B. | • Manage 39,821 acres as VRM Class I on:<br>– Rio San Antonio Wilderness<br>– Cerro del Yuta Wilderness<br>– Rio Grande and Red River WSR corridors (wild segments)<br>– Taos Valley Overlook<br>– Lower Gorge area<br>• Manage 202,425 acres as VRM Class II.<br>– Exceptions to VRM Class II would be considered for solar-powered range improvements when this infrastructure is consistent with the proper care and management of Monument objects and values. The contrast would be allowed only to the extent needed for the function of range improvement. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | | • Manage 540 acres as VRM Class III:<br>– Developed areas at Wild Rivers, TJB, and JDB<br>– The Powerline Falls ROW corridor over the gorge<br>– Horsethief Mesa ROW corridor<br>– High Bridge ROW corridor<br>See Map B.6, Appendix B. | |
| **6** | **VRM Management Action 4** | N/A | Minimize illumination (i.e., the quantity and intensity of lighting) and require permanent and temporary artificial outdoor lighting to be shielded and downward facing (i.e., "full cut-off" fixtures) to minimize impacts on naturally dark skies. | Same as Alternative B. |
| **7** | **VRM Management Action 5** | N/A | Working in partnership with local communities, universities, other agencies, and interested parties, maintain night skies, measure light pollution, and implement artificial-light BMPs. | Same as Alternative B. |

## C.2.9 Water Resources

General management guidance from the 2012 Taos RMP for water resources would apply for all alternatives unless noted differently below (see BLM 2012:27).

**Table C-10. Comparison of Alternatives: Water**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **1** | **WR GOAL 1** | Water resources would be highly functioning and in good condition, as measured by physical, chemical, and biological parameters in the planning area. | Detect, address, and prevent further degradation of Outstanding National Resource Waters (ONRW), springs, and playas within the Monument. Ensure proper hydrologic functions, processes, and resilience of springs, riparian areas, subsurface flows, and floodplains to address long-term anthropogenic and climatic risk to these systems. | Same as Alternative B. |
| **2** | **WR GOAL 2** | Provide for the physical and legal availability of water to facilitate authorized use on public lands, including potable water at recreational facilities. | Provide for the physical and legal availability of water to facilitate authorized use on public lands, including potable water at recreational facilities and stock water for appropriate livestock management. | Same as Alternative B. |
| **3** | **WR GOAL 3** | Restore, maintain, and preserve the natural functions of floodplains to reduce the risk of flood loss or damage to property, and minimize the impact of floods on human health and safety. | Same as Alternative A, except that the BLM would emphasize the need for environmental flows that sustain and reestablish floodplains and wetlands, as well as the need to actively restore and protect them. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **4** | **WR GOAL 4** | Restore, maintain, and preserve water quality in surface waters that flow through BLM-administered lands. | Manage for surface and groundwater resources to be highly functioning and in good condition, as measured through monitoring of physical, chemical, and biological parameters (see Map B.8, Appendix B). | Same as Alternative B. |
| **5** | **WR GOAL 5** | Develop and maintain partnerships with other agencies, organizations, and individuals to develop and implement watershed-restoration projects and pursue funding opportunities to complete projects. | Same as Alternative A. | Same as Alternative B. |
| **6** | **WSR GOAL 6** | No similar goal. | Manage designated ONRWs in the Monument to ensure that there is no new, increased water-quality degradation and that the values or special uses for which those waters were designated are maintained and protected. | Same as Alternative B. |
| **7** | **WR OBJECTIVE 1** | Assess water quality and establish management objectives for perennial streams using the *Standards for Public Land Health and Guidelines for Livestock Grazing Management in New Mexico* (BLM 2001a). | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **8** | **WR OBJECTIVE 2** | Over the life of the plan, reduce channel instability across the planning area by 50% in ephemeral, intermittent, and perennial stream channels through a combination of resource management and active restoration or rehabilitation. | Reduce channel instability across the Monument in ephemeral, intermittent, and perennial stream channels through a combination of resource management and active restoration or rehabilitation practices. | Same as Alternative B. |
| **9** | **WR OBJECTIVE 3** | Manage projects and activities to reduce water runoff and soil loss. | Same as Alternative A. | Same as Alternative B. |
| **10** | **WR OBJECTIVE 4** | Update water-resource inventories and maintain water quality–monitoring data necessary to make management decisions. | Same as Alternative A. | Same as Alternative B. |
| **11** | **WR OBJECTIVE 5** | Submit documentation to support Federal water rights to the New Mexico State Engineer for all waters on BLM-administered lands that have not been previously claimed. | The BLM would submit documentation to support Federal water rights to the New Mexico State Engineer for all waters on Monument lands that have not been previously claimed, as necessary to manage for Special Status Species habitat and aquatic and riparian resource values. In addition to minimum necessary surface flows, the need for flushing flow events to maintain fish habitat and riparian areas would be considered. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **12** | **WR OBJECTIVE 6** | The Taos Field Office would continue to participate in local watershed-planning efforts for streams that cross BLM jurisdiction. | The BLM would continue to participate in local watershed-planning efforts and would develop and maintain partnerships with other agencies, organizations, and individuals to develop and implement watershed-restoration projects that address any water-quality impairments and pursue funding opportunities to implement projects. | Same as Alternative B. |
| **13** | **WSR OBJECTIVE 7** | No similar objective. | Where ONRWs have been designated:<br>• Prohibit new or increased degradation, except for short-term degradation associated with State-approved restoration or public-safety activities.<br>• Manage ONRW waters for the values for which the ONRW was designated (i.e., exceptional recreational and ecological attributes).<br>• Monitor for degradation by documenting any visual signs of degradation, such as from erosion or any discharges through discrete conveyances.<br>• Prioritize water-quality sampling. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | | • Implement restoration projects to protect and maintain water quality and the values or special uses for which the waters were designated.<br>• If degradation were detected, then identify, document, and address sources of degradation through restoration or other management measures.<br>• If degradation were detected, then increase water quality–monitoring frequency to once annually to assist in source identification and pollution mitigation measures. | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **14** | **WR Management Action 1** | Ongoing management would provide for mitigation and monitoring of land-use activities to ensure that BLM public lands are not contributing to surface or groundwater water-quality impairments. The BLM would continue to monitor water quality and quantity on public lands within the planning area. Water resources–monitoring data would be assessed to guide water-resource restoration and conservation and the acquisition of water rights on public lands. The Taos Field Office would continue to participate in and provide expertise for public-lands water resources to work groups developing watershed-restoration plans that address water-quality impairments. The water program would work with other BLM programs to meet water-resource goals. | Same as Alternative A, except that lotic and lentic AIM data, benchmarks, PFC evaluations, Springs Stewardship Institute spring surveys, playa biological and hydrological function surveys, fish-population surveys, macroinvertebrate sampling, U.S. Geological Survey gage-flow data, rapid recreational surveys, water-level loggers, thermographs, and water-quality data would be used to determine sites of potential degradation and priority restoration sites.<br>The BLM would encourage the public to protect aquatic resources through interpretation, education, and outreach.<br>All water quality impairments in the Monument would be thoroughly investigated and identified.<br>The BLM would coordinate with the NMED's Surface Water Quality Bureau to develop shared protocols for implementing ONRW protections, including strategies to prevent future degradation in ONRW streams and wetlands. These protocols would include efforts to monitor water quality | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | | and potential impacts in designated river miles, steps to be taken if degradation is detected, and measures to consider whether a proposed action would affect water quality in an ONRW when conducting analyses under NEPA.<br>The BLM would assess each potential project in the Monument for compliance with the State's antidegradation policy.<br>Adaptive management would be implemented to achieve watershed health priorities. | |
| **15** | **WR Management Action 2** | Under the Riparian and Aquatic HMP, coordination would occur with the State Engineer to acquire water rights as necessary to manage for Special Status Species habitat and aquatic and riparian resource values. In addition to minimum necessary surface flows, the need for flushing flow events to maintain fish habitat and riparian areas would be considered. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **16** | **WR Management Action 3** | Current and future potable drinking water systems at campgrounds and recreational sites would comply with U.S. Environmental Protection Agency standards, as managed by NMED. The BLM would cooperate with NMED and other affected parties to comply with the Federal Water Pollution Control Act (i.e., the Clean Water Act) to maintain or restore the chemical, physical, and biological integrity of area waters and provide for mitigation and monitoring of land-use activities to ensure that BLM-administered lands are not contributing to surface or ground water-quality impairments. | Same as Alternative A. | Same as Alternative B. |
| **17** | **WR Management Action 4** | Secure water rights in perennial streams adequate to manage aquatic habitat and riparian vegetation | Secure water rights in perennial streams informed by in-stream flow calculations that estimate the ecological flow volume needed to sustain wildlife and riparian habitats. | |
| **18** | **WR Management Action 5** | Survey playas for frequency of inundation and the relationship to precipitation events. | Same as Alternative A, except that playas and other lentic areas would be surveyed for aquatic diversity, frequency of inundation, and the relationship to precipitation events.<br>Prohibit modification of playa and other lentic area surfaces and adjacent uplands. Facilitate the restoration of playa and other lentic habitats to PFC. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 19 | **WR Management Action 6** | No similar action. | For designated ONRWs within the Monument:<br>• New or increased degradation of water quality is prohibited in the designated ONRWs in the Monument, except for short-term degradation associated with State-approved restoration or public safety activities.<br>• Restoration to protect and promote water quality and the values for which the ONRW was designated (i.e., exceptional recreational and ecological attributes) would be encouraged.<br>• Shared protocols with NMED would be developed for managing ONRWs at the Monument.<br>• 52.2 miles of mainstem of the Rio Grande within the Monument, from the New Mexico–Colorado state line down to the confluence with the Rio Pueblo de Taos are designated as ONRWs for having outstanding ecological and recreational significance and would be managed to prohibit new or increased water quality degradation.<br>• The BLM would coordinate with NMED's Surface Water | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | | Quality Bureau to develop shared protocols for implementing ONRW protections, including strategies to prevent future degradation in ONRW streams and wetlands. These protocols would include efforts to monitor water quality and potential impacts in designated river miles, steps to be taken if degradation is detected, and measures to consider whether a proposed action would affect water quality in an ONRW when conducting analyses under NEPA.<br>• No new or increased degradation of water quality would be allowed in ONRW streams, except for short-term degradation associated with restoration or public safety activities that have been approved by the New Mexico Water Quality Control Commission. Short-term degradation would be minimized and controlled by BMPs or in accordance with permit requirements, as appropriate. All practical means of minimizing the duration, magnitude, frequency, and cumulative | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | | effects of such degradation would be utilized, and short-term degradation would not last more than 6 months. The short-term degradation would not result in water quality lower than necessary to protect any existing use in the ONRW, nor would the degradation alter the essential character or special use that makes the water an ONRW. Restoration would be encouraged and supported in ONRW streams and wetlands. | |

## C.2.10 Lands with Wilderness Characteristics

General management guidance from the 2012 Taos RMP for Lands with Wilderness Characteristics would apply for all alternatives unless noted differently below (see BLM 2012:28).

**Table C-11. Comparison of Alternatives: Lands with Wilderness Characteristics**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **LWC GOAL 1** | Manage Lands with Wilderness Characteristics identified for protection to maintain those characteristics. | **Alternative B:** Same as Alternative A.<br>**Alternative B1:** Same as Alternative A. | Same as Alternative B. |
| 2 | **LWC OBJECTIVE 1** | Where wilderness characteristics are managed for protection:<br>• Minimize surface-disturbing activities such that the natural quality of the area is maintained.<br>• Maintain opportunities for solitude and primitive recreation where they occur in these areas. | **Alternative B:** Same as Alternative A.<br>**Alternative B1:** Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 3 | **LWC Management Action 1** | Management to protect wilderness characteristics—naturalness, solitude, and opportunities for primitive recreation, as defined by Section 2(c) of the Wilderness Act of 1964—outside of designated wilderness or Wilderness Study Areas (WSAs) may be applied administratively in one or more of the following ways.<br>• Withdraw lands from mineral entry<br>• Close to mineral leasing or place No Surface Occupancy restrictions on such lands<br>• Designate as ROW-exclusion areas<br>• Close to new roads<br>• Close or limit motor vehicle use and/or mechanized use<br>• Close to mineral material sales<br>• Exclude, or restrict with conditions, certain commercial uses or other activities<br>• Designate as VRM Class I or II<br>• Restrict construction of new structures and facilities unrelated to the preservation or enhancement of wilderness characteristics<br>• Retain public lands in Federal ownership. | **Alternative B:** Same as Alternative A. | Same as Alternative B. |
| | | | **Alternative B1:** Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **4** | **LWC Management Action 2** | Manage the following area to protect its wilderness characteristics as a priority over other multiple uses.<br>• San Antonio East (9,855 acres) (Map B.9)<br>The following management restrictions would apply:<br>• Land-Use Authorizations: Excluded<br>• Renewable Energy: Excluded<br>• **Transportation**: Limited to designated<br>• **VRM**: Class II | **Alternative B:** Same as Alternative A, and manage the Cerro de la Olla unit (5,120 acres) to protect its wilderness characteristics as a priority over other multiple uses (Map B.10). The following management restrictions would apply to Cerro de la Olla.<br>• Closed to motorized travel<br>• ROW exclusion<br><br>**Alternative B1:** The Cerro de la Olla unit (5,120 acres) would be managed as a WSA under the provisions of Section 202 of the Federal Land Policy and Management Act of 1976 (FLPMA) (Map B.11). See Table C-21 below. | Same as Alternative B. |

## C.2.11 Wildland Fire

General management guidance from the 2012 Taos RMP for wildland fire would apply for all alternatives unless noted differently below (see BLM 2012:29–30).

**Table C-12. Comparison of Alternatives: Wildland Fire**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **FIRE GOAL 1** | Suppress wildland fires where they threaten human health and safety, natural resource values, and private property. | Emphasize firefighter safety and suppress wildland fires where they threaten human health and safety, natural resource values, and private property.<br>Firefighter and public safety are the foremost consideration when combatting wildfires. Firefighting strategies would be used to protect firefighters, human life, and property. Protection of natural resource values would be considered when it can be performed safely. | Same as Alternative B. |
| 2 | **FIRE GOAL 2** | Restore fire frequency and intensity regimes to pre-European settlement levels by reducing fuel loads. | Restore fire frequency and intensity regimes to become more resilient to changing environmental and climatic conditions by reducing fuel loads.<br>Utilize the best-available science to reduce fuel loading that allows for a resistant and resilient ecosystem from wildfire events in changing climatic conditions. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 3 | **FIRE GOAL 3** | Reestablish appropriate vegetation communities to maintain natural fire regimes. | Same as Alternative A. | Same as Alternative B. |
| 4 | **FIRE GOAL 4** | Reduce the need for wildfire suppression through restoration activities. | Same as Alternative A. | Same as Alternative B. |
| 5 | **FIRE OBJECTIVE 1** | Prevent the loss of life or property from wildland fire. | Same as Alternative A. | Same as Alternative B. |
| 6 | **FIRE OBJECTIVE 2** | Manage wildfire with minimal damage to other resources. | Utilize firefighting tactics that allow for resource protection, when possible. | Same as Alternative B. |
| 7 | **FIRE OBJECTIVE 3** | Use prescribed fire and mechanical-fuels treatments to reduce hazardous fuels, while achieving the objectives of the wildlife habitat, livestock grazing, visual quality, vegetation, watershed quality, and weed-control programs. | Utilize fuel-reduction treatments, including mechanical, prescribed fire, and herbicide application, to achieve fire-management objectives, while considering wildlife habitat, livestock grazing, visual quality, vegetation, watershed quality, and weed management. Monitor efficacy of fuel-reduction treatment for ecological and wildlife benefit. | Same as Alternative B. |
| 8 | **FIRE OBJECTIVE 4** | Follow fire-management actions delineated for each fire-management unit throughout the planning area, while employing multiple strategies to meet resource objectives. | Follow fire-management actions delineated for each strategic area throughout the planning area, while employing multiple strategies to meet resource objectives. | Same as Alternative B. |
| 9 | **FIRE OBJECTIVE 5** | When possible, allow for wildland fire to be managed for resource objectives or limited suppression tactics, enabling fire to act in its natural role as a disturbance. | Evaluate unplanned fire ignitions that allow fire managers to utilize wildfire for the purpose of resource benefit. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **10** | **FIRE OBJECTIVE 6** | Maintain a landscape of diverse plant communities and successional stages similar to those created by historic fire regimes. | Same as Alternative A. | Same as Alternative B. |
| **11** | **FIRE OBJECTIVE 7** | Implement wildfire-rehabilitation efforts to protect and sustain ecosystems, protect public health and safety, and help communities protect infrastructure. | Same as Alternative A. | Same as Alternative B. |
| **12** | **FIRE OBJECTIVE 8** | Cooperate with adjacent landowners (i.e., Federal, State, Tribal, and private) in fire-management activities across jurisdictional boundaries. | Same as Alternative A. | Same as Alternative B. |
| **13** | **FIRE Management Action 1** | **Unplanned Fire:** Response to wildland fire would be based on the ecological, social, and legal consequences of the fire, with priority given to public health and safety or private properties. The circumstances by which a fire occurs and the resulting consequences dictate the appropriate response to it. | Same as Alternative A. | **Unplanned Fire:** Response to wildland fire would be based on the ecological, social, and legal consequences of the fire, with priority given to public health and safety or private properties. The circumstances by which a fire occurs, and the resulting consequences dictate the appropriate response to it.<br>The BLM would utilize unplanned wildfire starts to meet objectives for landscape-scale fuel and fire regimes. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **14** | **FIRE Management Action 2** | **Fuels Treatments:** The full range of fire-management activities would continue to help achieve ecosystem sustainability, including its interrelated ecological, economic, and social components.<br>BLM fire staff would conduct fuel treatments, community assistance, education/mitigation programs, and rehabilitation/restoration actions to meet management objectives. | **Fuels Treatments:** The full range of fire management activities would continue to help achieve ecosystem sustainability, including its interrelated ecological, economic, and social components.<br>The BLM would utilize State and private partners to conduct fuel treatments, community assistance, education/mitigation programs, and rehabilitation/restoration actions to meet management objectives. | Same as Alternative B. |
| **15** | **FIRE Management Action 3** | **Prescribed/Planned Fire:**<br>Prescribed burning would be used to treat forest, grassland, or shrubland vegetation types to move communities toward desired ecological conditions and reference state.<br>In grasslands or shrublands, prescribed burning would be used to kill encroaching conifers, remove dead finer fuels created by years of grass or shrub growth, and stimulate grass and shrub regrowth. If these habitat types were not PFC as a result of management activities, then management would be modified to improve conditions.<br>In forests, prescribed burning would be used to eliminate slash generated by mechanical | Prescribed burning would be used to remove heavy fuel loading that would lower fire-behavior potential during an unplanned wildfire.<br>Additionally, in grasslands or shrublands, prescribed fire would be used as a tool to reduce woodland encroachment and allow for PFC of these ecotypes.<br>In woodlands, prescribed fire would reduce the likelihood of stand-replacing fires by removing heavy fuel loading. Trees left postfire would likely benefit from reduced competition from other trees, allowing for a more fire-resistant and resilient landscape. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | treatments, thin understories, recycle nutrients, eliminate "ladder" fuels, and/or create and maintain a more savannah-like habitat in stands dominated by medium-and large-sized trees. | Prescribed burns would not be implemented in riparian areas due to their lack of resiliency to fire. Fuel-reduction activities that occur in riparian areas would include the transport of fuels off site before burning. | |

## C.2.12 Invasive Species/Noxious Weeds

General management guidance from the 2012 Taos RMP for invasive species/noxious weeds would apply for all alternatives unless noted differently below (see BLM 2012:31–32).

**Table C-13. Comparison of Alternatives: Invasive Species/Noxious Weeds**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **ISN GOAL 1** | Maintain plant communities free of noxious weeds and invasive species, where possible. | Same as Alternative A, and limit/ prevent introduction of invasive species and noxious weeds (both terrestrial and aquatic) to the Monument, employing feasible BMPs and methods applicable with current science, management, and regulations (refer to Appendix D, *BMPs*). | Same as Alternative B. |
| 2 | **ISN GOAL 2** | Isolate and control populations by an appropriate method. | Same as Alternative A. | Same as Alternative B. |
| 3 | **ISN GOAL 3** | Immediately control and eliminate newly discovered outlier occurrences of noxious or invasive species. | Same as Alternative A. | Same as Alternative B. |
| 4 | **ISN OBJECTIVE 1** | Inventory and control weed populations through an integrated pest management (IPM) program implemented through integrated weed management (IWM) and cooperative weed management areas (CWMAs). | Utilize AIM surveys, data, and benchmarks to inventory distributions of invasive species, and control weed populations through an IPM program that would be implemented through IWM and CWMAs. | Same as Alternative B. |
| 5 | **ISN OBJECTIVE 2** | Reduce the area and density of existing populations of noxious weeds and invasive species to acceptable levels. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **6** | **ISN OBJECTIVE 3** | Monitor and reevaluate noxious weeds and invasive species populations at suitable intervals through the use of surveys to identify new infestations. | Same as Alternative A. | Same as Alternative B. |
| **7** | **ISN OBJECTIVE 4** | N/A | Maintain an enhanced education and outreach component to the weeds program, using partners, publications, and signage. | Same as Alternative B. |
| **8** | **ISN Management Action 1** | The Taos Field Office would focus on the five Strategic Goals, as presented in the *National Invasive Species Management Plan* (National Invasive Species Council 2008) (as updated). These goals are as follows.<br>• **Prevention:** Prevent the introduction and establishment of invasive species to reduce their impact on the environment, economy, and health of the United States.<br>• **Early Detection and Rapid Response:** Develop and enhance the capacity to identify, report, and effectively respond to newly discovered/localized invasive species.<br>• **Control and Management:** Contain and reduce the spread and populations of established invasive species to minimize their harmful impacts. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | • **Restoration:** Restore native species and habitat conditions and rehabilitate high-value ecosystems and key ecological processes that have been affected by invasive species to meet desired future conditions.<br>• **Organizational Collaboration:** Maximize organizational effectiveness and collaboration on invasive species issues among international, Federal, State, local, and Tribal governments, private organizations, and individuals. | | |
| **9** | **ISN Management Action 2** | The *Record of Decision on the Final Vegetation Treatments Herbicides Programmatic Environmental Impact Statement* (BLM 2007) provides programmatic policy and guidance from which subsequent BLM Field Office-specific vegetation treatment plans can be tiered. Subsequent programmatic or site-specific plans could address the application of herbicides on noxious or invasive weed species. | Same as Alternative A, except also tier to the *Record of Decision on the Final Programmatic Environmental Impact Statement for Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on BLM-Administered Land in 17 Western States* (BLM 2017a) and *Final Programmatic Environmental Impact Statement Addressing Vegetation Treatments Using Herbicides* (BLM 2023).<br>Prior to implementation of chemical vegetation treatments, step-down NEPA analysis would be completed to evaluate impacts of vegetation treatments consistently with Instruction Memorandum (IM) 2017-078 (BLM 2017b). | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **10** | **ISN Management Action 3** | Integrated weed management would continue to be practiced throughout the planning area to control the introduction and proliferation of noxious weeds and other undesirable invasive plants and be consistent with the other objectives stated above. Emphasis would be on identification of existing populations on and off public lands, with a priority on noxious-weed inventories in plant communities that are critical for wildlife habitat, in plant communities that are at-risk, in high-use areas, and at recreational sites. | Integrated weed management would continue to be practiced throughout the planning area to control the introduction and proliferation of noxious weeds and other undesirable invasive plants. Emphasis would be on identification of existing populations on and off public lands through data sharing with State and local land managers, including the New Mexico State Land Office. A priority would be placed on noxious-weed inventories and treatment areas in plant communities that are critical for wildlife habitat, in plant communities that are at-risk, in high-use areas, and at recreational sites. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **11** | **ISN Management Action 4** | Any fill, mulch, seed, hay, or other livestock feed used on public lands administered by the Taos Field Office must be certified weed-free. Stipulations would be attached to use permits and emergency stabilization and rehabilitation plans to reduce the spread of noxious or invasive weeds through contaminated hay, straw, fill, and mulch. Education and prevention measures would include community education conducted by the BLM. | Any fill, mulch, seed, or hay or other livestock feed used on public lands administered by the Taos Field Office must be certified weed-free, consistently with the New Mexico State University Seed Certification and Noxious Weed-Free Program or similar standard approved by the BLM and in coordination with the New Mexico State University Cooperative Extension Service. Stipulations would be attached to use permits and emergency stabilization and rehabilitation plans to reduce the spread of noxious or invasive weeds through contaminated hay, straw, fill, and mulch. Prevention measures would include community and livestock grazing–permittee education conducted by the BLM. | Same as Alternative B. |
| **12** | **ISN Management Action 5** | Emphasis would be placed on development of CWMAs. Actions would be taken in cooperation with interested parties to identify and treat weed populations where they exist through integrated weed-management methods. All actions would be subject to a programmatic or site-specific NEPA analysis that considers local concerns on the methods of treatment. | Same as Alternative A. | Same as Alternative B. |

# C.3 Resource Uses

## C.3.1 Land-Tenure and Land-Use Authorizations

General management guidance from the 2012 Taos RMP for land tenure and land-use authorizations would apply for all alternatives unless noted differently below (see BLM 2012:34–35).

**Table C-14. Comparison of Alternatives: Land Tenure**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **1** | **LTA GOAL 1** | Develop a deliberate and well-considered combination of public- and private-land ownership patterns to provide for more efficient and effective resource management actions. | Same as Alternative A, except, when feasible and in agreement with other landowners, increase Federal ownership of lands within the Monument to protect or support Monument objects and to provide for more efficient and effective resource management. | Same as Alternative B. |
| **2** | **LTA Goal 2** | Provide for reasonable access to public lands, resources, and facilities for the use and enjoyment of the public, as well as for administrative purposes. | Same as Alternative A. | Same as Alternative B. |
| **3** | **LTA GOAL 3** | Provide land-use authorizations in support of public needs, to be performed in consideration of and in compliance with the various management decisions, goals, objectives, and resource restrictions required to protect or maintain multiple uses and resource values. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **4** | **LTA GOAL 4** | Establish an efficient system of utility corridors and communication sites to meet the energy and communication needs of the public, with minimum negative impacts on visual, biological, cultural, and physical resources. | Same as Alternative A, except where consistent with Presidential Proclamation 8946. | Same as Alternative B. |
| **5** | **LTA OBJECTIVE 1** | Adjust land ownership to consolidate public-land holdings, acquire lands with high public-resource values, and meet public and community needs. | Same as Alternative A, except acquire lands—particularly those with special resource values—to provide the most effective management of the Monument objects and other resource values. | Same as Alternative B. |
| **6** | **LTA OBJECTIVE 2** | Facilitate the acquisition, exchange, or disposal of public lands to provide the most efficient management of public resources. | Facilitate the acquisition or exchange of public lands to provide the most efficient management for the protection, restoration, and care of Monument objects. | Same as Alternative B. |
| **7** | **LTA OBJECTIVE 3** | Acquire and maintain access to public lands where needed to improve management efficiency and facilitate multiple use and the public's enjoyment of these lands in coordination with other Federal agencies, State and local governments, and private landowners. | Acquire lands to provide access where needed to improve management efficiency and facilitate, as appropriate, the public's enjoyment of Monument lands, in coordination with other Federal agencies, State and local governments, and private landowners. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **8** | **LTA OBJECTIVE 4** | Identify areas that are suitable and available to meet public needs for use authorizations, such as ROWs, leases, and permits, while minimizing adverse impacts on other resource values. | Same as Alternative A. | Same as Alternative B. |
| **9** | **LTA OBJECTIVE 5** | Process ROW applications in a timely manner, applying appropriate mitigation to protect resource values. | Same as Alternative A. | Same as Alternative B. |
| **10** | **LTA OBJECTIVE 6** | Issue land-use authorizations based on RMP decisions, BLM policy, and other Federal mandates to support the public need for uses, such as utilities, renewable energy, and telecommunications. | Same as Alternative A. | Same as Alternative B. |
| **11** | **LTA Management Action 1** | Acquire available private land by purchase or exchange: approximately 66,900 acres. Acquire available State land by exchange. | The BLM would continue to seek opportunities to acquire available private land within the Monument by purchase or exchange. Available State lands would be acquired by exchange. The BLM would prioritize purchase of private lands from willing sellers and/or State lands through exchange that support big-game migration corridors and/or critical winter range or for the protection, restoration, and care of other Monument objects. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **12** | **LTA Management Action 2** | The following allocations would be applied to opportunities for land-use authorizations (see Map B.13).<br>• **Excluded** (37,610 acres)<br>– Wild Rivers<br>– San Antonio WSA<br>– Ute Mountain<br>• **Avoidance**<br>– Remainder of the Monument<br>– Orillia Verde, except as a last resort<br>ROWs within avoidance areas may be considered on a case-by-case basis (approximately 185,539 acres) if consistent with the care and management of the Monument objects. Authorizations would be subject to NEPA analysis and site-specific mitigation measures identified through the environmental review process. ROW corridors include the following.<br>• High Bridge ROW Corridor<br>• Powerline Falls ROW Corridor (width 190 feet)<br>Maximum use of existing ROWs is encouraged, including joint use whenever possible. The High Bridge ROW is a 530-foot-wide corridor designated along the Rio Grande Gorge Bridge and rest area. The corridor width is 530 feet at the bridge and widens to encompass the rest area. The Powerline | Same as Alternative A, except that wind and solar energy development would be excluded from the Monument (242,668 acres). The existing Powerline Falls ROW corridor over the Rio Grande Gorge would be widened from 190 feet to 600 feet (47 acres). A new ROW corridor would be designated following an existing 115-kilovolt transmission line within Horsethief Mesa and the Arroyo Hondo Land Grant. The new corridor would be approximately 2.5 miles long and have a width of 450 feet (136 acres). Cerro de la Olla (5,120 acres) would be closed to new ROWs. See Map B.14. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | Crossing is designated along the 345-kilovolt transmission line (Ojo Caliente-Taos line) and 115-kilovolt transmission line, with a maximum combined width of 190 feet. | | |
| **13** | **LTA Management Action 3** | Within the Orilla Verde and Taos Valley Overlook areas, ROWs for road improvements related to safety would be allowed. New utility projects would be underground and would be collocated with existing ROWs and roads. | Same as Alternative A. | Same as Alternative B. |
| **14** | **LTA Management Action 4** | Permits to use the public lands for commercial film production are issued by the BLM on a case-by-case basis under section 302(b) of FLPMA and in accordance with associated regulation and policy. | Same as Alternative A. | Same as Alternative B. |
| **15** | **LTA Management Action 5** | Wind and solar energy development is excluded, except for a small area along the west rim of the Rio Grande Gorge, south of Highway 64, where solar development is allowable (from 2012 Taos RMP, Section 2.2.7, *Renewable Energy*). | Exclude wind- and solar-energy development from the entirety of the Monument. | Same as Alternative B. |

## C.3.2 Livestock Grazing

General management guidance from the 2012 Taos RMP for livestock grazing would apply for all alternatives unless noted differently below (see BLM 2012:43–44).

Presidential Proclamation 8946 provides the following regarding grazing on Monument lands:

> Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on lands under its jurisdiction shall continue to apply with regard to the lands in the monument, consistent with the purposes of this proclamation.

The Taos Field Office authorizes grazing to comply with the fundamentals of rangeland health (USDI-BLM Grazing Regulations, 43 Code of Federal Regulations [CFR] Part 4100 § 4180.1) and the New Mexico Statewide RMPA/EIS (BLM 2001a), which adopted statewide standards for public land health and guidelines for livestock-grazing management. The assessment and adjustment process for authorized livestock grazing occurs on an allotment basis and is conducted through trend monitoring, AIM, and a land-health evaluation, followed by appropriate NEPA analysis, in compliance with the Grazing Regulations 43 CFR Part 4100, Subparts 4110, 4120, 4130, 4160 and 4180. Allotment evaluations usually occur prior to permit/lease expiration, where permits and leases are typically issued on a 10-year basis. Implementation-level management and site-specific NEPA analyses for livestock grazing would consider compatibility and the impacts of grazing on objects of scientific and historic interest. Monument objects would be protected through the implementation of tools such as exclosures, adjustments to permitted use (i.e., AUMs), season, and class of livestock.

## Table C-15. Comparison of Alternatives: Livestock Grazing

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **LG GOAL 1** | Manage the public rangelands to provide for a sustainable level of livestock grazing consistent with the principles of multiple use and sustained yield. | Same as Alternative A. | Same as Alternative B. |
| 2 | **LG GOAL 2** | Manage livestock grazing on public rangelands to provide maintenance or enhancement of the natural resources. | Same as Alternative A, except utilize range improvements for grazing management throughout the Monument. | Manage livestock grazing on public rangelands to provide maintenance or enhancement of the natural resources.<br>Utilize range improvements for grazing management throughout the Monument, consistently with the protection, preservation, and restoration of Monument objects. |
| 3 | **LG OBJECTIVE 1** | Maintain existing desirable rangeland conditions and improve rangeland health utilizing BMPs, meeting or exceeding the State's *Standards for Public Land Health and Guidelines for Livestock Grazing Management in New Mexico* (BLM 2001a) | Same as Alternative A. | Same as Alternative B. |
| 4 | **LG OBJECTIVE 2** | Avoid net loss of AUMs within the planning area, where practical. | Same as Alternative A. | Same as Alternative B. |
| 5 | **LG OBJECTIVE 3** | Identify and implement vegetation improvements on a landscape scale to increase forage quality and quantity for both livestock and wildlife and support and sustain local communities. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **6** | **LG OBJECTIVE 4** | Establish reserve common allotments to provide forage reserves for conservation benefits and management flexibility. | Maintain and continue improvements within established reserve common allotments in the Monument. | Same as Alternative B. |
| **7** | **LG Management Action 1** | Management plans would be completed or revised for all priority allotments, followed by lower-category allotments as budget and time constraints allow. The BLM would consult with grazing permittees, government agencies, such as the Natural Resources Conservation Service and State Lands, and other interested parties to prepare allotment management plans. | Same as Alternative A. | Same as Alternative B. |
| **8** | **LG Management Action 2** | Monitoring would be used, as necessary, for the following activity-level decisions based on subsequent allotment-specific analyses.<br>• Any increase or decrease in the allocation of AUMs would be approved by the authorized officer. An interdisciplinary team would follow the guidance provided in 43 CFR 4110 when making recommendations to the authorized officer. The actual percentages of forage allocation between wildlife and livestock would be determined on a case-by-case basis through allotment-management plans, or other activity plans intended to serve as | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | the functional equivalent, prepared in compliance with NEPA and in consultation, cooperation, and coordination with affected permittees or lessees, landowners, State agencies, and other interested publics.<br>• Livestock-grazing adjustments may be necessary to meet requirements for sensitive species and for protecting cultural and archeological sites and areas. Grazing allotments would be evaluated for significant cultural sites, and conflicts with cultural resources would be eliminated or minimized. | | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **9** | **LG Management Action 3** | After a disturbance event (e.g., wildland fire, prescribed fire, fuels treatments, thinnings, seedings), livestock would not be allowed to graze until directed by the authorized officer. This period of time is usually 2 years to allow for grasses to establish sufficient root growth to sustain grazing, but may fluctuate based on climatic conditions.<br>Permitted or prescribed livestock use may be used as a tool at any time after disturbances in pastures if an interdisciplinary team designs and monitors the grazing to accomplish resource objectives (e.g., to control noxious and invasive weeds or assist in getting broadcast seed worked into the ground). A drought-management policy would be implemented when conditions warrant, as determined through monitoring for the drought conditions. | Same as Alternative A. | Same as Alternative B. |
| **10** | **LG Management Action 4** | Within the Taos Plateau ACEC, grazing is limited and managed to ensure the enhancement of critical elk and pronghorn winter range; no increase in the existing grazing preference would be permitted. Vacant allotments would be considered for management as common reserve allotments. Work cooperatively with permittees to | Same as Alternative A, except that two vacant grazing allotments would become unavailable to livestock grazing (Map B.16). These allotments have not been applied for since Monument designation, potentially due to the lack of access and range improvements, such as fencing | Within the Lower Gorge unit, riparian areas and wetlands would be unavailable to livestock grazing.<br>In order to reduce potential conflicting uses, four vacant grazing allotments within the Black Rock Special Recreation Management Area (SRMA) would become unavailable to livestock grazing (Map B.16), as follows. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | study impacts of grazing on playas through comparison of grazed to ungrazed playas or areas within a playa.<br>Within the Lower Gorge ACEC, riparian areas and wetlands are unavailable to livestock grazing. | and water developments. These grazing allotments are as follows.<br>• 621 East Rio Grande (946 acres)<br>• 628 Arroyo Hondo (826 acres)<br>In addition, the area north of the Cerro del Yuta Wilderness boundary would be considered to allow livestock grazing as a vegetation management/ maintenance tool, when determined by range specialists and wildlife biologists to promote seed propagation, reduce "wolfy" caespitose grasses, and promote new growth to be utilized by wildlife, particularly in the seeded portion of the Ute Mountain area north of the wilderness boundary (consistent with WL MA 7).<br>Increases in the allocation of AUMs would be permitted, consistently with Livestock Grazing Management Action 2. Because reserve common allotments have already been established in the Monument, additional vacant allotments would not be considered for management as common reserve allotments. | • 621 East Rio Grande (946 acres)<br>• 628 Arroyo Hondo (826 acres)<br>• 627 Dunn Bridge (305 acres)<br>• 623 Hot Spring (1,510 acres)<br>In addition, the Proposed Monument Management Plan would allow consideration of livestock grazing as a vegetation-management and -maintenance tool in the area north of the Cerro del Yuta Wilderness boundary to promote seed propagation, reduce "wolfy" caespitose and other undesired grasses, and promote new forage growth for wildlife utilization (consistently with WL MA 7; see Appendix B, Map B,). The BLM would determine design features and monitoring of this treatment through implementation-level site-specific NEPA analysis and the NHPA Section 106 compliance process.<br>Increases in the allocation of AUMs would be permitted, consistently with Livestock Grazing Management Action 2. Because reserve common allotments have already been established in the Monument, additional vacant allotments would not be considered for management as common reserve allotments. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **11** | **LG Management Action 5** | The BLM would work cooperatively with permittees to study impacts of grazing on playas through comparison of grazed to ungrazed playas or areas within a playa. | Same as Alternative A. | The BLM would work cooperatively with permittees to study impacts of grazing on playas through comparison of grazed to ungrazed playas or areas within a playa.<br>In addition, the BLM would consider other options for exclosures, such as virtual fencing (see VEGR Management Action 6). |
| **12** | **LG Management Action 6** | Reserve common allotments would be established for use by permittees or lessees whose BLM Taos Field Office-administered allotments are not available due to drought, vegetation manipulations, or wildfire or when monitoring indicates that a change or rest is needed in their respective allotments. Although available for use under these or similar circumstances, these allotments would not be available by application (see Map B.15). | Reserve common allotments would be managed and maintained for use by permittees or lessees whose BLM Taos Field Office-administered allotments are not available due to drought, vegetation manipulations, and wildfire or when monitoring indicates a change or rest is needed in their respective allotments. Although available for use under these or similar circumstances, these allotments would not be available by application (see Map B.15). | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **13** | **LG Management Action 7** | No livestock conversions from cattle to domestic sheep or goats would be allowed in allotments within occupied bighorn sheep habitat because of the potential for transmission of disease and subsequent mortality of bighorn sheep. New sheep and goat allotments or conversions from cattle to sheep or goats would be permitted a minimum of 9 airline miles from known bighorn sheep habitat. This distance would be enlarged, if deemed necessary through site-specific analysis or a cooperative agreement with other Federal or State agencies. | Same as Alternative A. | Same as Alternative B. |
| **14** | **LG Management Action 8** | No similar action. | Fences in reserve common allotments would utilize BLM wildlife-friendly specifications where fencing is necessary. Existing, non-wildlife-friendly fences would be removed or replaced with wildlife-friendly fencing to facilitate wildlife passage where feasible in consideration of livestock needs. | Same as Alternative B. |

## C.3.3 Recreation

General management guidance from the 2012 Taos RMP for recreation would apply for all alternatives unless noted differently below, or in Appendix E (see BLM 2012:54–55).

**Table C-16. Comparison of Alternatives: Recreation**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **REC GOAL 1** | Provide a diversity of settings where visitors may have the opportunity to realize their personal expectations or goals while engaging in a variety of activities in the outdoors. | Provide a diversity of settings where visitors may have the opportunity to realize their personal expectations or goals while engaging in a variety of activities in the outdoors and in a manner that provides for the protection of Monument objects. | Same as Alternative B. |
| 2 | **REC GOAL 2** | Provide high-quality recreational opportunities and experiences. | Same as Alternative A. | Same as Alternative B. |
| 3 | **REC GOAL 3** | Manage for appropriate levels of use, facilities, management, services, and administrative controls in each recreational area. Balance public demand, protection of resources, setting objectives, and fiscal responsibility. | Manage for appropriate levels of use, facilities, management, services, and administrative controls in each recreational area to ensure the protection of Monument objects and values. Balance public demand, setting objectives, and fiscal responsibility with the protection of resources. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **4** | **REC GOAL 4** | Issue SRPs in an equitable manner for specific recreational uses of public lands and related waters as a means to minimize user conflicts, control visitor use, protect recreational resources, and provide for private and commercial recreational use according to the management objectives and implementing actions of each SRMA and Extensive Recreation Management Area (ERMA). | Same as Alternative A., but in a manner consistent with Presidential Proclamation 8946 and the protection of Monument objects. | Same as Alternative B. |
| **5** | **REC GOAL 5** | Develop and maintain cooperative relationships with national, State, and local recreation providers, tourism entities, and local recreational groups. | Same as Alternative A. | Same as Alternative B. |
| **6** | **REC GOAL 6** | Improve and expand collaboration with the State on boating safety. | Same as Alternative A. | Same as Alternative B. |
| **7** | **REC GOAL 7** | N/A | Develop trails to scenic overlooks and recreational facilities that are consistent with the Americans with Disabilities Act. | Same as Alternative B. |
| **8** | **REC OBJECTIVE 1** | Strive to achieve the objectives of each SRMA or ERMA. | Same as Alternative A, except that no ERMAs would be included under Alternative B. | Same as Alternative B. |
| **9** | **REC OBJECTIVE 2** | Enhance recreational access, opportunities, and experiences by increasing the level of management presence through signs and basic onsite controls. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **10** | **REC OBJECTIVE 3** | Strengthen the BLM's identity, enhance visitor services, and promote appropriate behavior by providing clear and consistent signing, information, maps, interpretation, and environmental education at recreational sites and facilities. | Strengthen the BLM's identity, enhance visitor services, and promote appropriate behavior by providing clear and consistent signing, information, maps, interpretation, and environmental education at recreational sites and facilities and near important resource values, such as cultural sites or sensitive species habitat. | Same as Alternative B. |
| **11** | **REC OBJECTIVE 4** | Collaborate with communities to provide trail links and access to public land. | Same as Alternative A. | Same as Alternative B. |
| **12** | **REC OBJECTIVE 5** | Manage and maintain recreational sites and facilities for quality experiences and enjoyment. Design for functionality and aesthetics, using design standards that are appropriate for the setting and enjoyment of the public. | Manage and maintain recreational sites and facilities for quality experiences and enjoyment, while also avoiding and mitigating damage to sensitive habitats. Design for functionality and aesthetics, using design standards that are appropriate for the setting and enjoyment of the public. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **13** | **REC Management Action 1** | The BLM has shifted the emphasis of the recreational program from an activity-based approach to one that focuses on recreational experiences and benefits. The BLM's *Priorities for Recreation and Visitor Services* (BLM 2003), which outlines seven primary objectives, would be consulted for future planning and management. Furthermore, the *Unified Strategy* (BLM 2007) would be used to coordinate actions along a hierarchy of those objectives. Ongoing or future projects or administrative actions would be consistent with the assigned physical, social, and administrative setting character, experiences, and benefits that are unique to each unit. | Same as Alternative A. | Same as Alternative B. |
| **14** | **REC Management Action 2** | A sign plan would be developed and implemented BLM Field Office-wide, consistently with the RMP and subsequent activity-level plans, which would incorporate the objectives for recreational management. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **15** | **REC Management Action 3** | The entire planning area would remain open to dispersed recreation. The camping limit on public lands is set by BLM policy and is currently limited to 14 days. Emphasis would be placed on providing interpretive and informational signs and materials for public-land visitors and maintaining existing facilities to a high standard, consistently with the recreational setting. | Same as Alternative A. | Same as Alternative B. |
| **16** | **REC Management Action 4** | SRPs would be considered for commercial, noncommercial, and competitive events on a case-by-case basis. Business plans would be developed in which fees (i.e., those associated with recreational use permits) are required or SRPs are issued. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **17** | **REC Management Action 5** | Installation of new rock-climbing routes or hardware would require preapproval by the BLM. | New rock-climbing routes that use fixed hardware would require preapproval by the BLM through site-specific NEPA analysis and be subject to NHPA Section 106.<br>No climbing would be permitted within raptor-nesting areas during the seasonal restrictions identified in Wildlife Management Action 13 or within 50 feet of cultural resources, as determined on a case-by-case basis. | New rock-climbing routes that use fixed hardware would require preapproval by the BLM through site-specific NEPA analysis and be subject to NHPA Section 106. Replacement of existing fixed hardware on existing rock-climbing routes would be subject to NHPA Section 106.<br>No climbing would be permitted within raptor-nesting areas during seasonal restrictions; nor would disturbance of migratory-bird nesting, as identified in Wildlife Management Action 13, or within 50 feet of cultural resources, as determined on a case-by-case basis.<br>Existing routes determined to be in conflict with Monument objects and values would be subject to removal. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **18** | **REC Management Action 6** | The following allocations would be applied to recreation management (Map B.17).<br>• **SRMA**: Rio Grande Gorge Recreation Area SRMA, with the following Recreation Management Zones (RMZs):<br>– Rio Del Norte RMZ<br>– Taos Box RMZ<br>– Wild Rivers Rim RMZ<br>– Guadalupe Mountain RMZ<br>– Orilla Verde and Lower Gorge RMZ<br>– Taos Valley Overlook RMZ<br>– Rio Grande Rim and Cooper Hill RMZ<br>• **ERMAs**<br>– San Antonio Gorge ERMA<br>– Taos Plateau ERMA<br>– Ute Mountain ERMA<br>Refer to Appendix F, *Recreation Management Areas*, for specific management of each of these areas. | The following allocations would be applied to recreation management (Map B.18).<br>• SRMAs and their associated RMZs:<br>– Wild Rivers SRMA<br>– Wild Rivers Rim RMZ<br>– Guadalupe Mountain RMZ<br>– Black Rock SRMA<br>– Horsethief Mesa RMZ<br>– JDB RMZ<br>– Black Rock Rim RMZ<br>– Orilla Verde SRMA<br>– Orilla Verde and Lower Gorge RMZ<br>– Taos Valley Overlook Zone<br>• No portion of the Monument would be managed as an ERMA.<br>Refer to Appendix F for specific management of each of these areas. | Same as Alternative B. |
| **19** | **REC Management Action 7** | The entire Monument would remain open to dispersed recreation, with the exception of JDB and developed recreational areas, which would be closed to dispersed camping. | Same as Alternative A. | Same as Alternative B. |
| **20** | **REC Management Action 8** | Maintain visitor centers at Pilar and Wild Rivers. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 21 | **REC Management Action 9** | SRPs would be considered for commercial, noncommercial, and competitive events on a case-by-case basis. Business plans would be developed in which fees (i.e., those associated with recreation use permits) are required or SRPs are issued.<br>SRPs for commercially guided angling of the Rio Grande would preclude fishing on the Ute Mountain segment from April 1 to May 31 to protect sensitive wildlife breeding areas.<br>**Boating**: Boating management would follow the prescriptions set forth in the 2012 Taos RMP and the *2000 Rio Grande Corridor Final Plan.* | Same as Alternative A, except that SRPs may be subject to adaptive-management strategies that apply spatial and timing limitations on activities in order to protect important wildlife habitat. | SRPs would be considered for commercial, noncommercial, and competitive events on a case-by-case basis. Business plans would be developed in which fees (i.e., those associated with recreation use permits) are required or SRPs are issued. SRPs may be subject to adaptive-management strategies that apply spatial and timing limitations on activities in order to protect important wildlife habitat.<br>SRPs for commercially guided angling of the Rio Grande would preclude fishing on the Ute Mountain segment from April 1 to May 31 to protect sensitive wildlife breeding areas.<br>• **Boating**: Boating management would follow the prescriptions set forth in the 2012 Taos RMP and the *2000 Rio Grande Corridor Final Plan.*<br>• **Hot Air Balloon Flights:** Below-the-rim fights would be allowed outside of the seasonal closure period (January 1–August 31), but only in the area between JDB and Manby Hot Springs. The following wildlife harassment and land-based stipulation would be added to the SRP: Wildlife must not be pursued if seen from a hot air balloon. The pilot must continue on the original path. If |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | | | wildlife is showing stressed behavior (e.g., running away from the balloon, cowering, hiding) then the pilot must pull back immediately and remove themselves from the area. Within the JDB RMZ, tours would be allowed throughout the year, except for flights below the rim from January 1 through August 31. Flights below the rim outside of the seasonal closure would be restricted to the area between the JDB and Manby Hot Springs. Launching would be approved at three designated sites above the bridge. |
| **22** | **REC Management Action 10** | Developed recreational areas would remain closed to target shooting, including at Wild Rivers, Orilla Verde, and Taos Valley Overlook. | Same as Alternative A. | Same as Alternative B. |
| **23** | **REC Management Action 11** | A sign plan would be developed and implemented, consistently with Monument Management Plan and subsequent activity-level plans, which would serve to meet the objectives of recreation and cultural resource interpretation and protection. | A sign plan would be developed and implemented, consistent with Monument Management Plan and subsequent activity-level plans, which would serve to meet the objectives of recreation, wildlife, and cultural resource interpretation and protection. | Same as Alternative B. |
| **24** | **REC Management Action 12** | Support public awareness and interest in cultural and other resources through interpretative sites, tours, presentations, and literature. | Same as Alternative A. | Same as Alternative B. |

## C.3.4 Transportation and Access

General management guidance from the 2012 Taos RMP for transportation and access would apply for all alternatives unless noted differently below (see BLM 2012:80–81).

**Table C-17. Comparison of Alternatives: Transportation and Access**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **TRA GOAL 1** | Provide reasonable access to public lands for multiple uses in a manner consistent with the goals and objectives of all resources, uses, and other opportunities. | Provide reasonable access to Monument lands for multiple uses in a manner consistent with the care of the Monument's objects, as well as with the goals and objectives of all resources, uses, and other opportunities. | Same as Alternative B. |
| 2 | **TRA GOAL 2** | Work collaboratively with the public, including State, Tribal, and local governments, special interest groups, and individuals, to develop an appropriate transportation system on public lands, including motorized and nonmotorized recreational trails. | Work collaboratively with the public, including State, Tribal, and local governments, special interest groups, and individuals, to share data and manage a Monument travel and transportation system that accommodates a variety of uses and growing visitation, minimizes user conflicts, and contributes to protection of sensitive resources (e.g., wildlife habitat, riparian areas, wetlands, highly erodible soils, cultural resources). | Same as Alternative B. |
| 3 | **TRA OBJECTIVE 1** | No similar objective. | As funding and resources are available, complete a TMP to provide for appropriate access to the Monument, while minimizing conflicts among users and impacts on resources, including Special Status Species and their habitats. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **4** | **TRA OBJECTIVE 2** | No similar objective. | **Ingress, Egress, and Parking**: Work with State and local agencies to provide safe ingress, egress, and parking for the Monument, with priority at the JDB, TJB, and established recreational areas. | Same as Alternative B. |
| **5** | **TRA OBJECTIVE 3** | No similar objective. | **Travel Opportunities**: Provide travel opportunities as closed or limited for all travel modes (from motorized to nonmotorized, including access for visitors with disabilities), based on opportunities provided and/or the need to protect resources, per Presidential Proclamation 8946. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **6** | **TRA OBJECTIVE 4** | No similar objective. | Sustain compatible traditional, current, and future use of the land by establishing a route system in the TMP that contributes to protection of sensitive resources, accommodates recreational and grazing uses, and minimizes user conflicts. In future travel-management planning, identify opportunities for increased education regarding legal access to the Monument, in cooperation with local parties, including the Stagecoach Hills neighborhood. Identify opportunities for trail improvements, consolidation of duplicative travel routes, bilingual signage, and closure and restoration of user-created routes (including those within critical winter range for big game on the Taos Plateau). | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **7** | **TRA Management Action 1** | The following allocations are applied to mechanized travel management (Map B.19).<br>• San Antonio and Ute Mountain zones are closed.<br>• Motorized-vehicle use and nonmotorized mechanized vehicle use are limited to designated routes (except for emergency or authorized administrative purposes).<br>• Certain sites in Lower Gorge ACEC are closed to vehicles to improve riparian condition. | Existing travel would be maintained consistently with existing travel management decisions and Presidential Proclamation 8946. In accordance with Presidential Proclamation 8946, except for emergency or authorized administrative purposes, motorized-vehicle use in the Monument would be limited to designated roads. Non-motorized mechanized-vehicle use would be limited to designated roads and trails.<br>In addition to areas closed under the Taos RMP, Cerro de la Olla would also be closed above 8,200 feet in elevation (5,120 acres) in order to protect its primitive character. Administrative/ authorized use of motor vehicles may only be allowed within this area (see Map B.20). | Same as Alternative B. |
| **8** | **TRA Management Action 2** | No similar action. | In cooperation with State and local governments, study and develop feasible solutions for Monument access, travel, and transportation options to serve varied scenarios of visitor growth and reduce and/or mitigate Monument transportation and travel infrastructure risk factors, vehicle collision, and public safety risks. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **9** | **TRA Management Action 3** | No similar action. | Travel decisions would be consistent with existing TMPs. The BLM recognizes that planning and administration of the travel routes and facilities include Federal, State, and Taos County infrastructure. Routes may be analyzed and approved separately. | Same as Alternative B. |
| **10** | **TRA Management Action 4** | No similar action. | Actively participate in other Federal agency (i.e., U.S. Forest Service), State, local, and Tribal travel-management planning for access to the Monument and collaboratively seek feasible solutions to address issues created outside the Monument. | Same as Alternative B. |

## C.3.5 Special Designations

General management guidance from the 2012 Taos RMP for special designations would apply for all alternatives unless noted differently below (see BLM 2012:88–94). There would be no changes under this RMPA to National Scenic Byways (see BLM 2012:89–90) or Watchable Wildlife Areas (see BLM 2012:91).

**Table C-18. Comparison of Alternatives: Areas of Critical Environmental Concern (ACECs)**

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **ACEC GOAL 1** | Provide special management attention to areas with relevant and important (R&I) values to ensure that such values are protected and preserved from irreparable harm. | Provide special management attention to areas with R&I values identified under the 2012 Taos RMP to ensure that such values are protected and preserved from irreparable harm. | Same as Alternative B. |
| 2 | **ACEC OBJECTIVE 1** | Inventory, protect, and monitor ACECs consistently with special management prescriptions to ensure that their R&I values may be preserved. | Inventory, protect, and monitor areas with R&I values identified under the 2012 Taos RMP consistently with special management prescriptions, as applicable. | Same as Alternative B. |
| 3 | **ACEC Management Action 1** | **Taos Plateau ACEC:** The area (approximately 222,500 acres) is managed as the Taos Plateau ACEC to protect the area's R&I values, including scenic quality, water quality and quantity, wetlands, and wildlife and Special Status Species habitat (Map B.21).<br>Specific management prescriptions from the existing Taos RMP are provided below:<br>• **Land Tenure**<br>– Acquire available private land by purchase or exchange. | No ACECs are designated because Monument protections are substantially equivalent to ACEC designation (see Map B.23); however, the management of R&I values for the Taos Plateau ACEC would continue as described in the existing Taos RMP. Changes in management for resources or other resource uses that would affect the ACEC are described in detail in those resource sections. | Same as Alternative B, except for livestock grazing–management actions for the Taos Plateau ACEC see Section C.4.2; the ACEC management from Alternative A contradicts Livestock Grazing Management Guidance under Alternative A. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | – Acquire available State trust land by exchange.<br>• **Land-Use Authorizations**<br>– Wild Rivers, Ute Mountain, and San Antonio zones are excluded from ROWs (37,610 acres).<br>– ROWs would be considered in the North Unit on a case-by-case basis (185,539 acres).<br>• **Livestock Grazing**<br>– Grazing is unavailable on 120 acres in the Rio San Antonio area, on 897 acres in the Wild Rivers zone, and on 14,404 acres in the Ute Mountain zone.<br>– Grazing would be limited and managed to ensure the enhancement of critical elk and pronghorn winter range; no increase in the existing grazing preference would be permitted.<br>– Vacant allotments would be considered for management as reserve common allotments.<br>– Work cooperatively with permittees to study impacts of grazing on playas through comparison of grazed to ungrazed playas or areas within a playa. | | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | • **Minerals**: 286,220 acres of mineral estate<br>– **Leasable**: Closed, 286,220 acres<br>– **Locatable**: Withdrawn, Ute Mountain zone, San Antonio zone, and Wild Rivers zone (hard rock minerals under acquired lands on Ute Mountain are leasable and are closed to leasing); open, North Unit zone<br>– **Salable**: Closed, 286,220 acres<br>– All existing mineral extraction operations would be reclaimed on completion of mining operations.<br>• **Recreation**: Manage as part of the Rio Grande Gorge SRMA or the Ute Mountain, San Antonio, and Taos Plateau ERMAs.<br>• **Renewable Energy**<br>– Wind- and solar-energy development are excluded.<br>• **Transportation and Access**<br>– Closed, 25,741 acres (San Antonio and Ute Mountain zones)<br>– Limited to designated routes and/or season of use: 196,759 acres.<br>– Request seasonal closure of Forest Road 1016.<br>• **Forestry:** Intensively manage and monitor all fuelwood sales to | | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | improve habitat; all forestry activities would be conducted in a manner that improves and expands thermal cover conditions.<br>• **Cultural Resources:** Mitigate adverse effects on cultural resources associated with playas, among others.<br>• **Fish and Wildlife**<br>– Consider areas for introduction, augmentation, or reestablishment of fish and wildlife species, consistently with NMDGF plans.<br>– Wildlife habitat–improvement projects would continue to be planned and implemented throughout the ACEC.<br>– Assess wildlife uses of and needs for playas.<br>– Survey playas for aquatic biota.<br>• **Vegetation/Soils**<br>– Prohibit modification of playa surfaces and adjacent uplands.<br>– Vegetation transects may be used to determine total available forage.<br>• **Visual Resources**<br>– **Class I**: 25,741 acres (includes Rio San Antonio and Cerro del Yuta Wilderness areas).<br>– **Class II**: 196,439 acres | | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | – **Class III**: 320 acres<br>• **Water Resources**<br>– Secure water rights in perennial streams that are adequate for managing aquatic habitat and riparian vegetation.<br>– Survey playas for frequency of inundation and relationship to precipitation events.<br>• **Lands with Wilderness Characteristics**<br>– Manage Ute Mountain WSA (now Cerro del Yuta Wilderness) to preserve wilderness characteristics.<br>– Manage the area east of San Antonio WSA (now the Río San Antonio Wilderness) to preserve wilderness characteristics (9,859 acres).<br>– Remove the abandoned telephone line and poles that form the eastern boundary of the Rio San Antonio and rehab the associated road.<br>• **Wildland Fire**: Use limited fire-suppression tactics whenever possible, and use minimum impact–suppression tactics within the San Antonio WSA (now Rio San Antonio Wilderness)<br>• **Activity Planning** | | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | – Revise the San Antonio/Pot Mountain HMP to incorporate RMP prescriptions.<br>– Prepare an ACEC management plan within 5 years of RMP approval. | | |
| 4 | **ACEC Management Action 2** | **Lower Gorge ACEC:** The area (approximately 21,190 acres) is managed as the Lower Gorge ACEC to protect the area's R&I values, including cultural, riparian, and wildlife habitat, including habitat for Special Status Species (Map B.21). Specific management prescriptions from the existing Taos RMP are provided below.<br>• **Land Tenure**<br>– Acquire non-federal land that has the values identified above, as well as land that would improve recreational access; acres are the maximum available, not necessarily what the BLM would acquire.<br>– Acquire available private land by purchase from willing sellers or exchange, especially undeveloped private land.<br>– Acquire available State trust land by exchange.<br>– The ACEC would be withdrawn from the public land laws.<br>• **Land-Use Authorizations** | No ACECs are designated because Monument protections are substantially equivalent to ACEC designation; however, the management of R&I values for the Lower Gorge ACEC would continue as described in the existing Taos RMP. Changes in management for resources or other resources uses that would affect the ACEC are described in detail in those resource sections. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | – Exclude new ROWs, except for road improvements to improve safety, or to provide access or utility service to non-federal land where no practicable alternative exists<br>• **Livestock Grazing**<br>– Riparian areas and wetlands are unavailable to livestock grazing.<br>• **Minerals:** 21,410 acres of mineral estate<br>– **Leasable**: Closed<br>– **Locatable**: Withdrawn<br>– **Salable**: Closed, 21,409 acres; open, 1 acre (Arroyo Hondo)<br>• **Recreation**: Manage ACEC as part of the Rio Grande Gorge Recreation Area; boating would continue to be managed under guidelines of the 2000 Rio Grande Corridor Plan<br>• **Renewable Energy**: Wind- and solar-energy development are excluded<br>• **Transportation and Access**<br>– Limited to designated routes: 21,190 acres.<br>– Close certain sites to vehicles to improve riparian condition.<br>– Work with NMDOT to identify safe pullouts along NM-68.<br>• **Fish and Wildlife** | | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | – Consider areas for introduction, augmentation, or reestablishment of fish and wildlife species, consistently with NMDGF plans<br>– In cooperation with NMDGF, manage the Rio Grande and adjacent tributaries to control or eliminate exotic species<br>– Employ mechanical removal methods to reduce nonnative aquatic species in the Rio Grande<br>– Assess aquatic habitat and develop restoration or enhancement plans to meet management goals for fish and other species<br>• **Special Status Species**: Protect southwestern willow flycatcher habitat (Critical Habitat established in 2005).<br>• **Vegetation/Soils**<br>– Prevent degradation of aquatic habitat by prohibiting activities that disturb soil and vegetation in streams and within the 100-year floodplain.<br>– Actively manage riparian areas to return them to full functioning condition, restore native plant species, and reduce the density of exotic vegetation. | | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | – Improve riparian conditions by closing certain sites to vehicles.<br>– Suppress noxious weeds with methods deemed most effective; herbicides would be used as a last resort.<br>• **Visual Resources**<br>– **Class I**: 2,430 acres<br>– **Class II**: 18,760 acres<br>– Improve scenic quality, revegetate closed roads, redesign/landscape recreational sites, and rehabilitate abandoned mine sites, and work with ROW holders to improve the appearance of NM-68, NM-570, and the gas pipeline.<br>• **Water Resources**<br>– Secure water rights in perennial streams that are adequate to manage aquatic habitat and riparian vegetation.<br>– Manage in-stream hydrologic processes to maximize aquatic and riparian habitat area, improve river condition, and reduce excessive deposition or erosion.<br>• **Wildland Fire**<br>– Fire prescriptions and burn plans would be developed to meet vegetation-management objectives, a full-suppression | | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | zone would be established around Pilar, and unplanned fires would be extinguished.<br>– Improve watershed health by controlled burns in shrub grasslands.<br>• **Other Designations**<br>– 1.3 miles of the Arroyo Hondo are eligible for Wild and Scenic River (WSR) designation; a suitability determination would be made in cooperation with the Carson National Forest; 1.2 miles of the Rio Pueblo de Taos is recommended suitable for designation as a WSR.<br>– 7. 6 miles of the Rio Grande (Bosque segment) are recommended as suitable for designation as a recreational WSR segment, per a study completed after its Congressional designation as a study segment.<br>• **Activity Planning**: Manage the ACEC under guidelines established by *The Rio Grande Corridor Final Plan and Record of Decision* (BLM 2000a); management would be reviewed and revised if needed within 10 years of the RMP's approval | | |

## Table C-19. Comparison of Alternatives: National Historic or Scenic Trails (NHT)

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **NHT GOAL 1** | Provide for effective and accessible orientation, interpretation, and education programs and activities on the trails, enabling visitors of all abilities to understand and appreciate the trails' history, significance, and enduring legacy. | Same as Alternative A. | Same as Alternative B. |
| 2 | **NHT OBJECTIVE 1** | Provide for the safe enjoyment of cultural resources and recreational opportunities related to the trails' history and resources. | Same as Alternative A. | Same as Alternative B. |
| 3 | **NHT OBJECTIVE 2** | Establish and support partnerships to provide visitor experiences and conserve and preserve resources related to the historic trails' period of use. | Same as Alternative A. | Same as Alternative B. |
| 4 | **NHT OBJECTIVE 3** | Use current management practices and technologies to implement the National Trails System Act and administer National Historic Trails to protect their setting, visual integrity, cultural resources, and physical traces. | Same as Alternative A. | Same as Alternative B. |
| 5 | **NHT Management Action 1** | **OSNHT:** Although the BLM would continue to work in partnership with the National Park Service to manage the OSNHT, protective management prescriptions for the trail corridors on public lands are summarized below. A 1-mile-wide corridor encompassing the OSNHT throughout the planning area (see Map B.21) would be used to define | **OSNHT:** Although the BLM would continue to work in partnership with the National Park Service to manage the OSNHT, protective management prescriptions for the trail corridors on public lands are summarized below. The BLM, as a Trail Administrator, would directly and indirectly support | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | the area in which these prescriptions would be implemented.<br>• **Land Tenure**<br>– Acquire available private land with trail resources or access to trail resources by purchase or exchange.<br>– Acquire State trust land containing trail resources or access to trail resources by exchange.<br>• **Livestock Grazing**: If trail resources were being damaged by livestock, then the BLM would mitigate with exclosures or other means to address the impacts<br>• **Minerals**<br>– **Leasable**: closed<br>– **Locatable**: withdrawn<br>– **Salable**: closed<br>• **Recreation**<br>– Develop interpretative and educational projects where appropriate (on and off site).<br>– The Taos Overlook segment is in the Taos Valley Overlook zone of the Rio Grande Gorge SRMA, where interpretive information would include the OSNHT; NM-68 segment is within the Orilla Verde and Lower Gorge zone and the Horseshoe Curve zone of the Rio Grande Gorge SRMA, the | protection of high-potential route segments, and any resources listed or determined eligible for the NRHP. A 1-mile-wide corridor encompassing the OSNHT throughout the planning area would be used to define the area in which these prescriptions would be implemented (see Map B.23):<br>• **Land Tenure**: Acquire available private land with trail resources or access to trail resources by purchase or exchange.<br>• **Livestock Grazing**: If trail resources were being damaged by livestock, then the BLM would mitigate with exclosures or other means to address the impacts.<br>• **Minerals**<br>– Leasable: closed<br>– Locatable: withdrawn<br>– Salable: closed<br>• **Recreation**<br>– Develop interpretative and educational projects where appropriate (on and off site).<br>– Manage the Taos Overlook segment as a high-potential segment of the OSNHT in the Taos Valley Overlook | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | Chimayo, Embudo Pass, Entranas, and Ojo Sarco cut-off segments are in the Palacio Arroyo SRMA, the Apodaca segment is within the Rio Grande Rim and Copper Hill zones of the Rio Grande Gorge SRMA, the Abiquiu and US-84 segments are within the Chama ERMA, the Rio Chama segment is within the Chama ERMA and the Chama Canyons SRMA, and all of these SRMAs and ERMAs contain strong direction to manage and interpret the OSNHT.<br>• **Renewable Energy**: Wind- and solar-energy development is excluded<br>• **Transportation and Access**<br>– Limited to designated routes: 21,280 acres, with no motorized travel on defined trail segments.<br>– Acquire easements from willing landowners that provide access to trail resources.<br>• **Cultural Resources**<br>– Conduct Class III inventory and record trail resources in detail.<br>– Nominate eligible cultural sites to the NRHP.<br>• **Visual Resources**<br>– **Class II**: 21,280 acres | zone of the Rio Grande Gorge SRMA.<br>– According to Section 12 of the National Trails System Act, high-potential segments are those segments of a trail that afford high-quality recreational experiences along a portion of the route having greater-than-average scenic values or affording an opportunity to share vicariously the experience of the original users of a historic route.<br>– The OSNHT Comprehensive Administrative Strategy (BLM and NPS 2017), BLM Policy Manual 6250 (BLM 2012), BLM Technical Reference 6280 (BLM 2019), the 2016 Multi-Agency National Trails System Memorandum of Understanding, as well as Presidential Proclamation 8946, all contain strong direction to manage and interpret the OSNHT.<br>• **Renewable Energy**: Wind- and solar-energy development is excluded<br>• **Transportation and Access** | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | – Determine if any proposed projects can be seen from the trail, and propose suitable mitigation.<br>• **Wildland Fire**: Implement limited fire-suppression strategies to assist in the protection of trail resources<br>• **Activity Planning**<br>– Complete a comprehensive management plan for the historic trail.<br>– An activity plan for trail segments in the planning area would be prepared to focus on inventory, research, interpretation, signing, and site-specific actions to protect trail resources.<br>• **Monitoring**: Monitor site conditions using site stewards and BLM staff. | – Limited to designated routes, with no motorized travel on defined trail segments.<br>– Acquire easements from willing landowners that provide access to trail resources.<br>• **Cultural Resources**<br>– Conduct a Class III inventory, and record trail resources in detail.<br>– Nominate eligible cultural sites to the NRHP.<br>• **Visual Resources**<br>– Class II<br>– Determine if any proposed projects can be seen from the trail, and propose suitable mitigation.<br>• **Wildland Fire**: Implement limited fire-suppression strategies to assist in the protection of trail resources.<br>• **Activity Planning**: An activity plan for the Taos Overlook trail segment in the planning area would be prepared to focus on inventory, research, interpretation, signing, and site-specific actions to protect trail resources.<br>• **Monitoring**: Monitor site conditions using site stewards and BLM staff. | |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **6** | **NHT Management Action 2** | The BLM Taos Field Office would evaluate trail resources present (identified through survey or other means) and determine their respective values. Trail resources include physical traces of the trail (e.g., ruts, swales, campsites, artifact scatters) or may be associated with visitor uses and research, so that the evaluation would include an analysis of the opportunities for interpretation, recreational use, and research. | Same as Alternative A. | Same as Alternative B. |
| **7** | **NHT Management Action 3** | Within 5 years after approval of the RMP, an archaeological inventory would be carried out to help define the cultural and temporal settings of trail segments. Important artifacts associated with the trails would be collected, analyzed, and curated. These resources, along with historical information, may be used to interpret these National Historic Trails. | As funding and resources are available, archaeological inventories would be carried out to help define the cultural and temporal settings of the Taos Overlook trail segment. Important artifacts associated with the trails would be collected, analyzed, and curated. These resources, along with historical information, may be used to interpret the OSTNHT. | Same as Alternative B. |

## Table C-20. Comparison of Alternatives: Wild and Scenic Rivers (WSR)

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **WSR GOAL 1** | Continue to manage designated WSR segments consistently with the intent of their designations. | Same as Alternative A. | Same as Alternative B. |
| 2 | **WSR GOAL 2** | To the extent of the BLM's authority, maintain the free-flowing character, preserve or enhance the outstandingly remarkable values (ORVs), and allow no activities within the river corridor that would alter the tentative classification of those segments determined suitable for congressional designation in the National WSR System. | Same as Alternative A. | Same as Alternative B. |
| 3 | **WSR OBJECTIVE 1** | Review all eligible rivers to determine suitability for congressional designation into the National WSR System. | Same as Alternative A. | Same as Alternative B. |
| 4 | **WSR Management Action 1** | All eligible and suitable segments would be managed to protect their identified ORVs, tentative classification, and free-flowing character. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **5** | **WSR Management Action 2** | Rio Grande WSR (includes 4 miles of Red River) is managed under the guidelines of the of the *The Rio Grande Corridor Final Plan and Record of Decision* (BLM 2000a) and the Wild and Scenic River Act to maintain the free-flowing character, preserve or enhance the ORVs, and allow no activities within the river corridor that would alter the tentative classification of those segments determined suitable for congressional designation in the National Wild and Scenic River System (Map B.22). | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **6** | **WSR Management Action 3** | **WSRs**: 1.3 miles of the Arroyo Hondo, 1.0 mile of the Red River, and 4.5 miles of the Rio San Antonio are eligible for WSR designation; 1.1 mile of the Rio Pueblo de Taos is recommended suitable for designation as a WSR. | Apply interim protective-management guidelines for eligible and suitable WSR segments (**Eligible**: Arroyo Hondo, 1.3 miles; Red River, 1.0 mile; Rio San Antonio, 4.5 miles. **Suitable**: Rio Pueblo de Taos, 1.1 mile), as follows (Map B.22).<br>• Land-use authorizations would be allowed if project design were consistent with the maintenance of free-flowing condition, ORVs, classification, and water quality.<br>• No actions would be approved that would modify the setting or level of development of the suitable river segment to a degree that would change its tentative classification.<br>• No activities would be approved that would degrade the water quality in the segment that is necessary to support the ORVs.<br>• Conditions of Approval, BMPs, and standard operating procedures would be applied. | Same as Alternative B. |

## Table C-21. Comparison of Alternatives: Wilderness Areas (WA)

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **WA GOAL 1** | Provide for the long-term protection and preservation of designated wilderness under the principles of non-degradation. A wilderness area's naturalness and untrammeled condition, opportunities for solitude, opportunities for primitive and unconfined types of recreation, and any ecological, geological, or other features of scientific, educational, scenic, or historic value would be managed such that they remain unimpaired. | Same as Alternative A. | Same as Alternative B. |
| 2 | **WA OBJECTIVE 1** | Manage uses permitted by the Wilderness Act's special provisions and subsequent laws in a manner that would prevent degradation of the area's wilderness character. In managing these uses, emphasis would be placed on maintaining wilderness character. | Same as Alternative A. | Same as Alternative B. |
| 3 | **WA OBJECTIVE 2** | Prepare a management plan for a wilderness area within 2 years of its designation by Congress. | Same as Alternative A. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| **4** | **WA Management Action 1** | No similar action exists for Cerro del Yuta Wilderness (13,420 acres) nor Rio San Antonio Wilderness (8,120 acres), which were designated by Congress after publication of the 2012 Taos RMP. However, these areas were previously WSAs; the 2012 Taos RMP stipulated that the BLM would manage WSAs designated as wilderness pursuant to guidelines consistent with the Wilderness Act of 1964, the enabling legislation, and regulations for wilderness management at 43 CFR 6300, BLM Manuals 8560 and 8561, and BLM Handbook H-8560-1 (see Map B.21). | Same as Alternative A, except that a Wilderness Management Plan would be prepared by the BLM for the Cerro del Yuta and Rio San Antonio Wilderness Areas following completion of the RMPA/EA. | Same as Alternative B. |

## Table C-22. Comparison of Alternatives: Wilderness Study Areas (WSA)

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| 1 | **WSA GOAL 1** | No similar resource goal. No WSAs are present. | **Alternative B:** Same as Alternative A.<br>**Alternative B1:** Under the authority of Section 202 of FLPMA, designate areas where special management is required to preserve wilderness characteristics as WSAs. | Same as Alternative B. |
| 2 | **WSA OBJECTIVE 1** | No similar resource objective. No WSAs are present. | **Alternative B:** Same as Alternative A.<br>**Alternative B1:** Manage and protect WSAs to preserve wilderness characteristics so as not to impair the suitability of such areas for designation by Congress as Wilderness. | Same as Alternative B. |
| 3 | **WSA Management Action 1** | No similar action. No WSAs are present. | **Alternative B:** No similar action. No WSAs are present. The Cerro de la Olla unit would be managed as Lands with Wilderness Characteristics.<br>**Alternative B1:** Designate the Cerro de la Olla unit a WSA (5,120 acres). | Same as Alternative B. |
| 4 | **WSA Management Action 2** | No similar action. No WSAs are present. | **Alternative B:** No similar action. No WSAs are present. The Cerro de la Olla unit would be managed as Lands with Wilderness Characteristics. | Same as Alternative B. |

| ROW # | Program Area and Number | Alternative A (No Action – Current Management) | Alternative B (Proposed Action) | Proposed Monument Management Plan |
|---|---|---|---|---|
| | | | **Alternative B1:** Apply the following management prescriptions to the Cerro de la Olla WSA.<br>• VRM Class I<br>• Closed to motorized travel<br>• ROW Exclusion<br>• Allow maintenance of existing range improvements. Do not allow new range improvements or changes to existing range improvements that could impair the suitability of such areas for designation by Congress as Wilderness. | |

# C.4 References

Bureau of Land Management (BLM). 1986. Manual H-8410-1, *Visual Resource Inventory*. Available: https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_H-8410.pdf. Accessed: August 27, 2024.

_____. 1998. *Southwestern Willow Flycatcher Management Plan (Taos Resource Area)*. Taos, NM.

_____. 2000a. *The Rio Grande Corridor Final Plan and Record of Decision*. Available: https://w3.spa.usace.army.mil/urgwops/eis_admin_record/Ref150.PDF. Accessed: April 17, 2024.

_____. 2000b. *Final Environmental Impact Statement for Riparian and Aquatic Habitat Mangement in the Taos Field Office, New Mexico. Volume 2: Proposed Riparian and Aquatic Habitat Management Plan.* Taos, NM. BLM/NM/PL-00-008-1040.

_____. 2001a. *Standards for Public Land Health and Guidelines for Livestock Grazing Management New Mexico*. January. Available: https://www.blm.gov/sites/blm.gov/files/Standards%20for%20Public%20Land%20Health%20and%20Guidelines%20for%20Livestock%20Grazing%20in%20New%20Mexico.pdf. Accessed: February 9, 2024.

_____. 2001b. BLM Handbook H-4180-1. *Rangeland Health Standards*. Available: https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_h4180-1.pdf. Accessed: September 12, 2024.

_____. 2003. *The BLM's Priorities for Recreation and Visitor Services*.

_____. 2007. *A Unified Strategy to Implement BLM's Priorities for Recreation and Visitor Services Workplan*.

_____. 2012. *Taos Approved Resource Management Plan*. Available: https://eplanning.blm.gov/public_projects/lup/68121/86168/103326/Taos_RMP_Record_of_Decision_-_online_version.pdf. Accessed: January 19, 2024.

_____. 2017a. *Final Programmatic Environmental Impact Statement for Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on Bureau of Land Management Lands in 17 Western States*. DOI-BLM-WO-WO2100-2012-0002-EIS.

_____. 2017b. BLM Instruction Memorandum 2017-078. *Instructions for Implementing the Final Programmatic Environmental Impact Statement Using Aminopyralid, Fluroxypyr, and Rimsulfuron on the BLMs Land in 17 Western States*. Available: https://www.blm.gov/policy/im-2017-078. Accessed: September 12, 2024.

_____. 2019. BLM Technical Reference 6280, *National Scenic and Historic Trails Inventory, Assessment, and Monitoring*.

_____. 2020. BLM Technical Note 453. *Guide to Using AIM and LMF Data in Land Health Evaluations and Authorizations of Permitted Uses*. Available: https://www.blm.gov/learn/blm-library/agency-publications/technical-notes. Accessed: September 12, 2024.

_____. 2023. *Final Programmatic Environmental Impact Statement Addressing Vegetation Treatments Using Herbicides*. Available: https://eplanning.blm.gov/eplanning-ui/project/2017138/570. Accessed: April 12, 2024.

Bureau of Land Management (BLM) and National Park Service (NPS). 2017. *Old Spanish National Historic Trail Comprehensive Administration Strategy*. Available: http://npshistory.com/publications/olsp/cas-2017.pdf. Accessed: February 14, 2024.

Halterman, M., M. J. Johnson, J. A. Holmes, and S. A. Laymon. 2016. *A Natural History Summary and Survey Protocol for the Western Distinct Population Segment of the Yellow-billed Cuckoo*. U.S. Fish and Wildlife Service Techniques and Methods.

National Invasive Species Council. 2008. National Invasive Species Management Plan. Available: https://www.doi.gov/invasivespecies/management-plan. Accessed: April 18, 2024.

New Mexico Department of Game and Fish (NMDGF). 2002. *2022 Statewide Fisheries Management Plan*. June 17. Available: https://wildlife.dgf.nm.gov/download/nmdgf-fisheries-management-plan-2022/?ind=0&filename=NMDGF-Fisheries-Management-Plan-2022.pdf&wpdmdl=45515&refresh=669fc28dc55341721746061. Accessed: September 12, 2024.

New Mexico Department of Transportation (NMDOT). 2022. *Wildlife Corridors Action Plan*. Available: https://wildlifeactionplan.nmdotprojects.org/. Accessed: September 12, 2024.

U.S. Fish and Wildlife Service (USFWS). 2002. *Recovery Plan for the Southwestern Willow Flycatcher*. Available: https://www.fs.usda.gov/research/treesearch/35557. Accessed: March 7, 2024.

Williams, Byron K., and Eleanor D. Brown. 2012. Adaptive Management. *The U.S. Department of Interior Applications Guide*. Available: https://www.doi.gov/sites/doi.gov/files/uploads/DOI-Adaptive-Management-Applications-Guide-WebOptimized.pdf. Accessed: April 12, 2024.

# APPENDIX D: BEST MANAGEMENT PRACTICES

**D.1 COMMON TO ALL ACTIVITIES ..... D-2**
**D.2 ROAD DESIGN AND MAINTENANCE ..... D-2**
**D.3 SURFACE-DISTURBING ACTIVITIES ..... D-5**
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**Acronyms**

| Term | Definition |
|---|---|
| BLM | Bureau of Land Management |
| BMP | best management practice |
| CFR | Code of Federal Regulations |
| ESA | Endangered Species Act |
| Monument | Río Grande del Norte National Monument |
| NEPA | National Environmental Policy Act |
| NHPA | National Historic Preservation Act |
| NMDA | New Mexico Department of Agriculture |
| NRHP | National Register of Historic Places |
| NWMA | New Mexico Noxious Weed Management Act |
| ROW | right of way |
| SHPO | State Historic Preservation Office |
| USFS | U.S. Forest Service |
| USFWS | U.S. Fish and Wildlife Service |

# D.1 COMMON TO ALL ACTIVITIES

1. The project proponent will include a restoration plan for habitat of special status species when the Bureau of Land Management (BLM) determines it is appropriate. The restoration plan will be developed in consultation with, and approved by, the BLM.
2. Effects on Special Status Species that are federally listed by the Endangered Species Act (ESA) will be evaluated in the form of a Biological Evaluation and/or a Biological Assessment.
3. When possible, conduct treatments outside of pinyon jay breeding season (late February–early June). A buffer of 500 meters around a known breeding colony would allow for colony shifts across years. A patchy mosaic of suitable nesting habitat, with older age class and larger size trees should be retained (Pinyon Jay Multi-State Working Group 2020).

# D.2 ROAD DESIGN AND MAINTENANCE

1. Design roads to minimize total disturbance, conform to topography, and minimize disruption of natural drainage patterns.
2. Base road-design criteria and standards on road-management objectives, such as traffic requirements of the proposed activity and the overall transportation objectives, and minimize damage to the environment.
3. Locate roads on stable terrain, such as ridge tops, natural benches, and flatter transitional slopes near ridges and valley bottoms, and moderate side slopes and away from slumps, slide-prone areas, concave slopes, clay beds, and where rock layers dip parallel to the slope. Locate roads on well-drained soil types; avoid wet areas.
4. Construct cut-and-fill slopes to be approximately 3(h):1(v) or flatter, where feasible. Locate roads to minimize heights of cut banks. Avoid high, steeply sloping cut banks in highly fractured bedrock.
5. Avoid head walls, mid-slope locations on steep, unstable slopes, fragile soils, seeps, old landslides, side slopes in excess of 70 percent, and areas where the geological bedding planes or weathering surfaces are inclined with the slope. Implement extra mitigation measures when these areas cannot be avoided.
6. Construct roads for surface drainage by using out-slopes, crowns, grade changes, drain dips, water bars, and/or in-sloping to ditches, as appropriate.
7. Sloping the road base to the outside edge for surface drainage is normally recommended for local spurs or minor collector roads, where traffic volume is low, and lower traffic speeds are anticipated. This is also recommended in situations where long intervals between maintenance will occur and where minimum excavation is wanted. Out-sloping is not recommended on steep slopes. Sloping the road base to the inside

edge is an acceptable practice on roads with steep side slopes and where the underlying soil formation is very rocky and not subject to appreciable erosion or failure.

8. Crowning and ditching are recommended for arterial and collector roads, where traffic volume, speed, intensity, and user comfort are considerations. Recommended gradients range from 0 to 15 percent where crowning and ditching may be applied, as long as adequate drainage away from the road surface and ditch lines is maintained.
9. Minimize excavation when constructing roads through the use of balanced earthwork, narrowing road widths, and end-hauling where side slopes are between 50 and 70 percent.
10. If possible, construct roads when soils are dry and not frozen. When soils or road surfaces become saturated to a depth of 3 inches, BLM-authorized activities should be limited or cease unless otherwise approved by the BLM Authorized Officer.
11. Consider improving inadequately surfaced roads that are to be left open to public traffic during wet weather with gravel or pavement to minimize sediment production and maximize safety.
12. Retain vegetation on cut slopes unless it poses a safety hazard or restricts maintenance activities. Roadside brushing of vegetation should be performed in a way that prevents disturbance to root systems and visual intrusions (i.e., avoid using excavators for brushing).
13. Retain adequate vegetation between roads and streams and playa lakes to filter runoff caused by roads.
14. Avoid riparian/wetland areas where feasible; locate in these areas only if the roads do not interfere with the attainment of proper functioning conditions and riparian-management objectives.
15. Minimize the number of unimproved stream and playa lake crossings. When a culvert or bridge is not feasible, locate drive-through (i.e., low-water crossings) on stable rock portions of the drainage channel. Harden crossings with the addition of rock and gravel, if necessary. Use angular rock, if available.
16. Locate roads and limit activities of mechanized equipment within stream channels and playa lakes to minimize their influence on riparian areas. When stream crossing is necessary, design the approach and crossing perpendicular to the channel, where practical. Locate the crossing where the channel is well defined, unobstructed, and straight.
17. Avoid placing fill material in a floodplain unless the material is large enough to remain in place during flood events.
18. Use drainage dips instead of culverts on roads where gradients would not present a safety issue. Locate drainage dips in such a way that water would not accumulate, or where outside berms prevent drainage from the roadway. Locate and design drainage dips immediately upgrade of stream crossings, and provide buffer areas and catchment basins to prevent sediment from entering the stream.

19. Construct catchment basins, brush windrows, and culverts in a way to minimize sediment transport from road surfaces to stream channels. Install culverts in natural drainage channels in a way to conform with the natural streambed gradients to outlets that discharge onto rocky or hardened protected areas. Bottomless culverts should be used when new culverts must be installed and when existing culverts need improvement.
20. Design and locate water-crossing structures in natural drainage channels to accommodate adequate fish passage, provide for minimum impacts on water quality, and capable of handling a 100-year event for runoff and floodwaters. Design water-crossing structures to provide a seamless connection of aquatic habitat and streambed substrate.
21. Use culverts that pass, at a minimum, a 100-year storm event and/or have a minimum diameter of 24 inches for permanent stream crossings and a minimum diameter of 18 inches for road-crossing drains.
22. Replace undersized culverts, and repair or replace damaged culverts and downspouts. Provide energy dissipaters at culvert outlets or drainage dips.
23. Locate culverts or drainage dips in such a manner as to avoid discharge onto unstable terrain, such as head walls or slumps. Provide adequate spacing to avoid accumulation of water in ditches or road surfaces. Culverts should be placed on solid ground to avoid road failures.
24. Proper-sized aggregate and riprap should be used during culvert construction. Place riprap at culvert entrances to streamline water flow and reduce erosion.
25. Establish native, locally adapted, or approved experimental climate-resilient vegetation on all cuts and fill immediately following road construction and maintenance.
26. Remove berms from the down-slope side of roads, consistent with safety considerations.
27. Leave abandoned roads in a condition that provides adequate drainage without further maintenance. Close abandoned roads to traffic. Physically obstruct the road with gates, large berms, trenches, logs, stumps, or rock boulders as necessary to accomplish permanent closure.
28. Abandon and rehabilitate roads, including duplicate roads that are no longer needed. Leave these roads in a condition that provides adequate drainage. Remove culverts.
29. When plowing snow for winter use of roads, provide breaks in snow berms to allow for road drainage. Avoid plowing snow into streams. Plow snow only on existing roads.
30. Maintenance should be performed to conserve existing surface material, retain the original crowned or out-sloped, self-draining cross sections, and prevent or remove rutting berms (except those designed for slope protection) and other irregularities that retard normal surface runoff. Avoid placing loose-ditch or surface material over the shoulder, where it can cause stream sedimentation or weaken slump-prone areas. Avoid undercutting back slopes.

31. Do not disturb the toe of cut slopes when pulling ditches or grading roads. Avoid side-casting road material into streams.
32. Grade roads only as necessary. Maintain drain dips, water bars, road crown, in-sloping, and out-sloping, as appropriate, during road maintenance.
33. Maintain roads in special management areas according to special management area guidance. Generally, retain roads within existing disturbed areas, and side cast material away from the special management area.
34. When landslides occur, save all soil and material usable for reclamation, or stockpile it for future reclamation needs. Avoid side-casting slide material where it can damage, overload, and saturate embankments or flow into down-slope drainage courses. Reestablish vegetation, as needed, in areas where vegetation has been destroyed due to side casting.
35. Strip and stockpile topsoil ahead of construction of new roads, if feasible. Reapply soil to cut and fill slopes prior to revegetation.

# D.3 SURFACE-DISTURBING ACTIVITIES

1. Special design and reclamation measures may be required to protect scenic and natural landscape values. This may include transplanting trees and shrubs, mulching and fertilizing disturbed areas, removing surfacing material, imprinting, utilizing irrigation, using low-profile permanent facilities, and painting to minimize visual contrasts. Surface-disturbing activities may be moved to avoid sensitive areas or to reduce the visual effects of the proposal.
2. Aboveground facilities requiring painting should be designed to blend in with the surrounding environment.
3. Surface disturbance will be restricted in areas that have special topographic (i.e., steep or broken terrain and/or benches) and soil concerns in order to reduce impacts caused by soil erosion and habitat disturbance. Development in these areas will be considered on a case-by-case basis and will contain site-specific mitigation designed to prevent increased sediment from being transported into drainages and fragmentation of areas determined to provide important wildlife habitat.
4. In areas that allow for off-road travel, minimize the off-road impact of large vehicles. Use wide, flat-tread balloon tires where possible. Use all-terrain vehicles, rather than large vehicles, where possible.
5. Only excavate topsoil and subsoil where it is absolutely necessary. Consider brush-beating, mowing, and/or parking on vegetation for surface-disturbing activities.
6. Disturbed areas should be contoured to blend with the natural topography. *Blending* is defined as reducing form, line, and color contrast associated with the surface disturbance. Disturbance should be contoured to match the original topography, where

*matching* is defined as reproducing the original topography and eliminating form, line, and color caused by the disturbance as much as possible.

7. Interim reclamation should be implemented concurrent with construction and site operations to the fullest extent possible. Final reclamation actions will be initiated within 6 months of the termination of operations, unless otherwise approved in writing by the BLM Authorized Officer.
8. Fill material should be pushed into cut areas and up and over back slopes. Depressions should not be left that would trap water or form ponds, unless the BLM Authorized Officer has determined that dips or depressions may be used to assist reclamation efforts and seed propagation.
9. Reclaimed soil will be free of contaminants and have adequate depth, texture, and structure to provide for successful vegetation reclamation. Vegetation reclamation will be considered successful when healthy, mature perennials are established with a composition and density that closely approximates the surrounding vegetation, as prescribed by the BLM, and the reclamation area is free of noxious weeds.
10. If necessary after reclamation, BLM-standard wildlife-friendly fencing will be constructed to exclude livestock for a minimum of at least two successful growing seasons. Exceptions may be necessary in areas where exclusion of native gazing ungulates is required for habitat recovery.
11. Surveys for BLM Special Status Species and their habitat will be required prior to all surface-disturbing activities (per BLM Manual 6840 [BLM 2008]). The project proponent will include a restoration plan for the habitat of Special Status Species when the BLM determines it is appropriate. The restoration plan will be developed in consultation with, and approved by, the BLM.
12. Additional reclamation measures may be required, based on the conditions existing at the time of abandonment.
13. Oil and fuel for equipment and vehicles must be carefully handled and disposed of to prevent soil or water contamination.
14. Develop a spill contingency plan that identifies all actions to be taken in the event of a chemical spill, including the phone numbers for Federal, State, and local agencies that must be notified.
15. Time activities to avoid wet periods.
16. All areas of surface disturbance within riparian areas and/or adjacent uplands should be revegetated with native seed.

# D.4 RIGHTS OF WAY AND UTILITY CORRIDORS

1. Rights of way (ROWs) and utility corridors should use areas adjoining or adjacent to previously disturbed areas whenever possible, rather than traverse undisturbed vegetation communities. Utility-line ROWs or upgrades outside existing utility-line ROWs

may only be authorized if consistent with the care and management of BLM Special Status Species and Río Grande del Norte National Monument (Monument) objects.

2. Water bars or dikes should be constructed on all ROWs and utility corridors and across the full width of the disturbed area, as directed by the BLM Authorized Officer.
3. Disturbed areas within road ROWs and utility corridors should be stabilized by vegetation practices designed to hold soil in place and minimize erosion.
4. Sediment barriers should be constructed when needed to slow runoff, allow deposition of sediment, and prevent transport from the site. Straining or filtration mechanisms may also be employed for the removal of sediment from runoff.
5. Within the limits of ROWs and utility corridors, the proponent/holder will be responsible for weed monitoring and control on disturbed areas (including maintenance, construction activities, and roads). Should invasive/noxious weeds be found, then the proponent/holder would be responsible for consultation with a BLM Authorized Officer within the BLM Taos Field Office for acceptable weed-control methods and site-specific National Environmental Policy Act (NEPA) analysis (if needed).
6. Applicants for electrical-facility and transmission development will incorporate best practices for raptor and avian protection in project design, including, but not limited to, Avian Collision Avoidance Systems, such as the use of near-ultraviolet light to reduce avian collisions. The BLM may require design modifications to minimize surface disturbance, operational conflicts, visual contrast, and/or avian conflicts and impose additional best management practices (BMPs) or mitigation measures during site-specific NEPA analysis for the protection of Monument objects, Special Status Species, wildlife, and other resources.

# D.5 FIRE SUPRESSION

1. Minimize surface disturbances and avoid the use of heavy earth-moving equipment, where possible, on all fire-suppression and -rehabilitation activities, including mop-up, except where high-value resources (including lives and property) are being protected.
2. Install water bars, and seed all constructed firelines with native vegetation species, as appropriate and in accordance with the BLM's *Emergency Fire Rehabilitation Handbook* (BLM 2007).
3. Avoid dropping fire retardant that is detrimental to aquatic communities on streams, lakes, ponds, and in riparian/wetland areas, except where high-value resources (including lives and property) are being protected.
4. The location and construction of handlines should result in minimal surface disturbance. while ensuring that fire containment is not compromised. Hand lines will include existing land features that represent natural fire breaks. Whenever possible, handlines should follow the contour of the slope to protect the soil, provide sufficient residual vegetation to capture and retain sediment, and maintain site productivity.

5. Suppression in riparian areas and Special Status Species habitat should be performed by hand crews, when possible.

# D.6 PRESCRIBED BURNING

1. Prescribed burning will be undertaken in accordance with a BLM-approved burn plan. When preparing the unit for burning, avoid piling concentrations of large logs and stumps; pile small material (i.e., 3 to 8 inches in diameter). Slash piles should be burned when soil and duff moisture are adequate to reduce potential damage to soil resources. When possible, slash piles should be burned during the winter to avoid unintentional mortality of small animals that may inhabit piles during warmer seasons. Additional BMPs for the protection of Monument objects and other resources will be developed in BLM-approved burn plans, as necessary.
2. All fire-management activities would be subject to the BMPs identified in the *Decision Record and Resource Management Plan Amendment for Fire and Fuels Management on Public Land in New Mexico and Texas*.

# D.7 LIVESTOCK-GRAZING MANAGEMENT

1. The objective of all range activities, projects, management plans, and vegetative land treatments is to achieve or exceed the *Standards for Public Land Health and Guidelines for Livestock Grazing Management in New Mexico* (BLM 2001) Grazing-management practices are developed through consultation, with allotment-specific objectives. The purpose of the objectives is to achieve standards and guidelines and progress toward multiple-use objectives and sustainability of resources. Adaptive management will be used when applying management practices. Some of the management practices used to achieve standards and guidelines are as follows.
    a. Monitor the weather, vegetation, livestock, and wildlife.
    b. Adjust the season of use.
    c. Utilize deferment periods.
    d. Utilize rest periods.
    e. Comply with forage use standards.
    f. Make changes in livestock numbers.
    g. Make changes in the class of livestock.
    h. Herd livestock.
    i. Employ low-stress livestock-handling techniques.
    j. Close areas to livestock use.

k. Use salt and supplements as incentives for livestock distribution; no salt or supplement will be placed closer than 0.25 mile from any water source unless otherwise specified.

l. Construct range improvements (i.e., fences, water developments, and pipelines) to facilitate grazing management and improve the resources. All improvements will conform to BLM standards.

m. Maintain sufficient residual vegetation and litter on both upland and riparian sites to protect the soil from wind and water erosion and support ecological functions.

# D.8 INVASIVE/NOXIOUS WEED MANAGEMENT

1. All surface-disturbing equipment should be inspected and cleaned prior to being brought onto public land. This is especially important for out-of-state vehicles or for vehicles traveling from a weed-infested area.
2. If fill dirt or gravel is brought onto public land, then the source needs to be noxious weed–free.
3. Construction sites should be monitored for the life of the project for the presence of invasive/noxious weeds (including maintenance and construction activities). If weeds are found, then the Taos Field Office will be notified, and it will determine the best method for the control of that particular weed species.
4. Site reclamation after surface-disturbing activity will utilize native seed for planting. All seed will be certified noxious weed–free. Areas will be monitored to determine the success of revegetation and the presence of invasive/noxious weeds, and will be reseeded, if necessary.
5. In consultation and coordination with affected permittees, consider livestock quarantine, removal, or timing limitations in invasive/noxious weed–infested areas.
6. All seed, hay, straw, mulch, or other vegetative material transported and used on public land for site stability, rehabilitation, or project facilitation will be certified noxious weed–free of all reproductive parts, consistent with national standards and the New Mexico Noxious Weed Management Act (NWMA), in coordination with the New Mexico Department of Agriculture (NMDA). All baled feed, pelletized feed, and grain used to feed livestock will also be certified as free of noxious weed seed.
7. It is recommended that drivers of all vehicles, including off-road and all-terrain vehicles, traveling in or out of weed-infested areas should clean their equipment before and after use on public land.
8. To avoid unintended dispersal, removal of invasive/noxious species will occur when plants are not producing seed. Sites will be replanted with native species. All seed will be certified noxious weed–free. Areas will be monitored to determine the success of revegetation and the presence of invasive/noxious weeds and will be reseeded if necessary.

9. Through consultation, coordination, and collaboration with grazing permittees, consider corralling livestock on turn-outs/gatherings for up to 72 hours to reduce the chance of introduction or spread of noxious weed species to or from public lands. Feeding certified weed-free hay on public lands may be allowed during this time at the discretion of the BLM Authorized Officer.

# D.9 DEVELOPED RECREATION

1. Construct recreational sites and provide appropriate sanitation facilities to minimize impacts on resource values, public health, and safety and user conflicts with approved activities and access within an area, as appropriate.
2. Minimize impacts on resource values or to enhance a recreational setting and recreational experience. Harden sites and locations subject to prolonged/repetitive concentrated recreational uses with selective placement of gravel or other porous materials, and allow for dust abatement, paving, and engineered road construction.
3. Use public educational signage and/or physical barriers (e.g., rocks, posts, vegetation) to direct or preclude unwanted uses and minimize impacts on resource values, Special Status Species, and the quality of recreational experiences.
4. As appropriate, employ limitations on specific activities to avoid or correct adverse impacts on resource values, Special Status Species, public-safety issues, and/or conflicts between recreational uses.
5. Employ land-use ethics programs and techniques, such as “Leave No Trace” and “Tread Lightly” programs. Use the outreach efforts of such programs to lessen the need to implement more-stringent regulatory measures to obtain resource protection and a quality recreational experience.
6. As appropriate, employ the use of boot-washing stations and interpretive signage to minimize the spread of noxious and invasive weeds associated with recreational uses.
7. To reduce the potential spread of aquatic invasive species, users of water vessels (i.e., rafts, kayaks, canoes, inflatables, and paddle boards) should apply the following measures.
    a. All watercraft and gear that contacts the water (e.g., hip boots, bait containers, trailers) should be thoroughly cleaned and dried before use in public and/or navigable waters to avoid the possible spread of aquatic nuisance species.
    b. Before leaving any water access:
        i. Remove aquatic plants, animals, and mud.
        ii. Drain water from boats, motors, bilges, live wells, and bait containers. Dispose of unwanted bait and other aquatic animals and plants in designated trash receptacles. Before entering another body of water, conveyances should be completely clean, drained, and dry. Conveyances arriving from out of state are required to receive an inspection by the New Mexico Department of Game and

Fish or other certified inspectors. Hot-water decontamination may be required if inspectors determine that the risk of aquatic invasive species introduction is high.

# D.10 WILDLIFE AND RIPARIAN HABITAT

1. Prior to the initiation of a surface-disturbing activity, the project area will be surveyed for raptor or migratory-bird nests, active prairie dog towns, and other BLM Special Status Species. Surveys will be conducted by professional biologists approved by the BLM Authorized Officer. All active nests and active prairie dog towns will be avoided by the distances and seasonal periods listed below.
    a. **Bald Eagle**: 0.5–1.0 mile (January 1–August 31)
    b. **Golden Eagle**: 0.5 mile (January 1–August 31)
    c. **Peregrine Falcon**: 1.0 mile (February 1–August 31)
    d. **Prairie Falcon**: 0.5 mile (April 1–August 31)
    e. **Osprey**: 0.25 mile (April 1–August 31)
    f. **Cooper's Hawk**: 0.25 mile (March 15–August 31)
    g. **Northern (American) Goshawk**: 0.5 mile (March 1–July 31)
    h. **Red-Tailed Hawk**: 0.25 mile (February 1–July 15)
    i. **Ferruginous Hawk**: 1.0 mile (February 1–July 15)
    j. **Mountain Plover**: 1.0 mile (March 1–August 1)
    k. **Gray Vireo**: 0.5 mile (April 1–August 31)
    l. **Gunnison Prairie Dog**: 0.25 mile (February 15–June 15)
    m. **Migratory Birds**: Primary nesting season of May 1–July 31, except for the pinyon jay, which can exhibit breeding behavior as early as March.

    Long-duration land-use activities will not be allowed to occur within the species-specific spatial buffer zone of active nests or occupied prairie dog towns, as listed above. Short-duration activities will be avoided within the species-specific spatial buffer zones during the dates listed above. Short-duration activities will be limited to the spatial buffer zone outside of the boundary of the occupied prairie dog town and will not occur within the occupied town. All other raptor-species nests will be avoided by the spatial buffer zone only during the period(s) listed above, regardless of the duration of the activity. Before land-use activities can commence, a raptor and prairie dog survey must be completed.

    A *short-duration activity* is defined as an activity that would begin outside of a given breeding season and end prior to initiation of a given breeding season. A *long-duration activity* is defined as an activity that would continue into or beyond a given nesting/ breeding season. An *active nest* is defined as any nest that has been occupied in the last 7 years. A nest will be determined active or inactive by the BLM Authorized Officer.

Surveys will be conducted by professional biologists approved by the BLM Authorized Officer.

2. Ensure that all fences are constructed to BLM Taos Field Office fence specifications to mitigate impacts on wildlife and reduce wildlife habitat-connectivity barriers.
3. Ensure that wildlife escape ramps are installed and maintained on all applicable water-development projects, including existing watering facilities on their modification, on public land (see BLM Manual Handbook H-1741-2, *Water Developments;* BLM 1990).
4. Construct all new water improvements so that they are located a minimum of 30 meters away from fences or other structures likely to pose a collision threat to bats.
5. Surface disturbance will not be allowed within up to 0.5 mile of the outer edge of 100-year floodplains, playas, all artificial water developments (e.g., tanks, guzzlers), and riparian habitat (e.g., seeps, arroyos). Exceptions to this requirement will be considered on a case-by-case basis.
6. In areas where habitat- and/or rangeland-enhancement projects have been implemented, with the exception of large landscape projects (i.e., prescribed burns, chemical treatments, and mechanical treatments), adverse impacts on the landscape will be avoided by minimizing or excluding certain surface-disturbing activities that may degrade the objectives or intent of the project. Exceptions to this requirement will be considered on a case-by-case basis.
7. In all crucial calving, lambing, kidding, and fawning areas and wintering ranges, all surface-disturbing activities, permanent or temporary, will be avoided during the appropriate time periods.
8. Prior to initiating geophysical or other preliminary surveys during the raptor-breeding season, the area will be surveyed for the presence of raptor nests.
9. In siting facilities, the following measures must be followed.
    a. During operations at any time, all habitat features (i.e., pinnacles, cliffs, ledges, caves, and trees and shrubs greater than 6 feet in height) containing or capable of containing raptor nests or bat habitat will be avoided by vehicular traffic or other surface-disturbing activities likely to remove or destroy them, unless authorized by the BLM Authorized Officer.
    b. Tree and vegetation clearing will be limited to the minimum area required.
    c. Construction activities will be timed to avoid wet periods.
    d. Power lines will be constructed to meet the standards outlined in the most recent version of *Suggested Practices for Raptor Protection on Power Lines* (Edison Electric Institute/Raptor Research Foundation 2006), , U.S. Fish and Wildlife Service (USFWS) guidelines, or other current design standards, unless otherwise agreed to by the BLM Authorized Officer. The utility provider is responsible for demonstrating that power-pole designs that do not meet these standards are raptor-safe. Such proof will be provided by a raptor expert approved by the BLM Authorized Officer. The BLM

reserves the right to require modifications or additions to power-line structures constructed under this authorization, if necessary, to ensure the safety of large, perching birds. The modifications and/or additions will be made by the utility provider without liability or expense to the Federal government.

e. All equipment and facilities installed on Federal land will be constructed to prevent birds and bats from entering them and, to the extent practical, to discourage perching and nesting.

f. Open top tanks, reserve pits, disposal pits, or other open pits will be required to be equipped with escape ramps and deterrents for entry by birds, bats, or other wildlife.

g. Noise-disturbance and management activities will be avoided or minimized within 1 mile of raptor nests during the nesting and brood-rearing period. Unoccupied raptor nests will be protected from removal or destruction, including a year-round protection of a 0.25-mile buffer of suitable habitat around any known occupied and unoccupied nests. Avoid loss or degradation of large cottonwood-gallery riparian habitat.

h. All areas of surface disturbance within riparian areas and/or adjacent uplands should be revegetated with native species.

i. Place infrastructure within or near previously disturbed locations to avoid new impacts on fish and wildlife habitat.

j. Identify important, sensitive, and unique habitats, Special Status Species, fish, and wildlife in the area. Incorporate practices that minimize impacts on these habitats.

k. Where practicable, follow *Pollinator-Friendly Best Management Practices for Federal Lands* (USFWS 2015)

# D.11 VISUAL-RESOURCE MANAGEMENT

1. All surface-disturbing projects will include consideration for visual resource–management objectives early in the planning process, with proponents and managers engaging a qualified Visual Resource Specialist as an integral member of the project-planning team.
2. BMPs to address visual-resource concerns have been incorporated into the resource discussions, as appropriate. BMPs dealing with visual resource–management considerations in general are available at www.blm.gov/nstc/VRM/destech.

# D.12 CULTURAL RESOURCES

1. Evaluation of all BLM activities and BLM-authorized activities will be made in compliance with BLM Manual 8100, *The Foundations for Managing Cultural Resources*, (BLM 2004) and subsequent 8100 series manuals, and the *Handbook of Guidelines and Procedures for Inventory, Evaluation, and Mitigation of Cultural Resources* (BLM 1998).

2. When possible, locate projects in areas that are previously disturbed. To comply with the National Historic Preservation Act (NHPA), the BLM must identify eligible cultural resources. Under the current regulations and guidelines, the BLM may decide that no inventory needs to be conducted because the proposed action is located in an environment where ground disturbance has modified the surface so extensively that the likelihood of finding intact cultural resources is negligible.
3. When a NEPA document specifically stipulates the need for an archaeological monitor during construction, or a project is located in areas that require an archaeological monitor to be present, it is the applicant's responsibility to contract an archaeological consultant that holds a current New Mexico BLM permit (as applicable) and that is authorized to work on the Monument. Fieldwork authorizations are required prior to any construction monitoring.
4. Where proposed projects or development will adversely affect a cultural resource, testing and/or data recovery to recover scientific information may be required as mitigation. The applicant or operator bears the full cost of mitigation and is encouraged to consider avoiding adverse effects through project relocation or redesign, rather than mitigating adverse effects. The applicant or operators will also be responsible for the costs of consultation with Tribal cultural advisors, in addition to contracted archaeologists. The agencies will consult with the Tribes prior to cultural-resources testing or data recovery, consistently with existing agency policy.
5. A cultural resource must be allocated by appropriate analysis prior to:
    a. Authorizing or implementing any heritage tourism project.
    b. When special recreation permits are issued that will utilize a cultural resource.
    c. A BLM recreation project is proposed that involves the use or interpretation of a cultural resource.
6. The NHPA, as amended, requires that if newly discovered historic or archaeological materials or other cultural resources are identified during project implementation, then work in that area must stop and the Authorized Officer (BLM)/Responsible Official (U.S. Forest Service [USFS]) must be notified immediately. Within 5 working days, the Authorized Officer (BLM)/Responsible Official (USFS) will inform the proponent about the following.
    a. Whether the materials appear eligible for the National Register of Historic Places (NRHP)
    b. The mitigation measures that will likely have to be undertaken before the site could be used (assuming that *in situ* preservation is not practicable) (36 Code of Federal Regulations [CFR] 800.13)
    c. A time frame for the Authorized Officer (BLM)/Responsible Official (USFS) to complete an expedited review under 36 CFR 800.11 to confirm, through the State Historic Preservation Office (SHPO), that the Authorized Officer's (BLM)/Responsible Official's (USFS) findings were correct, and mitigation was appropriate

7. A standard discovery stipulation for cultural-resource protection will be attached to the land-use authorization. The operator or its contractor is responsible for informing all persons associated with project operations that Federal laws protect archaeological resources, and they will be subject to prosecution for disturbing or destroying any historic or archaeological sites or collecting any cultural objects, prehistoric or historic, from Federal lands.
8. Any companies, individuals, or their subcontractors to which the BLM issues a land-use authorization will strictly adhere to the confidentiality of information provided by the BLM that pertains to the nature and location of archaeological resources (Archaeological Resource Protection Act, 16 United States Code § 470hh).
9. If any previously unidentified cultural resources or human remains are discovered, then all activity in the vicinity of the discovery will cease, and it will be immediately reported to the BLM Field Office. Work may not resume at that location until it is approved by the BLM Authorized Officer.
10. Use visual-resource BMPs to avoid, minimize, or mitigate potential adverse effects on historic properties.
11. The Taos Field Office's Fuels Program utilizes design features during vegetation projects to protect cultural resources. These design features were developed through the Section 106 process in consultation with the SHPO and generally include, but are not limited to, the following.
    a. Buffer the sites (generally 15 meters).
    b. Include cultural sites within the feathered edges of treatments.
    c. Leave faux islands for wildlife habitat purposes.
    d. Treat the site.
    e. Leave the site untreated.
    f. Identify the method of treatment (e.g., hand, mechanized, rubber tire or tracked).
    g. Identify the best time of year (i.e., frozen/dry preferred).
    h. Evaluate, protect, and monitor all NRHP-eligible sites. These sites will be avoided during mechanized treatments or managed as agreed through SHPO consultation.

# D.13 REFERENCES

Bureau of Land Management (BLM). 2008. BLM Manual 6840 – *Special Species Management*. December 12. Available: Form 1221-2, 6840 - Special Status Species Management (blm.gov).

———. 2001. *Standards for Public Land Health and Guidelines for Livestock Grazing Management New Mexico*. January. Available: https://www.blm.gov/sites/blm.gov/files/Standards%20for%20Public%20Land%20Health%20and%20Guidel

ines%20for%20Livestock%20Grazing%20in%20New%20Mexico.pdf. Accessed: February 9, 2024.

———. 2004. BLM Manual 8100, *The Foundations for Managing Cultural Resources.* Available: https://www.blm.gov/sites/blm.gov/files/Manual%20-%20Foundations%20for%20Managing%20Cultural%20Resources.pdf.

———. 2007. BLM Handbook H-1742-1, *Burned Area Emergency Stabilization and Rehabilation Handbook*. February 12. Available: Media_Library_BLM_Policy_Handbook_h1742-1.pdf.

———. 1998. *BLM Handbook of Guidelines and Procedures for Inventory, Evaluation, and Mitigation of Cultural Resources.* Colorado State Office. Updated March 2021. Available: https://www.blm.gov/sites/default/files/docs/2021-03/Handbook%20revised%2003-2021.pdf.

———. 1990. BLM Manual Handbook H-1741-2, *Water Developments*. November 6.

Edison Electric Institute/Raptor Research Foundation. 2006. *Suggested Practices for Avian Protection On Power Lines: The State of the Art in 2006.* Available: https://www.nrc.gov/docs/ML1224/ML12243A391.pdf.

Pinyon Jay Multi-State Working Group. 2020. Conservation Strategy for the Pinyon Jay (*Gymnorhinus cyanoephalus).* February. Available: https://partnersinflight.org/wp-content/uploads/2019/10/Conservation-Strategy-for-Pinyon-Jay_Version-1_February-2020_LowRes.pdf. Accessed: February 9, 2024.

U.S. Fish and Wildlife Service (USFWS). 2015. *Pollinator-Friendly Best Management Practices for Federal Lands.* Available: PollinatorFriendlyBMPsFederalLands05152015.pdf (usda.gov).

# APPENDIX E: SPECIAL STATUS SPECIES

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**Acronyms**

| Term | Definition |
|---|---|
| 2012 Taos RMP | *2012 Approved Taos Resource Management Plan* |
| BLM | Bureau of Land Management |
| Monument | Río Grande del Norte National Monument |
| NMDFG | New Mexico Department of Fish and Game |
| NMED | New Mexico Environment Department |
| ONRW | Outstanding National Resource Water |
| USFWS | U.S. Fish and Wildlife Services' |

Management guidance is provided below for special status species habitat that occurs on Río Grande del Norte National Monument (Monument) lands administered by the Bureau of Land Management (BLM) Taos Field Office. The remaining listed species habitat that might occur within the planning area would be subject to the guidelines presented in Section 2.1.6, *Special Status Species*, of the *2012 Approved Taos Resource Management Plan* (BLM 2012). Species given special status are subject to change.

# E.1 SPECIAL STATUS ANIMAL SPECIES

## E.1.1 Southwestern Willow Flycatcher

Southwestern willow flycatcher (*Empidonax traillii extimus*) is a federally listed Endangered species and BLM Sensitive Species. To protect southwestern willow flycatcher habitat, the BLM will continue to implement the following management plans: *Southwestern Willow Flycatcher Management Plan for the Taos Field Office* (BLM 1998), the U.S. Fish and Wildlife Services' (USFWS) *Final Recovery Plan for the Southwestern Willow Flycatcher* (Empidonax traillii extimus) (USFWS 2002), the *Final Environmental Impact Statement for Riparian and Aquatic Habitat Management in the Taos Field Office* (BLM 2000b), and the *Rio Grande Corridor Final Plan* (BLM 2000a). BLM management actions will incorporate those recovery actions for the southwestern willow flycatcher that will increase and improve occupied, suitable, and potential breeding habitat, increase metapopulation stability, and minimize threats to migration habitat, and the BLM will continue to survey and monitor populations and provide public education and outreach.

The only Critical Habitat designation within the planning area is for the southwestern willow flycatcher. The Final Rule establishing Critical Habitat for southwestern willow flycatcher was published on January 3, 2013 (*Federal Register* Volume 78, Number 2). The planning area is in the Upper Rio Grande Management Unit. Critical Habitat is designated along the upper Rio Grande, from Taos Junction Bridge to the border of the Pueblo of Ohkay Owingeh.

As needed, seasonal restrictions on BLM-authorized activities will be applied in southwestern willow flycatcher habitat from April 15 through September 15. These dates could be revised if new data become available. The following management prescriptions for the southwestern willow flycatcher will apply.

- Presence/absence surveys will be conducted annually for the species in potential habitat areas where project activity is expected.
- A 0.25-mile buffer will be established around any known southwestern willow flycatcher nests that are being defended as a territory, typically during the breeding season (April–September), and project activity will be excluded from this buffer zone.

## E.1.2 Gunnison's Prairie Dog

Gunnison's prairie dog (*Cynomys gunnisoni*) is a BLM Sensitive Species and known to have active populations in the planning area. To protect Gunnison's prairie dog habitat, the BLM will continue to survey and map colonies and monitor for plague, the main threat to existing populations. The *Draft Conservation Plan for Gunnison's Prairie Dog* (NMDGF 2008) outlines a conservation approach for this species, and the BLM Taos Field Office will, wherever feasible, employ the strategies and actions outlined therein to promote conservation and minimize disturbance to Gunnison's prairie dogs where they occur or have potential habitat within the planning area. Populations will be managed for the protection of the metapopulation dynamics required for sustainability of the species. Potential areas for introduction, transplant, or augmentation may be considered in cooperation with the Monument.

## E.1.3 Hoary Bat

Hoary bat (*Lasiurus cinereus*) is a BLM Sensitive Species. Hoary bats are uncommon, but widespread throughout most of North America and ranging into Central America. They roost solitarily in trees, with preferences including maple, oak, ash, elder, hemlock, and redwood trees. Hoary bats migrate seasonally, moving from summer ranges across most of North America to southern and coastal winter habitat. They will also hibernate for short periods of time. Continued development of wildlife waters accessible to bats and project-related surveys for this species will allow for appropriate management decisions and conservation of this species.

## E.1.4 Spotted Bat

The spotted bat (*Euderma maculatum*) is a BLM Sensitive Species. Its preferred habitat is meadows in subalpine coniferous forest with streams or other water sources. Rocky cliffs are important for roosting. The species may also summer in forested areas and migrate through lower elevations. Continued development of wildlife waters accessible to bats and project-related surveys for this species will allow for appropriate management decisions and conservation of this species.

## E.1.5 Townsend's Big-Eared Bat

Townsend's big-eared bat (*Corynorhinus townsendii*) is a BLM Sensitive Species. This bat roosts mostly in caves or mines; at night, it can roost in abandoned buildings. It will also use rock crevices and hollow trees as roost sites. In summer, this species occurs widely across New Mexico and can be found over desert–scrub, desert–mountain, oak–woodland, piñon–juniper, and coniferous forests. Continued development of wildlife waters accessible to bats, proper protection of cave and underground mine habitat, and project-related surveys for this species will allow for appropriate management decisions and conservation of this species.

## E.1.6 Bendire's Thrasher

Bendire's thrasher (*Toxostoma bendirei*) is a BLM Sensitive Species. This bird typically inhabits sparse desert shrubland and open woodland with scattered shrubs or trees. Project-related surveys for this species will allow for appropriate management decisions and conservation of this species.

## E.1.7 Chestnut-Collared Longspur

Chestnut-collared longspur (*Calcarius ornatus*) is a BLM Sensitive Species. This bird is a native prairie specialist that winters in grasslands, deserts, and plateaus dominated by low grasses and forbs, where most vegetation is less than 1.5 feet high. Project-related surveys for this species will allow for appropriate management decisions and conservation of this species.

## E.1.8 Loggerhead Shrike

The loggerhead shrike (*Lanius ludovicianus*) is a BLM Sensitive Species found year-round in New Mexico. This bird species inhabits open country with short vegetation and well-spaced shrubs or low trees, particularly those with spines or thorns. Project-related surveys for this species will allow for appropriate management decisions and conservation of this species.

## E.1.9 Mexican Whip-Poor-Will

Mexican whip-poor-will (*Antrostomus arizonae*) is a BLM Sensitive Species. This bird prefers pine–oak woodlands or densely wooded canyons between 5,400 and 6,500 feet high. Project-related surveys for this species will allow for appropriate management decisions and conservation of this species.

## E.1.10 Mountain Plover

The mountain plover (*Charadrius montanus*) is a BLM Sensitive Species. This ground-nesting bird breeds in flat, open grasslands that are often associated with prairie dog towns and intensive grazing. Project-related surveys for this species will allow for appropriate management decisions and conservation of this species.

## E.1.11 Pinyon Jay

Pinyon jay (*Gymnorhinus cyanocephalus*) is a BLM Sensitive Species primarily associated with piñon–juniper habitat. Project-related surveys for this species will allow for appropriate management decisions and conservation of this species.

## E.1.12 Thick-Billed Longspur

Thick-billed longspur (*Rhynchophanes mccownii*), also known as McCown's longspur, is a BLM Sensitive Species. This ground-dwelling bird is often found in flocks, sometimes mixed with other longspurs or horned larks (*Eremophila alpestris*). It breeds in shortgrass prairies and winters in similar shortgrass habitat or dirt fields. Project-related surveys for this species will allow for appropriate management decisions and conservation of this species.

## E.1.13 Virginia's Warbler

Virginia's warbler (*Leiothlypis virginiae*) is a BLM Sensitive Species. It typically occurs in piñon–juniper or oak woodlands. This bird prefers dense, shrubby vegetation for breeding. It is found in mountainous pine forests and cottonwood or willow riparian areas during migration. Project-related surveys for this species will allow for appropriate management decisions and conservation of this species.

## E.1.14 Northern Leopard Frog

Northern leopard frog (*Lithobates pipiens*) is a BLM Sensitive Species. Northern leopard frogs breed in a variety of aquatic habitats, most often in permanent pools, such as the marshy edges and side channels of streams or rivers. However, they also breed in springs, wetlands, beaver ponds, and temporary pools, as well as in human-constructed habitats, such as earthen stock tanks. Increased survey efforts and the prohibition of modification to wetlands and surrounding uplands will serve to protect northern leopard frog habitat and populations.

## E.1.15 Rio Grande Sucker

Rio Grande sucker (*Catostomus plebeius*) is a BLM Sensitive Species. The Rio Grande sucker is a small bottom-feeding fish that lives in slow-moving waters in the Rio Grande. It is the only native sucker to the Rio Grande Basin. The implementation of the best-available science and methods to prioritize restoration efforts by focusing on areas of potential degradation, while developing shared protocols with the New Mexico Environment Department (NMED) for implementing Outstanding National Resource Waters (ONRWs) protection, will protect and enhance Rio Grande sucker habitat and populations.

## E.1.16 Rio Grande Chub

Rio Grande chub (*Gila pandora*) is a BLM Sensitive Species and is present in the Rio Grande in the planning area. The implementation of the best-available science and methods to prioritize restoration efforts by focusing on areas of potential degradation, while developing shared protocols with the NMED for implementing ONRWs protection, will protect and enhance Rio Grande chub habitat and populations.

## E.1.17 Rio Grande Cutthroat Trout

Rio Grande cutthroat trout (*Oncorhynchus clarkia virginalis*) is a Federal Candidate species and a BLM Sensitive Species. Rio Grande cutthroat trout are present in the Rio Grande in the planning area. In coordination with the New Mexico Department of Fish and Game (NMDFG), fingerlings are stocked every year in the planning area. Rio Grande cutthroat are also found in the headwaters of the Rio San Antonio. The BLM is a signatory on a multi-state, multi-agency conservation agreement for Rio Grande cutthroat trout and participates in conservation planning and activities. The BLM will continue this participation and work to protect and enhance Rio Grande cutthroat trout habitat and populations.

## E.1.18 Roundtail Chub

Roundtail chub (*Gila robusta*) is a BLM Sensitive Species that occurs in large rivers and streams in the Upper Colorado River Basin and is less abundant in the lower basin. Roundtail chub are found in cool-to-warm waters of rivers, streams, and cienegas and often occupy the deepest pools and eddies present in the stream. The implementation of best-available science and methods to prioritize restoration efforts by focusing on areas of potential degradation, while developing shared protocols with the NMED for implementing ONRWs protection, will protect and enhance Rio Grande chub habitat and populations.

## E.1.19 Speckled Chub

Speckled chub (*Macrhybopsis aestivalis*) is a BLM Sensitive Species that is known from the Rio Grande. It inhabits the bottom of large river channels with moderate-to-swift currents and sandy or gravelly bottoms. The implementation of best-available science and methods to prioritize restoration efforts by focusing on areas of potential degradation, while developing shared protocols with the NMED for implementing ONRWs protection, will protect and enhance Rio Grande chub habitat and populations.

## E.1.20 American Bumble Bee

American bumble bee (*Bombus pensylvanicus*) is a BLM Sensitive Species that is found in open farmland and fields throughout its range. This bee is a highly adaptable forage generalist and can feed on a wide variety of flowering plants. Management strategies include project-related surveys, monitoring, and protection (e.g., avoid, minimize, mitigate hierarchy) from disturbance.

## E.1.21 Monarch Butterfly

Monarch butterfly (*Danaus plexippus plexippus*) is a BLM Sensitive Species. It occurs throughout New Mexico during the warm season, but is most abundant in southeast New Mexico. For reproduction, the butterfly exploits large milkweed populations during the summer. Habitat includes generally mesic or wet areas that support milkweed or other nectar species.

Management strategies include project-related surveys, monitoring, and protection (e.g., avoid, minimize, mitigate hierarchy) from disturbance.

### E.1.22 Western Bumble Bee

The western bumble bee (*Bombus occidentalis*) is a BLM Sensitive Species. As generalist foragers, they do not depend on any one flower type, but do require habitats rich with floral resources and continuous blooming from spring to fall. Management strategies include project-related surveys, monitoring, and protection (e.g., avoid, minimize, mitigate hierarchy) from disturbance.

### E.1.23 Yuma Skipper

Yuma skipper (*Ochlodes yuma anasazi*) is a subspecies restricted to northern New Mexico and the Rio Grande watershed. Habitat is defined by the presence of common reed (*Phragmites americanus*), an obligate wetland plant restricted to marshes, watercourses, pond edges, springs, and other water sources. Management strategies include project-related surveys, monitoring, and protection (e.g., avoid, minimize, mitigate hierarchy) from disturbance.

## E.2 SPECIAL STATUS PLANT SPECIES

### E.2.1 Bill's Neoparrya

Bill's neoparrya (*Neoparrya lithophila*) is a BLM Sensitive Species. A narrow endemic found on late Tertiary volcanic substrates, including dikes, lava flows, and igneous outcrops composed primarily of basalt or tuff, it has also been found on limestone substrates. Management strategies include project-related surveys for this species and will incorporate proper management decisions as new occurrences are discovered.

### E.2.2 Clipped Wild Buckwheat

Clipped wild buckwheat (*Eriogonum lachnogynum* var. *colobum*) is a BLM Sensitive Species. It is found on open sandy or gypseous limestone ridges and edges of mesas in piñon–juniper woodland between 6,820 and 7,540 feet tall. Management strategies include project-related surveys for this species and will incorporate proper management decisions as new occurrences are discovered.

### E.2.3 Rio Chama Blazingstar

Rio Chama blazingstar (*Mentzelia conspicua*) is a BLM Sensitive Species.

## E.2.4 Ripley's Milkvetch

Ripley's milkvetch (*Astragalus ripleyi*) is a BLM Sensitive Species. It is found in sagebrush, piñon–juniper woodland, and Gambel oak thickets in ponderosa pine forests between 7,000 and 8,250 feet tall. Ripley's milkvetch is known from approximately eight populations within the planning area. Management strategies include project-related surveys, monitoring, and protection (e.g., avoid, minimize, mitigate hierarchy) from disturbance.

## E.2.5 Taos Nailwort

Taos nailwort (*Paronychia "leucochthonicola"*) is a BLM Sensitive Species.

## E.2.6 Taos Milkvetch

Taos milkvetch (*Astragalus puniceus* var. *gertrudis*) is a BLM Sensitive Species. It is found on dry banks and gravelly benches in piñon–juniper woodland between 6,000 and 7,000 feet tall. Management strategies include project-related surveys for this species and will incorporate proper management decisions as new occurrences are discovered.

## E.2.7 Taos Springparsley

Taos springparsley (*Cymopterus spellenbergii*) is a BLM Sensitive Species. This plant usually grows among basalt boulders that form caprock along canyons rims over much of the Taos Plateau. It occasionally grows in soils derived from metamorphic rock or in sandy draws. The plant community is open piñon–juniper woodland or Douglas-fir–ponderosa pine forest at elevations of 6,200 to 8,800 feet. Management strategies include project-related surveys, monitoring, and protection (e.g., avoid, minimize, mitigate hierarchy) from disturbance.

# E.3 REFERENCES

Bureau of Land Management (BLM). 1998. *Southwestern Willow Flycatcher Management Plan for the Taos Field Office*. Available on request.

_____. 2000a. *The Rio Grande Corridor Final Plan and Record of Decision*. Available: https://w3.spa.usace.army.mil/urgwops/eis_admin_record/Ref150.PDF. Accessed: April 17, 2024.

_____. 2000b. *Final Environmental Impact Statement for Riparian and Aquatic Habitat Management in the Taos Field Office*. U.S. Department of the Interior, Bureau of Land Management, Taos Field Office.

_____. 2012. *Taos Approved Resource Management Plan*. Available: https://eplanning.blm.gov/eplanning-ui/project/68121/570. Accessed: August 27, 2024.

New Mexico Department of Game and Fish (NMDGF). 2008. *Draft Conservation Plan for Gunnison's Prairie Dog (*Cynomys gunnisoni*) in New Mexico*. May 12. Available:

https://www.wildlife.state.nm.us/download/conservation/species/mammals/Conservation-Plan-Gunnisons-Prairie-Dog-final-draft-May_12_2008.pdf. Accessed: April 17, 2024.

U.S. Fish and Wildlife Service (USFWS). 2002. *Final Recovery Plan for the Southwestern Willow Flycatcher (*Empidonax traillii extimus). Albuquerque, NM: U.S. Fish and Wildlife Service, Region 2. 529 pp. Available: https://www.fs.usda.gov/research/treesearch/35557. Accessed: April 17, 2024.

# APPENDIX F: RECREATION MANAGEMENT

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## Acronyms

| Term | Definition |
|---|---|
| ERMA | Extensive Recreation Management Area |
| JDB | John Dunn Bridge |
| Monument | Río Grande del Norte National Monument |
| NM | New Mexico |
| NMDOT | New Mexico Department of Transportation |
| SRMA | Special Recreation Management Area |
| SRP | Special Recreation Permit |
| TJB | Taos Junction Bridge |
| TMP | Travel Management Plan |
| VRM | Visual Resource Management |
| WSR | Wild and Scenic River |

Recreational opportunities offered in the Río Grande del Norte National Monument (Monument) span from rafting on the Rio Grande, to camping at developed campgrounds with river access in Orilla Verde Recreation Area, to visiting remote hiking locations that have opportunities for solitude within Cerro de Yuta and Rio San Antonio Wildernesses. The Rio Grande Gorge is a boating, hiking, and fishing destination for local families and others traveling from Colorado, New Mexico, Texas, and beyond. Segments of the Wild and Scenic River (WSR) corridor offer a range of some of the most challenging whitewater rafting in New Mexico, as well as the opportunity for developing boating skills. Other public and commercial recreational opportunities within the Monument include picnicking, scenic drives, stargazing, rock climbing, hiking, heritage tourism (i.e., petroglyphs), horseback riding, wildlife viewing, mountain biking, cross-country skiing, hot-spring soaking, and hunting.

The Monument is adjacent to the Carson National Forest, an area that is popular with a variety of recreational uses. The Carson National Forest features five Wilderness Areas, the Taos Ski Valley, and the Continental Divide National Scenic Trail. The region also hosts the Cumbres & Toltec Scenic Railroad, which crosses through the northwest corner of the Taos Plateau, the High Road to Taos Scenic Byway, and the Enchanted Circle Scenic Byway.

# F.1 RECREATION MANAGEMENT AREAS

Public lands are identified for recreation as Special Recreation Management Areas (SRMAs) or Extensive Recreation Management Areas (ERMAs), and all lands that are not designated as either an SRMA or ERMA are considered public lands not specifically managed for recreational uses. No undesignated public lands are within the Monument. The BLM may also designate Backcountry Conservation Areas to protect, conserve, restore, and enhance lands that are generally intact and undeveloped and contain habitat for recreationally important fish and/or wildlife species.

## F.1.1 Special Recreation Management Areas

SRMAs recognize unique and distinctive recreational values that are managed to enhance a targeted set of activities, experiences, and benefits. These areas often have high levels of recreational activity and visitor services–program investments established to meet the recreation-market demand.

## F.1.2 Extensive Recreation Management Areas

ERMAs offer a variety of dispersed recreation activities through custodial recreation management to resolve use conflicts and provide visitor safety and resource protection.

# F.2 ALTERNATIVE A: NO ACTION

**Table F.2-1. Acres in the Recreation Management Area, Alternative A**

| Recreation Management Area | Acres |
|---|---|
| Taos Plateau ERMA | 168,889 |
| Ute Mountain ERMA | 17,784 |
| San Antonio Gorge ERMA | 7,366 |
| Rio Grande Gorge SRMA | 48,190 |
| *Rio Del Norte RMZ* | *10,334* |
| *Taos Box RMZ* | *3,323* |
| *Wild Rivers Rim RMZ* | *749* |
| *Guadalupe Mountain RMZ* | *10,573* |
| *Orilla Verde and Lower Gorge RMZ* | *3,950* |
| *Taos Valley Overlook RMZ* | *2,314* |
| *Rio Grande Rim and Copper Hill RMZ* | *16,947* |
| **TOTAL** | **242,229** |

ERMA = Extensive Recreation Management Area ; RMZ = Recreation Management Zone; SRMA = Special Recreation Management Area.

## F.2.1 Extensive Recreation Management Areas

### F.2.1.1 Taos Plateau Extensive Recreation Management Area

- Management Objectives
  - This is an undeveloped market, where users can spend time several miles from human development and activity. Manage this area to provide an open setting, with minimal to no facilities and controls, where unconfined recreation and casual use can be maximized.
- Implementation Actions
  - **Marketing**: Provide a kiosk for orientation to establish entrance and identity of BLM-administered public land. Other signs and information will be minimal and unintrusive.
  - **Management:** Designate and sign routes. Implement transportation plan. Post regulations and the "Leave No Trace" ethics statement at access points. Pursue access easements, and explore trail opportunities along the Petaca Drainage. Maintain trails in the Guadalupe Mountain area. Work with partners to develop the trail from Questa to Zimmerman Visitor Center. Contain and define parking, if needed, to prevent disturbance and protect resources in areas such as Las Mestenas. Maintain Horse Thief Trail.
  - **Monitoring:** Routine surveys and rotating vehicle counters. Participate in hunter contact stations and vehicle counters. Conduct trail-register and routine visitor surveys in the Guadalupe Mountains area within Wild Rivers Recreation Area.

- **Administrative**
  - **Visual Resource Management (VRM)**: Class II.
  - **Travel**: Limited to designated routes.
  - **Recreation**: No camping in the Guadalupe Mountains Areas within the Wild Rivers Recreation Area.
  - **Permits**: Consider small competitive events within Las Mestenas and guide services in remainder of unit.
  - **Minerals**: Closed to mineral material sales.

### F.2.1.2 San Antonio Extensive Recreation Management Area

- Management Objectives
  - Manage this zone to provide opportunities for visitors to engage in routine exercise and escape in this middle-country setting.
- Implementation Actions
  - **Marketing**: Signs and information will be minimal and unintrusive. Information will be provided on request. Management of the Watchable Wildlife Program will continue.
  - **Management:** Ranger patrols are rare. Management actions are limited to implementing the transportation plan.
  - **Monitoring:** Annual wilderness monitoring report.
  - **Administrative**
    - **VRM**: Class I.
    - **Travel**: Limited to designated routes.
    - **Recreation**: Trash and human waste to be packed out. Fires in containers only. Dead- and downed-wood collecting only.

### F.2.1.3 Ute Mountain Extensive Recreation Management Area

- Management Objectives
  - Manage this area to provide an open setting within this undeveloped market with minimal to no facilities and controls, where unconfined recreation, casual use, wildlife viewing, and hunting can be maximized.
- Implementation Actions
  - **Marketing**: Signs and information will be minimal and unintrusive. Information will be provided on request.
  - **Management:** No additional trails will be developed. The *Rio Grande Corridor Final Plan and Record of Decision* (BLM 2000)serves as guidance for boating on the Ute Mountain

stretch. Partner with the New Mexico Department of Transportation (NMDOT) to establish a Watchable Wildlife Area in an appropriate location. If necessary, contain and define parking with simple and rustic materials and design to prevent disturbance and protect resources.

- **Monitoring:** Trail registers. State game and fish reports for hunting unit.
- **Administrative**
  - **VRM**: Class I, except VRM II along travel routes.
  - **Travel**: Closed except limited to designated routes along north and west borders.
  - **Recreation**: Trash will be packed out. Dead and downed wood may be collected for campfires. Parking not allowed beyond 300 feet of designated routes. Camping is prohibited within 300 feet of descent points into Rio Grande or Costilla Creek.

## F.2.2 Special Recreation Management Areas

### F.2.2.1 Rio Grande Del Norte Recreation Management Zone

- Management Objectives
  - Manage this zone to provide opportunities for visitors to engage in boater skill development or outstanding opportunities for wildlife viewing in these back country and middle country settings.
- Outcomes
  - **Primary Activities:** Boating, hiking, and fishing.
  - **Experiences:** Solitude and savoring river and rock-art aesthetics.
  - **Benefits:** Improved self-confidence, improved boating skills, renewed spirit, and a closer relationship to nature. Economic benefits through Special Recreation Permits (SRPs). Increased knowledge and appreciation of resources through river-guided interpretation.
- Settings Prescription
  - **Physical:** Primitive. Generally not accessible by road, except at John Dunn Bridge (JDB), which is middle country, and Taos Junction Bridge (TJB), which is rural. Remote from highways and population.
  - **Social:** Up to 16 per group on the river, and up to 14 encounters per day on trails and the river.
  - **Operational:** Signs present at key access points. Patrolled periodically by river rangers. Some use restrictions, and limited boating permits are required.
- Implementation Actions

- **Marketing:** Develop interpretive signs at JDB on riparian resources, transportation history, user ethics, and WSR and boating resources. Display orientation information about whitewater rafting on the BLM website.
- **Management**: Signs present at key access points, but limited within the zone; interpretive signs at JDB, trails, shelters, visitor center, and parking areas at Wild Rivers. JDB boating put-in, toilets, and signage will be maintained.
- **Monitoring:** Vehicle counters, routine surveys, observation, SRP post-use reports, and visitor reports of crowding. If trends show that use is over acceptable limits, then additional action may be considered, such as encouraging use on other trails.
- **Administrative**
  - **VRM**: Class I, except at JDB, which is Class III.
  - **Travel**: Limited to designated but managed as nonmotorized except at JDB. The "wild" character of these river segments will be maintained through controls on surface-disturbing activity.
  - **Recreation**: Limit the use of signing or other administrative controls.
  - **Permits**: Maintain limits on boating permits.

### F.2.2.2 Taos Box Recreation Management Zone

- Management Objectives
  - Manage this zone to provide opportunities for visitors to engage in whitewater rafting, with convenient access in this back-country setting.
- Outcomes
  - **Primary Activities:** Boating, fishing, swimming, and hiking.
  - **Experiences:** Adventure, risk, teamwork, and testing.
  - **Benefits:** Improved outdoor confidence and stronger ties with family and friends.
- Settings Prescription
  - **Physical:** Back country. Generally not accessible by road, except at TJB, which is rural.
  - **Social:** Up to 16 per group on the river. Up to 14 encounters per day on trails. Thirty or more encounters in the rural areas.
  - **Operational:** Signage present at key access points.
- Implementation Actions
  - **Marketing:** Develop interpretive signage at TJB and JDB regarding riparian resources, transportation history, user ethics, and WSR and boating resources. Basic orientation information is displayed on the BLM website and in the Rio Grande Gorge brochure.

- **Management**: Maintain existing facilities. The *Rio Grande Corridor Plan* will serve as guidance at the activity-plan level. Pursue access easements, and explore trail opportunities along the Rio Pueblo de Taos.
- **Monitoring:** Vehicle counters with routine surveys, observation, and SRP post-use reports.
- **Administrative**
  - **VRM**: Class I, except at TJB which is Class III.
  - **Travel**: Limited to designated, but managed as nonmotorized, except at TJB.
  - **Recreation**: Limit the use of signage or other administrative controls.
  - **Permits**: Maintain limits on boating permits to keep social encounters on the river low.

### F.2.2.3 Wild Rivers Rim Recreation Management Zone

- Management Objectives
  - Manage this zone to provide opportunities for visitors to engage in nature appreciation, rest, and exercise in this front-country setting.
- Outcomes
  - **Primary Activities:** Hiking, sightseeing, camping, and mountain and road biking.
  - **Experiences:** Escape from everyday responsibilities, and enjoy spectacular views, mental and physical rest, and exercise.
  - **Benefits:** Sense of well-being, gaining closeness to nature, physical fitness, and a greater awareness of aesthetics.
- Settings Prescription
  - **Physical:** Back country. Generally not accessible by road, except at TJB, which is rural.
  - **Social:** Up to 16 per group on river. Up to 14 encounters per day on trails. Thirty or more encounters in the rural areas.
  - **Operational:** Signage present at key access points.
- Implementation Actions
  - **Marketing:** Develop interpretive signage at TJB and JDB regarding riparian resources, transportation history, user ethics, and WSR and boating resources. Basic orientation information is displayed on the BLM website and in the Rio Grande Gorge brochure.
  - **Management**: Maintain existing facilities. The *Rio Grande Corridor Plan* will serve as guidance at the activity-plan level. Pursue access easements, and explore trail opportunities along the Rio Pueblo de Taos.

- **Monitoring:** Vehicle counters with routine surveys, observation, and SRP post-use reports.
- **Administrative**
  - **VRM**: Class I, except at TJB, which is Class III.
  - **Travel**: Limited to designated, but managed as nonmotorized, except at TJB.
  - **Recreation**: Limit the use of signage or other administrative controls.
  - **Permits**: Maintain limits on boating.

### F.2.2.4 Guadalupe Mountain Recreation Management Zone

- Management Objectives
  - By the year 2030, manage this zone to provide opportunities for visitors to engage in exercise and escape in this back-country setting.
- Outcomes
  - **Primary Activities**: Hunting, hiking, and mountain biking.
  - **Experiences**: Solitude and exercise.
  - **Benefits**: Fitness and well-being.
- Settings Prescription
  - **Physical**: Back country. Sparse, two-track roads and trails. Minimal to nonexistent facilities.
  - **Social**: Up to 14 encounters per day on trails, except during permitted events.
  - **Operational**: Area personnel are periodically available; rules are clearly posted, and enforcement presence is periodic.
- Implementation Actions
  - **Marketing**: Signs and information will be minimal and unintrusive.
  - **Management**: Work with partners to develop trail from Questa to the SRMA, with potential to link to other trails.
  - **Monitoring**: Trail registers and routine visitor surveys.
  - **Administrative**
    - **VRM**: Class II.
    - **Travel:** Limited to designated routes.
    - **Recreation:** Camping not allowed (except in designated sites along the Wild Rivers rim).
    - **Permits:** Consider small competitive events and limited number of guide services.

### F.2.2.5 Orilla Verde and Lower Gorge Recreation Management Zone

- Management Objectives
  - Manage this zone to provide opportunities for visitors to engage in river-related activities, with convenient access and creature comforts in this rural setting.
- Outcomes
  - **Primary Activities**: Boating, camping, fishing, hiking, wildlife viewing, picnicking, and swimming.
  - **Experiences**: Enjoying time with friends and family, connect to nature, and rest.
  - **Benefits**: Stronger ties with friends and family and enhanced understanding of nature.
- Settings Prescription
  - **Physical**: Rural. Proximate to New Mexico (NM) Highways 68 and 570. Modified by agriculture and has modern and convenient facilities.
  - **Social**: Seasonally and boating dependent; high level of encounters at developed sites.
  - **Operational**: Highway auto and truck traffic, orientation information, onsite education, and personnel available. Regulations prominent, reservations required, and routine enforcement is present.
- Implementation Actions
  - **Marketing**: Campgrounds and day-use sites will be featured in the Rio Grande Gorge brochure, on the BLM website, and at Zimmerman and Rio Grande Gorge visitor centers. Orientation signage will be placed along NM Highway 68. Interpretive information about the Apodaca Trail, the Old Spanish National Historic Trail, and Camino Real will be available at the Rio Grande Gorge Visitor Center. Display the richness of archaeological and historical resources of the area.
  - **Management**: Continue to replace old campground facilities through deferred maintenance. Maintain trails. Construct trail along NM 570 from Pilar Campground to Taos Junction Bridge. Collaborate with NMDOT, and pursue safe access from NM Highway 68 along the Bosque segment. The *Rio Grande Corridor Final Plan and Record of Decision* (BLM 2000) will serve as guidance at the activity-plan level.
  - **Monitoring**: Observation by stratified sample and visitor survey or interviews every 2–5 years, vehicle counters at Quartzite and County Line, Recreation Use Permits, and SRP post-use reports.
  - **Administrative**
    - **VRM**: Class II; Class III in developed sites.
    - **Travel**: Limited to designated routes.
    - **Permits**: Maintain limits on boating permits. Consider up to three vending permits throughout this zone.

- **Land Use**: Right-of-way exclusion.
- **Minerals**: Closed to leasing/withdrawn.

### F.2.2.6 Taos Valley Overlook Recreation Management Zone

- Management Objectives
  - Manage this zone to provide opportunities for visitors to engage in routine exercise and escape from responsibilities in this community-market, middle-country setting.
- Outcomes
  - **Primary Activities**: Hiking, dog walking, horseback riding, mountain biking, running, and watching the sunset.
  - **Experiences**: Enjoy personal time, exercise, and enjoy nature.
  - **Benefits**: Peace of mind, improved health and fitness, and greater awareness of aesthetics.
- Settings Prescription
  - **Physical**: Middle country. Natural appearing, except from primitive access routes to trailheads. Maintained and marked trails, simple and few trailhead developments, signage, and toilets.
  - **Social**: Up to 14 encounters per day on trails, except during permitted events. Occasional noise and litter.
  - **Operational**: Orientation materials and low-level interpretive media. Personnel periodic. Rules clearly posted with some restrictions. Periodic enforcement.
- Implementation Actions
  - **Marketing**: Primarily for community use. Keep highway signs small and unintrusive. Orientation information will be available at the Rio Grande Gorge Visitor Center. May market special events to a broader audience. Consult 2006 *Taos Valley Overlook Plan* for guidance on interpretive media and themes. Interpretive information will include the Old Spanish National Historic Trail and Camino Real, as well as other themes from the 2006 *Taos Valley Overlook Plan*. Provide rustic trail signs with difficulty-level and distance information.
  - **Management**: Develop trails according to the 2006 *Taos Valley Overlook Plan*. Develop rustic trailheads to the rim; one on the southeastern boundary and one on the northeastern boundary. Acquire land, and work with NMDOT and Taos County. If necessary, harden surfaces to the level needed to protect resources. Barbed-wire fence the boundary, where appropriate for vehicle closure, and fortify and define trailhead boundaries with materials that fit setting prescriptions. Purse access easements, and explore trail opportunities along the Rio Pueblo de Taos. Frequent patrols.
  - **Monitoring**: Vehicle counters, trail register, visitor survey, or interviews every 2–5 years.

- **Indicators**: Visitor complaints of crowding, unauthorized trails, and visible erosion. Potential adaptive management for impacts could include limiting the number of SRPs for guided trips and special events.
- **Administrative**
  - **VRM**: Class I.
  - **Travel**: Closed. Two- and four-wheel drive at trailheads. Nonmotorized and mechanized use everywhere else.
  - **Permits**: Issue commercial recreation permits appropriate to setting prescriptions. Consider mountain bike–guide services and small competitive events.
  - **Recreation**: Work with the New Mexico Department of Game and Fish to close the area to hunting, target shooting, and camping; dogs must be on leashes at trail heads and under voice command everywhere else.

### F.2.2.7 Rio Grande Rim and Copper Hill Recreation Management Zone

- Management Objectives
  - Manage this zone to provide opportunities for visitors to engage in routine exercise and escape in this middle-country setting.
- Outcomes
  - **Primary Activities**: Hiking, mountain biking, and dog walking.
  - **Experiences**: Independence, exploration, and solitude.
  - **Benefits**: Sense of adventure, balanced spirit, and better sense of place.
- Settings Prescription
  - **Physical**: Middle country. Distance from facilities and roads. Facilities minimal to nonexistent.
  - **Social**: Up to 14 encounters per day on trails, except during permitted events.
  - **Operational**: Two- and four-wheel drive near old vehicle-access points.
- Implementation Actions
  - **Marketing**: Minimal marketing, except for Rio Grande Rim Trail.
  - **Management**: Occasional or rare patrols. Communication with adjacent landowners. Obtain access easements on private property to develop nonmotorized trail connections along the eastern and western rims of the Rio Grande.
  - **Monitoring**: Visitor survey or interviews every 2–5 years.
  - **Administrative**
    - **VRM**: Class II.

- **Travel**: Limited to designated.
- **Permits**: Consider SRPs for an annual competitive trials riding event, excluding Rio Embudo Canyon.

# F.3 ALTERNATIVE B: PROPOSED ACTION

**Table F.3-1. Acres in the Recreation Management Area, Alternative B**

| Recreation Management Area | Acres |
|---|---|
| *Wild Rivers SRMA* | *11,322* |
| Wild Rivers Rim RMZ | 749 |
| Guadalupe Mountains RMZ | 10,573 |
| *Black Rock SRMA* | *4,664* |
| Horsethief Mesa RMZ | 1,742 |
| John Dunn Bridge RMZ | 394 |
| Black Rock Rim RMZ | 2,529 |
| *Orilla Verde SRMA* | *6,264* |
| Orilla Verde and Lower Gorge RMZ | 3,950 |
| Taos Valley Overlook RMZ | 2,314 |
| **TOTAL** | **22,250** |

RMZ = Recreation Management Zone; SRMA = Special Recreation Management Area.

## F.3.1 Wild Rivers Special Recreation Management Area

### F.3.1.1 Wild Rivers Rim Recreation Management Zone

Same as Alternative A: No-Action (see Section F.2.2.3 above).

### F.3.1.2 Guadalupe Mountains Recreation Management Zone

Same as Alternative A: No=Action (see Section F.2.2.4 above).

## F.3.2 Black Rock Special Recreation Management Area

### F.3.2.1 Horsethief Mesa Recreation Management Zone

- Management Objectives
  - Improve access and provide enhanced opportunities for trail-based recreation in accordance with the *Horsethief Mesa Travel Management Plan* (TMP) (BLM 2021), while protecting objects and values for which the Monument was established.

- Desired Recreation Site Characteristics
    - **Physical**: Retain current middle-country setting and characterized by limited two-track roads, a network of single-track trails, abandoned stock ponds, and existing rights-of-way in an otherwise undeveloped landscape.
    - **Social**: Average of up to fourteen encounters with up to six people per encounter.
    - **Operational**: Trailhead parking, kiosk, and vault toilet per the Horsethief Mesa TMP (BLM 2021).
- Management Actions
    - Implement Horsethief Mesa TMP seasonal limitations (January 1–April 1), as follows:
    - Campsite closed.
    - No dispersed camping.
    - No surface-disturbing activities.
    - No large-group SRPs.
    - Monitor for potential conflicts with recreational target shooting and consider closing the RMZ to target shooting if conflicts occur.
    - Provide Rio Grande Trail connection from Horsethief Mesa to JDB area, while minimizing impacts on ecological resources and processes.
    - Monitor recreational impacts on Monument objects. If monitoring indicates that impacts are occurring, then implement an adaptive-management strategy, which may include seasonal- and-spatial timing restrictions for the protection of raptor and special status species. When necessary, consider alternative trail-based recreational opportunities that avoid or otherwise mitigate impacts.
    - Develop interpretive media to protect Monument objects and values.

### F.3.2.2 John Dunn Bridge Recreation Management Zone

- Management Objectives
    - Enhance access to dispersed recreational opportunities, while reducing congestion and protecting objects and values for which the Monument was established.
- Desired Recreation Site Characteristics
    - **Physical**: Retain current rural setting, which is characterized by the historic bridge and road accessing the river. Retain VRM classification, and retain the existing character of the landscape.
    - **Social**: Multiple parties engaged in a variety of activities in the area.

- **Operational**: Maintain vault toilets. Continue to have patrols assist with traffic and parking flow to reduce congestion, noise, and any conflicts between users.

- Management Actions
  - Monitor for potential conflicts with recreational target shooting and consider closing the RMZ to target shooting if conflicts occur. No vending would be authorized, unless it were associated with a permitted event.
  - Establish threshold for when the road to lower beach area (i.e., below mouth of Rio Hondo) should be closed to motorized access.
  - Develop interpretive media to protect Monument objects and values.
  - Monitor recreational impacts on Monument objects and values. If monitoring indicates that impacts or overcrowding are occurring above acceptable limits, then implement an adaptive-management strategy, which may include seasonal- and spatial-timing restrictions for the protection of raptor and special status species.
  - Allow for below-the-rim aircraft fights (i.e., hot air balloon) outside of the seasonal closure period (January 1 through August 31), but only in the area between JDB and Manby Hot Springs.
    - The following wildlife harassment and land-based stipulation would be added to the SRP: Wildlife must not be pursued if seen from a hot air balloon. The pilot must continue on the original path unless this is pursuing wildlife. If wildlife is showing stressed behavior (i.e., running away from the balloon, cowering, or hiding, etc.) the pilot must pull back immediately and remove themselves from the area. Incidental take is a take (that is to harass, harm, pursue etc. or to attempt to engage in any such conduct) that results from activities that are otherwise lawful (16 U.S.C. 1531-1544).
  - Within the JDB RMZ, tours would be allowed throughout the year except for aircraft flights below the rim from January 1 through August 31. Flights below the rim outside of the seasonal closure will be restricted to the area between the JDB (36.534447, -105.708761) and Manby Hot Spring (36.508081, -105.7242). Launching is approved at three designated sites above the bridge.
  - No camping.

### F.3.2.3 Black Rock Rim Recreation Management Zone

- Management Objectives
  - Improve, but limit, motorized access, and provide enhanced opportunities for trail-based recreation, including pedestrian access from the gorge rim to the bridge area, while protecting objects and values for which the Monument was established.

- Desired Recreation Site Characteristics

- **Physical**: Retain current middle-country to backcountry setting. Convert two-track routes to mostly nonmotorized access and use.
- **Social**: Multiple parties may use the area for dispersed camping, trailhead parking, designated hot-air balloon launching, and other activities where motorized access is available. Beyond the trailheads, average of up to six encounters with up to four people per encounter.
- **Operational**: Consider and analyze opportunities for developed or dispersed campsites. Consider trailhead parking on the rim that provides for trail access to the bridge area, including Black Rock Hot Springs and the Rio Grande Trail.

- Management Actions
  - Apply and implement Horsethief Mesa TMP seasonal limitations (January 1–April 1) to the Black Rock Rim RMZ, as follows.
    - No dispersed camping.
    - No surface-disturbing activities.
    - No large-group SRPs.
    - Monitor for potential conflicts with recreational target shooting, and consider closing RMZ to target shooting if conflicts occur.
    - Provide trail connection from the rim area to the JDB area, which could serve as Rio Grande Trail, to provide for nonmotorized access to the bridge area.
    - Monitor recreational impacts on Monument objects of value. If monitoring indicates that impacts are occurring, then implement an adaptive-management strategy, which may include seasonal- and spatial-timing restrictions for the protection of raptor and special status species.
    - Develop interpretive media to protect Monument objects and values.
    - Allow for below-the-rim aircraft fights (i.e., hot air balloons) outside of the seasonal closure period (January 1 through August 31), but only in the area between JDB and Manby Hot Springs.
  - The following wildlife harassment and land-based stipulation would be added to the SRP: Wildlife must not be pursued if seen from a hot air balloon. The pilot must continue on the original path unless this is pursuing wildlife. If wildlife is showing stressed behavior (i.e., running away from the balloon, cowering, or hiding, etc.) the pilot must pull back immediately and remove themselves from the area. *Incidental take* is a take (that is to harass, harm, pursue etc. or to attempt to engage in any such conduct) that results from activities that are otherwise lawful (16 U.S.C. 1531-1544).
    - Flights below the rim outside of the seasonal closure (January 1 through August 31) will be restricted to the area between the JDB (36.534447, -105.708761) and Manby Hot Spring (36.508081, -105.7242). Launching is approved at three designated sites above the bridge.

## F.3.3 Orilla Verde Special Recreation Management Area

### F.3.3.1 Orilla Verde and Lower Gorge Recreation Management Zone

Same as Alternative A: No-Action (see Section F.2.2.5, above).

### F.3.3.2 Taos Valley Overlook Recreation Management Zone

Same as Alternative A: No-Action (see Section F.2.2.6, above).

# F.4 REFERENCES

Bureau of Land Management (BLM). 2001. *Horsethief Mesa Travel Management Plan.* Available: https://eplanning.blm.gov/public_projects/1505217/200380361/20052160/250058343/Horsethief%20Mesa%20Travel%20Management%20Plan%20Environmental%20Assessment%20FINAL.pdf.

———. 2000. *The Rio Grande Corridor Final Plan and Record of Decision*. Available: https://w3.spa.usace.army.mil/urgwops/eis_admin_record/Ref150.PDF. Accessed: August 27, 2024.

# APPENDIX G: SOCIOECONOMIC CONTENT AND ENVIRONMENTAL JUSTICE

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# G.1 INTRODUCTION

This appendix discusses the current conditions and trends of environmental justice and socioeconomic values associated with the uses of Bureau of Land Management (BLM)-administered lands for the environmental justice analysis area (i.e., Rio Arriba and Taos Counties in New Mexico and Conejos and Costilla Counties in Colorado), the socioeconomic analysis area (i.e., Rio Arriba and Taos Counties in New Mexico), and, where available, the decision area.

The environmental justice analysis area includes Rio Arriba and Taos counties in New Mexico and Costilla and Conejos counties in Colorado. Rio Arriba and Taos are the counties that encompass the Río Grande del Norte National Monument (Monument). The proposed management would directly affect the populations in these counties, as well as populations in the surrounding counties in New Mexico (i.e., Colfax, Mora, Santa Fe, Los Alamos, Sandoval, and San Juan) and Colorado (i.e., Conejos and Costilla), which might have cultural or historical ties to the planning area.

The socioeconomic analysis area includes Rio Arriba and Taos counties. The Monument is located in these counties, and any impacts on their economy or employment will most likely occur in and around the population centers within these two counties.

# G.2 SOCIOECONOMIC CONTEXT AND ENVIRONMENTAL JUSTICE

## G.2.1 Current Conditions

### G.2.1.1 Environmental Justice

Executive Order (EO) 12898 requires each federal agency to "make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations" (59 *Federal Register* 7629, February 16, 1994). Fundamental principles of EO 12898, as amended, require that the BLM:

- Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- Ensure the full and fair participation by all potentially affected communities in the decision-making process.
- Prevent the denial of, reduction in, or significant delay in the receipt of benefits of the project by minority and low-income populations.

An evaluation of environmental justice impacts requires identification of minority and low-income populations (including Tribal Nations) within the affected area and evaluation of the potential for the alternatives to have disproportionately high and adverse impacts on such populations.

This appendix provides the first step in the environmental justice analysis: a screening analysis of the environmental justice analysis area for the planning action to identify the presence and location of any environmental justice populations. Evaluation of potential adverse impacts on these populations will take place during the impacts analysis phase of the planning process.

Following publication of EO 12898, the Council on Environmental Quality (CEQ), part of the Executive Office of the President, issued guidance for considering environmental justice within the National Environmental Policy Act (NEPA) process (CEQ 1997). This guidance defines *minorities* as individuals who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic. The guidance further defines a minority population as follows:

> Minority populations should be identified where either: (a) the minority population of the affected area exceeds 50 percent; or (b) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis" (CEQ 1997).

The CEQ guidance does not define what constitutes *meaningfully greater*. The BLM recommends using 110 percent of the reference population as the threshold of "meaningfully greater" (BLM 2022a). The guidance also makes clear that Tribal Nations in the affected area should also be considered in the environmental justice screening analysis. The CEQ guidance does not specify how to identify a *low-income population*, but, in practice, an approach similar to that used for minority populations can be followed: where the percentage of the area's total population with income below 200 percent of the poverty threshold is equal to or greater than either 50 percent or the percentage in the general population or an appropriate comparison area (the reference population). The BLM defines low-income populations as being present if the region's percentage of the population with income below 200 percent of the poverty threshold is greater than or equal to the poverty rate of the reference area.

These thresholds are based on the experience evaluating environmental justice indicators and the sense that these thresholds represent significant differences between the affected and reference populations. For the purposes of this screening, the CEQ and the BLM thresholds stated above have been used to identify any low-income or minority communities in the environmental justice analysis area.

Figure G.2-1 identifies communities with potential environmental justice communities in the environmental justice analysis area. Table G.2-1 shows data for potential environmental justice populations in the environmental justice analysis area. The reference group for whether an environmental justice population exists are the states of New Mexico and Colorado. The BLM has used place-level data from the U.S. Census Bureau for the Resource Management Plan

(RMP)/Environmental Assessment (EA) to provide a representation of communities that are easily recognizable by the public.

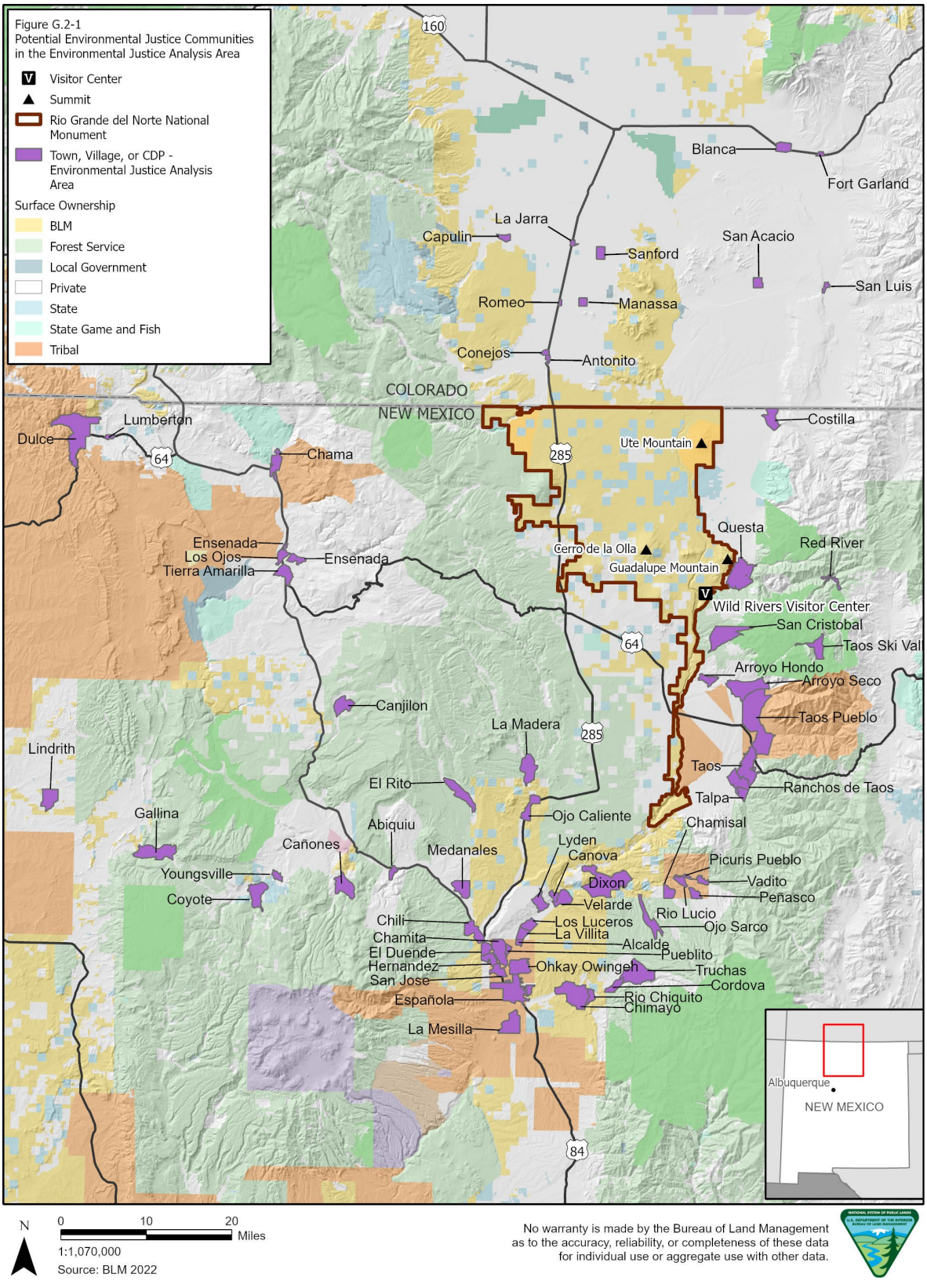


**Figure G.2-1. Potential Environmental Justice Communities in the Environmental Analysis Area**

## Table G.2-1. Environmental Justice Screening for Environmental Justice Analysis Area (2022)

| Geography | Low Income (%) | Minority (%) | Tribal Population (%) |
|---|---|---|---|
| *Colorado Place Data* | | | |
| Antonito Town, Colorado[1] | 61% | 46% | 3% |
| Capulin CDP, Colorado[1] | 90% | 77% | 7% |
| Conejos CDP, Colorado[2] | – | – | – |
| La Jara Town, Colorado[1] | 59% | 25% | 2% |
| Manassa Town, Colorado[1] | 45% | 32% | 5% |
| Romeo Town, Colorado[1] | 62% | 55% | 5% |
| Sanford Town, Colorado[1] | 54% | 35% | 2% |
| Blanca Town, Colorado[1] | 44% | 33% | 0% |
| Fort Garland CDP, Colorado[1] | 77% | 26% | 1% |
| San Acacio CDP, Colorado[1] | 40% | 7% | 0% |
| San Luis Town, Colorado[1] | 61% | 49% | 5% |
| **Colorado (Reference Population)** | 23% | 24% | 1% |
| *New Mexico Place Data* | | | |
| Abiquiu CDP, New Mexico[2] | – | – | – |
| Alcalde CDP, New Mexico[1] | 48% | 86% | 0% |
| Brazos CDP, New Mexico[2] | – | – | – |
| Canjilon CDP, New Mexico | 0% | 35% | 0% |
| Cañones CDP, New Mexico[1] | 0% | 100% | 0% |
| Canova CDP, New Mexico | 0% | 0% | 0% |
| Chama Village, New Mexico[1] | 47% | 64% | 0% |
| Chamita CDP, New Mexico[1] | 35% | 86% | 3% |
| Chili CDP, New Mexico[1] | 0% | 90% | 0% |
| Chimayo CDP, New Mexico[1] | 32% | 67% | 1% |
| Cordova CDP, New Mexico[1] | 56% | 79% | 0% |
| Coyote CDP, New Mexico | 0% | 22% | 0% |
| Dixon CDP, New Mexico[1] | 67% | 38% | 0% |
| Dulce CDP, New Mexico[1] | 38% | 98% | 88% |
| El Duende CDP, New Mexico[1] | 65% | 35% | 0% |
| El Rito CDP, New Mexico[1] | 75% | 89% | 0% |
| Ensenada CDP, New Mexico[1] | 11% | 89% | 0% |
| Española City, New Mexico[1] | 44% | 61% | 3% |
| Gallina CDP, New Mexico[1] | 28% | 57% | 0% |
| Hernandez CDP, New Mexico[1] | 53% | 52% | 3% |
| La Madera CDP (Rio Arriba County), New Mexico[1] | 100% | 0% | 0% |
| La Mesilla CDP, New Mexico[1] | 24% | 56% | 4% |

| Geography | Low Income (%) | Minority (%) | Tribal Population (%) |
|---|---|---|---|
| La Villita CDP, New Mexico[1] | 10% | 91% | 0% |
| Lindrith CDP, New Mexico[1] | 18% | 11% | 11% |
| Los Luceros CDP, New Mexico[1] | 40% | 80% | 0% |
| Los Ojos CDP, New Mexico[1] | 0% | 100% | 0% |
| Lumberton CDP, New Mexico[1] | 42% | 100% | 42% |
| Lybrook CDP, New Mexico[1] | 77% | 100% | 100% |
| Lyden CDP, New Mexico | 0% | 0% | 0% |
| Medanales CDP, New Mexico[1] | 42% | 100% | 0% |
| Ohkay Owingeh CDP, New Mexico[1] | 39% | 97% | 77% |
| Ojo Caliente CDP, New Mexico | 0% | 0% | 0% |
| Ojo Sarco CDP, New Mexico[1] | 31% | 83% | 0% |
| Pueblito CDP, New Mexico[1] | 68% | 95% | 72% |
| Rio Chiquito CDP, New Mexico[1] | 0% | 82% | 0% |
| San Jose CDP (Rio Arriba County), New Mexico[1] | 42% | 69% | 1% |
| Santa Clara Pueblo CDP, New Mexico[1] | 53% | 97% | 76% |
| Tierra Amarilla CDP, New Mexico[1] | 90% | 6% | 0% |
| Truchas CDP, New Mexico | 32% | 31% | 0% |
| Velarde CDP, New Mexico[1] | 61% | 39% | 0% |
| Youngsville CDP, New Mexico[1] | 100% | 100% | 0% |
| Arroyo Hondo CDP (Taos County), New Mexico | 33% | 0% | 0% |
| Arroyo Seco CDP, New Mexico | 17% | 9% | 0% |
| Chamisal CDP, New Mexico[1] | 27% | 57% | 1% |
| Costilla CDP, New Mexico[1] | 0% | 100% | 0% |
| Peñasco CDP, New Mexico[1] | 53% | 55% | 1% |
| Picuris Pueblo CDP, New Mexico[1] | 33% | 100% | 100% |
| Questa Village, New Mexico | 40% | 17% | 1% |
| Ranchos de Taos CDP, New Mexico[1] | 61% | 58% | 3% |
| Red River Town, New Mexico[1] | 54% | 2% | 0% |
| Rio Lucio CDP, New Mexico[1] | 51% | 67% | 2% |
| San Cristobal CDP, New Mexico | 40% | 0% | 0% |
| Talpa CDP, New Mexico | 18% | 45% | 0% |
| Taos Town, New Mexico[1] | 46% | 35% | 2% |
| Taos Pueblo CDP, New Mexico[1] | 72% | 96% | 91% |
| Taos Ski Valley Village, New Mexico | 5% | 0% | 0% |
| Vadito CDP, New Mexico[1] | 28% | 46% | 0% |
| **New Mexico (Reference Population)** | 39% | 41% | 9% |

Source: U.S. Census Bureau 2022a, 2022b.
[1] Indicates an environmental justice community in the CDP.
[2] CDP did not have any reported population available in data.
CDP = census designated place.

Most communities in this study are considered environmental justice communities compared to their corresponding reference values. The only communities in the study area that are *not* considered environmental justice communities are within New Mexico: Conjilon Census-Designated Place (CDP), Canova CDP, Coyote CDP, Lyden CDP, Ojo Caliente CDP, Truchas CDP, Arroyo Hondo CDP (Taos County), Arroyo Seco CDP, Questa Village, San Cristobal CDP, and Talpa CDP.[1]

The adjacent counties in Colorado were screened for potential environmental justice populations because it is possible that nearby communities may have a cultural or historical link to the planning area. Based on this analysis, all communities within Costilla and Conejos counties are considered environmental justice communities because they fall above the threshold for minority and/or low-income status.

## G.2.1.2 Socioeconomic Context

A variety of groups and communities of interest are stakeholders in the use and management of BLM-managed lands, including Tribal and cultural resource stakeholders, habitat and resource conservation stakeholders, recreation stakeholders, mineral development and production stakeholders, visual resource stakeholders, and local residents and communities. These stakeholder organizations and individuals have varying interests in the use and management of BLM-managed public resources. Different types of stakeholders have distinct sets of attitudes, beliefs, values, opinions, and perceptions about BLM-managed public resources and the effects of various management policies and actions. These views reflect different cultural and economic linkages that people have to BLM-managed lands. Individuals may belong to or share values with more than one stakeholder group.

### G.2.1.2.1 Stakeholders

**Tribal and Cultural Resource Stakeholders**

Tribal and cultural resource stakeholders value the Monument for its cultural and spiritual significance. For these stakeholders, protecting cultural resources, combined with maintaining access to traditional cultural sites and access for traditional uses, such as livestock grazing, fuelwood gathering, and hunting, is extremely important. These cultural sites include areas of past occupation and areas where traditional practices, such as plant gathering and woodland harvest, have occurred. The cultural importance of springs, lakes, and rivers is well documented for the Tribal Nations in and around the Monument (White House 2013). See Section 3.2.1, *Cultural Resources*, of the RMPA/EA for more details.

[1] Data was not available for Conejos CDP, Colorado, or Abiquiu CDP and Brazos CDP, New Mexico.

**Habitat and Resource Conservation Stakeholders**

Habitat and resource conservation stakeholders have several conservation objectives, but most believe broadly that protecting at-risk species and maintaining habitats and ecosystems for all species are fundamental values that should be high priorities in public policy. Most believe in the intrinsic value of wildlife, well-functioning ecosystems, and pristine areas. Some advocate resource conservation for human and wildlife needs, pointing to the beauty and solitude values of unspoiled areas in the planning area. For example, some conservation stakeholders highly value preserving dark skies by reducing light pollution, or excessive artificial light that diminishes the visibility of the stars and negatively affects wildlife and the environment. Additional resource conservation topics that are of interest to these stakeholders may include water, air, soil resources, and vegetation and riparian-zone management. Persons and organizations concerned with protecting paleontological, cultural, and historic sites also generally fit into this category of resource conservation stakeholders.

**Recreational Resource Stakeholders**

Many types of recreational activities are enjoyed in the analysis area. A concern for many recreation stakeholders is the potential degradation and loss of recreational-use values from potential resource use and development. These stakeholders typically believe that resource development has permanent impacts on recreational values and seek protection of areas with high recreation values so that future generations can enjoy these values. For many recreationists, maintaining recreational values and habitat or ecosystem values go hand-in-hand; these stakeholders say that healthy ecosystems support positive recreational experiences. For many recreational stakeholders, preservation of natural soundscapes and dark skies is also important, in order to provide users with adequate opportunities for quiet recreation and better views of the night sky. These stakeholders see resource development and new roads as incompatible with this objective.

Recreational users of the Monument generally believe the region relies on tourism and recreation as its primary economic driving forces. They point out how expenditures by mountain bikers, rafters, hunters, anglers, and other recreationists help support local businesses, provide local jobs and income, and generate sales tax and other public revenues. They maintain that the tourism industry has proven a stable and increasing economic engine for the area. They often compare this to local historical experience with and future potential for downturns in commodities-based industries. See Section 3.2.15, *Recreation*, of the RMPA/EA for more details.

**Visual Resource Stakeholders**

Visual resource stakeholders focus on the area's scenic qualities. Although they share many of the perspectives of habitat and resource conservation stakeholders and recreational stakeholders, they emphasize the role of visual resources as the fundamental asset underlying both direct recreational use of public lands and general tourism in the region. They believe that the scenic quality of the landscape in and around the planning area is world-renowned and that national monuments, parks, and other federally and state-managed lands are a huge economic

draw to northern New Mexico and the area in and around the planning area. Dark skies are also valuable to visual resource stakeholders. Based on this view of visual resources as a unique and valuable asset, these stakeholders emphasize that the visual integrity of the area needs to be maintained. See Section 3.2.8, *Visual*, of the RMPA/EA for more details.

**Local Residents and Communities**

Intertwined with the above stakeholder groups are local residents and their communities. Some residents of Rio Arriba and Taos counties seek to preserve the historical agricultural setting of the community and are reluctant to embrace change in the form of increased recreation and tourism. They are concerned about changes in the character of the community, as well as speeding, drunk driving, trespassing, unattended campfires, squatting and lost access to recreational sites from increased competition and crowding. They are also concerned about increased demands on local government services and infrastructure.

Others welcome the opportunities that increased recreation and tourism may provide, including increased employment and earnings and increased business opportunities, such as increased opportunities for BLM-permitted activities, such as guiding and outfitting services. Some see increased opportunities for the sizable Tribal population, through any or all of the above. Still others see increased fiscal revenues for local governments through tourism-related taxes.

## G.2.1.2.2 Demographics of Socioeconomic Analysis Area

**Population Demographics and Household Income**

Table G.2-2 shows the basic demographic makeup within the socioeconomic analysis area. Rio Arriba County has a population of about 40,300, and Taos County has a population of almost 34,500. Within counties in the socioeconomic analysis area, median and mean incomes generally are reported as lower than those for New Mexico. Per capita income is higher in Taos County than its reference area, which may be due to a smaller household size. As is true nationally, nonlabor income comprises a significant portion of total personal income in Rio Arriba and Taos counties, more so than in New Mexico as a whole. This is likely because the state has an overall younger median age and likely a larger share of the population in the workforce (see Table G-2-3).

### Table G.2-2. Population Demographics and Household Income (2022)

| Geography | Population | Median Age | Per Capita Income | Median Household Income | Mean Annual Household income |
|---|---|---|---|---|---|
| Rio Arriba County | 40,285 | 42.0 | $27,878 | $52,031 | $69,379 |
| Taos County | 34,475 | 50.0 | $36,361 | $55,145 | $81,285 |
| New Mexico | 2,112,463 | 39.0 | $32,667 | $58,722 | $82,382 |

Source: U.S. Department of Commerce 2023; U.S. Census Bureau 2022c, 2022d.

### Table G-2-3. Components of Household Income (2022)

| Geography | Labor Earnings | Dividends, Interest, and Rent | Age-related Transfer Payments | Hardship-Related Payments | Other Transfer Payments |
|---|---|---|---|---|---|
| Rio Arriba County | 45.6% | 13.1% | 15.7% | 22.3% | 3.4% |
| Taos County | 38.3% | 25.2% | 17.4% | 15.4% | 3.6% |
| New Mexico | 54.4% | 18.2% | 12.2% | 12.0% | 3.3% |

Source: U.S. Department of Commerce 2023.

Table G-2-4 shows that the population is expected to decrease in Rio Arriba and Taos counties but increase in the state of New Mexico overall through 2040.

### Table G-2-4. Population Forecast Through 2040

| Geography | 2020 | 2025 | 2030 | 2035 | 2040 | Percentage Change (2020–2040) |
|---|---|---|---|---|---|---|
| Rio Arriba County | 41,210 | 40,650 | 40,040 | 39,330 | 38,500 | -6.6% |
| Taos County | 33,300 | 33,310 | 33,170 | 32,860 | 32,340 | -2.9% |
| New Mexico | 2,190,000 | 2,250,000 | 2,310,000 | 2,360,000 | 2,400,000 | 9.6% |

Source: New Mexico Economic Development Department 2021.

No forecasts are available that project minority, low-income, or Tribal populations over the environmental justice analysis area through 2040.

#### Poverty Rates

Table G.2-5 shows poverty rates for different categories of the population. These rates vary across the socioeconomic analysis area and the comparison region. In general, poverty rates are higher in Rio Arriba County than in the state. When evaluated by ethnicity, poverty rates within the analysis area are similarly complex and varied. No clear patterns emerge when compared with the United States. This is an indication that economic conditions in the analysis area do not uniformly mirror national trends or statistics. However, poverty rates for certain categories within the analysis area are markedly higher than the poverty rates for the corresponding reference area.

### Table G.2-5. Percentage of People in Poverty (2022)

| Demographic Group | Rio Arriba County | Taos County | New Mexico |
|---|---|---|---|
| People | 21.8% | 14.9% | 18.3% |
| Families | 15.9% | 12.8% | 13.7% |
| People under 18 years | 27.6% | 18.7% | 24.3% |
| People 65 years and older | 19.6% | 14.0% | 12.9% |
| Families with related children under 18 years | 28.4% | 21.4% | 21.2% |
| Married couple families | 7.2% | 7.8% | 7.7% |

| Demographic Group | Rio Arriba County | Taos County | New Mexico |
|---|---|---|---|
| Married couple families with children under 18 years | 12.6% | 4.3% | 11.1% |
| Female householder, no husband present | 33.4% | 25.3% | 29.3% |
| Female householder, no husband present, with children under 18 years | 47.8% | 38.4% | 38.4% |

Source: U.S. Department of Commerce 2023.

### Jobs and Wages by Industry

Table G.2-6 shows total employment by industry in 2022 for the socioeconomic analysis area in New Mexico. Due to the small populations of the two counties, much of the sector data are estimated to protect smaller firms from disclosure requirements.

## Table G.2-6. Jobs by Industry (2022)

| Industry | Rio Arriba County | Taos County | New Mexico |
|---|---|---|---|
| Total Employment | 15,066 | 18,056 | 1,139,488 |
| Agriculture, Forestry, Fishing and Hunting, Mining | 2,153 | 1,207 | 60,678 |
| Construction | 619 | 1,190 | 67,735 |
| Manufacturing | 293 | 362 | 33,829 |
| Wholesale Trade | 103 | 209 | 25,062 |
| Retail Trade | 1,369 | 1,901 | 112,166 |
| Transportation, Warehousing, and Utilities | 396 | 288 | 49,255 |
| Information | 152 | 256 | 15,066 |
| Finance and Insurance, and Real Estate | 596 | 1,555 | 90,334 |
| Professional, Management, Administrative, and Waste Management | 1,054 | 1,764 | 156,837 |
| Education, Health Care and Social Assistance | 2,014 | 2,735 | 156,942 |
| Art, Entertainment, Recreation, Accommodation and Food | 1,369 | 3,649 | 116,440 |
| Other Services, Except Public Administration | 730 | 951 | 55,225 |
| Public Administration | 4,218 | 1,989 | 199,919 |

Source: U.S. Department of Commerce 2023.

Local residents are interested in not only which sectors create jobs, but also the relative pay in those sectors, as shown in Table G.2-7.

## Table G.2-7. Wages by Industry (2022)

| Industry | Rio Arriba County | Taos County | New Mexico |
|---|---|---|---|
| Non-Services Related | $46,032 | $63,685 | $64,904 |
| Natural Resources and Mining | $40,513 | $81,914 | $76,962 |
| Agriculture, Forestry, Fishing, and Hunting | $33,778 | $39,048 | $37,953 |

| Industry | Rio Arriba County | Taos County | New Mexico |
|---|---|---|---|
| Mining (including fossil fuels) | $58,050 | $99,309 | $95,635 |
| Construction | $50,314 | $67,919 | $59,036 |
| Manufacturing (including forest products) | $36,515 | $35,184 | $61,922 |
| Services Related | $37,803 | $42,229 | $51,548 |
| Trade, Transportation, and Utilities | $36,151 | $33,995 | $45,113 |
| Information | $61,219 | $48,446 | $77,007 |
| Financial Activities | $40,800 | $48,964 | $67,917 |
| Professional and Business Services | $53,733 | $61,227 | $78,324 |
| Education and Health Services | $46,661 | $54,813 | $49,150 |
| Leisure and Hospitality | $27,864 | $23,479 | $24,605 |
| Other Services | $33,091 | $44,366 | $44,146 |
| *Unclassified* | | | |
| Government | $50,151 | $43,861 | $61,298 |
| Federal Government | $79,386 | $72,326 | $87,433 |
| State Government | $50,867 | $51,416 | $66,750 |
| Local Government | $44,220 | $40,387 | $50,678 |

Source: U.S. Department of Commerce 2023.

**Local Government Tax Revenue**

BLM-managed lands and federal mineral-estate managed within the socioeconomic analysis area affect government budgets at federal, state, and local (i.e., county, city, town, school district, and special district) levels based on revenues from sales tax, property taxes, payment in lieu of taxes (PILT), mineral royalties, severance taxes, fees, and other funding sources. Likewise, lands and federal mineral estate in the socioeconomic analysis area result in government expenditures for management, law enforcement, and other activities.

BLM Field Offices collect fees and other revenue for a variety of other uses of BLM-managed lands. These revenue sources include right of way (ROW) rents, recreational fees, grazing fees, permit fees, and more. Revenues from vegetation and mineral materials, grazing, and ROW rents mostly go to the U.S. Treasury, whereas BLM Field Offices retain all recreational fees.

With respect to grazing fees, 12.5 percent of fees collected are returned to the local Grazing Board in the state where the grazing lands are located. Per Section 10 of the Taylor Grazing Act, this money is then disbursed to local ranchers through the local Grazing Board, using a 40/60 matching-funds formula, for use in range improvements and maintenance projects. The above payments totaled $5,740 to Rio Arriba and Taos counties in fiscal year 2022 (primarily fees under the Taylor Grazing Act; BLM 2022a).

In addition to BLM payments, New Mexico counties receive money from the Department of the Interior (DOI), which compensates county governments for nontaxable federal lands within their borders via PILT. PILT is based on a maximum per-acre payment reduced by the sum of all revenue-sharing payments. These payments are subject to a population cap. PILT to Rio Arriba,

and Taos counties in fiscal year 2022 from PILT totaled $3,027,885 and $2,129,260 respectively (DOI 2023).

In the socioeconomic analysis area, local revenues from recreation and tourism, natural resources, and land ownership comprise an important portion of total local government revenues. Table G.2-8 summarizes the tourism- and natural resource-related state and local government revenues obtained from these sources.

**Table G.2-8. Local Government Tax Revenue from Tourism and Natural Resource Industries ($ millions)**

| Tax Category | Rio Arriba County | Taos County | New Mexico |
|---|---|---|---|
| Tourism Tax Revenue | $2.3 | $6.3 | $427.9 |
| Natural Resource Extraction Tax Revenue | $60.0 | – | $1,545.8 |

Source: Tourism Economics 2015; DOI 2022.

It is important to note that the sectoral estimates in the tables above are not specific to BLM-managed resources, or even to public lands, generally. Tourism-related revenues are based on all tourism, which includes some activities on private property, as well as activities on federal and state lands, including local national parks and monuments. However, much of the tourism in both counties is based on the large public lands base that is unique to the area. The natural resources-related revenues include revenues from private property, as well as public resources. Again, public lands and minerals are the basis for much of the activity in these industries in the counties.

Rio Arriba and Taos counties are rich in outdoor recreational resources enjoyed by local residents and nonresidents alike. Visitation for outdoor recreation—whether passive pursuits, like scenic drives, or active, high-energy sports, like rock climbing and rafting—supports an active tourism industry. This industry is an important economic base for the socioeconomic analysis area. See Section 3.2.15, *Recreation*, of the RMPA/EA for more details.

Livestock grazing is an important use of BLM-managed lands in the Monument. Forage is important to many ranchers in the socioeconomic analysis area. Grazing on this forage puts weight on calves and sustains producing heifers. Forage on BLM-managed lands may be the only forage available to some ranchers during parts of the year. In addition to its economic benefits for local ranchers and the local economy, grazing on BLM-managed lands has important social and cultural significance. Some ranching families have been using these lands for generations. These lands help support a ranching culture that is a key part of the social fabric among analysis area communities. Although the economy and culture of ranching have a less prominent role today than in years past, their historical and continuing cultural significance is clear to many in the region. See Section 3.2.14, *Livestock Grazing*, of the RMPA/EA for more details.

## G.2.1.3 Trends

### G.2.1.3.1 Environmental Justice

Table G.2-9 shows the environmental justice population percentages for all counties in the environmental justice analysis area over the past 8 years. Note that although the current environmental justice analysis has been conducted at the place-data level, these trends are presented at the county level to provide a high-level trend within the region. Only Taos County showed a sufficient decrease in the component metrics of environmental justice populations to not be designated at the county level in 2022. Apart from Conejos County, all the other counties and the reference areas of Colorado and New Mexico all saw a reduction in low-income percentage, ranging from 0.7 percentage point in Costilla County to 12.0 percentage points in Taos County. Minority populations increased in all counties from 2015 to 2022. Indigenous populations were also quite consistent between the two periods, with Costilla County experiencing the largest increase, from 0.3 percentage point to 3.4 percentage points.

**Table G.2-9. Environmental Justice Trends (2015–2022)**

| | Low-Income | | Minority | | Indigenous | |
|---|---|---|---|---|---|---|
| **Geographic Area** | **2015** | **2022** | **2015** | **2022** | **2015** | **2022** |
| Colorado | 29.5% | 23.1% | 15.8% | 23.9% | 0.9% | 1.0% |
| Conejos County[1, 2] | 48.5% | 51.1% | 8.3% | 31.9% | 1.9% | 3.2% |
| Costilla County[1, 2] | 51.0% | 50.3% | 7.0% | 36.0% | 0.3% | 3.4% |
| New Mexico | 43.1% | 38.8% | 26.8% | 40.8% | 9.1% | 9.4% |
| Rio Arriba County[1, 2] | 47.8% | 41.6% | 37.5% | 64.7% | 15.3% | 15.0% |
| Taos County[1] | 48.7% | 36.7% | 29.4% | 35.1% | 6.1% | 6.0% |

Source: U.S. Census Bureau 2015a, 2015b, 2022a, 2022.
[1] Indicates presence of environmental justice community in 2015.
[2] Indicates the presence of environmental justice communities in 2021.

### G.2.1.3.2 Socioeconomic Context

Table G.2-10 shows the basic demographic composition in the socioeconomic analysis area for Rio Arriba and Taos counties and for New Mexico. At 0.4 percent, population growth from 2000 to 2022 in Rio Arriba was lower than in New Mexico, which experienced 4.9 percent growth during the same period. With a median age of 42.0 and 50.0 years in 2022, both Rio Arriba and Taos counties had an older population than New Mexico as a whole (i.e., 3.0- and 11-years median age respectively). Both counties and the state show an increasing median age over time, a trend that is national in scope.

### Table G.2-10. Demographic Trends (2000–2022)

| Demographic Group | Rio Arriba County | Taos County | New Mexico |
|---|---|---|---|
| Population (2022) | 40,285 | 34,475 | 2,112,463 |
| Population Percentage Change (2000–2022) | 0.2% | 5.8% | 4.9% |
| Median Age (2022) | 42.0 | 50.0 | 39.0 |
| Median Age (2010) | 38.6 | 44.1 | 36.4 |

Source: U.S. Department of Commerce 2023.

Table G.2-11 shows changes in employment by industry from 2001 to 2022. Service-related jobs have shown the most growth over the last two decades, with education, health care, and social assistance leading the way in Taos County and public administration in Rio Arriba County. Non-service industries in the same period have shown little growth, and they have shown actual decline in some sectors. For the socioeconomic analysis area, the growth in some sectors, especially education, health care, and social assistance may be in part due to the aging population of the region.

### Table G.2-11. Employment Trends by Industry (2001–2022)

| | Rio Arriba County | | Taos County | | New Mexico | |
|---|---|---|---|---|---|---|
| Industry | 2001 | 2022 | 2001 | 2022 | 2001 | 2022 |
| Total Employment | 15,702 | 15,066 | 16,396 | 18,056 | 976,506 | 1,139,488 |
| Agriculture, Forestry, Fishing and Hunting, Mining | 1,503 | 2,153 | 1,008 | 1,207 | 49,698 | 60,678 |
| Construction | 905 | 619 | 1,460 | 1,190 | 63,628 | 67,735 |
| Manufacturing | 590 | 293 | 402 | 362 | 45,736 | 33,829 |
| Wholesale Trade | 196 | 103 | 220 | 209 | 28,304 | 25,062 |
| Retail Trade | 1,743 | 1,369 | 2,044 | 1,901 | 110,525 | 112,166 |
| Transportation, Warehousing, and Utilities | 436 | 396 | 217 | 288 | 28,387 | 112,166 |
| Information | 94 | 152 | 287 | 256 | 19,576 | 15,066 |
| Finance and Insurance, and Real Estate | 478 | 596 | 1,020 | 1,555 | 60,205 | 90,334 |
| Professional, Management, Administrative, and Waste Management | 948 | 1,054 | 1,431 | 1,764 | 119,729 | 156,837 |
| Education, Health Care and Social Assistance | 2,048 | 2,014 | 1,748 | 2,735 | 100,071 | 156,942 |
| Art, Entertainment, Recreation, Accommodation and Food | 1,272 | 1,369 | 3,505 | 3,649 | 95,525 | 116,440 |
| Other Services, Except Public Administration | 729 | 730 | 1,019 | 951 | 49,981 | 55,255 |
| Public Administration | 4,982 | 4,218 | 2,275 | 1,989 | 205,141 | 199,919 |

Source: U.S. Department of Commerce 2023.

# G.3 REFERENCES

Council on Environmental Quality (CEQ). 1997. *Environmental Justice Guidance Under the National Environmental Policy Act*. Available: https://www.energy.gov/sites/default/files/nepapub/nepa_documents/RedDont/G-CEQ-EJGuidance.pdf. Accessed: February 6, 2024.

New Mexico Economic Development Department. 2021. *Population Projections and Growth Rates, 2010–2040*. Available: https://edd.newmexico.gov/documents/population-projections-and-growth-rates-2010-2040/. Accessed: February 6, 2024.

Tourism Economics. 2015. *The Economic Impact of Tourism in New Mexico, 2015 Analysis*. Available: https://assets.simpleviewinc.com/simpleview/image/upload/v1/clients/newmexico/NM_Visitor_Economic_Impact_2015_FINAL_7c937a91-e3de-4e78-a1f2-85c3c2371369.pdf. Accessed: February 6, 2024.

U.S. Census Bureau. 2015a. *American Community Survey 5-Year Average 2015, Table B02001*. Available: https://www.data.census.gov/data.html. Accessed: February 6, 2024.

———. 2015b. *American Community Survey 5-Year Average 2015, Table C17002*. Available: https://www.data.census.gov/data.html. Accessed: February 6, 2024.

———. 2022a. *American Community Survey 5-Year Average 2022, Table C17002*. Available: https://www.census.gov/data.html. Accessed: February 6, 2024.

———. 2022b. *American Community Survey 5-Year Average 2022, Table B02001*. Available: https://www.data.census.gov/data.html. Accessed: February 6, 2024.

———. 2022c. *American Community Survey 5-Year Average 2022, Table S1902*. Available: https://www.data.census.gov/data.html. Accessed: February 6, 2024.

———. 2022d. *American Community Survey 5-Year Average 2022, Table S1903*. Available: https://www.data.census.gov/data.html. Accessed: February 6, 2024.

U.S. Department of Commerce. 2023. *Economic Profile System*. Washington, D.C.: Bureau of Economic Analysis, Regional Economic Accounts,. Available: https://eps.headwaterseconomics.org/. Accessed: February 6, 2024.

U.S. Department of the Interior (DOI). 2022. *Fiscal Year 2023 Payments in Lieu of Taxes*. Available: https://edit.doi.gov/sites/doi.gov/files/2023-national-summary-pilt-508.pdf. Accessed: February 6, 2024.

———. 2023. *Natural Resource Revenue Data New Mexico*. Available: https://archive.revenuedata.doi.gov/explore/NM/. Accessed: February 6, 2024.

U.S. Department of the Interior Bureau of Land Management (BLM). 2022a. *Public Land Statistics 2022*. Available: https://www.blm.gov/sites/default/files/docs/2023-07/Public_Lands_Statistics_2022.pdf. Accessed: February 6, 2024.

White House. 2013. Establishment of the Río Grande Del Norte National Monument. Available: https://www.blm.gov/sites/blm.gov/files/Rio%20Grande%20del%20Norte%20Proclamation.pdf. Accessed: February 6, 2024.

# APPENDIX H: CLIMATE CHANGE

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# H.1 CLIMATE CHANGE

## H.1.1 Current Conditions

The Intergovernmental Panel on Climate Change (IPCC) defines *climate change* as:

> "a change in the state of the climate that can be identified (e.g., by using statistical tests) by changes in the mean and/or the variability of its properties and that persists for an extended period, typically decades or longer. Climate change may be due to natural internal processes or external forcing such as modulations of the solar cycles, volcanic eruptions, and persistent anthropogenic changes in the composition of the atmosphere or in land use" (IPCC 2018).

Ongoing scientific research has identified the potential impacts of greenhouse gas (GHG) emissions (including carbon dioxide, methane, nitrous oxide, and several industrial gases) on global climate. Through complex interactions on a regional and global scale, these GHG emissions cause a net-warming of the atmosphere, primarily by decreasing the amount of heat energy radiated by the Earth back into space. Although GHG levels have varied for millennia, recent industrialization and burning of fossil carbon sources have caused carbon dioxide equivalent ($CO_2e$) concentrations to increase dramatically and are likely to contribute to overall global climatic changes.

In the planning area, as in most of the United States, GHG emissions derive primarily from the combustion of fossil fuels for energy generation. Energy use is largely driven by economic growth, with short-term fluctuations in its growth rate driven by weather patterns that affect heating and cooling need, and changes in the fuels used in electricity generation. In 2020, carbon dioxide emissions from combustion of fossil fuel for energy production in the United States were equal to 73 percent of total U.S. anthropogenic GHG emissions (USEIA 2022). Other major GHGs that are released as a result of human activity include methane and nitrous oxide. Methane, which largely comes from landfills, coal mines, oil- and natural-gas operations, and agricultural operations, accounted for up to 11 percent of total GHG emissions in 2020. Nitrous oxide, created primarily as a byproduct of certain industrial and waste-management processes, using nitrogen fertilizers, and burning fossil fuels, comprised about 7 percent of total anthropogenic U.S. GHG emissions (USEIA 2022).

GHG emissions are offset to some degree by carbon that is sequestered in terrestrial ecosystems. Terrestrial ecosystems on Federal lands were estimated to have sequestered an average of 195 million metric tons of $CO_2e$ per year nationally between 2005 and 2014; in New Mexico, the annual average sequestration was 8.6 million metric tons of $CO_2e$ per year (Buursink et al. 2018). In 2023. the total U.S. $CO_2$ emissions were approximately 4,807 million metric tons (U.S. Energy Information Administration 2023). Based on these estimates, Federal lands sequester roughly 4 percent of the total U.S. $CO_2$ emissions annually; New Mexico sequesters approximately 0.2 percent of the total U.S. $CO_2$ emissions annually.

The planning area is primarily within the Arizona/New Mexico Plateau and Southern Rockies ecoregions. *Ecoregions* are large areas of similar climate, where ecosystems recur in predictable patterns. The Arizona/New Mexico Plateau ecoregion covers the northern half of Arizona, northwestern New Mexico, and southern Colorado. The Southern Rockies ecoregion covers southern Wyoming, western Colorado, eastern Utah, and northern New Mexico.

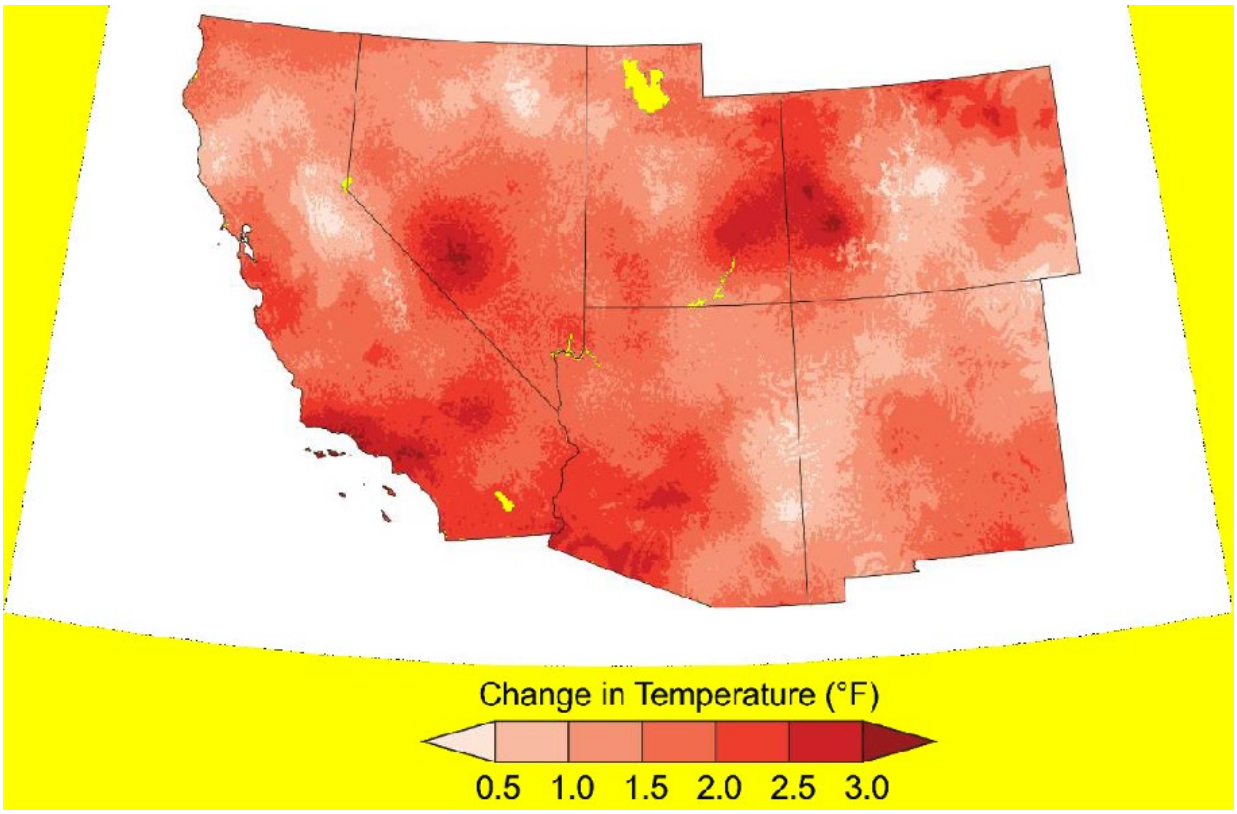
The climate of most of the Arizona/New Mexico Plateau is classified as semiarid and varies from north to south and from low to high elevations. Annual precipitation amounts range from 127 millimeters at the mid and lower elevations to 890 millimeters at higher elevations, but annual precipitation in most of the ecoregion averages between 152 and 254 millimeters and is the product of southwestern monsoonal summer thunderstorms and winter frontal storms (Ruhlman et al. 2012). For the Southern Rockies ecoregion, annual precipitation amounts range from 250 to 1,000 millimeters, most of which falls as snow. This provides a significant amount of high-elevation snowpack that is an important water source for surrounding ecoregions (Drummond 2012).

Temperatures also vary considerably in the Arizona/New Mexico Plateau ecoregion. The coldest temperatures can dip below -27 degrees Fahrenheit (°F) (-17.8 degrees Celsius (°C)) in winter and can exceed 96.8°F (36°C) in summer (Ruhlman et al. 2012). Based on records from long-term stations, average monthly temperatures (for 1991–2020) in the northern mountains of New Mexico range from the low 20s°F (-6.6°C) during the winter months to around 60°F (15.5°C) in July (Frankson et al. 2022).

## H.1.2 Trends

GHGs are necessary to life as we know it because they keep the Earth's surface warm enough to support life. However, as the concentrations of these gases continue to increase in the atmosphere, the Earth's global temperature is climbing above past levels. Continuing a long-term warming trend, globally-averaged temperatures in 2021 were 1.5°F (0.85°C) warmer than the 1951–1980 baseline average and 1.9°F (1.1°C) warmer than late-eighteenth to mid-nineteenth–century levels, which represent the start of the Industrial Revolution (approximately 1760 to 1840) (NASA 2022). All 8 years leading up to 2021 were the warmest years since 1880, when modern recordkeeping began (NASA 2022). Other aspects of the climate, such as rainfall patterns, extreme drought, snow and ice cover, and sea level, are also changing.

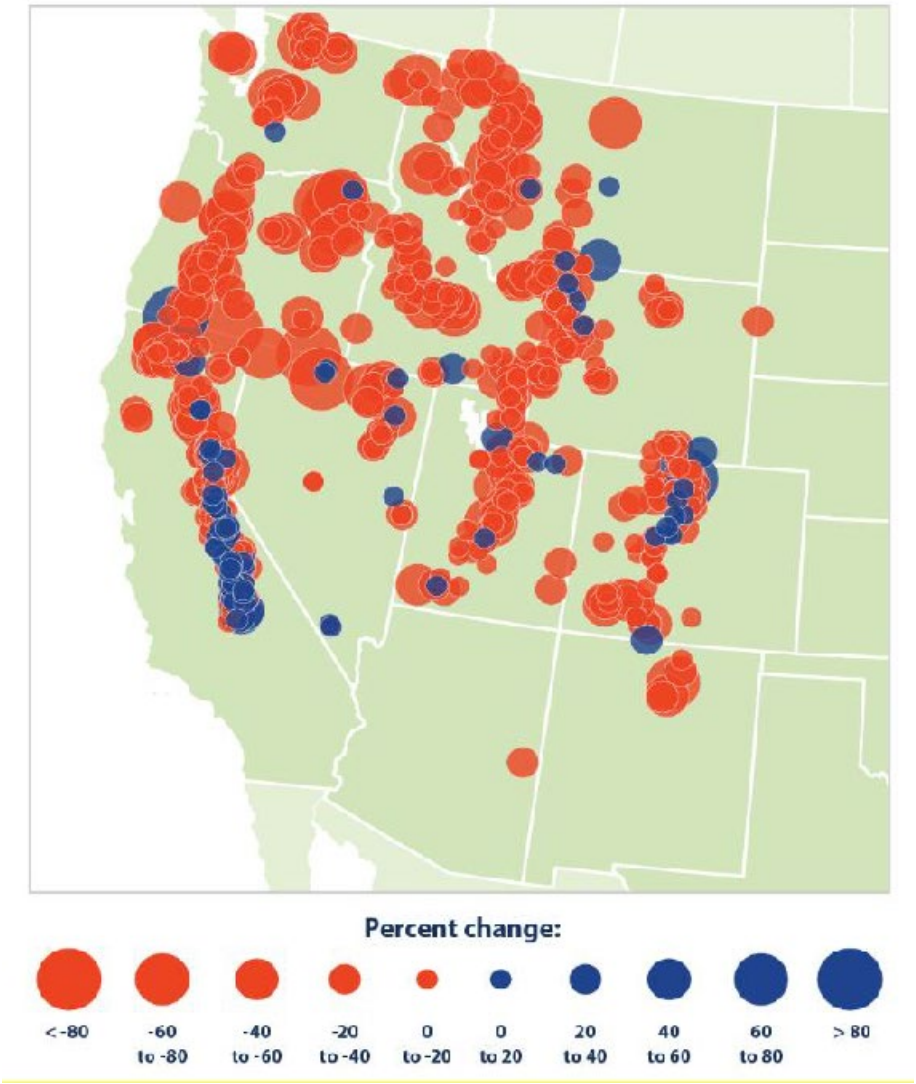
Within the southwestern region of the United States, the average annual temperature increased 1.6°F (0.9°C) between 1901 and 2016 (Figure H-1). The region recorded more warm nights and fewer cold nights between 1990 and 2016, including an increase of 4.1°F (2.3°C) for the coldest day of the year (Gonzalez et al. 2018). Temperatures in New Mexico have risen more than 2°F (1.1°C) since the beginning of the twentieth century. The period since 2012 has been the warmest on record for New Mexico, with increasing trends in the number of extremely hot days and warm nights, as well as a decrease in the number of very cold nights (Frankson et al. 2022).




Source: Gonzalez et al. 2018.

**Figure H-1. Change in Temperature across the Southwestern Region of the United States (1901–2016)**

As the state has warmed, the percentage of precipitation falling as snow during the winter has decreased, as have snow depth and snow cover (Frankson et al. 2022). Figure H-2 shows changes in snowpack for the western United States between 1955 and 2020, which bear out this trend.




Source: EPA 2022.

**Figure H-2. Change in Snowpack Across the Southwestern Region of the United States (1995–2020)**

## H.1.3 Forecasts

According to the IPCC's Sixth Assessment Report, compared to 1850–1900, global surface temperature averaged over 2081–2100 will very likely be higher by 1.8 to 3.2°F (1.0 to 1.8°C) under the very-low GHG-emissions scenario (i.e., pathway), by 3.8 to 6.3°F (2.1 to 3.5°C) under the intermediate GHG-emissions scenario, and by 5.9 to 10.3°F (3.3 to 5.7°C) under the very-high GHG-emissions scenario (IPCC 2021).

The annual average temperature of the contiguous United States is projected to rise throughout the twenty-first century. Increases for 2021–2050 relative to 1976–2005 are projected to be about 2.5°F (1.4°C) for a lower GHG scenario and 2.9°F (1.6°C) for a higher GHG scenario (Vose et al. 2017). Within the southwestern region, annual average temperatures are projected to

increase by 3.72°F (2.07°C) and 4.80°F (2.67°C) by midcentury (2036–2065) under low and high GHG scenarios, respectively (compared with 1976–2005), and by 4.93°F (2.74°C) and 8.65°F (4.80°C) by late century (2071–2100) under low and high GHG scenarios, respectively (Vose et al. 2017). The frequency and intensity of cold waves are projected to decrease throughout the century, whereas the frequency and intensity of heat waves are projected to increase (Vose et al. 2017).

In New Mexico, historically unprecedented warming is projected during the twenty-first century for both a higher- and lower-emissions pathway. A large range of temperature increases is projected under both pathways, and the hottest end-of-century projections would be approximately 11°F (6°C) warmer than the hottest year in the historical record (Frankson et al. 2022). Drought intensity is projected to increase, and snowpack accumulation is projected to decrease, posing a major challenge to New Mexico's environmental, agricultural, and human systems. Under a higher-emissions pathway, total spring (March–May) precipitation in the planning area is projected to decrease by 5 percent by 2050, compared to the late 1900s (Frankson et al. 2022). Additionally, wildfire frequency and severity are projected to increase throughout the state due to worsening drought conditions (Frankson et al. 2022).

## H.1.4 Environmental Consequences of the Alternatives

Management actions that involve combustion-engine vehicles, equipment, and prescribed fire and/or result in surface disturbance would affect climate change through direct GHG emissions and changes to the carbon sequestration and storage potential of the land in the planning area. Management decisions for alternatives considered in detail for this land use–planning effort that have the potential to contribute to emissions or affect carbon sequestration involve livestock grazing, recreation, travel management, vegetation management, and wildland fire management. Potential effects from emissions are discussed qualitatively in the sections below because GHG emissions are not expected to vary substantially across the alternatives. Additionally, contributions of GHG emissions from the alternatives toward the low- and high-GHG scenarios discussed above in Section H.1.3 would be small in comparison to GHG emission sources considered by Vose et al. (2017), such as fossil-fuel burning and industrial processes.

### H.1.4.1 Livestock Grazing

Methane emissions from enteric fermentation[1] and manure deposition are a primary source of GHGs emitted on public lands because of the stronger radiative forcing of methane, as represented by its higher global-warming potential (Kauffman et al. 2022). Methane emissions would continue in the Monument under all alternatives as a result of livestock grazing. However,

[1] Enteric fermentation occurs as a result of the digestive process of ruminant animals (i.e., those with multichambered stomachs [i.e., including a rumen]), such as cattle, sheep, and deer, through microbial fermentation, which allows them to break down tough plants and grains that are not otherwise easily digestible. This process produces methane in the rumen (Kauffman et al. 2022).

sustainable grazing management can restore degraded lands to improve production and increase carbon input and sequestration. Alternative B under the Proposed Resource Management Plan amendment (RMPA) would close four grazing allotments, totaling 3,287 acres, within the Monument, but the effects on GHG emissions would be negligible when compared to Alternative A because there has been no grazing in those allotments since the Monument's designation, and permitted animal unit months would remain the same. Therefore, livestock grazing under all alternatives would not alter current GHG emissions nor carbon-sequestration potential of lands within the Monument.

### H.1.4.2 Travel Management and Recreation

Emissions from motorized vehicles would continue to be a source of GHG emissions in the planning area under all alternatives. The BLM's decisions would affect emissions commensurate with differences in total miles traveled in the Monument under each alternative. Direct GHG emissions from travel management and recreation include exhaust emissions from vehicles and fuel-burning equipment involved in road-facility maintenance and construction projects. In accordance with Presidential Proclamation 8946 (Appendix A), motorized vehicle use in the Monument is limited to designated roads under all alternatives; however, Alternative B would close an additional 5,120 acres to motorized travel and slightly reduce total miles traveled and associated GHG emissions, when compared to Alternative A.

Recreation and travel can result in the loss of vegetative cover and disturbance of soil, which ultimately release carbon into the atmosphere, especially where biological soil crusts are present (Eldridge 2000). The potential for this adverse effect would be unlikely because motorized-vehicle use would be closed or limited to existing routes throughout the Monument, with Alternative B closing an additional 5,120 acres to motorized travel, compared to Alternative A.

### H.1.4.3 Vegetation and Wildland Fire Management

Under all alternatives, vegetation treatments would emit GHGs through the combustion of woody materials in prescribed fires and the use of fuel-burning equipment, such as chainsaws, masticators, dozers, or tractors. The decomposition of any vegetation left on site after a treatment would also result in the release of GHGs. Vehicular use by staff to commute to project sites and transport materials would also result in GHG emissions. Vegetation treatments and prescribed fire to reduce fuel loads and improve vegetation conditions would reduce carbon-sequestration potential in the short term by removing vegetation and disturbing soils, especially in areas with biological soil crusts. Relative to the overall carbon-storage potential in the Monument, this short-term reduction in sequestration would be small, and long-term beneficial effects would result from reducing the severity or extent of wildfires. This is based on the assumption that vegetation treatments would be implemented such that they retain the health of the local soil biotic community, the remaining vegetation thrives, and vegetative regrowth (and associated carbon sequestration) occurs following the treatment. Although there would be an initial release of GHGs, the use of prescribed burning as a tool in

grasslands and shrublands under Alternative B would increase the potential for vegetative communities to move toward desired vegetation-condition classes and fire regime groups and result in greater long-term benefits for carbon sequestration, when compared to Alternative A. Additionally, prescribed fires may reduce the risk of wildfires and offset emissions from prescribed fires to a degree that would reduce the overall emissions from wildland fires. Prescribed fires would also encourage vegetative regrowth and result in long-term increased carbon-sequestration potential within the Monument. Under Alternative B, seed sources would be procured from native species that best match the existing environmental and climatic conditions of the site. When appropriate, seed may be sourced from other sites, using projected future climatic conditions and following best-available science at the time.

### H.1.4.4 Cumulative Effects

Past, present, and reasonably foreseeable future actions that contribute to cumulative effects on climate change include those that contribute to GHG emissions, remove carbon stocks, and reduce the potential for carbon storage and sequestration. Because climate change is a global process, the BLM's decisions under the alternatives, described above, would result in the emission of GHGs that would contribute incrementally to climate-change trends in New Mexico, the Arizona/New Mexico Plateau and Southern Rockies ecoregions, and the United States. In the reasonably foreseeable future, several projects are expected to contribute cumulative effects to climate change, including hazardous-fuelwood reduction, integrated weed-management projects, development and use of the Rio Grande Trail and Questa to Red River Trail, permitted recreational events, development of transmission lines and rights of way, and ongoing land-use authorizations. As described above, the management actions under Alternatives A and B would also contribute to cumulative effects from livestock grazing, travel management, recreation, vegetation treatments, and wildfire management. Over the long term, Alternative B would result in greater potential for countervailing effects through vegetation and wildfire management, which would maintain or increase carbon-storage and -sequestration potential to a slightly greater extent than Alternative A.

## H.1.5 References

Buursink, M. L., S. M. Cahan, and P. D. Warwick. 2015. *National assessment of geologic carbon dioxide storage resources—Allocations of assessed areas to Federal lands: U.S. Geological Survey Scientific Investigations Report 2015–5021*. 21 pp. Available: http://dx.doi.org/10.3133/sir20155021. Accessed: March 29, 2024

Intergovernmental Panel on Climate Change (IPCC). 2018. Summary for Policymakers. In: *Global Warming of 1.5°C: An IPCC Special Report on the impacts of global warming of 1.5°C above pre-industrial levels and related global greenhouse gas emission pathways, in the context of strengthening the global response to the threat of climate change, sustainable development, and efforts to eradicate poverty* [V. Masson-Delmotte, P. Zhai, H. O. Pörtner, D. Roberts, J. Skea, P. R. Shukla, A. Pirani, W. Moufouma-Okia, C. Péan, R. Pidcock, S. Connors, J. B. R. Matthews, Y. Chen, X. Zhou, M. I. Gomis, E. Lonnoy, T.

Maycock, M. Tignor, and T. Waterfield (eds.)]. , Cambridge, UK and New York, NY: Cambridge University Press. pp. 3–24, Available: http://10.1017/9781009157940.001. Accessed: March 29, 2024

_____. 2021. *Sixth Assessment Report*. Available: https://www.ipcc.ch/assessment-report/ar6/. Accessed: March 29, 2024.

Drummond, M. 2012. Chapter 8: Southern Rockies Ecoregion. *Status and Trends of Land Change in the Western United States – 1973 to 2000*. Available: https://pubs.usgs.gov/pp/1794/a/chapters/pp1794a_chapter08.pdf. Accessed: March 29, 2024.

Eldridge, D. 2000. Ecology and management of biological soil crusts: Recent developments and future challenges. *The Bryologist* 103(4):742–747.

Frankson, R., K. E. Kunkel, L. E. Stevens, and D. R. Easterling. 2022. *New Mexico State Climate Summary 2022*.

Gonzalez, P., G. M. Garfin, D. D. Breshears, K. M. Brooks, H. E. Brown, E. H. Elias, A. Gunasekara, N. Huntly, J. K. Maldonado, N. J. Mantua, H. G. Margolis, S. McAfee, B. R. Middleton, and B. H. Udall. 2018. Southwest. In *Impacts, Risks, and Adaptation in the United States: Fourth National Climate Assessment, Volume II* [D. R. Reidmiller, C. W. Avery, D. R. Easterling, K. E. Kunkel, K. L. M. Lewis, T. K. Maycock, and B. C. Stewart (eds.)]. Washington, DC: U.S. Global Change Research Program. pp. 1,101–1,184. Available: https://nca2018.globalchange.gov/chapter/25/. Accessed: March 29, 2024.

Kauffman, B. J., R. L. Beschta, P. M. Lacy, and M. Liverman. 2022. Livestock use on public lands in the western USA exacerbates climate change: Implications for climate change mitigation and adaptation. *Environmental Management* 69:1,137–1,152. Available: https://doi.org/10.1007/s00267-022-01633-8. Accessed: March 29, 2024.

National Aeronautics and Space Administration (NASA). 2022. Goddard Institute for Space Studies. *2021 Tied for 6th Warmest Year in Continued Trend, NASA Analysis Shows*. Available: https://www.nasa.gov/press-release/2021-tied-for-6th-warmest-year-in-continued-trend-nasa- analysis-shows. Accessed: March 29, 2024.

Ruhlman, J., L. Gass, and B. Middleton. 2012. Chapter 26, *Arizona/New Mexico Plateau Ecoregion*. In *Status and Trends of Land Change in the Western United States—1973 to 2000*. Available: https://pubs.usgs.gov/pp/1794/a/chapters/pp1794a_chapter26.pdf Accessed: March 29, 2024.

U.S. Energy Information Administration (USEIA). 2022. *Energy and the Environment Explained: Where Greenhouse Gases Come From*. Available: https://www.eia.gov/energyexplained/index.cfm?page=environment_where_ghg_come_from. Accessed: March 29, 2024.

_____. 2023. *U.S. Energy-Related Carbon Dioxide Emissions*. Available: https://www.eia.gov/environment/emissions/carbon/. Accessed: August 30, 2024.

U.S. Environmental Protection Agency (EPA). 2022b. *CASTNET Site Locations*. Available: https://www.epa.gov/castnet/castnet-site-locations. Accessed: March 29, 2024.

Vose, R. S., D. R. Easterling, K. E. Kunkel, A. N. LeGrande, and M. F. Wehner. 2017. Chapter 6: *Temperature Changes in the United States*. In *Climate Science Special Report: Fourth National Climate Assessment, Volume I* [D. J. Wuebbles, D. W. Fahey, K .A. Hibbard, D. J. Dokken, B. C. Stewart, and T. K. Maycock (eds.)]. Washington, D.C.: U.S. Global Change Research Program. pp. 185–206. Available: https://science2017.globalchange.gov/chapter/6/. Accessed: March 29, 2024.

# APPENDIX I: REFERENCES

Allred, Kelly A. 2005. *A Field Guide to the Grasses of New Mexico*. Third Edition. Available: https://pubs.nmsu.edu/sale/documents/GrassesNewMexico_2016.pdf. Accessed: August 27, 2024.

Asher-Bolinder, S. 1988. *Stratigraphy of Reference Sections in the Popotosa Formation, Socorro County*. New Mexico: U.S. Geological Survey, Bulletin 1800, scale 1:312,500.

Bailey, D. W., J. C. Moseley, R. E. Estell, C. F. Andres, M. Horney, J. R. Hendrickson, J. W. Walker, K. L. Launchbaugh, and E. A. Burritt. 2019. Targeted livestock grazing: Prescription for healthy rangelands. Synthesis Paper. *Rangeland Ecology & Management* 72(6). November. Available: https://www.sciencedirect.com/science/article/pii/S1550742419300399. Accessed: August 27, 2024.

Baldwin, B. 1956. The Santa Fe Group of North-Central New Mexico. *In Southeastern Sangre de Cristo Mountains: New Mexico Geological Society 7th Annual Fall Field Conference Guidebook* [A. Rosenzweig, ed.]. pp. 115–121.

Bureau of Land Management (BLM). 1984. Manual 8400, *Visual Resource Management*. Available: https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmpolicymanual8400.pdf. Accessed: August 27, 2024.

_____. 1986. Manual H-8410-1, *Visual Resource Inventory*. Available: https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_H-8410.pdf. Accessed: August 27, 2024.

_____. 1987. BLM Manual H-4120-1, *Grazing Management*.

_____. 1988. BLM Manual 1613, *Areas of Critical Environmental Concern*.[1]

_____. 1998. *Southwestern Willow Flycatcher Management Plan for the Taos Field Office*. Available on request.

_____. 2000a. *The Rio Grande Corridor Final Plan and Record of Decision*. Available: https://w3.spa.usace.army.mil/urgwops/eis_admin_record/Ref150.PDF. Accessed: August 27, 2024.

_____. 2000b. *Final Environmental Impact Statement for Riparian and Aquatic Habitat Management in the Taos Field Office, New Mexico. Volume 2: Proposed Riparian and Aquatic Habitat Management Plan*. Taos, NM. BLM/NM/PL-00-008-1040.

[1] On April 18, 2024, the BLM announced an update to its regulations, known as the Public Lands Rule, which included updates to the *Areas of Critical Environmental Concern Manual*. The updated ACEC manual is referred to in the Environmental Assessment or Finding of No Significant Impact because the National Environmental Policy Act process associated with the plan amendment began prior to this date.

_____. 2001. *New Mexico Standards for Public Land Health and Guidelines for Livestock Grazing Management*. January. Available: https://www.blm.gov/sites/blm.gov/files/Standards%20for%20Public%20Land%20Health%20and%20Guidelines%20for%20Livestock%20Grazing%20in%20New%20Mexico.pdf. Accessed: August 27, 2024.

_____. 2004. *Fire and Fuels Management Plan Amendment and Environmental Assessment*.

_____. 2005. BLM Manual H-1601-1, *Land Use Planning Handbook*. Available: https://www.ntc.blm.gov/krc/system/files?file=legacy/uploads/5656/4_BLM%20Planning%20Handbook%20H-1601-1.pdf. Accessed: August 27, 2024.

_____. 2008a. BLM Manual 6840, *Special Status Species Management*. REL. 6-125. Washington, DC.

_____. 2008b. BLM Handbook H-1740-2, *Integrated Vegetation Management*. Available: https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_Handbook_H-1740-2.pdf. Accessed: August 27, 2024.

_____. 2010a. *The National Landscape Conservation System 15-year Strategy 2010–2025.* Available: https://www.blm.gov/sites/default/files/documents/files/NLCS%20Strategy_0.pdf. Accessed: August 27, 2024.

_____. 2010b. *Implementing the National 15-Year Strategy in New Mexico*. Available: https://www.blm.gov/sites/blm.gov/files/documents/files/New%20Mexico_National%20Conservation%20Lands%20State%20Stepdown.pdf#:~:text=The%20New%20Mexico%20implementation%20strategy%20is%20a%20companion,workload%20priorities%20set%2C%20budgets%20allocated%2C%20and%20accomplishments%20tracked. Accessed: August 27, 2024.

_____. 2011. *Proposed Taos Resource Management Plan and Final Environmental Impact Statement*. Available: https://eplanning.blm.gov/eplanning-ui/project/68121/570. Accessed: August 27, 2024.

_____. 2012a. *Taos Approved Resource Management Plan*. Available: https://eplanning.blm.gov/eplanning-ui/project/68121/570. Accessed: August 27, 2024.

_____. 2012b. BLM Manual 6340, *Management of Designated Wilderness Areas*.

_____. 2014. *State Protocol Between the New Mexico Bureau of Land Management and the New Mexico State Historic Preservation Officer Regarding the Manner in Which BLM will Meet its Responsibilities under the National Historic Preservation Act in New Mexico*. Available: https://www.blm.gov/sites/default/files/NM%20BLM-SHPO%20Protocol%20Agmt_Signed_12-17-2014%20%281%29.pdf. Accessed: August 27, 2024.

_____. 2017a. *Río Grande Del Norte National Monument: Inventory for Lands with Wilderness Characteristics Report*. Final. January.

_____. 2017b. *Final Programmatic Environmental Impact Statement for Vegetation Treatments Using Aminopyralid, Fluroxypyr, and Rimsulfuron on Bureau of Land Management Lands in 17 Western States*. DOI-BLM-WO-WO2100-2012-0002-EIS. Available: https://eplanning.blm.gov/eplanning-ui/project/70301/570. Accessed: August 27, 2024.

_____. 2017c. *Setting Priorities for Review and Processing of Grazing Authorizations and Related Livestock Grazing Monitoring*. Instruction Memorandum No. 2018-24.

_____. 2018. *Decision Record – Río Grande del Norte National Monument Land Acquisitions*. DOI-BLM-NM-F020-2018-0007-EA. Available: https://eplanning.blm.gov/public_projects/nepa/103891/140383/172637/RGdNNM_Land_Acquisitions_DecisionRecord_March272018_508.pdf. Accessed: August 27, 2024.

_____. 2019a. *Río Grande del Norte National Monument Science Plan*. Unpublished Report.

_____. 2019b. *BLM State Wilderness Study Documents*. Available: https://www.blm.gov/learn/blm-library/agency-publications/select-state-publications/state-wilderness-documents. Accessed: August 27, 2024.

_____. 2020. *Río Grande del Norte National Monument Cones Fire Project Environmental Assessment*. DOI-BLM-NM-F020-0017-EA. July. Available: https://eplanning.blm.gov/public_projects/2001177/200382169/20057102/250063284/RGdN%20National%20Monument%20Cones%20Fire%20Project%20EA.pdf. Accessed: August 27, 2024.

_____. 2021a. *Annual Manager's Report: Río Grande del Norte National Monument*. Available: https://www.blm.gov/sites/default/files/docs/2022-08/Rio%20Grande%20del%20Norte%20NM%20FY21%20ManagersReport.pdf. Accessed: August 27, 2024.

_____. 2021b. *Rio Grande Gorge Summer Lamb Survey*. Unpublished Data.

_____. 2021c. *Assessment, Inventory, and Monitoring (AIM) National Aquatic Monitoring Framework: Field Protocol for Wadeable Lotic Systems*. Technical Reference 0735-2, Version 2. Available: https://www.blm.gov/sites/default/files/docs/2021-03/AIM%20National%20Aquatic%20Monitoring%20Framework%2C%20Field%20Protocol%20for%20Wadeable%20Lotic%20Systems%2C%20TR1735-2.pdf. Accessed: September 4, 2024.

_____. 2021d. *Horsethief Mesa Travel Management Plan (TMP)*. Available: https://eplanning.blm.gov/eplanning-ui/project/1505217/570. Accessed: August 27, 2024.

_____. 2023a. *Taos Resource Management Plan Amendment and Environmental Assessment for the Río Grande del Norte National Monument Management Plan*. Scoping Report. November. Available: https://eplanning.blm.gov/public_projects/2024165/200560834/20110129/251010120/Scoping%20Report_2023.pdf. Accessed: August 27, 2024.

_____. 2023b. *Final Programmatic Environmental Impact Statement Addressing Vegetation Treatments Using Herbicides*. Available: https://eplanning.blm.gov/eplanning-ui/project/2017138/570. Accessed: August 27, 2024.

_____. 2023c. *Lands, Realty, & Cadastral Survey*. Available: https://www.blm.gov/programs/lands-and-realty. Accessed: August 27, 2024.

_____. 2023d. *Recreation Management Information System (RMIS)*. Visitor Use Data Prepared by LLNM02000 for 2013–2022. Internal BLM Database. Accessed: March 17, 2023.

_____. 2024a. *BLM New Mexico Special Status Plant Species List*. Draft unpublished list.

_____. 2024b. *Assessment, Inventory, and Monitoring Data for the Río Grande del Norte National Monument and Ecological Site and Vegetation Cover*. Taos Field Office.

_____. 2024c. *Lands, Realty, & Cadastral Survey*. Available: https://www.blm.gov/programs/lands-and-realty. Accessed: August 27, 2024.

_____. 2024d. *Rangeland Administration System Reports*. Allotment Master Exported from: https://reports.blm.gov/reports/RAS. Accessed: August 27, 2024.

_____. 2024e. *BLM Land Health and Allotment Data*, Taos Field Office.

_____. 2024f. *Geographic Information System Data,* Taos Field Office.

_____. 2024g. *New Mexico John D. Dingell, Jr. Act Designations*. Available: https://www.blm.gov/about-laws-and-regulations-dingell-jr-act-new-mexico. Accessed: August 27, 2024.

_____. 2024h. *Rio Grande and Red River Wild and Scenic Rivers*. Available: https://www.blm.gov/programs/national-conservation-lands/new-mexico/rio-grande-wsr#:~:text=Rio%20Grande%20and%20Red%20River%20Wild%20and%20Scenic,journeys%201%2C900%20miles%20to%20the%20Gulf%20of%20Mexico. Accessed: August 27, 2024.

Bureau of Land Management (BLM) and National Park Service (NPS). 2017. *Old Spanish National Historic Trail Comprehensive Administration Strategy*. Available: http://npshistory.com/publications/olsp/cas-2017.pdf. Accessed: August 27, 2024.

BLM Legacy Rehost 2000 (LR2000). 2023. *Pub CR Geo Report w/ Land*. Bureau of Land Management Case Recordation [database]. Available: https://reports.blm.gov/report/lr2000/57/Pub-CR-Geo-Report-w-Land. Accessed: August 27, 2024.

BLM Mineral & Land Records System (MLRS). 2023. *Mining Claims – Geographic Index Report*. Bureau of Land Management Case Recordation [database]. Available: https://reports.blm.gov/reports/mlrs. Accessed: August 27, 2024.

Bryce, S. A., J. R. Strittholt, B. C. Ward, and D. M. Bachelet. 2012. *Colorado Plateau Rapid Ecoregional Assessment Report*. Denver, CO: Prepared for the U.S. Department of the Interior, Bureau of Land Management.

Chapin, C. E., and S. M. Cather. 1994. Tectonic setting of the axial basin of the northern and central Rio Grande rift. *Geological Society of America* 291:3.

Connell, S. D., S. M. Cather, N. W. Dunbar, W. C. McIntosh, and L. Petters. 2002. Stratigraphy of the Tanos and Blackshare formations (lower Santa Fe Group), Hagan embayment, Rio Grande rift. *New Mexico Geology* 24:107–120.

Cox, John J., and S. M. Murphy. 2019. *Demographic and Genetic Status of a Reintroduced River Otter Population in North-Central New Mexico*. Lexington, KY: Final Report to New Mexico Department of Game and Fish Share with Wildlife Program Project #171012.

Department of the Interior (DOI). 2000. *Rio Grande Corridor Final Plan.* Available: https://archive.org/details/doi-report_i-5359r-47/page/n11/mode/2up. Accessed: August 27, 2024.

Ellis, Florence Hawley. 1974. Anthropological data pertaining to the Taos land claim. In *Pueblo Indians I*. pp. 29–150. New York, NY: Garland Publishing, Inc.

Fowles, Severin M. 2009. The Enshrined pueblo: Villagescape and cosmos in the northern Rio Grande. *American Antiquity* 74(3):448–466.

Fullerton, W., and D. Batts. 2003. *Hope for a Living River: A Framework for a Restoration Vision for the Rio Grande*. Prepared for the Alliance for Rio Grande Heritage, World Wildlife Fund.

Galusha, T. 1966. The Zia sand formation, new early to medial Miocene beds in New Mexico. *American Museum Novitates* 2271.

Galusha, T., and J. C. Blick. 1971. Stratigraphy of the Santa Fe group, New Mexico. *Bulletin of the American Museum of Natural History* 144:7–127.

Griffith, G. E., J. M. Omernik, M. M. McGraw, G. Z. Jacobi, C. M. Canavan, T. S. Schrader, D. Mercer, R. Hill, and B. C. Moran. 2006. *Ecoregions of New Mexico* (color poster with map, descriptive text, summary tables, and photographs). Reston, VA: U.S. Geological Survey (map scale 1:1,400,000).

Halterman, M., M. J. Johnson, J. A. Holmes, and S. A. Laymon. 2016. *A Natural History Summary and Survey Protocol for the Western Distinct Population Segment of the Yellow-billed Cuckoo*. U.S. Fish and Wildlife Service Techniques and Methods.

Karl, T. A., J. M. Melillo, and T. C. Peterson, editors. 2009. *Global Climate Change Impacts in the United States*. Cambridge, UK, and New York, NY: Cambridge University Press.

Koning, D. J., and S. B. Aby. 2005. Proposed members of the Chamita Formation, north-central New Mexico. In *Geology of the Chama Basin: New Mexico Geological Society 56th Annual Fall Field Conference Guidebook* [S. G. Lucas, K. E. Zeigler, V. W. Lueth, and D. E. Owen, eds.]. pp. 258–278.

Llewellyn, D., and S. Vaddey. 2013. *Reclamation: Managing Water in the West. West-Wide Climate Risk Assessment: Upper Rio Grande Impact Assessment*. Prepared for U.S. Department of the Interior, Bureau of Reclamation, Upper Colorado Region, Albuquerque Area Office.

Lorenz, David. 2020. *Light Pollution Atlas 2020*. Available: https://djlorenz.github. io/astronomy/lp2020/. Accessed: August 27, 2024.

Mack, G. H., S. L. Salyards, and W. C. James. 1993. Magnetostratigraphy of the Plio-Pleistocene Camp Rice and Palomas formations in the Rio Grande rift of southern New Mexico. *American Journal of Science* 293:49–77.

Maldonado, F., and S. A. Kelley. 2009. Revisions to the stratigraphic nomenclature of the Abiquiu formation, Abiquiu, and contiguous areas, north-central New Mexico. *New Mexico Geology* 31:3–8.

McIntosh, W. C., and J. Quade. 1995. 40Ar/39Ar geochronology of tephra layers in the Santa Fe Group, Espanola Basin, New Mexico. In *Geology of the Santa Fe Region: New Mexico Geological Society 46th Annual Fall Field Conference Guidebook* [P. W. Bauer, B. S. Kues, N. W. Dunbar, K. E. Karlstrom, and B. Harrison, eds.]. pp. 279–287.

Morgan, G. S., S. G. Lucas, and J. W. Estep. 1998. Pliocene (Blancan) vertebrate fossils from the Camp Rice Formation near Tonuco Mountain, Dona Ana County, southern New Mexico. In *Las Cruces Country II: New Mexico Geological Society 49th Annual Fall Field Conference Guidebook* [G. H. Mack, G. S. Austin, and J. M. Barker, eds.]. pp. 237–249.

National Park Service (NPS). 2017. T*he National Trails System Memorandum of Understanding*. Available: https://www.nps.gov/subjects/nationaltrailssystem/upload/National_Trails_System_MOU_2017-2027.pdf. Accessed: August 27, 2024.

National Wildfire Coordinating Group (NWCG). 2023. *Glossary*. Available: https://www.nwcg.gov/publications/pms205/nwcg-glossary-of-wildland-fire-pms-205. Accessed: August 27, 2024.

Natural Resources Conservation Service (NRCS). 2024. *Soil Survey Geographic Database (SSURGO)*. United States Department of Agriculture. Available: https://www.nrcs.usda.gov/resources/data-and-reports/soil-survey-geographic-database-ssurgo. Accessed: August 27, 2024.

NatureServe. 2023. *NatureServe Network Biodiversity Location Data*. Arlington, VA. Available: https://www.natureserve.org/access-data. Accessed: February 2, 2023.

New Mexico Department of Agriculture (NMDA). 2020. *Noxious Weed Memo and List* (updated June 2020). Available: https://nmdeptag.nmsu.edu/apr/noxious-weeds.html. Accessed: August 27, 2024.

New Mexico Department of Game and Fish (NMDGF). 2022. *Threatened and Endangered Species of New Mexico 2022 Biennial Review*. Santa Fe, NM: Wildlife Management and Fisheries Management Divisions.

_____. 2024. *New Mexico State Wildlife Action Plan*. Available: https://nmswap.org/. Accessed: August 27, 2024.

New Mexico Energy, Minerals, and Natural Resources Department (NM EMNRD). 2018. *New Mexico Rio Grande Trail Master Plan.* Available: https://www.emnrd.nm.gov/wp-content/uploads/RioGrandTrail_MasterPlan_FINALwChanges.pdf. Accessed: August 27, 2024.

New Mexico Environment Department (NMED). 2022. *Impaired Waters 2022 Dataset*. Available: https://data-nmenv.opendata.arcgis.com/search?q=impaired%20waters. Accessed: August 27, 2024.

_____. 2024. *Outstanding National Resource Waters*. Available: https://www.env.nm.gov/surface-water-quality/onrws/. Accessed: August 27, 2024.

North American Bat Program. 2023. *NABat Acoustic Survey Results. National Data Processing Lab*. Report Prepared for the Bureau of Land Management Taos Field Office.

Pouyat, R.V, D. S. Page-Dumroese, T. Paterl-Weynand, and L. H. Geiser. Forest and rangeland soils of the United States under changing conditions. *Springer Open*. Available: https://www.fs.usda.gov/rm/pubs_journals/2020/rmrs_2020_pouyat_r001.pdf. Accessed: August 27, 2024.

Reitsma, J. 2021. *Bureau of Land Management: National Invasive Species Information Management System, Plants*. v1.2. United States Geological Survey. Dataset/ Occurrence. Available: https://bison.usgs.gov/ipt/resource?r=blm_nisims&v=1.2. Accessed: August 27, 2024.

S.593 – 118th Congress. 2023. *Cerro de la Olla Wilderness Establishment Act*. Library of Congress. July 11. Available: https://www.congress.gov/bill/118th-congress/senate-bill/593. Accessed: August 27, 2024.

Seager, W. R., J. W. Hawley, and R. E. Clemons. 1971. Geology of San Diego Mountain area, Dona Ana County, New Mexico. *New Mexico Bureau of Mines and Mineral Resources Bulletin* 97:38

Seltzer-Rogers, Heather. 2024. *Class I for the Río Grande del Norte National Monument Management Plan, Rio Arriba and Taos Counties, New Mexico*. Chronicle Heritage Technical Report No. 23-583. Albuquerque, NM: Chronicle Heritage, LLC.

Strain, W. S. 1966. Blancan mammalian fauna and Pleistocene formations, Hudspeth County, Texas. *Texas Memorial Museum Bulletin* 10:55.

Strain, W. S. 1969. Late Cenozoic strata of the El Paso–Juarez area. In *New Mexico Geological Society Fall Field Conference Guidebook* [D. A. Cordoba, S. A. Wengerd, and J. Shoemaker, eds.]. 20:228.

Tala. 2022. *Vegetative Changes Within Areas of Critical Environmental Concern in Taos and Rio Arriba Counties of Northern New Mexico 2000–2020*. Master of Science Geographic Information Systems Technology Final Project, University of Arizona.

Thompson, R. A., and N. J. McMillan. 1992. *A Geologic Overview and One-Day Field Guide of the Taos Plateau Volcanic Field, Taos County, New Mexico*. United States Geological Survey, Open-File Report 92-528, p. 23.

Thompson, R. A., K. J. Turner, P. W. Lipman, J. A. Wolff, and M. A. Dungan. 2022. *Field-Trip Guide to Continental Arc to Rift Volcanism of the Southern Rocky Mountains—Southern Rocky Mountain, Taos Plateau, and Jemez Mountains Volcanic Fields of Southern Colorado and Northern New Mexico*. U.S. Geological Survey Scientific Investigations Report 2017-5022-R. Available: https://pubs.usgs.gov/publication/sir20175022R. Accessed: August 27, 2024.

U.S. Environmental Protection Agency (EPA). 2024. *Clean Water Act Section 303(d): Impaired Waters and Total Maximum Daily Loads (TMDLs)*. Available: https://www.epa.gov/tmdl. Accessed: August 27, 2024.

U.S. Fish and Wildlife Service (USFWS). 2002. *Recovery Plan for the Southwestern Willow Flycatcher*. Available: https://www.fs.usda.gov/research/treesearch/35557. Accessed: August 27, 2024.

_____. 2012. *Mexican Spotted Owl Recovery Plan, First Revision (*Strix occidentalis lucida*)*. Southwest Region. U. S. Fish and Wildlife Service. Albuquerque, New Mexico.

_____. 2013. *Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for Southwestern Willow Flycatcher*. *Federal Register* Vol. 78, No. 2. January 3.

_____. 2014. *Endangered and Threatened Wildlife and Plants; Designation of Critical Habitat for the Western Distinct Population Segment of the Yellow-Billed Cuckoo (*Coccyzus americanus*)*. *Federal Register* Vol. 79, No. 231. December 2.

_____. 2017. *Species Status Assessment for the Canada Lynx (*Lynx canadensis*) Contiguous United States Distinct Population Segment*. Version 1.0 Final.

_____. 2020a. *Species Status Assessment Report for the New Mexico Meadow Jumping Mouse (*Zapus hudsonius luteus*), 1st Revision*. January. Albuquerque, NM. 160 pp.

_____. 2020b. *Monarch (*Danaus plexippus*) Species Status Assessment Report*. V2.1. Available: https://ecos.fws.gov/ServCat/DownloadFile/191345. Accessed: August 27, 2024.

_____. 2021. *Species Status Assessment Report for* Speyeria nokomis nokomis. Version 1.0. Available: https://www.fws.gov/media/species-status-assessment-report-silverspot-butterfly-speyeria-nokomis-nokomis. Accessed: August 27, 2024.

_____. 2024a. *Information for Planning and Consultation: List of Trust Resources in the Río Grande del Norte National Monumen*t. Generated online: https://ecos.fws.gov/ipac/. Accessed: August 27, 2024.

_____. 2024b. *National Wetland Inventory (NWI)*. Available: https://www.fws.gov/program/national-wetlands-inventory/data-download. Accessed: August 27, 2024.

U.S. Forest Service (USFS). 2022. *Carson National Forest Land Management Plan*. U.S. Department of Agriculture, U.S. Forest Service, Southwestern Region/Carson National Forest. September. Available: https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd942568.pdf. Accessed: August 27, 2024.

U.S. Geological Survey (USGS). 2014. *LANDFIRE Fire Regime Groups Dataset*. Available: https://data.usgs.gov/datacatalog/data/USGS:64beace9d34e70357a31c517. Accessed: August 27, 2024.

_____. 2022. *Ungulate Migrations of the Western United States Volume 3, Scientific Investigations Report 2022-5008*. Available: https://pubs.usgs.gov/publication/sir20225088/full. Accessed: August 27, 2024.

_____. 2024. *National Hydrography Dataset (NHD)*. Available: https://www.usgs.gov/national-hydrography/national-hydrography-dataset. Accessed: August 27, 2024.

U.S. Geological Survey (USGS) Earth Resources Observation and Science Center (EROS). 2020a. *LANDFIRE Remap 2016 Biophysical Settings (BPS) CONUS, LF Remap, October 16, Sioux Falls, SD*. Available: https://www.landfire.gov. Accessed: August 27, 2024.

_____. 2022b. *LANDFIRE 2020 Existing Vegetation Type (EVT) CONUS, LF 2020, June 6, Sioux Falls, SD*. Available: https://www.landfire.gov. Accessed: August 27, 2024.

Walston, L. J., H. M. Harmann, K. L. Wescott, E. A. Zvolanek, K. E. Rollins, and L. R. Fox. 2016. *San Luis Valley–Taos Plateau Level IV Ecoregion Landscape Assessment*. Prepared for U.S. Department of Interior, Bureau of Land Management, Colorado State and New Mexico State Offices. Available: https://www.blm.gov/sites/blm.gov/files/uploads/Landscape%20Assessment%20Final%20Report.pdf. Accessed: August 27, 2024.

Wescott, Konnie L., Jennifer M. Abplanalp, Jeff Brown, Brian Cantwell, Merrill Dicks, Brian Fredericks, Angie Krall, Katherine E. Rollins, Robert Sullivan, Arnie Valdez, Bruce Verhaaren, Joseph Vieira, Lee Walston, and Emily A. Zvolanek. 2016. *San Luis Valley–Taos Plateau Landscape Level Cultural Heritage Values and Risk Assessment Final Report*. Argonne, IL: Argonne National Laboratory.

Woodward, L. A., and R. S. Timmer. 1979. *Geology of the Jarosa Quadrangle, New Mexico. New Mexico Bureau of Mines and Mineral Resources*. Geologic Map 47, scale 1:24,000.

# APPENDIX J: DRAFT RMPA/EA COMMENT ANALYSIS REPORT

Public involvement is important to the Bureau of Land Management (BLM) and serves as a critical part of the National Environmental Policy Act (NEPA) process. All comments the BLM received on the Draft Resource Management Plan A mendment and Environmental Assessment (RMPA/EA) were reviewed and categorized. Although not required for an EA by regulation, an agency may respond to substantive and timely comments received (BLM 2008).

*Substantive comments* do one or more of the following.

- Question, with reasonable basis, the accuracy of information in the EA
- Question, with reasonable basis, the adequacy of, methodology for, or assumptions used for the environmental analysis
- Present new information relevant to the analysis
- Present reasonable alternatives other than those analyzed in the EA
- Cause changes or revisions in one or more of the alternatives

Comments that are *not* considered substantive include the following.

- Comments in favor of or against the proposed action or alternatives without reasoning that meet the criteria listed above
- Comments that only agree or disagree with BLM policy or resource decisions without justification or supporting data that meet the criteria listed above
- Comments that do not pertain to the project area or the project
- Comments that take the form of vague, open-ended questions

Similar comments, when applicable, have been grouped by topic and are summarized in **Error! Reference source not found.**, below.

Table J.1-2 lists comments received on the Draft RMPA/EA and the BLM responses.

## Table J.1-1. Summarized Comments and Summary Responses

| Summary Comment and Response Number and Comment Number in Table J.1-2 | Comment Summary | Comment Response |
|---|---|---|
| **1. Hot Air Balloons**<br>003, 123, 033, 124, 125, 181, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136,137, 138, 139, 140. 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153 | **Public.** Several commenters expressed concern regarding proposed management of hot air balloons, including the following themes:<br>• **Hot air balloon flights below the rim of the gorge are beneficial for recreation and tourism:** Several comments from balloonists and visitors argued that hot air balloon flights below the rim of the gorge provide a unique and enjoyable experience that enhances the recreational value of the Rio Grande del Norte National Monument. They also stated that these flights contribute to the local economy and culture and allow access to people with physical limitations.<br>• **Hot air balloon flights below the rim of the gorge have minimal impact on wildlife and other users:** Some commenters cited observations that suggest that hot air balloon flights below the rim of the gorge do not disturb or harm the wildlife or the habitat in the area. Commenters also challenged the assertion that hot air balloon flights detract from the recreational experience of other users and stated that there is little overlap in time and space between balloonists and other activities.<br>• **Hot air balloon flights below the rim of the gorge are safe and regulated:** Commentors stated that hot air balloon flights below the rim of the gorge are not a safety concern or a violation of aviation regulations. Commenters suggested that hot air balloons can fly in and around the terrain features of the gorge with ease and precision, and that they | Section 3.2.3 of the EA has been revised to better describe the potential impacts of hot air balloons on wildlife within the gorge, especially on raptor habitat.<br>In addition, the Proposed RMPA has been revised to allow for below-the-rim flights outside of the seasonal closure period (January 1 through August 31), but only in the area between John Dunn Bridge and Manby Hot Springs. A wildlife harassment stipulation would be added to the Special Recreation Permit (SRP) and general land-based stipulations that states:<br>> Wildlife must not be pursued if seen from a hot air balloon. The pilot must continue on the original path. If wildlife is showing stressed behavior (e.g., running away from the balloon, cowering, hiding), then the pilot must pull back immediately and remove themselves from the area. *Incidental take* is a take (that is to harass, harm, pursue etc. or to attempt to engage in any such conduct) that results from activities that are otherwise lawful.<br>**John Dunn Bridge**: Tours would be allowed throughout the year except for flights below the rim from January 1 through August 31. Flights below the rim outside of the seasonal closure will be restricted to the area between the John Dunn Bridge (36.534447, -105.708761) and Manby Hot Spring (36.508081, -105.7242). Launching would be approved at three designated sites above the bridge.<br>The BLM will practice adaptive management with this determination if circumstances change.<br>These spatial and temporal closures protect the unique and finite habitat of the Rio Grande gorge. The gorge has historically been a densely populated raptor-nesting area, |

| Summary Comment and Response Number and Comment Number in Table J.1-2 | Comment Summary | Comment Response |
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| | operate in non-congested airspace. Some commenters added that hot air balloon flights are subject to seasonal and spatial restrictions to protect wildlife and habitat. | including for Golden Eagles, is an important migratory bird corridor, and provides ideal habitat for Rocky Mountain Bighorn Sheep. |
| **2. County Road B-017 and access west of John Dunn Bridge**<br>118 and 197 | **Public.** Commenters expressed concern about County Road B-017 near John Dunn Bridge and stated their interest in keeping the road open for various reasons, such as public safety, historical significance, and access to public lands west of the gorge. | The BLM understands the importance of County Road B-017 to the local community and will continue to coordinate efforts with Taos County to identify a long-term solution to ensure public safety. Meetings and coordination with Taos County are ongoing, and the BLM reaffirms its support for reopening the road. |
| **3. NEPA Process, Environmental Assessment versus Environmental Impact Statement; Decision Process**<br>011, 012, 023, 001 | **Public.** Some commenters questioned why the Bureau of Land Management (BLM) is prepared an environmental assessment (EA) instead of an environmental impact statement (EIS) for its draft monument plans and noted that other national monuments that have their own plans, rather than amending Resource Management Plans (RMP) that cover a larger area. Commenters also stated that an EA-level assessment is not sufficient because BLM failed to assess how well management of the 2012 Taos RMP is working to protect Monument objects and that a FONSI is not adequate if the BLM approves actions that jeopardize monument objects or result in significant effects. | Section 1.1 of the Proposed RMPA/EA states:<br>> Because the 2012 Taos RMP was completed at the time Proclamation 8946 established the Monument, and the BLM does not anticipate needing substantial changes to how the Monument is currently being managed under the 2012 Taos RMP, an EA-level plan amendment has been determined to be the appropriate means of streamlining the process now that planning for the Monument is once again proceeding. The BLM believes that the purposes for which the Monument was designated—the protection, preservation, and restoration of important resource values—can be achieved without substantial changes to its current management. Under the 2012 Taos RMP, the Monument lands are being managed as two Areas of Critical Environmental Concern (ACECs), which provide management largely consistent with the purposes of the Monument's designation.<br>Although other monuments have used EISs and have their own RMPs, the circumstances of the Río Grande del Norte National Monument (Monument), the fact that it was already managed to protect its resources under an ACEC designation, and the fact that major changes to management are not being proposed, directed the BLM toward using a more efficient EA process. The fact that no |

| Summary Comment and Response Number and Comment Number in Table J.1-2 | Comment Summary | Comment Response |
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| | | significant impacts from the proposed action were predicted during our analysis justifies this decision.<br>Commenters also stated that an EA-level assessment is not sufficient because the BLM failed to assess how well management of the 2012 Taos RMP is working to protect Monument objects. The No Action alternative in this EA analyzes the impacts of current management under the 2012 RMP and shows where they are and are not working. The Proposed Action addresses the areas of management that need adjustment.<br>Commentors are correct that a Finding of No Significant Impact (FONSI) would not be appropriate if the BLM were to approve actions that jeopardized Monument objects or resulted in significant effects; however, the analysis in this EA does not show significant effects or jeopardization of Monument objects. Therefore, an EIS is not necessary, and an EA is appropriate. |
| **4. Proposed Right-of-Way Corridors**<br>002, 046, 047, 048, 049, 050, 051, 202, 052, 053, 054, 055, 056, 057, 058, 059, 061, 063, 179, 065, 066, 180, 067, 068, 069, 070, 214, 071, 072, 073 | Public, Amigos Bravos, Trout Unlimited, NMDGF, New Mexico Wild, Sierra Club – Rio Grande Chapter, and Enchanted Circle Trails Association. Commenters raised concerns regarding the BLM's proposal to designate new and expanded rights of way (ROWs) within the Monument. Commenters expressed apprehension about potential visual degradation, wildlife habitat fragmentation, avian collision hazard, soil erosion, water quality degradation, and reduced public participation due to the proposed 600-foot Powerline Falls ROW corridor. Several commenters requested that the BLM withdraw its proposal and instead conduct a project-specific National Environmental Policy Act (NEPA) analysis for any future transmission projects. Other commenters argued that the proposed ROW corridors, in particular, | Presidential Proclamation 8946 specifically states:<br>> Nothing in this proclamation shall be construed to preclude the Secretary from renewing or authorizing the upgrading of existing utility line rights-of-way within the physical scope of each such right-of-way that exists on the date of this proclamation. Additional utility line right-of-way or upgrades outside the existing utility line rights-of-way may only be authorized if consistent with the care and management of the objects identified above.<br>The Proposed RMPA/EA is a programmatic document and subsequent projects, including any applications for transmission/utility facilities and ROWs, will be analyzed during site-specific NEPA analysis processes. The magnitude of specific resource impacts will be identified during those analyses. The BLM identified the proposed expansion of the Horsethief Mesa and Powerline Falls ROW |

| Summary Comment and Response Number and Comment Number in Table J.1-2 | Comment Summary | Comment Response |
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| | the proposed Powerline Falls ROW corridor, run contrary to Proclamation 8946, the Wild and Scenic Rivers Act, and the spirit of community stakeholders who stated that the Monument should be designated in part to prevent new development. Another commenter noted that the Rio Grande Gorge Bridge is listed on the National Register of Historic Places and raised concerns that a utility corridor within view of the bridge would represent adverse impacts on the qualities of value to visitors.<br>Some commenters acknowledged the BLM's willingness to exclude the Monument from wind or solar energy development and offered suggestions for best management practices renewable energy transmission, including visual monitoring of erosion impacts and water quality testing following any visual identification of high erosion impacts in the river.<br>Commenters emphasized the need for more information on potential future projects before including implementation-level specifics of ROW expansion into the Monument Management Plan and requested that construction of new transmission lines be analyzed in future RMP amendment and Environmental Impact Statement (EIS) processes.<br>In summary, commenters requested a reconsideration of the proposed ROWs to avoid significant impacts on the Wild and Scenic River Corridor and the values the Monument was established to protect. | corridors due to the presence of existing utility line facilities at these locations; expanding and designating these ROW corridors would provide the opportunity for collocation and reduce impacts of linear utility infrastructure on Monument objects and resources across the broader landscape.<br>Although no formal application has been accepted by the BLM, a local electric cooperative has expressed interest in crossing the gorge at Powerline Falls. The existing ROW and infrastructure at Powerline Falls were granted prior to designation of the Rio Grande as a Wild and Scenic River and are considered to be grandfathered uses. New ROWs or new installations on existing structures would only be granted if subsequent site-specific NEPA analysis determines that Monument objects and outstandingly remarkable values of the Rio Grande are not affected.<br>The Proposed RMPA proposes expansion of the existing Powerline Falls ROW from 190 feet to 600 feet (i.e., a 410-foot expansion), which is a reasonable to accommodate an additional potential transmission line crossing at this location when considering design and engineering requirements, including adequate separation from existing infrastructure. Appendix D, *Best Management Practices*, includes best management practices (BMPs) for ROWs and utility corridors, including measures to minimize erosion and sedimentation, ensure soil stabilization, control invasive/noxious weeds, and provide information about raptor and avian protection in the project design. The BLM may require design modifications to minimize surface disturbance, operational conflicts, visual contrast, and/or avian conflicts and may impose additional BMPs or mitigation measures during site-specific NEPA analysis, if necessary for the protection of Monument objects, special status species, wildlife, and other resources. |

| Summary Comment and Response Number and Comment Number in Table J.1-2 | Comment Summary | Comment Response |
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| **5. Travel Management, Signage, and Enforcement**<br>189, 190, 173, 193, 195 | **Public.** Trout Unlimited, New Mexico Wild. Commenters raised concerns about inadequate signage and law enforcement within the Monument, trespassing, and resource impacts associated with illegal OHV use. Commenters expressed support for the BLM's proposal for a Travel Management Plan to balance access with resource protection and suggested collaboration with volunteer groups such as the Friends of the Río Grande del Norte National Monument and Backcountry Hunters and Anglers for sign placement and road decommissioning to address these issues effectively. | Signage is an example of a matter normally addressed in plan implementation. As indicated in TRA Objective 1, a Travel Management Plan (TMP) would be developed during implementation-level planning, as funding and resources are available. TRA Objectives 2, 3, and 4 include additional objectives for travel management within the Monument, including resource protection and increased education and signage regarding legal access to the Monument in coordination with local cooperating parties. REC Management Action 23 identifies development and implementation of a sign plan consistent with subsequent activity-level plans. The BLM will consider partnerships and collaboration with volunteer groups during implementation-level planning associated with the future TMP. |
| **6. Recreational Climbing – Use of Hardware**<br>154, 157, 158, 161, 162, 163, 164, 165, 166, 167, 169, 171, 172 | Commenters requested that the BLM better define the process for approving the installation of new climbing hardware within the Monument. Commenters note the delayed implementation of approval processes and actions from the Climbing Fixed Hardware EA.<br>Additional comments request the BLM clarify that the replacement of existing hardware is allowed for safety reasons.<br>A programmatic approach to permitting new climbing routes that require the placement of fixed hardware was proposed to improve the review and approval process. Commenters encouraged the BLM to continue to work with climbing community to implement climbing management and develop an effective process. | The process for authorizing new fixed hardware within the Monument is an implementation-level decision addressed outside the scope of the Monument Management Plan. The BLM is actively finalizing its evaluation of a programmatic process—independent of the Monument-planning process—to authorize the placement of fixed hardware for rock climbing in a manner that addresses input received on the Draft RMPA/EA. |

| Summary Comment and Response Number and Comment Number in Table J.1-2 | Comment Summary | Comment Response |
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| **7. eBike Speed and Conflicts**<br>025, 026, 027, 028, 029, 030, 031, 032 | Commenters noted the EA failed to distinguish the potential impact of e-bikes as compared to regular mountain bikes including potential for recreational conflict with other uses and safety. | A decision regarding the use of electric bicycles (e-bikes) on trails within the Monument has been removed from the scope of this analysis because it has been determined that the BLM does not have discretion to make such a decision because of the limitations on motorized vehicles specified in Presidential Proclamation 8946. |

## Table J.1-2. Comments and Responses to Comments

| Comment Number | Comment Category | Commenter | Comment Text | Comment Response |
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| 001 | Affected Environment and Environmental Consequences | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | The BLM opportunity is to assess how well the management objectives in the first plan work. The agency also must evaluate the first plan's objectives in the context of a change to landscape conservation emphasis brought by the National Monument designation. With that assessment it might adjust the new plan based on the results of the analysis and any change in environmental and cultural circumstances. Unfortunately, the draft documents for the Monument fail to provide any review of the past management performance. In addition, it provides no clear discussion of the current conditions in the Monument. Consequently, the possibility of a science-based decision on the nature of management impacts to Monument values is not met. Most importantly, the chance to learn from experience and improve operations has been missed. An Environmental Assessment is not sufficient given these deficiencies | Summary Comment and Response 3 (see Table J.1-1) |
| 002 | Alternative B – Proposed Action | Not Provided | A 600 foot-wide transmission line corridor seems to be excessive. When this was first discussed I figured a 400 foot ROW would be proposed. I was surprised when it was 600'. | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 003 | Alternative B – Proposed Action | Not Provided | I seriously doubt if the momentary presence of a hot-air balloon disturbs any other user. In fact, the opposite is probably true. Seeing a balloon below the | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

| Comment Number | Comment Category | Commenter | Comment Text | Comment Response |
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| | | | rim from the ground would be an experience worth retelling. Similar to the human sighting, I have only seen wildlife below the rim once. I realize that flight below the rim is restricted during certain times of the year to avoid disturbing nesting birds and I do not object to that. For the reasons above, I strongly object to the proposal to prohibit flights below the rim for the entire year. | |
| 004 | Alternative B1 – Designate Cerro de la Olla Wilderness Study Area (WSA) | Not Provided | Alternative B 1 is good but it should have included more limits on livestock grazing and target shooting. These uses can adversely affect monument objects. Grazing is an allowable use but not required if it conflicts with object protection. Target shooting is not appropriate in a national monument for public safety and environmental reasons. Please strengthen B 1 to be more effective at protecting monument objects. | As stated in Presidential Proclamation 8946, laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases will continue to apply with regards to the lands in the Monument, consistently with the purposes of this proclamation. The BLM Taos Field Office will perform land-health evaluations and grazing-compatibility assessment(s) to develop appropriate grazing-management guidance and decisions consistent with Presidential Proclamation 8946's direction to "preserve the objects of scientific and historic interest on the Río Grande del Norte lands" (see Proposed RMPA/EA Appendix C, Section C.3.2). Recreational target-shooting restrictions are established under 43 Code of Federal Regulations (CFR) 8365.2-5(a) and the Supplementary Rules (70 *Federal Register* [FR] 48584). All alternatives prohibit recreational target shooting within developed recreational areas. |
| 005 | Alternatives | Not Provided | I support Alternative B1. But I am disappointed that BLM unfairly and | The Proposed RMPA/EA evaluates the closure of four vacant grazing allotments. |

| Comment Number | Comment Category | Commenter | Comment Text | Comment Response |
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| | | | preemptively removed closing vacant grazing allotments as well as target shooting from alternatives. This prevented the public from commenting on these land uses as part of the alternatives analysis. Alternative analysis is the "heart" of the NEPA process | As noted in Section 2.6.2, an alternative to close all 10 vacant allotments has been dismissed from detailed analysis per the feedback gained during public scoping, the rationale above, and because the grazing-authorization process allows for compatibility of livestock grazing with the Monument designation. Recreational target-shooting restrictions are established under 43 CFR 8365.2-5(a) and the Supplementary Rules (70 FR 48584). All alternatives prohibit recreational target shooting within developed recreational areas. As noted in Section 2.6.1 of the Proposed RMPA/EA, by maintaining the existing management within the Monument, the BLM can meet the needs of the resources and values in this area under the BLM's multiple-use and sustained-yield mandates, while preserving and protecting Monument objects and values. The BLM would continue to monitor target-shooting impacts and consider restrictions on recreational target shooting, if necessary, during area-specific implementation planning to avoid or correct public safety issues, conflicts between recreational uses, and adverse impacts on Monument objects or values. |
| 006 | Alternatives | Cyndi Tuell, Western Watersheds Project | It does not appear that our prior comments were carefully considered. The range of alternatives is insufficient, especially as it concerns livestock grazing. There has been no consideration of a no- grazing alternative and no consideration of a voluntary grazing permit retirement provision. Our specific | The BLM has reviewed and considered the specific recommendations provided by the commenter and has incorporated relevant information from the Tala 2022 study into Section 3.2.7 of the Proposed RMPA/EA. See Appendix C, Section C.2.7, *VEGR Management Action 6*, and Section C.3.2, *LG Management Action 5*, which have been |

| Comment Number | Comment Category | Commenter | Comment Text | Comment Response |
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| | | | recommendations for management direction, goals, objectives and allocations appear to have been completely ignored. There is no response to our concerns about impacts to the playa from livestock grazing and a scientific study of vegetation in the project area that we provided with our prior comments has been ignored without comment. | revised to address concerns regarding potential impacts from grazing within playas.<br>The BLM must manage the Monument pursuant to the multiple-use and sustained-yield mandates of the Federal Land Policy and Management Act (FLPMA) of 1976, and the specific direction in Presidential Proclamation 8946, which states:<br>> Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on lands under its jurisdiction shall continue to apply with regard to the lands in the monument, consistent with the purposes of this proclamation.<br>During alternatives development, the BLM considered the impacts of livestock grazing on objects identified in Presidential Proclamation 8946, as well as other natural and cultural resources. After considering potential conflicts between livestock grazing and other objects and resources, the BLM determined that there were no issues or conflicts that require the complete elimination of livestock grazing within the Planning Area for their resolution. In response to comments received on the Draft RMPA/EA, the BLM has revised the Proposed RMPA to make two additional vacant allotments unavailable for grazing (627 Dunn Bridge and 623 Hot Spring; see Proposed RMPA/EA Appendix C, *LG Management Action 4*). The BLM considered a reasonable range of alternatives in compliance with NEPA, the *BLM NEPA* |

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| | | | | *Handbook (H-1790-1)*, the *BLM Land Use Planning Handbook (H-1601-1)*, and other applicable laws, policies, and regulations. |
| 007 | Alternatives | Cyndi Tuell, Western Watersheds Project | As we noted in our prior comments, on lands within the National Landscape Conservation System (NLCS), the Bureau intends to "[l]imit discretionary uses to those compatible with conservation, protection, and restoration of the values for which NLCS lands were designated," and in order to do this, the Bureau will "[u]se the best-available science to conduct capacity studies, establish specific, measurable, attainable, relevant and time-specific (SMART) objectives, and develop monitoring plans for compatible uses to ensure the NLCS values are protected, consistent with the designation legislation or presidential proclamation." See 15-Year Strategy for the NLCS at 10, available at http://www.blm.gov/pgdata/etc/medialib/blm/wo/Communications_Directorate/public_affairs/news_release_attachments.Par.16615.File.tmp/NLCS_Strategy.pdf. We again insist that the Bureau must apply this clarity of vision for the NLCS lands to this monument. For the Rio Grande del Norte, the Bureau has a higher standard of duty to protect monument objects under the Antiquities Act of 1906. | Section 302(a) of FLPMA states that public lands are to be managed under the principles of multiple use and sustained yield…<br>> except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it will be managed in accordance with such law.<br>For this planning effort, the area will therefore be managed in accordance with FLPMA and the enabling legislation that created the area (Presidential Proclamation 8946). The Presidential Proclamation states:<br>> For purposes of protecting and restoring the objects identified above, the Secretary, through the BLM, shall prepare and maintain a management plan for the monument…<br>In compliance with 43 CFR 1610.4–9 and 36 CFR 219.12, land-use plans must establish monitoring intervals and standards based on resource sensitivity. Additionally, BLM Manual 6220 mandates that plans for national monuments analyze and incorporate measures ensuring the conservation, protection, and restoration of objects and values. This involves the inclusion of a monitoring strategy specifying change indicators, methodologies, protocols, and time frames |

| Comment Number | Comment Category | Commenter | Comment Text | Comment Response |
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| | | | | for evaluating outcome achievement. In addition, implementation-level actions would be subject to NEPA review, and site-specific mitigation measures would be identified through the environmental review process. Refer to Section 2.5 of the Proposed RMPA/EA. To address changing conditions and provide management flexibility incorporating BMPs (refer to Appendix D, *Best Management Practices*), the BLM would evaluate the effectiveness of management actions, analyze current resource conditions, and, if necessary, adjust management approaches.<br>Monitoring would track the BLM's advancement in fully implementing the land-use plan and attaining desired outcomes. Monitoring efforts would be prioritized in alignment with the *Río Grande del Norte National Monument Science Plan* (BLM 2019a), as well as the goals and objectives outlined in the RMP. |
| 008 | Alternatives (comparing, range) | Not Provided | I believe that BLM was improperly arbitrary in not carrying forward a reasonable range of management alternatives that could provide a more consistent and reliable level of protection for monument objects. Alternative B seems very similar to typical BLM management for public domain lands. | As noted in Section 1.1 of the Proposed RMPA/EA, an EA-level plan amendment has been determined to be the appropriate means of streamlining the land-use planning process. The BLM believes that the purposes for which the Monument was designated—the protection, preservation, and restoration of important resource values—can be achieved without substantial changes to its current management. Under the 2012 Taos RMP, Monument lands are being managed as two ACECs, which provide management largely consistent |

| Comment Number | Comment Category | Commenter | Comment Text | Comment Response |
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| | | | | with the purposes of the Monument's designation. Council on Environmental Quality (CEQ) regulations require that agencies "make diligent efforts to involve the public in preparing and implementing their NEPA procedures" (40 CFR 1506.6(a)); external scoping for EAs is optional (40 CFR 1501.7). However, when evaluating the need for scoping the Taos RMP Amendment for the *Río Grande del Norte National Monument Management Plan* (Monument Management Plan), the BLM determined that external scoping was an important step in the planning process due to the size, scale, and uniqueness of the planning effort and due to previous public interest in the Monument Management Plan effort. Alternative B (the Proposed Action) was developed in response to internal and external scoping, which provided input on changed circumstances and management needs for the protection of Monument objects. In compliance with NEPA, the *BLM NEPA Handbook*, the *BLM Land Use Planning Handbook*, and other applicable laws, policies, and regulations, the BLM considered a reasonable range of alternatives based on the narrow and specific purpose and need for this action. |
| 009 | Alternatives Considered but Eliminated from Detailed Analysis | Richard Spotts | What is the justification to summarily reject alternatives that would address the threats to monument objects from grazing, OHV recreation, and target shooting? Other BLM monument NEPA documents carry forward and address these issues. Are these rejections | Refer to Section 2.6 of the Proposed RMPA/EA, which provides justification for alternatives considered but eliminated from detailed analysis. Regarding livestock grazing, the Proposed RMPA/EA evaluates closure of four vacant grazing allotments. As noted in Section 2.6.2, an alternative to |

| Comment Number | Comment Category | Commenter | Comment Text | Comment Response |
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| | | | evidence of improper pre-decisional bias? If so, they are clear violations of the APA and NEPA. | close all 10 vacant allotments has been dismissed from detailed analysis per the feedback gained during public scoping, the rationale above, and because the grazing-authorization process allows for compatibility of livestock grazing with the Monument designation. Recreational target-shooting restrictions are established under 43 CFR 8365.2-5(a) and the Supplementary Rules (70 FR 48584). All alternatives prohibit recreational target shooting within developed recreational areas. As noted in Section 2.6.1 of the Proposed RMPA/EA, by maintaining the existing management within the Monument, the BLM can meet the needs of the resources and values in this area under the BLM multiple use and sustained yield mandate, while preserving and protecting Monument objects and values. The BLM would continue to monitor target-shooting impacts and consider restrictions on recreational target shooting, if necessary, during area specific–implementation planning to avoid or correct public safety issues, conflicts between recreational uses, and adverse impacts on Monument objects or values. See Appendix C, *TRA Management Action 1*, which states:<br>Maintain existing travel consistent with existing travel management decisions and Presidential Proclamation 8946. In accordance with Presidential Proclamation 8946, except for emergency or authorized administrative purposes, motorized-vehicle use in the Monument is limited to designated |

| Comment Number | Comment Category | Commenter | Comment Text | Comment Response |
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| | | | | roads. Nonmotorized mechanized vehicle use is limited to designated roads and trails.<br>CEQ regulations require that agencies "make diligent efforts to involve the public in preparing and implementing their NEPA procedures" (40 CFR 1506.6(a)); external scoping for EAs is optional (40 CFR 1501.7). However, when evaluating the need for scoping the Taos RMP Amendment for the Monument Management Plan, the BLM determined that external scoping was an important step in the planning process due to the size, scale, and uniqueness of the planning effort, and due to previous public interest in the Monument Management Plan effort. Alternative B (the Proposed Action) was developed in response to internal and external scoping, which provided input on changed circumstances and management needs for the protection of Monument objects. In compliance with NEPA, the *BLM NEPA Handbook*, the *BLM Land Use Planning Handbook*, and other applicable laws, policies, and regulations, the BLM considered a reasonable range of alternatives based on the narrow and specific purpose and need for this action. |
| 010 | Alternatives Considered but Eliminated from Detailed Analysis | Cyndi Tuell, Western Watersheds Project | The Bureau's rational for dismissing an alternative that closes these 10 allotments is baseless. The Bureau simply states the following: When the NOI was published, the BLM initially identified 10 vacant allotments that would be made unavailable to grazing under the Proposed Action because the allotments have not | Refer to Section 2.6 of the Proposed RMPA/EA, which provides justification for alternatives considered, but eliminated from detailed analysis. Regarding livestock grazing, the Proposed RMPA/EA evaluates closure of four vacant grazing allotments. As noted in Section 2.6.2, an alternative to close all 10 vacant allotments has been |

| Comment Number | Comment Category | Commenter | Comment Text | Comment Response |
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| | | | been applied for since Monument designation. At that time, it was believed the allotments had not been applied for due to the lack of access and lack of range improvements, such as fencing and water developments. After further review and consideration of scoping comments, the BLM adjusted the Proposed Action to close two of the 10 vacant allotments initially identified…[this alternative] has been dismissed from detailed analysis per the feedback gained during public scoping…and because the grazing-authorization process allows for compatibility of livestock grazing with the Monument designation. The Bureau must provide an explanation for this arbitrary and capricious change and explain why at the scoping stage it "was believed" that permittees had not sought to use these allotments and identify exactly what public feedback persuaded the Bureau that their prior understanding was wrong. | dismissed from detailed analysis per the feedback gained during public scoping, the rationale above, and because the grazing-authorization process allows for compatibility of livestock grazing with the Monument designation.<br>CEQ regulations require that agencies "make diligent efforts to involve the public in preparing and implementing their NEPA procedures" (40 CFR 1506.6(a)); external scoping for EAs is optional (40 CFR 1501.7). However, when evaluating the need for scoping the Taos RMP Amendment for the Monument Management Plan, the BLM determined that external scoping was an important step in the planning process due to the size, scale, and uniqueness of the planning effort, and due to previous public interest in the Monument Management Plan effort. Alternative B (the Proposed Action) was developed in response to internal and external scoping, which provided input on changed circumstances and management needs for the protection of Monument objects. In compliance with NEPA, the *BLM NEPA Handbook*, the *BLM Land Use Planning Handbook*, and other applicable laws, policies, and regulations, the BLM considered a reasonable range of alternatives based on the narrow and specific purpose and need for this action. |
| 011 | Analysis Type (Categorical Exclusion [CE], EA, EIS) | Not Provided | I also wonder why this is an EA. These BLM draft monument plans are normally analyzed in EISs. | Summary Comment and Response 3 (see **Error! Reference source not found.**) |

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| 012 | Analysis Type (CE, EA, EIS) | Richard Spotts | Why is BLM not preparing a draft standalone monument plan? Other BLM national monuments have their own plans (not as amendments to RMPs covering larger areas). And why only an EA when other draft BLM monument plans are analyzed in EISs? Is BLM trying to avoid Federal Register notices or discourage public notice and involvement? | Summary Comment and Response 3 (see **Error! Reference source not found.**) |
| 013 | Best-Available Science | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | The place of Rio Grande del Norte in the Landscape. The RMP and a discussion that would enable a reasonable consideration of whether there is or is not any significant environmental impact would be greatly enhanced by incorporation of more information from several superb reports only briefly referenced within the draft version of the Plan. These reports also should be posted on the BLM website so they are available to the public who funded them. Any sensitive sections can be redacted. Examples include: * Bureau of Land Management, Argonne Labs. 2016a. San Luis Valley-Taos Plateau Level IV Ecoregion Landscape Assessment. Report prepared for the Bureau of Land Management by Argonne National Laboratory. * Bureau of Land Management, Argonne Labs. 2016b. San Luis Valley-Taos Plateau Landscape-Level Cultural Heritage Values and Risk Assessment Study. Report prepared for the Bureau of Land Management by Argonne National Laboratory. * Dicks, | CEQ regulations implementing NEPA require that agencies use "high quality information" (40 CFR 1500.1(b)). NEPA regulations require the BLM to "ensure the professional integrity, including scientific integrity, of the discussions and analyses in environmental impact statements" (42 U.S.C 4332(d)). The *BLM NEPA Handbook* also directs the BLM to<br>> use the best-available science to support NEPA analyses and give greater consideration to peer-reviewed science and methodology over that which is not peer-reviewed (BLM Handbook H-1790-1, p. 55).<br>Under the BLM's guidelines for implementing the Information Quality Act, the BLM applies the principle of using the "best available" data in making its decisions (*BLM Information Quality Act Guidelines,* February 9, 2012). The BLM used the best-available science to support the NEPA analysis in the RMPA/EA. Appendix I of the RMPA/EA includes a bibliography that lists information considered by the BLM in preparation of the RMPA/EA, including |

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| | | | A.M., A.C. Anderson, J. Mrstik, P. Rogers, and T. Scarbourgh. 2017. Rio Grande del Norte National Monument: Class III Cultural Resources Survey of the 16,992 acre Cerro Montoso Project Area, Taos County, New Mexico, Volumes 1-VI. Bureau of Land Management, Taos Field Office, Cultural Resources Report #2017-002 (NMCRIS [New Mexico Cultural Resources Information System] Activity #117233). * Seltzer-Rogers, Heather. 2024. Class I for the Río Grande del Norte National Monument Management Plan, Rio Arriba and Taos Counties, New Mexico. Chronicle Heritage Technical Report No. 23-583. Albuquerque, NM: Chronicle Heritage, LLC. | some of the reports the commenter listed, such as the *2016 San Luis Valley–Taos Plateau Level IV Ecoregion Landscape Assessment* (Walston et al. 2016) and the *2024 Class I Report for the Río Grande del Norte National Monument* (Seltzer-Rogers 2024). |
| 014 | Consultation and Coordination | Shannon Romeling, Amigos Bravos | The New Mexico Environment Department ("NMED") and the USFS [U.S. Forest Service] have developed a Memorandum of Understanding ("MOU") that outlines how the agencies will work together to protect water quality standards, including the Outstanding Waters standards in streams that flow through USFS managed land.2 This MOU outlines steps that both NMED and USFS will take to implement Outstanding Water protections on USFS managed land and includes provisions laying out specific requirements, including: ¦ Developing shared protocols between NMED and USFS for implementing Outstanding Water protections, including strategies to prevent future degradation in Outstanding Water streams and wetlands. ¦ | As noted in WR Management Action 1, WR Management Action 3, and WR Management Action 6 in Appendix C, the BLM will consult and coordinate with the New Mexico Environment Department (NMED) to develop shared protocols for implementing and managing applicable portions of the RMP related to water resources. |

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| | | | Considering whether a proposed action will impact water quality in an Outstanding Water when conducting analyses under the National Environmental Policy Act (NEPA). ¦ Notifying NMED if degradation is suspected or detected in an Outstanding Water. ¦ Steps to be taken if degradation is detected in an Outstanding Water stream including meeting with stakeholders to identify sources of degradation and actions to take to address the degradation. ¦ Increasing water quality monitoring in Outstanding Water streams where degradation has been detected. On page 99, Table 4-2 of the MMP draft, the BLM shows that they have reached out to many agencies and organizations to create a MOU, but the NMED is not included in this table. We commend the language in Goal F-4 on page C-15 and WR Management Action 1 on page C-57 of Appendix C. However, we suggest that the BLM specifically work on creating an MOU with the NMED. | |
| 015 | Consultation and Coordination | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | TU encourages the BLM to seek meaningful opportunities for co-stewardship of public lands and waters with Tribal Nations. TU supports federal agencies' initiatives to protect cultural and aquatic resources associated with playas and work cooperatively with livestock-grazing permittees to assess impacts to those resources. It is important that BLM ensure that access is available to religious and cultural sites for | The BLM has engaged with Tribal Nations and encouraged their participation throughout the planning process. Additionally, CUL Goal 4 in Appendix C of the RMP specifically lays out a goal for the BLM to seek opportunities for co-stewardship of public lands and waters with Tribal Nations, and CUL Goal 1 notes that the BLM will consult with Tribes to identify traditional cultural properties and culturally significant resource sites. Also, TU Goal 1 in |

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| | | | noncommercial traditional cultural and customary uses. Furthermore, we encourage BLM to work with Tribal and traditional communities to identify, define, and delineate cultural landscapes within the Monument, recognizing them as a larger equivalent of cultural resources, and refine the definition and delineation of these cultural landscapes as additional information becomes available. | Appendix C ensures that access is available to religious and cultural sites by Native American Tribal members. Finally, CUL Goal 5 tasks the BLM to identify, define, and delineate cultural landscapes within the Monument, and CUL Goal 6 requires maintaining and enhancing the integrity of cultural landscapes within the Monument. |
| 016 | Consultation and Coordination | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | Finally, we wish to note one more vigorous objection: the BLM provides no evidence of any consultation with land grant organizations and acequias. These are recognized political subdivisions of the state of New Mexico and Proclamation 8946 specifically requires that effort. | All cooperating agency relationships are described in Chapter 4, Section 4.2.1 of the draft RMPA/EA. The BLM sent letters to all eligible Federal, State, local, and Tribal governments inviting them to be a cooperating agency.<br>To date, six agencies have agreed to participate in developing the planning effort as cooperating agencies. The San Antonio del Rio Colorado Land Grant previously participated in the 2014 planning effort. At the inception of the current planning effort, the BLM performed research and reached out to the New Mexico Land Grants Council on a number of occasions via email and phone to obtain current contact information for this and other land-grant organizations and acequias near the planning area. Unfortunately, the BLM was not able to obtain this information.<br>The BLM also reached out numerous times to the New Mexico Land Grants Council to invite them to participate as a Cooperating Agency, but did not receive a signed |

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| | | | | Memorandum of Agreement from the organization formalizing the relationship.<br>In addition to the BLM's invitations to a wide variety of agencies to participate as cooperating agencies, from the time that the Notice of Intent (NOI) was published and throughout the development of the RMPA/EA, an agency could notify the BLM requesting cooperating agency status. The NOI invited all potential cooperating agencies to participate:<br>> Federal, State, and local agencies, along with Tribal Nations and other stakeholders that may be interested in or affected by the proposed approval that the BLM is evaluating, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate in the development of the environmental analysis as a cooperating agency (88 FR 54660).<br>The BLM did not receive notification from any agency or entity requesting the BLM to consider them for cooperating agency status during development of the Draft RMPA/EA. As a result, only the agencies described in Chapter 4, Section 4.2.1, of the Draft RMPA/EA were cooperating agencies in the development of the EA. |
| 017 | Consultation and Coordination | John Martin, William Fawcett, Scott Henderson, David Love, Paul | Consultation with Land Grant and Acequia Organizations is a requirement of the Proclamation. Any BLM plans need to show evidence and results of consultation with Land Grant | All cooperating agency relationships are described in Chapter 4, Section 4.2.1 of the draft RMPA/EA. The BLM sent letters to all eligible Federal, State, local, and Tribal |

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| | | McGuff, and Hank Saxe | Associations and Acequia Associations at least within the analysis area (Taos and Rio Arriba Counties). Proclamation 8946 directs that BLM "shall prepare and maintain a management plan for the monument and shall provide for maximum public involvement in the development of that plan including, but not limited to, consultation with tribal, state, and local governments as well as community land grant and acequia associations." Acequia and land grant associations have standing in consultation as they are recognized political subdivisions of the state of New Mexico. The Proclamation directs their involvement, as well as involvement with unaffiliated individuals who have interests in management of the Monument. There is no indication within the documents BLM presents for review that acequia and land grant organizations have been consulted. Also the Northern Rio Grande National Heritage Area and the Northern New Mexico Resource Advisory Council were not included in consultations. Apparently a number of other organizations contacted for comment as interested and consulting parties, but most seem not to have made any response. Does this mean there is little public interest in the National Monument, or does it mean that engagement was not effectively encouraged? We believe the later explanation is the case. | governments inviting them to be a cooperating agency.<br>To date, six agencies have agreed to participate in developing the planning effort as cooperating agencies. The San Antonio del Rio Colorado Land Grant previously participated in the 2014 planning effort. At the inception of the current planning effort, the BLM performed research and reached out to the New Mexico Land Grants Council on a number of occasions via email and phone to obtain current contact information for this and other land-grant organizations and acequias near the planning area. Unfortunately, the BLM was not able to obtain this information.<br>The BLM also reached out numerous times to the New Mexico Land Grants Council to invite them to participate as a Cooperating Agency, but did not receive a signed Memorandum of Agreement from the organization formalizing the relationship.<br>In addition to the BLM's invitations to a wide variety of agencies to participate as cooperating agencies, from the time that the NOI was published and throughout the development of the RMPA/EA, an agency could notify the BLM requesting cooperating agency status. The NOI invited all potential cooperating agencies to participate:<br>Federal, State, and local agencies, along with Tribal Nations and other stakeholders that may be interested in or affected by the proposed approval |

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| | | | | that the BLM is evaluating, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate in the development of the environmental analysis as a cooperating agency (88 FR 54660).<br>The BLM did not receive notification from any agency or entity requesting the BLM to consider them for cooperating agency status during development of the Draft RMPA/EA. As a result, only the agencies described in Chapter 4, Section 4.2.1, of the Draft RMPA/EA were cooperating agencies in the development of the EA. |
| 018 | Consultation and Coordination | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos | In general, it is vital that the BLM maintain ongoing consultation and partnership with sovereign Pueblos and Tribes, as well as other traditional communities, throughout the completion and implementation of both the Monument Plan and future projects within RGDN. 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. Where appropriate, we also encourage the BLM to work with local groups, non-governmental organizations, and volunteers to help identify and protect sensitive archaeological sites, promote site stewardship, conduct public outreach, | The BLM has engaged with Tribal Nations and encouraged their participation throughout the planning process. Goals, objectives, and management actions related to cultural resources and traditional uses are provided in Draft RMPA/EA Appendix C, Tables C-2 and C-3. CUL Goal 4 specifically lays out a goal for the BLM to seek opportunities for co-stewardship of public lands and waters with Tribal Nations, and CUL Goal 1 notes that the BLM will consult with Tribes to identify traditional cultural properties and culturally significant resource sites. Also, TU Goal 1 in Appendix C ensures that access is available to religious and cultural sites by Native American Tribal members. |

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| | | • Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | and provide interpretive guides to educate the greater public on the Monument's heritage. | |
| 019 | Consultation and Coordination | Katie Goodwin, Access Fund | Given the importance that the Access Fund and NM CRAG [New Mexico | The National Historic Preservation Act (NHPA) requires Federal agencies, as part |

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| | | | Climbers Resource and Advocacy Group] place on the need to protect historic properties from adverse effects, NM CRAG will be submitting a formal letter to the BLM asking to add NM CRAG as a consulting party for the DRAFT RMPA/EA Section 106 process given that NM CRAG has: (1) a demonstrated interest in avoiding and minimizing adverse effects to historic properties in the Monument; (2) a clear relationship to the undertaking and any potentially affected historic properties; and (3) also has concern about the potential effects of the proposed Monument RMPA EA undertaking on historic properties. NM CRAG therefore clearly meets the requirements to be an additional Section 106 consulting party per 36 CFR 800.2(5)(c). Further, even if BLM decides not to add NM CRAG as a consulting party in the Section 106 process, NM CRAG would like the DRAFT RMPA/EA to clearly identify the BLM's "plan to involve the public" in the Section 106 process, "identify the appropriate points for seeking public input," and notify "the public of proposed actions" per 36 CFR 800.3(e). | of the NHPA Section 106 process, to consult with State Historic Preservation Officers, Native American Tribes, representatives of local governments, applicants for Federal assistance or approvals, and community groups that attach religious and cultural significance to historic properties potentially affected by an undertaking (54 United States Code [USC] 302706). Per 36 CFR 800.2(c)(5), additional parties with a demonstrated interest in the undertaking may participate as consulting parties due to the nature of their legal or economic relation to the undertaking or affected properties as determined by the lead Federal agency.<br>The regulations implementing NHPA Section 106 requires Federal agencies to make a "reasonable and good faith effort" to identify historic properties within the area of potential effect in part through consultation with Tribes and consulting parties (36 CFR 800.4(b)). The scope and scale of cultural resource identification for RMP level efforts are much more general and less intensive than for site-specific use proposals. Per the *BLM Land Use Planning Handbook* (H-1601-1), the appropriate level of identification for land-use planning is a regional overview, or Class I document. As described in Section 4.2.3, the BLM began formal NHPA Section 106 consultation for the RMPA/EA on June 23, 2023, by inviting 23 Federal, state, and local agencies and organizations with a demonstrated interest in the project, as well as the All Pueblo |

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| | | | | Council of Governors and the 20 Tribes and Pueblos listed in Section 4.2.1. The BLM developed a Class I Cultural Resources Report for the Monument and provided it to the parties that accepted consulting party status for review on January 19, 2024. No comments were received on the report. Because an RMP does not approve any specific on-the-ground actions, the RMPA/EA would have no adverse effects on historic properties, as defined by NHPA Section 106 on cultural resources.<br>The RMPA/EA provides goals, objectives, and management actions related to cultural resources and traditional uses in Draft RMPA/EA Appendix C, Tables C-2 and C-3. The public and consulting parties had an opportunity to review and comment on these goals, objectives, and management actions during the public comment period for the Draft RMPA/EA, from April 23 through May 23, 2024. Any future site-specific actions would be subject to Section 106 of the NHPA and all applicable Federal historic preservation laws, including NEPA, Executive Order 13287, and Sections 106 and 110 of the NHPA. |
| 020 | Cultural Resources | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | Rock Art requires special protection, regulation of visitation, and condition monitoring as a result of increased visitation. Rock Art is one of the outstanding resources for preservation and conservation identified in Proclamation 8946 but it is not effectively treated in the EA. The rock art resource | Rock art, or *petroglyphs*, are considered cultural resources; therefore, all cultural resources goals, objectives, and management actions in RMPA/EA Appendix C, Table C-2, would apply to these sites. This includes CUL Goal 1, which protects all cultural resources and objects of value under Alternative B and CUL Goal 2, which |

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| | | | needs special measures for documentation, protection, and monitoring for visitor impacts. BLM needs to restrict access to rock art sites where visitation degrades the rock art resources. | seeks to reduce imminent threats and resolve potential conflicts from natural or human-caused deterioration. All authorizations for land and resource use would comply with NRHP Section 106. Additionally, REC Management Action 5 under Alternative B in Draft RMPA/EA Appendix C, Table C-16, requires preapproval by the BLM subject to NEPA and NHPA Section 106 for any new rock-climbing routes using fixed hardware. This management action also would not allow climbing within 50 feet of cultural resources, which would include petroglyphs, as determined on a case-by-case basis. This management action also applies to the Proposed RMPA, and additionally existing routes determined to be in conflict with Monument objects and values, including cultural resources, would be subject to removal. |
| 021 | Cultural Resources | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | Number and Types of Cultural Resources, Extent of Inventoried Areas and Allocation of Use. The EA/RMP needs to include tables that provide the numbers and types of cultural properties within the Monument and list property use allocations (for example: public and conservation). | The BLM developed a Class I Cultural Resources Report that identifies all known cultural resources in the planning area. This report is considered confidential, per 43 CFR 7.18, which establishes that information relating to the nature and location of any archaeological resource will not be made available to the public. A summary of the Class I report, including the types of cultural resources sites located within the Monument, can be found in Section 3.2.1.1 of the Draft RMPA/EA. Additionally, the Draft RMPA/EA amends the 2012 Taos RMP, which includes a cultural resource use-allocation categories |

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| | | | | table (Table 2-1) in Chapter 2 of the 2012 Taos RMP. A sentence has been added to the Proposed RMPA/Final EA in Appendix C, Section C.2.1, that explicitly incorporates that table into the RMPA/EA by reference. |
| 022 | Cultural Resources | Loren Bell, Enchanted Circle Trails Association | 3.2.1.3 Cultural Resources: Cumulative Effects Concern: This section states in part that, "future trail development would contribute to increased recreation and tourism in the Monument, which would increase access to more remote areas that contain cultural resources." While increased trail development may result in increased recreation, it does not follow that this would necessarily increase access to more remote areas that contain cultural resources. And, as pointed out in the same paragraph, special designations, and management strategies have the potential to reduce impact by managing that recreation use effectively. Proposal: Rewrite the sentence to state, "future trail development could contribute to increased recreation and tourism in the Monument, which could increase access to more remote areas that contain cultural resources. | The BLM accepts this change and has updated this language in the Proposed RMPA/EA. |
| 023 | Decision Process | Not Provided | This FONSI is not adequate if BLM approves a weak new monument plan that allows livestock grazing, target shooting, and other human uses that harm or threaten the monument objects. The protection of monument objects is "the dominant reservation" and supersedes normal FLPMA management. | Summary Comment and Response 3 (see **Error! Reference source not found.**) |

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| | | | Under the CEQ context and intensity criteria, approving actions that jeopardize monument objects would be a "significant" effect on the human environment and also arguably violate federal monument law. A FONSI is only appropriate if the new monument plan ensures the actual protection of monument objects. | |
| 024 | Decision Process | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | On May the third one of our team, Paul McGuff, realized that a document uploaded on the BLM review and comment site was incomplete and notified you by email. He found that the 2023 Scoping Report link was the link posted on January 11, 2024 did not contain Appendix A. The report's complete version was posted recently on May 9, 2024 as reflected on the government website. BLM needs to extend the public review and comment period for an additional 30 days from the date that Appendix A was added. This will allow time for individuals and organizations to fully understand a late addition to the BLM DOI-BLM-NM-F020-2023-0014-RMP-EA documents page. the specific request is to extend the review and comment period to June 09, 2024. | The original version of the Scoping Report, published to ePlanning in November 2023, did include Appendix A. On January 11, 2024, the BLM noticed an error with certain elements of the Scoping Report's compliance with Section 508 of the Rehabilitation Act of 1973 and posted a corrected version on the project's ePlanning page; however, Appendix A of the January 11 version of the Scoping Report was accidentally omitted. The BLM reposted the version of the Scoping Report containing Appendix A on May 9, 2024. CEQ regulations require that agencies "make diligent efforts to involve the public in preparing and implementing their NEPA procedures" (40 CFR 1506.6(a)); external scoping for EAs is optional (40 CFR 1501.7). However, when evaluating the need for scoping the Taos RMP Amendment for the Monument Management Plan, the BLM determined that external scoping was an important step in the planning process due to the size, scale, and uniqueness of the planning effort and due to previous public |

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| | | | | interest in the Monument Management Plan effort.<br>The BLM Taos Field Office took into careful consideration requests for extending the public review and comment period. In coordination with the BLM District and New Mexico State Office leadership, the BLM decided not to grant an extension, in order to maintain the project schedule. This project is a high priority for this Administration, and its timely completion is imperative. |
| 025 | E-Bikes | Maresa Pryor-Luzier, Back Country Horsemen of New Mexico | While Secretarial Order 3376 (August 2019) instructs the BLM to exempt e-bikes from the definition of a motorized vehicle and to classify (i.e., manage) them as regular bicycles (EA, page 2-11), common sense still dictates that Class 1 e- bikes are propelled, at least in part, via an electric motor. There is no escaping the fact that e-bikes are different from regular bicycles in this regard. Yet the EA fails to make any distinction between the use and potential impact of e-bike use versus that of regular mountain bikes. Consequently, the EA is absent any discussion of the potential for recreational conflict, or safety concerns, associated with hiking and equestrian use as a result of the potential difference in speed between e-bike use and that of traditional non-motorized recreational uses. | Summary Comment and Response 7 (see **Error! Reference source not found.**) |
| 026 | E-Bikes | Maresa Pryor-Luzier, Back | Class 1 e-bikes are capable of speeds in excess of 20mph [miles per hour]. | Summary Comment and Response 7 (see **Error! Reference source not found.**) |

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| | | Country Horsemen of New Mexico | Horsethief Mesa is mostly undeveloped, and some vegetation is much thicker which will cause line of sight issues for bicycles, hikers, and horseback activities. Respecting the yield triangle to minimize potential safety conflicts is essential such as bikes coming up on horses on trails at high speeds from behind. Horses generally travel 2-4 mph. So, a motorized bike traveling 16-20mph or around a corner lends to a potential and significant safety issue. This difference in speed, and its ramifications for potential conflict and safety issues, certainly along the Rio Grande Gorge trails, so, these issues must be addressed in the Final EA. | |
| 027 | E-Bikes | Maresa Pryor-Luzier, Back Country Horsemen of New Mexico | The BLM has neither the resources nor the personnel to adequately monitor or enforce e-bike use on its trails. When viewed on the trail, there are few visual differences among the three classifications of E-bikes addressed in the proposed Rule. Thus, restricting the use of one class versus another on a given trail or trails would be pointless and prove frustrating for BLM law enforcement personnel. | Summary Comment and Response 7 (see **Error! Reference source not found.**) |
| 028 | E-Bikes | Maresa Pryor-Luzier, Back Country Horsemen of New Mexico | Many e-bikes sold on the market today are built with an appearance similar to the three classes of e-bikes addressed in the proposed Rule yet exceed the maximum power and speed specifications the proposed Rule wishfully envisions. Worse still, a search on YouTube yields dozens of tutorials on how to “hack” or override | Summary Comment and Response 7 (see **Error! Reference source not found.**) |

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| | | | the speed constraints programmed into nearly every e-bike from any manufacturer. These facts make irrefutable our claim that the BLM could neither adequately monitor nor enforce e-bike use on non-motorized trails. | |
| 029 | E-Bikes | Maresa Pryor-Luzier, Back Country Horsemen of New Mexico | One element of the Proposed Action, however, if implemented would clearly violate law and BLM policy. Specifically, TRA Management Action 5, as listed in Appendix C (p. C- 86). It proposes that "Any trail within the Monument open to bicycles would also be open to electronic bicycles (e-bikes) .." As noted in the final NEPA# DOI-BLMNM-F020-2020-0015-EA, the BLM's Decision Record for the Horsethief Mesa Travel Management Plan states the following: "After further, careful review, the BLM recognizes that the Presidential Proclamation that established Rio Grande del Norte National Monument precludes motorized trails within the Monument. Therefore, e-bikes are permitted to be used only on roads designated OHV Open." Presumably nothing has changed since that time with respect to the Presidential Proclamation. If so, then any proposal to authorize e-bike use on trails within the Rio Grande del Norte National Monument would violate existing law and policy. As such, proposed RTA Management Action 5 must be removed from the Proposed or Adopted action alternative. We then would approve Alt B. | Summary Comment and Response 7 (see **Error! Reference source not found.**) |

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| 030 | E-Bikes | International Mountain Bicycling Association | E-bikes The following sentence in this RMPA, however, is not clear but we believe it sets the process up for future trail by trail e-bike authorizations "Under Alternative B, the BLM would employ the e-bike definitional exclusion from the motorized classification, as provided at 43 CFR 8340.0-5(a), for the purposes of authorizing e-bikes (or emountain bikes [eMTBs]) on nonmotorized trails within the Monument." p82 IMBA [International Mountain Bicycling Association] recommended in scoping that the BLM consider using their definitional exclusion in this Monument since this might be the only way to allow e-bikes on trails in a proclamation driven Monument. The rationale for this is described in more detail below. However in this Draft RMPA, the BLM seems to suggest utilizing this e-bike definitional exclusion carte blanc. IMBA generally recommends that agencies do trail by trail assessments to see if there are compelling reasons to withhold allowing e-bikes on any subset of the bike trail system. There may not be but doing such a review is an appropriate step in quelling public concerns over appropriateness of e-bikes and maintaining clear management separation from traditional bikes which is also important and inline with IMBA's policy recommendations on eMTBs. Those recommendations are as follows: IMBA believes decisions at the local level are the best place to examine the unique | Summary Comment and Response 7 (see **Error! Reference source not found.**) |

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| | | | characteristics eMTBs possess compared to traditional mountain bikes and determine appropriate shared access for Class 1 eMTBs. IMBA supports trail access for Class 1 eMTBs and supports facilitating shared use on trails as long as such decisions do not cause or lead to lost or impeded access for traditional mountain bikes. IMBA recommends Class 1 eMTBs be managed as an independent category from traditional mountain bikes even when access is shared. IMBA will continue to engage all stakeholders on this issue in an effort to reach outcomes that best suit all users. | |
| 031 | E-Bikes | International Mountain Bicycling Association | IMBA would recommend the BLM be more clear that the definitional exclusion will be utilized to assess the trail system on a trail by trail basis for allowing ebikes where other traditional bikes are authorized. We assume that this statement allows for the BLM to later authorize e-Bikes where they deem appropriate in site specific planning but it is not clear in this draft as may be read to unilaterally allow e-bikes on non-motorized bike trails. We think that would be a mistake without some site specific review. | Summary Comment and Response 7 (see **Error! Reference source not found.**) |
| 032 | E-Bikes | Loren Bell, Enchanted Circle Trails Association | 3.2.16 Transportation and Access Concern: The Plan allows for the blanket use of e-bikes on all non-motorized trails through definitional exclusion from the motorized classification. While we appreciate the Plan's recognition that e- | Summary Comment and Response 7 (see **Error! Reference source not found.**) |

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| | | | bikes may be appropriate recreational tools for some non-motorized trails, it is important to recognize that not all trails or use patterns may be compatible with e-bike inclusion. Proposal: Allow for the usage of e-bikes on individual non-motorized trails or trail areas only after a thorough evaluation of the specific usage and management objectives and reviewing public and stakeholder input. | |
| 033 | Effects Analysis | Robert Heinonen | I strongly believe that those entering the area and the gorge on hot-air balloon flights are "recreational users" with rights equal to those on the ground or water, and that these "balloonists" actually have far less impact on the area and the gorge than those visitors on the ground or water. It is pretty obvious that passing over the area in a hot-air balloon is much less damaging than traveling by vehicle, boat or on foot. If I were a visitor on the ground in the gorge, I would love to watch a hot-air balloon navigate through the area. It would only enhance my experience. I see no facts presented on a negative impact of hot-air balloons on wildlife or other "recreational users". In fact, I think the impact of humans on the ground has exponentially greater impact on the area and the gorge. Please do not prevent hot-air balloons from entering the area or the gorge. It would actually be counter-productive from almost all points of view. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| 034 | Fish and Wildlife | Shannon Romeling, Amigos Bravos | We request to see more details in the MMP that will accomplish these objectives and research needs. In addition, we request that the MMP put in place measures to observe their populations and habitat health and identify aquatic and riparian habitat restoration needs and priorities. Suggested language for River Otter, Objectives, and Management Allocations and Actions: Goals: ¦ Manage River otter populations levels and health by working with local partners. 4 Id. at p. 17 5 BLM Taos Field Office, Rio Grande del Norte Science Plan, p. 51 (2019), available at https://www.blm.gov/sites/default/files/docs/2021-03/RioGrandedelNorteNM_SciencePlan2019_0.pdf¦ Manage river otter habitat health by identifying restoration needs that increase native fish species health and general riparian ecosystem health. ¦ To promote the benefit of river otters to native species fish population levels and to recreational income. Objectives: ¦ Create a river otter habitat management plan. ¦ Conduct at least one restoration project a year in river otter habitat that promotes native fish, water quality, and other characteristics that are beneficial to river otter species success. ¦ Track estimated river otter population levels and locations by working with local partners and the Department of Game and Fish (NMDGF) to conduct river otter surveys every 5 years. ¦ Track non-native cray fish | As stated in Section C.2.3.1, the RMP/EA provides for conserving populations of native aquatic species and identifying aquatic habitat conservation and restoration opportunities. Native species, including the river otter, would be monitored to prevent population declines that could result in listing under the Endangered Species Act. Under the Proposed RMPA, the BLM would coordinate and cooperate with the New Mexico Department of Game and Fish (NMDGF) to mitigate adverse impacts on wildlife and their habitats, including river otter (Section C.2.3.1.2). The goals, objectives, and management actions for fish and wildlife (Appendix C, Table C-4) would directly and indirectly benefit river otter and its habitat by protecting and managing streams and aquatic ecosystems in the planning area. WL Objective 11 states that the BLM will determine long-term trends in the distribution and abundance of river otters and beavers in the Rio Grande or any other areas of relocation. The RMP identifies goals, objectives, and management actions to support, sustain, and increase river otter populations in the planning area. |

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| | | | populations through work with local partners and document this in relation to river otter populations. Allocations and Management Actions: River otter's populations are growing and spreading throughout New Mexico rivers. Management will emphasize protecting and restoring special habitat components or features that contribute to the conservation of river otters. These features include, but are not limited to, stable river banks, healthy native fish populations, functioning wetlands, and healthy beaver populations (there is a commensal relationship between beavers and river otters). The BLM will continue to cooperate and collaborate with Federal, tribal, and State wildlife management agencies, as well as private landowners, to improve habitat for river otters. While the BLM is responsible for protecting and improving wildlife habitat on public land, population management of river otters is under the authority of NMDGF. Wherever practicable, the BLM will coordinate and cooperate with the NMDGF to manage and support river otter populations. | |
| 035 | Fish and Wildlife | Shannon Romeling, Amigos Bravos | Land management practices such as logging or prescribed burning can have positive or negative effects on bats by altering the distribution and abundance of living and dead trees used for roosting or the number of forest openings and edge habitat used for foraging. To support bat habitat BLM should leave as many dead, damaged, dying and defective live trees | The management actions are currently in place to protect and restore habitat components for the conservation of bat species (Proposed RMPA/EA Appendix C, Table C.4; *WL Management Action 15*). These management actions would continue under the Proposed RMPA. These actions also include surveying caves for bat use and installing bat gates or other measures |

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| | | | as possible in the Monument. Troughs, tanks and other livestock-watering facilities are critical watering sites for bats in the arid southwest and should be maintained and protected. In addition, land management practices that eliminate or limit access to water or degrade water quality through siltation negatively affect bats and should be avoided. For a full comprehensive review for bats and land management, please see Forest Management and Bats by Daniel A.R. Taylor.6 Recommendations: ¦ Conduct a comprehensive bat mist net and acoustic survey throughout the park to estimate how many species are present in the Monument. ¦ Conduct bat mist net and acoustic surveys in specific locations prior to any forest management that will occur in those areas between April – October. ¦ Establish buffer zones around streams to help to maintain water quality and reduce siltation in the limited but vital resource of streams needed for drinking by bats. ¦ Gate any caves known or found to contain bats (specifically Black Rock Springs and Posa Cave entrances, which are listed to be gated in the 2012 Taos Management Plan) to minimize disturbance by visitors in the Monument. 6 https://www.srs.fs.usda.gov/pubs/misc/misc_2020_perry_001.pdf ¦ Continue using and expand on the language on page 199 – 200, Appendix G of the 2012 Taos Management Plan to | to restrict public access. Additional management actions to protect and conserve bat species include WR Management Action 1 (Appendix C, Table C-10) to monitor and maintain water quality standards and WR Management Action 6 to implement strategies to protect Outstanding National Resource Waters. SSS Management Action 6 (Appendix C, Table C-5) states that populations of special status species would be monitored to assess their abundance and trend; special status species include several bat species. |

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| | | | identify measures needed for particular sensitive bat species. | |
| 036 | Fish and Wildlife | Jack Marchetti, New Mexico Department of Game and Fish | FONSI page 8 Issue 3b The Summary of the Issue does not mention the importance of removing barriers to terrestrial wildlife movement, nor does it mention the importance of actions such as fence removal or installation of wildlife-friendly fences to habitat connectivity and wildlife movement. Because these are issues and actions mentioned in the EA and Appendix C, these components of this issue should be included here. | Issue 3b was updated in the FONSI to capture the removal of barriers to terrestrial wildlife movement. Additional information is outlined in Appendix D, *Best Management Practices*, under Section D.10, *Wildlife and Riparian Habitat*:<br>Ensure that all fences are constructed to BLM Taos Field Office fence specifications to mitigate impacts on wildlife and reduce wildlife habitat-connectivity barriers. |
| 037 | Fish and Wildlife | Jack Marchetti, New Mexico Department of Game and Fish | Appendix D page D-12 Line 31 Suggest changing red-tailed hawk (Buteo jamaicensis) active nest buffer distance from 0.125 mile to 0.25 mile. This is a standard buffer distance used by other states. For example, Colorado recommends a 1/3 mile buffer surrounding active red-tailed hawk nests. (https://cpw.state.co.us/Documents/WildlifeSpecies/LivingWithWildlife/Raptor-Buffer-Guidelines.pdf). | Active nest-buffer distance for red-tailed hawk has been updated to 0.25 mile in the Proposed RMPA/EA in Appendix C (Table C-4, *WL Management Action 14*) and Appendix D. |
| 038 | Fish and Wildlife | Jack Marchetti, New Mexico Department of Game and Fish | Draft EA, Section 3.2.3.1 page 34 Line 15 The text states, "Baseline amphibian surveys have recorded the spadefoot toad (Scaphiopodidae)…" It is likely that Spea multiplicata,or potentially, S. bombifrons, is the species that was detected during surveys. Draft EA, Section 3.2.3.1 page 34 Line 16 The Tiger Salamander taxonomic name is now Ambystoma mavortium. Recommend making this correction. Draft | The requested changes have been applied to the Proposed RMPA/EA. |

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| | | | EA, Section 3.2.3.1 page 34 Line 17 AmphbiaWeb recommends the species name of American Bullfrog as Rana (Aquarana) catesbeiana. Recommend making this correction. | |
| 039 | Fish and Wildlife | Jack Marchetti, New Mexico Department of Game and Fish | Draft EA, Section 3.2.3.1 page 35 Line 25 Currently states "the BLM augmented this herd in 2007 with an additional 25 sheep." Recommend changing to say "NMDGF augmented the herd with an additional 25 sheep released on BLM land in 2007 in collaboration with the BLM." Draft EA, Section 3.2.3.1 page 35 Line 28 Currently states "In 2023, bighorn sheep surveys were conducted, indicating that the estimated numbers of bighorn sheep in the Rio Grande Gorge were between 225 and 275, as compared to the 2021 numbers of 375 to 420, indicating that the Rio Grande Gorge herd could be stable to decreasing (BLM unpublished data 2021d)." The Department recommends adding the following sentence after the quoted sentence "These results build on the trend of low and decreasing lamb:ewe ratios observed since a February 2020 spillover of Mycoplasma ovipneumoniae into the local bighorn sheep population." The Department feels that Mycoplasma is important to consider in the management of this herd, and therefore important to mention in this document. | The requested changes have been applied to the Proposed RMPA/Final EA. |

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| 040 | Fish and Wildlife | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds | We encourage the BLM to go one step farther by seeking proactive solutions to mitigate negative impacts of climate change and increased recreation on fish and wildlife habitat. Projects such as instream habitat improvements for fish, riparian rehabilitation, and wildlife drinkers are paramount for the resilience of wildlife on the Monument. | WL Management Action 4 (Appendix C, Table C-4) states that wildlife-improvement projects would be considered on a case-by-case basis. The BLM would continue to cooperate and collaborate with Federal, state, and Tribal wildlife-management agencies and private landowners to improve habitat for wildlife and would continue to implement existing activity-level plans to improve wildlife habitat, including the *San Antonio/Pot Mountain Habitat Management Plan*, the *Final Rio Grande Corridor Plan*, and the *Riparian and Aquatic Habitat Management Plan* (BLM 2000a; BLM 2000b), to be consistent with the Monument's objects and values. |

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| | | • Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | | |
| 041 | Fish and Wildlife | Loren Bell, Enchanted Circle Trails Association | Appendix D: Best Management Practices D.10 Concern 1: This document proposes multiple area and time restrictions – such as 0.25-mile buffers from raptor nests, etc – that do not consider the nuances of site-specific potential impacts on the species of concern. The landscape of the RGDNNM [Río Grande del Norte National Monument] is complex, and while it may be easier to draw a circle on a map, it would be more appropriate to base management decisions on field evaluations, specific proposed usages, and the potential impacts of that use. Proposal 1: Revise the section to | The raptor- and migratory bird–nest and prairie dog–town avoidance buffers and timing restrictions have been developed using the best-available science specific to each species, including their response and adaptability to disturbance, breeding season, and life-history strategies. |

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| | | | implement modern adaptive management practices that consider multiple mitigating factors including site topography, specific proposed usage, species response to current disturbance, potential mitigating actions, etc. | |
| 042 | Fish and Wildlife | Loren Bell, Enchanted Circle Trails Association | 3.2.3.1 Fish and Wildlife: Affected Environment: Habitat Trends Concern: This section concludes with "habitats in the planning area have been fragmented from construction of roads and recreational trails." The statement is overly broad, as it conflates the impact from a roadway with the impact from a trail, which is significantly different. Further, this does not indicate which species' habitats have been fragmented. We suspect that few species are impacted by an 18" wide trail with light usage. Proposal: De-couple roads and trails in the discussion of impacts to habitat. Further, emphasize that while trails may have some impact on the habitat of some species, managing recreation on linear features such as trails is the best way to control human impact on an environment. 3.2.3.3 Fish and Wildlife: Cumulative Affects Concern: The section states in part, "Habitat fragmentation occurs within the planning area as a result of the current road and trail network;" See comments above. | Although recreational trails (e. g., hiking, biking, horseback riding) are typically not as wide as roadways, these linear anthropogenic disturbances still serve to fragment vegetation/habitat into patches separated by modified edge effects and eventually contribute to ecosystem degradation. The ecological effects from trails are similar to roads and are not considered substantially different based solely on width. These effects include, but are not limited to, vegetation removal, soil compaction, interruption of soil microbial processes, increased soil erosion, the introduction and spread of invasive species, increased human and activity, wildlife disturbance and altered movement patterns, litter, increased edge effects, and habitat fragmentation. |
| 043 | General Effects Analysis | Shannon Romeling, Amigos Bravos | Illegal dumping of trash and waste throughout the Monument is a large and long-standing problem. Illegal dumping | As Section 1.4.6 of the Proposed RMPA/EA indicates, addressing illegal activities in accordance with all provisions provided for |

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| | | | has substantial impacts on wildlife, tourism and water resources and needs to be adequately addressed to protect the Monument's objects of value. We thank the BLM for stating in section 1.4.6 (page 14) of the MMP [Monument Management Plan] draft that the BLM has the ability to issue citations for illegal dumping. However, we request further detail in the MMP about BLM's plans for addressing illegal dumping. Illegal Dumping Recommendations: ¦ Survey and map the illegal dumping problem areas. ¦ Work with County Waste Management and law enforcement agencies to deter dumping. ¦ Provide and maintain dumpsters at key locations in the Monument. ¦ Collaborate with local stakeholders on public education about illegal dumping. ¦ Collaborate with local stakeholders on River and Lands Day (a locally based volunteer trash clean-up day) . ¦ Organize volunteer trash pick-up days throughout the year. | in 43 CFR, Subpart 8365.1-1(b) for dumping and littering are actions that do not require a planning decision to implement. The Taos Field Office has developed a list of sites, amounts, and descriptions of waste piles, and sites are cleaned up as resources and funding becomes available. Additional strategies, including the recommendations provided in the comment, may be considered during activity- and implementation-level planning for the Monument. |
| 044 | General Effects Analysis | Jack Marchetti, New Mexico Department of Game and Fish | Appendix H; H.1.1 page H-2 Line 11 Change from "..cause a net-warming effect of the atmosphere" to "..cause a net-warming of the atmosphere".<br>Appendix H; H.1.1 page H-2 Lines 17-18 Add "generation" after "..of fossil fuels for energy"; change "created by" to "driven by". Appendix H; H.1.1 page H-2 Line 22 Change "caused by" to "released as a result of". | Edits, clarifications, and revisions have been applied to Appendix H, *Climate Change,* where applicable. Note that *Southern Rockies Ecoregion* is correct, as written in Appendix H. Similar changes were not applied if the text in Appendix H was correct, as supported by cited literature. |

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| | | | Appendix H; H.1.1 page H-2 Line 25 Change “from using” to “as a byproduct of”; add “using” before “nitrogen fertilizers”.<br>Appendix H; H.1.1 page H-2 Line 32 Recommend putting these carbon sequestration values in context; what fraction of the total global emissions mentioned in the preceding paragraph do these sequestered amounts represent?<br>Appendix H; H.1.1 page H-2 Line 33 Change “Southern Rockies” to “Southern Rocky Mountains”.<br>Appendix H; H.1.1 page H-3 Lines 1 and 8 Change “Southern Rockies” to “Southern Rocky Mountains”.<br>Appendix H; H.1.1 page H-3 Line 6 Add “annual precipitation in” before “most of”; change “due to” to “and is the product of”.<br>Appendix H; H.1.1 page H-3 Lines 14-16 Suggest showing temperatures in degrees Celsius to match previously provided temperatures and limiting description of temperatures to the Southern Rocky Mountains ecoregion; as written, this sounds like it goes as far south as the Chihuahuan Desert, which is not relevant for the Rio Grande del Norte National Monument.<br>Appendix H; H.1.2 page H-3 Lines 20-22 Add “global” after “Earth’s”; put a dash between “globally” and “averaged”; potentially just show degrees Celsius to match other temperatures provided in this Appendix; otherwise, change all | |

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| | | | temperature references in this Appendix to show both degrees Fahrenheit and degrees Celsius; 1760 to 1840 should represent the late eighteenth to mid-ninteenth century, NOT late nineteenth century.<br>Appendix H; H.1.2 page H-3 Lines 27-28 Fix spelling of United States; change "-" to "and" for both date ranges (i.e., 1901 and 2016; 1990 and 2016).<br>Appendix H; H.1.2 page H-3 Line 33 Any information to add specific to the northern part of New Mexico/area encompassing the Rio Grande del Norte National Monument?<br>Appendix H; H.1.1 page H-4 Line 3 Make "bears" singular.<br>Appendix H; H.1.1 page H-5 Line 1 Make IPCC possessive (IPCC's); remove dash after "surface".<br>Appendix H; H.1.3 page H-5 Line 9 Correct spelling of southwestern.<br>Appendix H; H.1.3 pages H-5 and H-6 The second paragraph of this section throws out a lot of different numbers and there are enough inconsistencies in the timelines provided and emission scenarios shared to potentially cause confusion. If it is possible to share numbers that are more directly comparable to those from the IPCC [Intergovernmental Panel on Climate Change]/first paragraph in terms of timeframes compared and emission scenarios used, that might make it easier | |

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| | | | to figure out how impacted the US and southwetern US are likely to be compared to the rest of the world. Consider using Adapt West data to get information specific to the Rio Grande del Norte National Monument (https://adaptwest.databasin.org/pages/adaptwest-climatena/) or other regions (e.g., Southwestern US).<br>Appendix H; H.1.3 page H-6 Lines 13-15 Change "Projected changes….(Frankson et al. 2022)" to "Under a higher-emissions pathway, total spring (March-May) precipitation in the planning area is projected to decrease by 5 percent by 2050, compared to the late 1900's". Correct years as needed.<br>Appendix H; H.1.3 page H-6 Lines 16-17 Delete "also" and add "worsening" before "drought".<br>Appendix H; H.1.4 page H-6 Lines 19-21 Change "and" to "," after "vehicles" and "equipment"; change "and" to "and/or" before "result"; add "direct" before "GHG" [greenhouse gas]; add "the" before "carbon".<br>Appendix H; H.1.4 page H-6 Line 29 Give examples of the types of emission sources considered by Vose et al. (2017), e.g., industrial? Appendix H; H.1.4.1 page H-6 Lines 30-32 Change "is" to "are"; move the footnote to be after "fermentation"; add "emitted" after "GHGs". Delete "Under all alternatives,"; capitalize subsequent "Methane". | |

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| | | | Appendix H; H.1.4.1 page H-6 Footnote Make “stomach” plural and add “including a” before “rumen”; put “otherwise” before “easily”. Appendix H; H.1.4.1 page H-7 Lines 4-6 It isn’t accurate to imply that there is NO effect of grazing on GHG’s or carbon-sequestration potential of lands in the Monument. Could potentially say that livestock grazing proposed under all alternatives would not alter current GHG emissions or carbon-sequestration potential of lands within the Monument. Would be good to add a sentence or two about the current impacts of grazing on carbon-sequestration potential in the Monument.<br>Appendix H; H.1.4.2 page H-7 Line 9 Change “according to” to “commensurate with”.<br>Appendix H; H.1.4.2 page H-7 Lines 19-21 Add “ultimately” before “releases”; make “releases” singular; add “, especially where cryptobiotic crusts are present (Eldridge 2000).” after “atmosphere”; reference: Eldridge, D. 2000. Ecology and management of biological soil crusts: recent developments and future challenges. The Bryologist 103(4):742-747. Correct “exiting” to “existing”. If there are areas with substantive presence of cryptobiotic crusts present, suggest closing these to OHV use or at least posting areas with larger patches of these crusts as areas to avoid when recreating. | |

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| | | | Appendix H; H.1.4.3 page H-7 Line 26 Add reference to the release of GHGs through the decomposition of any thinned vegetation that is left on-site after a treatment.<br>Appendix H; H.1.4.3 page H-7 Lines 28-29 Move ", depending on the type of treatment," to be after "would"; add ", especially in areas with cryptobiotic crusts." after "disturbing soils".<br>Appendix H; H.1.4.3 page H-7 Lines 30-32 Clarify that this statement regarding an anticipated short-term reduction in carbon sequestration and long-term beneficial impacts assumes that vegetation treatments are done in such a way that a) they retain the health of the local soil biotic community, b) the remaining vegetation thrives, and c) there is some vegetative regrowth (and associated carbon sequestration) following treatment. Also clarify that there is some release of GHG's associated with any vegetation that is cut and remains onsite.<br>Appendix H; H.1.4.3 page H-7 Lines 33-36 Clarify that there would be an initial release of GHG's even when burning grasslands/shrublands; Make "class" plural; clarify how fire benefits carbon sequestration (e.g., by encouraging regrowth through the release of nutrients, etc.); clarify that seeds may be sourced from lower elevations OR other sites with current climatic conditions that match | |

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| | | | those projected to occur in future at restoration sites.<br>Appendix H; H.1.4.4 page H-8 Lines 4-6 Change "for" to "under"; add "proposed" before "alternatives"; add "would" before "contribute"; change "Southern Rockies" to "Southern Rocky Mountains".<br>Appendix H; H.1.4.4 page H-8 Lines 9-10 Correct spelling of "Trail"; add "and use" after "development"; if transmission line and rights-of-way development are anticipated to contribute to GHG's, then there should be a section added to Appendix H that discusses the GHG/carbon sequestration impacts of these developments.<br>Appendix H; H.1.4.4 page H-8 Lines 13-16 Add clarification on how Alternative B has greater potential to counter the effects of climate change; e.g., more acres of grassland and shrubland to be treated or..? | |
| 045 | Geology | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | TU [Trout Unlimited] requests that the BLM implement case-by-case evaluations and site-specific NEPA policies in the review of surface-disturbing activities to determine whether geologic objects would be affected. | GEO Management Action 1 states the following:<br>Implement case-by-case evaluations and site-specific NEPA analysis in the review of surface-disturbing activities to determine whether geologic objects would be affected. |
| 046 | Land Tenure and Land-Use Authorizations | Not Provided | I commend the BLM's willingness to create opportunities for renewable energy transmission, we feel that there is not enough information on potential future projects to warrant inclusion of the | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | implementation level specifics of ROW expansion into the RMP. I would prefer any new major development proposals, like construction of new transmission lines, to go through their own RMP amendment and EIS processes. | |
| 047 | Land Tenure and Land-Use Authorizations | Not Provided | Without specific details on the size and exact location of these new transmission lines, it's impossible to know if they will have a negative impact to the values protected by the designation of the monument such as wildlife habitat and scenic value. We need timely and thorough consideration of this proposal. | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 048 | Land Tenure and Land-Use Authorizations | Kristin Ulibarri | While the majority of BLM's draft amendment contains things that we think will be beneficial to the monument, we have concerns about the proposed expansions of two Right Of Way Corridors (ROWs) within the Monument. While these ROW's would help to transmit renewable energy created east of here to population centers west of here- helping address climate change -we are worried about the size of the proposed ROW's (up to 600 feet.) A ROW this wide could easily accommodate transmission lines big enough to change the view scape of the entire valley. Additionally, there would be road development and hazards to wildlife associated with new transmission line construction | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 049 | Land Tenure and Land-Use Authorizations | Kristin Ulibarri | While we commend the BLM's willingness to create opportunities for renewable energy transmission, we feel that there is | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | not enough information on potential future projects to warrant inclusion of the implementational level specifics of ROW expansion into the RMP. We would prefer any new major development proposals, like construction of new transmission lines, to go through their own RMP amendment and EIS processes. | |
| 050 | Land Tenure and Land-Use Authorizations | Kristin Ulibarri | Since there is currently no specific proposal for construction of these transmission lines in front of the BLM, we question the reasoning of including the expansion of ROW's in the new Resource Management Plan (RMP) now | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 051 | Land Tenure and Land-Use Authorizations | Kristin Ulibarri | Without specific details on the size and exact location of these new transmission lines, it's impossible to know if they will have a negative impact to the values protected by the designation of the monument such as wildlife habitat and scenic value. Furthermore, requirements to do a full Environmental Impact Survey could be modified or even lifted by future administrations, meaning the community may not have an opportunity to participate in future transmission line construction. | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 052 | Land Tenure and Land-Use Authorizations | Shannon Romeling, Amigos Bravos | If a specific transmission project is proposed in the future, the BLM should conduct a project specific NEPA analysis. They should also share the details of the project with the public, invite public input, and consider other transmission routes and options for modifying or adding | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | upgraded lines to existing towers before designating a new or expanded ROW. | |
| 053 | Land Tenure and Land-Use Authorizations | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | TU's primary concern with BLM's proposed action (Alternative B) is the proposed designation of new and expanded rights of way (ROWs) within the Monument, including a 600' corridor across the Río Grande Gorge. We encourage the BLM to reconsider the proposed ROWs to avoid significant impacts on the Wild and Scenic River Corridor (the heart of the Monument) and the objects and values the Monument was established to protect. We respectively ask the BLM to withdrawal its proposal to designate new and expanded ROW corridors through this RMPA process, which we believe may run contrary to Proclamation 8946; the Wild and Scenic Rivers Act; the BLM Proposed Rule on Rights-of-Way, Leasing, and Operations for Renewable Energy; and, most importantly, to the spirit of community stakeholders who clearly stated that the Monument should be designated in part to prevent such development. We believe that by designating ROWs through this RMPA process, the BLM might unintentionally pave the way for expedited review and approval of future transmission lines, infrastructure, and facilities without adequate review of Monument impacts or sufficient opportunities for public participation. | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| 054 | Land Tenure and Land-Use Authorizations | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | Although the plan includes multiple provisions intended to benefit wildlife, TU is concerned about potential impacts that the proposed new ROW corridors could have. In particular, the proposed 600-foot Powerline Falls ROW corridor would create a barrier to wildlife movement along the Rio Grande Gorge. | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 055 | Land Tenure and Land-Use Authorizations | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | The RMPA's Alternative B action to designate ROW corridors over an additional 183 acres under Alternatives B would result in short-term direct adverse effects if development were to occur within the corridors. Also, the construction of new transmission lines and utility infrastructure at the proposed 600' ROW would impact soil health and vegetation, and in turn, could cause soil erosion and water quality degradation through ground-disturbing activities | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 056 | Land Tenure and Land-Use Authorizations | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | Consistent with these executive and legislative actions, the BLM currently classifies the Wild and Scenic River corridor along the Río Grande as "Visual Resource Management Class I." The objective of Class I "is to preserve the existing character of the landscape." Although Class I management "does not preclude very limited management activity," the "level of change to the characteristic landscape should be very low and should not attract attention." We believe that the BLM's RMPA/EA proposed action to designate a 600' right of way (ROW) across the gorge, and to | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | change the Visual Resource Management classification within the ROW corridor to Class III is contrary to the proclamation and the intent of the Wild and Scenic Rivers Act. This proposal will significantly enlarge the existing ROW (600' is more than triple the size of the current 190' ROW) and could lead to a significant impairment of the RGNM viewshed. | |
| 057 | Land Tenure and Land-Use Authorizations | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | TU is concerned about the BLM's proposal to designate new and expanded rights of way (ROWs) within the Monument, including a 600' corridor across the Rio Grande gorge. We strongly encourage the BLM to reconsider the proposed ROWs to avoid significant impacts on the Wild and Scenic River Corridor and the objects and values the Monument was established to protect. Additionally, we recognize that there is a legal due-diligence process for acquiring new ROW that would require that the BLM amend existing ROW agreements with utilities, and/or require utilities to acquire new utility easements for ROW. In both an amendment and new easement agreement for a ROW, a utility often pays a lease for the easement to the landowner. In this case of an expanded ROW at the RGDN Monument, the United States BLM would be the landowner and would be required to go through the same legal due-diligence steps, but as a federal agency, each ROW project would be subject to NEPA and public comment, and, in certain quid-pro-quo scenarios, | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | require mitigation to offset negative resource impacts. TU believes that by designating ROWs through this RMPA process, the BLM may unintentionally bypass these critical legal controls for communities and their environments to decide how our public lands are managed. Additionally, without proper due-diligence and public comment, the BLM could also create industry expectations for expedited review and approval of future transmission lines, infrastructure, and facilities. | |
| 058 | Land Tenure and Land-Use Authorizations | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | TU applauds the BLM's proposal to exclude the entirety of the Monument from wind or solar energy development, and we ask that the BLM revisit its most recent regulations related to solar and wind development on public lands in the development of the Monument Plan, as the BLM Proposed Rule on Rights-of-Way, Leasing, and Operations for Renewable Energy (88 Fed. Reg. 39726; Docket No. BLM_HQ_FRN_MO#4500171739) (Proposed Rule). The BLM should consider for the RMPA/EA that renewable energy development includes transmission lines and their acquisition and leasing for ROW on public lands. It is imperative that the updated RGDN plan reflect the BLM's final Programmatic Environmental Impact Statement to Evaluate Utility- Scale Solar Energy Planning and Amend Resource | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | Management Plans for Renewable Energy Development (87 Fed. Reg. 75284). | |
| 059 | Land Tenure and Land-Use Authorizations | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | Finally, we encourage BLM to take a smart-from-the-start approach to planning that comprehensively evaluates where and how projects will be sited so that any new solar and wind development- including transmission lines- on public lands minimize impacts to fish and wildlife and habitat, cultural and Indigenous resources, water resources, and scenic viewsheds. Renewable energy projects in low impact areas on public lands will play an essential role in achieving our clean energy goals, but we must also ensure that the impacts of clean energy development do not compound the habitat loss and fragmentation that fish and wildlife are already experiencing. We urge the agency to consider how best to balance a need for greater renewable energy development with other uses of public lands and waters. | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 060 | Land Tenure and Land-Use Authorizations | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | The preliminary draft environmental assessment (EA) and resource management plan (RMP) for the Rio Grande Del Norte National Monument is deficient. A Finding of No Significant Impact is improper without substantial revision to the documents posted for public comment and that only if the proposed expansion of utility right of ways is dropped. Significant controversy about the utility corridor expansion | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | proposal in itself will trigger an Environmental Impact Statement. In addition, the proposed action to expand right of ways goes beyond the intent of the Monument Proclamation to conserve and protect landscapes and resources. | |
| 061 | Land Tenure and Land-Use Authorizations | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | Expansion of Utility ROW Footprints is not consistent with the care and maintenance of the Monument without consideration of purpose and need and alternatives. In Proclamation 8946 the President ordered a management plan that directs preservation of a Rio Grande del Norte landscape as of March 25, 2013. Accommodation of uses after that date are prohibited if they do not promote landscape preservation and resource values conservation. The proposed expansion of utility rights of way (ROW) is an example of a proposed action contrary to the proclamation. Room is left for expansion outside the present utility corridors only with Secretary of the Interior involvement and a higher public purpose. "Additional utility line rights-of-way or up- grades outside the existing utility line rights-of-way may only be authorized consistent with the care and management of…" "historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest," so states Proclamation 8946. Expansion of ROWs therefore would require an Environmental Impact Statement (EIS) with consideration of purpose, need, and alternatives and | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | documentation of involvement and a decision by the Secretary of Interior. The BLM has no authority to advocate any expansion of disturbance footprints within the Monument as it has seemed to attempt in the preliminary Environmental Assessment (EA) under review. | |
| 062 | Land Tenure and Land-Use Authorizations | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | The Rio Grande Gorge Bridge is listed on the National Register of Historic Places https://npgallery.nps.gov/AssetDetail/NRIS/97000733 and is currently used over capacity with known concerns for public health and safety and opportunities to inform visitors of the proper stewardship of the National Monument. There is a need for a careful review of activities at the Rio Grande Gorge Bridge. The majority of Monument visitation occurs at that place. It is there that the public may most often comprehend the intact nature of the landscape, geology, biology, and viewsheds. The careful review warranted is not evidenced in the RMP or EA. One related issue that we particularly wish to mention is that any expansion of the utility corridor within view of the bridge would represent a significant adverse impact on the qualities of value to visitors. A viewshed analysis to investigate this potential problem is required. Consultation and cooperation with the New Mexico Department of Transportation about the rest area at the Rio Grande bridge is an essential part of resource management planning for the | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | protection and conservation of the Monument. | |
| 063 | Land Tenure and Land-Use Authorizations | Jack Marchetti, New Mexico Department of Game and Fish | FONSI page 5 Lines 38-43 The Department has concerns about widening the existing Powerline Falls Right of Way (ROW) corridor from 190 feet to 600 feet and the designation of the new Horsethief Mesa ROW corridor. The Department believes that the addition of any new transmission lines or corridors should be kept to an absolute minimum and that co-location is preferred over creating new corridors. The Rio Grande Gorge is part of the Central Flyway and is a major migration corridor for numerous avian species. The Department is especially concerned about the long-term avian collision hazard that will be created by installing additional transmission lines across the Rio Grande. Future development of any new transmission lines should incorporate the most recent science and design features to minimize avian collisions. A recent study using near-ultraviolet light reduced Sandhill Crane (Antigone canadensis) collisions with power lines by 98% (Dwyer et al. 2019). Mitigation with line markers has had limited success because most collisions occur at night when line markers are least visible. The Department recommends evaluating the use of near-ultraviolet light to mitigate avian collisions where transmission lines cross the Rio Grande. As a tangible example, the developers of the SunZia | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | Transmission Line (currently under construction) will be installing an Avian Collision Avoidance System that utilizes near-ultraviolet light to reduce avian collisions where the project crosses the Rio Grande. Reference: Dwyer, J.F., A. K. Pandey, L. A. McHale, and R. E. Harness. 2019. Near-ultraviolet light reduced sandhill crane collisions with a power line by 98%. Ornithological Applications doi: 10.1093/condor/duz008. | |
| 064 | Land Tenure and Land-Use Authorizations | Jack Marchetti, New Mexico Department of Game and Fish | FONSI page 9 Issue 6 The Summary currently states "Proposed management would also designate ROW corridors over an additional 243 acres, which would result in short-term direct adverse effects if development were to occur within the corridors." The Department disagrees with this statement and feels that direct adverse effects of additional ROW corridors would also be long term due to the increased disturbance to wildlife and habitat following the construction of the ROW in previously undisturbed areas | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 065 | Land Tenure and Land-Use Authorizations | Not Provided | As a concerned citizen, I have concerns about the following aspects of the proposed plan: Land Use Authorizations The existing Powerline Falls ROW corridor over the gorge would be widened from 190 feet to 600 feet (47 acres). A new ROW corridor would be designated following an existing 115-kilovolt transmission line within Horsethief Mesa and the Arroyo Hondo Land Grant. The new corridor would be approximately 2.5 | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | miles long and have a width of 450 feet (136 acres). These enormous ROW corridors would severely disrupt the monument's viewscape and necessitate road upgrades. These upgrades, in turn, could create unintended access for irresponsible visitors, exacerbating the existing problem of illegal and unmanaged motorized activity and associated impacts to natural and cultural resources. Without knowing what type of transmission line or infrastructure projects might be proposed within these ROWs, neither the BLM nor the public can meaningfully evaluate whether the project is consistent with Proclamation 8946, which requires the protection of Monument objects, values, and resources. | |
| 066 | Land Tenure and Land-Use Authorizations | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers | Finally, although the plan includes multiple provisions that will likely benefit wildlife, there are a couple aspects of the plan that could have negative impacts on wildlife and warrant further consideration. First, as further described in Part J below, we are concerned about potential impacts that the proposed new ROW corridors could have on wildlife.23 In particular, the proposed 600-foot Powerline Falls ROW corridor would create a barrier to wildlife movement along the Rio Grande gorge and pose significant risks to birds. Additionally, high voltage overhead transmission lines produce a low frequency hum that can act as an audible barrier for wildlife, which might avoid the ROW and expend additional time and | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | • Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, | energy to navigate outside the ancient migration route along the Río Grande corridor. | |

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| | | WildEarth Guardians | | |
| 067 | Land Tenure and Land-Use Authorizations | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds | Contrary to the proclamation and the Wild and Scenic Rivers Act, the RMPA/EA proposes to designate a 600' right of way (ROW) across the gorge, and to change the Visual Resource Management classification within the ROW corridor to Class III. As discussed further in Part J below, this proposal will significantly enlarge the existing ROW (600' is more than triple the size of the current 190' ROW) and would have a significant impact on the undisturbed original landscape of the Rio Grande gorge. Although the colossal breadth of the proposed ROW is intended to accommodate multiple future uses and facilities, the ultimate visual impact of this proposed ROW is unknown at this time because the BLM is not currently evaluating any specific project proposals. | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | • Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | | |
| 068 | Land Tenure and Land-Use Authorizations | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation | We urge the BLM to reconsider its proposal to designate a 600' ROW corridor across the gorge. This aspect of the Draft RMPA/EA runs contrary to Proclamation 8946, the Wild and Scenic Rivers Act, and to the spirit of community stakeholders who clearly stated that the Monument should be designated in part to prevent new development. It is of greater importance to preserve the renowned ancient landscapes of the Rio Grande gorge than it is to select this ROW as the cheapest route for a hypothetical transmission line. If a specific transmission project is proposed in the | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | • Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO) | future, the BLM should share the details of the project with the public, invite public input, and consider other transmission routes and options for reconductoring or adding upgraded lines to existing towers before designating a new or expanded ROW through a subsequent RMPA. | |

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| | | • Andrew Rothman, WildEarth Guardians | | |
| 069 | Land Tenure and Land-Use Authorizations | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, | Despite the proclamation's express limitation on new ROWs or expanded ROWs outside existing corridors, the Draft Monument Plan proposes the designation of a significant amount of new ROW. Specifically, the BLM proposes to widen the existing Powerline Falls ROW corridor, which spans over the Rio Grande gorge, from 190 feet to 600 feet (47 acres). The BLM also proposes to designate a new ROW corridor following an existing 115-kilovolt transmission line within Horsethief Mesa and the Arroyo Hondo Land Grant. The new corridor would be approximately 2.5 miles long and have a width of 450 feet (136 acres). As described above, infrastructure additions within these enormous ROW corridors could severely disrupt the Monument's viewshed and visual resources, especially across the Wild and Scenic River corridor, which protects scenery as an outstandingly remarkable value. New infrastructure would also have significant negative impacts on the wildlife that uses the gorge as a connected wildlife migratory corridor, and on the locals and visitors who use the gorge as a unique recreation waterway. Additionally, the construction of new transmission lines and utility infrastructure would impact soil health and vegetation, and would cause | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | erosion and water quality degradation. Moreover, the construction and maintenance of new transmission lines, facilities, and utility infrastructure will necessitate road upgrades. These upgrades, in turn, would create unintended access for irresponsible visitors, exacerbating the existing problem of illegal and unmanaged motorized activity and associated impacts to natural and cultural resources. Given the limitations in Proclamation 8946, it is especially problematic that the BLM proposes to designate enormous ROWs through this RMPA process without having one or more concrete project proposals. Designated ROW corridors are intended to provide "a preferred location for existing and future linear rights-of-way and facilities. The corridor may be suitable to accommodate more than one right-of-way use or facility, provided that they are compatible with one another and the corridor designation."68 Without knowing what transmission line or infrastructure projects might be proposed within these enormous new ROWs,69 neither the BLM nor the public can meaningfully evaluate whether the project violates Proclamation 8946, which prohibits any new or expanded ROWs that are inconsistent with the care and management of Monument objects, including visual and wildlife resources. | |

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| 070 | Land Tenure and Land-Use Authorizations | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds | At the public meeting on May 7, 2024, the BLM explained that ROW designation is a plan-level decision, i.e., new ROWs must be designated through an RMP revision or amendment. The BLM also acknowledged that, even if a new or expanded ROW is designated through this RMPA process, any future transmission line projects will require additional NEPA review, likely through an environmental impact statement. We are concerned, however, that by designating ROWs through this RMPA process, the BLM might unintentionally pave the way for expedited review and approval of future transmission lines, infrastructure, and facilities without adequate review of Monument impacts or sufficient opportunities for public participation. The BLM recently updated its regulations addressing ROWs, leasing, and operations for renewable energy to promote solar and wind development and maximize "commercial interest" in lease sales and ROW grants.70 The BLM is also working to finalize an updated Western Solar Plan to expedite implementation of national clean energy goals.71 In the future, we anticipate that the BLM and federal public lands will continue to play an important role in the renewable energy transition, and the agency will likely enact more regulations and policies to facilitate and expedite siting and approval decisions. The agency may face pressure to adopt regulations that decrease environmental | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | • Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | review and public participation for projects that occur in designated ROWs. The development of public lands for renewable energy is important to meeting our nation's goals, but within the RGDN National Monument and the Wild and Scenic River corridor, the BLM must give more weight to the conservation of Monument objects and outstandingly remarkable values. Without a specific project proposal, the BLM cannot evaluate whether it is striking an appropriate balance. We strongly urge the BLM to reconsider its proposal to establish new and expanded ROW corridors through this RMPA process and to ensure that any future project proposals and associated impacts on the Monument are evaluated through a critical lens with a full and transparent public process. | |
| 071 | Land Tenure and Land-Use Authorizations | Miya King-Flaherty, Sierra Club Rio Grande Chapter | 2) Greatly enlarging the Powerline Falls right-of-way (ROW) corridor for transmission lines across the Gorge from 190 feet to 600 feet is problematic. These enormous ROW corridors would severely disrupt the monument's viewscape and necessitate road upgrades. The ROW corridors could also be used for other infrastructure such as pipelines. Without knowing what type of transmission line or infrastructure projects might be proposed within these ROWs, neither the BLM nor the public can meaningfully evaluate whether the project is consistent with Proclamation 8946, which requires the | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | protection of Monument objects, values, and resources. | |
| 072 | Land Tenure and Land-Use Authorizations | Miya King-Flaherty, Sierra Club Rio Grande Chapter | 3) Impacts from both transmission lines and OHV routes are likely to disrupt Wildlife corridor connectivity and cause avoidance behavior for migrating herds and loss of wildlife diversity. In general, the other provisions for connectivity in non-ROW areas and overall Alternative B provisions for wildlife protection are well-defined and beneficial. The draft plan should oppose significantly enlarging ROWs that would allow major transmission lines across the Rio Grande Gorge or other infrastructure facilities such as pipelines that would greatly diminish the scenic, cultural, and wildlife values of the monument. The BLM should support the updated and more specific wildlife-proposed actions under Alternative B. The BLM should select Alternative B1 to manage Cerro de la Olla, proposed for Wilderness designation, as a Wilderness Study Area. | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 073 | Land Tenure and Land-Use Authorizations | Loren Bell, Enchanted Circle Trails Association | 3.2.13 Land Tenure and Land-use Authorizations Concern: The proactive designation of powerline ROW corridors (Powerline Falls ROW 600 ft; Horsethief Mesa ROW 450 ft) has the potential to impact the scenic and recreation quality of these areas significantly. Including these in the Plan where there are currently no proposed projects is premature and could be used to reduce the opportunity for public input in future projects to utilize | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | | this corridor. Proposal: Remove the ROW corridor expansion until such a time that a specific proposal is before the BLM, and utilize thorough public consultation and review before deciding to expand the corridor by a specific required amount. | |
| 074 | Lands with Wilderness Characteristics | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation | Under Alternative B1, the BLM would continue its current approach, managing only San Antonio East as LWCs, while designating Cerro de la Olla as a Wilderness Study Area. As explained in Part N below, we strongly support Alternative B1, while encouraging the BLM to expand the size of the proposed Cerro de la Olla to include nearly 13,000 acres. Additionally, we strongly urge the BLM to implement its 2017 Inventory for Lands with Wilderness Characteristics by managing all of the qualifying LWC units to maintain the wilderness characteristics of those lands.63 These units include the Central Playas, Guadalupe Mountains, La Junta Rim, Llano, North Chiflo, Plover Prairie, and Punche Valley.64 In particular, the North Chiflo unit (34,452 acres) should be prioritized for LWC management. Based on the LWC inventory and our knowledge of this landscape, we also encourage the BLM to manage as LWCs the entire width of the Rio Grande gorge to the top of the rim on the East side from the confluence of the Red River north to the Colorado state line, as well as the portion of the Red River canyon within the Monument. | The BLM acknowledges your support for Alternative B1 and preference for the boundary of the Cerro de la Olla WSA boundary under the alternative to be expanded. As noted in Section 3.2.10.2 of the Proposed RMPA/ES, the BLM identified this portion of the Cerro de la Olla WSA using the 8,200-foot elevation contour line to account for existing access, wildlife-habitat improvements, and other resource uses. Although neither Alternative B nor B 1 would manage the inventoried units mentioned by the commenter specifically to maintain their wilderness characteristics, the BLM anticipates that other, overlapping management will help preserve wilderness characteristics in these areas. This includes management where the BLM is required to ensure the proper care and management of Monument objects. |

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| | | • Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | | |
| 075 | Lands with Wilderness Characteristics | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument | The BLM's 2017 LWC inventory reflects that the BLM intended to use this Monument planning process to evaluate and decide how to manage these LWC units, with several possible outcomes: (1) emphasize other multiple uses as a priority over protecting wilderness characteristics; (2) emphasize other multiple uses while applying management restrictions to reduce impacts to wilderness characteristics; or (3) protect | The BLM considered the tradeoffs of managing Lands with Wilderness Characteristics (LWC) to maintain those characteristics versus the other potential uses of lands in the Monument. In the land-use planning process, analysis of wilderness characteristics may result in several outcomes, including emphasizing other multiple uses as a priority over protecting wilderness characteristics, emphasizing other multiple uses while |

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| | | • Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360 | wilderness characteristics as a priority over other multiple uses.65 Now that RGDN has been designated as a National Monument, default multiple-use management no longer applies, and the RMPA must prioritize the protection and restoration of Monument objects and values, as described in Proclamation 8946. The BLM cannot authorize new development or discretionary uses of RGDN that conflict with the directives of the proclamation. Managing all eligible LWC units to maintain their wilderness character is consistent with the proclamation and would provide protection to Monument objects and values. As the Monument Plan is implemented and amendments or revisions to the Taos 2012 RMP are considered in the future, the BLM should continue to update its inventory of other wilderness- quality lands within RGDN and should prioritize the management of lands with wilderness characteristics to protect the RGDN's wide range of natural and cultural resources and to mitigate the effects of climate change and biodiversity loss. | applying management restrictions, such as conditions of use and mitigation measures, to reduce impacts on wilderness characteristics, and protecting wilderness characteristics as a priority over other multiple uses (BLM Manual 6320.06.A). All alternatives would carry forward management for the San Antonio East LWC unit; Alternative B would also manage 5,120 acres of the Cerro de la Olla WSA to protect and maintain wilderness characteristics. Any alternative selected by the BLM must provide for the proper care and management of Monument objects, as identified in Presidential Proclamation 8946. The BLM anticipates that other, overlapping management will help preserve wilderness characteristics in inventoried areas not specifically managed to preserve wilderness characteristics. This includes management where the BLM is required to ensure the proper care and management of Monument objects. |

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| | | • Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | | |
| 076 | Livestock Grazing | Not Provided | It would be a mistake to keep these allotments open as potential future forage reserves. BLM would be responsible for expensive ongoing maintenance of fences and other range improvements despite the uncertainty of when future grazing may occur. Climate change and drought are reducing land productivity and grazing levels will obviously need to decline to maintain resource sustainability. Ranching is already economically marginal for many reasons, and BLM should not use public funds to further subsidize ranching. Please review the attachments for more detailed information. Please revise Alternative B to permanently close the vacant grazing allotments | No change made. Please refer to Appendix C, *Livestock Grazing Management Action 4*, Alternative B which states:<br>Because Reserve Common Allotments (RCAs) have already been established in the Monument, additional vacant allotments would not be considered for management as common reserve allotments. |
| 077 | Livestock Grazing | Shannon Romeling, Amigos Bravos | During the scoping process, we supported the BLM's proposal to make ten vacant allotments unavailable to grazing. In the Draft MMP, the BLM now proposes to close only two of the grazing allotments (#621 East Río Grande and #628 Arroyo Hondo, totaling 1,772 acres). While we | BMPs for livestock grazing can be found in Appendix D of the Proposed RMPA/EA. The Taos Field Office assesses impacts from any proposed actions and permitted uses, such as livestock grazing, on the Monument objects of value through every site-specific NEPA analysis. Additionally, VEGR |

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| | | | recognize livestock grazing as a traditional use, and appreciate its cultural significance to the local community, we also encourage the BLM to require Best Management Practices by grazing permittees and implement funding to restore adequate fencing and water resources to protect streams, rivers and playas. | Management Action 6 and LG Management Action 5 (Appendix C, Sections C.2.7 and C.3.2, respectively) have been revised to address concerns regarding potential impacts from grazing within playas. Implementation and funding decisions will be made as part of the budgeting process and are not RMP decisions. |
| 078 | Livestock Grazing | Shannon Romeling, Amigos Bravos | On page 50 of the MMP, it is stated that "Allowing grazing as a vegetation-management tool to reduce undesirable plant species north of the Cerro del Yuta wilderness would benefit efforts to promote seed propagation and the establishment of desired species and support adaptive- management actions under Alternative B.". However, this, and further language on page 72 should be expanded upon and clarified in detail. Please specify what it means to use grazing as a temporary vegetation-management tool versus establishing a new grazing allotment. Specifically on page 72, the following language could be interpreted as the establishment of a new grazing allotment: "Unlike Alternative A, Alternative B would allow consideration of livestock grazing in the area north of the Cerro del Yuta Wilderness boundary to promote seed propagation, reduce undesired grasses, and promote new growth for wildlife utilization". | Change made to Section 3.2.14.2 of the Proposed RMPA/EA. |

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| 079 | Livestock Grazing | Shannon Romeling, Amigos Bravos | Please address the following in the language around this section of the Plan (Page 72): 1. Where exactly is this area "north of the Cerro del Yuta"? Please provide a map. 2. What exactly does "allow consideration" mean? How exactly would the BLM determine if grazing would help the area? 3. What other adaptive management actions would be considered besides grazing in this location? 4. Would alternative B and Alternative B1 both allow for this grazing consideration north of the Cerro del Yuta? 5. It is our understanding that this grazing activity would be time limited and specific to promoting ecological function. The time limited nature of the grazing activity and its purpose for restoring ecological function should be clearly stated in the plan. If the BLM continues with this aspect of its proposal, please commit to monitoring the success of this prescriptive grazing practice, to promptly changing this approach if it is unsuccessful, and to maintaining and implementing additional livestock exclosures along streams, wetlands, and riparian areas to protect watershed health and sensitive wildlife habitat. | 1 Please see Map B.2 in Appendix B of the Proposed RMPA/EA.<br>2 *Allow consideration* would include informed decision making through site-specific NEPA analysis. As shown in *Synthesis Paper: Targeted Livestock Grazing: Prescription for Healthy Rangelands*, targeted grazing to remove decadent vegetation for the goal of enhancing wildlife forage quantity and quality is an effective tool (Bailey et al. 2019). See revisions to Section 3.2.14.2 of the Proposed RMPA/EA.<br>3 *Other adaptive management* refers to tools at the BLM's disposal to manipulate vegetation, which could include fire, mechanical, or chemical treatments, which would be assessed with site-specific NEPA analysis if allowed under the RMPA/EA, per those respective resource programs.<br>4 Yes, because the only difference in Alternative B1 is the designation of Cerro de Olla WSA; all other elements of Alternative B1 would be the same as Alternative B.<br>5 Please refer to updated analysis in Section 3.2.14.2 of the RMPA/EA. Additionally, no streams, wetlands, or riparian areas are within the proposed treatment area north of Cerro del Yuta. |
| 080 | Livestock Grazing | Shannon Romeling, Amigos Bravos | We request language in the MMP that provides a clear plan to provide publicly available data on the current allotment assignment data (Improve vs. Maintain | Change made to include this information and the most recent land-health evaluations in Section 3.2.14 of the Proposed RMPA/EA. |

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| | | | vs. Custodial). Maps of this in Appendix B would provide a clear view of the current status of the health of grazing allotments in the Monument. | |
| 081 | Livestock Grazing | Jack Marchetti, New Mexico Department of Game and Fish | FONSI page 6 Lines 11-13 Currently states, "Livestock-grazing decisions would result in short- and long-term effects on vegetation, soils, and wildlife habitat, similar to those described in the 2011 PRMP/FEIS". However, it is not clear whether these effects would be positive or negative for vegetation, soils, and wildlife habitat. Recommend clarifying this point. | The FONSI has been revised to clarify that short- and long-term beneficial and adverse effects would result, similar to those described in the 2011 Proposed RMP/Final Environmental Impact Statement (FEIS). |
| 082 | Livestock Grazing | Not Provided | The plan would allow livestock grazing north of the Cerro del Yuta Wilderness boundary for the purpose of changing the composition of the vegetation and grass found there. I am concerned that the use of grazing to manage vegetation is controversial and may decrease overall landscape health in this area, to the detriment of wildlife. | Please refer to updated analysis in Section 3.2.14.2 of the Proposed RMPA/EA. |
| 083 | Livestock Grazing | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, | Second, we are concerned about the proposal to use livestock grazing as a vegetation management/maintenance tool "to restore and maintain wildlife habitat." We are skeptical about the purported benefits of prescriptive grazing to wildlife and believe this practice could have unintended negative impacts on wildlife and ecological health. | In accordance with LG Management Action 4, the Proposed Monument Management Plan would allow consideration of livestock grazing as a vegetation-management and -maintenance tool in the area north of the Cerro del Yuta WSA boundary to promote seed propagation, reduce "wolfy" caespitose grasses, and promote new forage growth for wildlife utilization (see Appendix B, Map B.2, ~~(~~consistent with WL MA 7). The BLM would determine design features and monitoring of this treatment through an implementation- |

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| | | National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The | | level site-specific NEPA analysis and Section 106 of the NHPA compliance process.<br>This management action is not intended to allow livestock grazing as a vegetation-management tool throughout the entirety of the Monument, but only in a specific area and when determined beneficial by range specialists and wildlife biologists. Please refer to Sections 3.2.3.2 and 3.2.14.2 of the Proposed RMPA/EA, which have been updated with additional context. Map B.2 shows the area of proposed treatment north of Cerro del Yuta. |

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| | | Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | | |
| 084 | Livestock Grazing | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation | During the scoping process, we supported the BLM's proposal to make ten vacant allotments unavailable to grazing because those allotments lack necessary range infrastructure and have not been applied for in over a decade.73 In the Draft RMPA/EA, the BLM now proposes to close only two of the grazing allotments (#621 East Río Grande and #628 Arroyo Hondo, totaling 1772 acres).74 The draft explains that this change responds to public scoping comments as well as an explanatory statement from the House and Senate Appropriations Committees that accompanied the Fiscal Year 2022 (FY22) Consolidated Appropriations Act.75 The explanatory statement, which relates to the expenditure of appropriations in FY22, encourages the BLM, "to the greatest extent practicable, to make vacant grazing allotments available to a holder of a grazing permit or lease when lands covered by the holder of the permit or lease are unusable because of drought or wildfire."76 The FY22 explanatory statement is legally inapplicable to the BLM's development of | Sections 2.6.2, 3.2.14.2, and 3.2.15 of the Proposed RMPA/EA have been revised to provide additional rationale and analyses for the number of proposed unavailable grazing allotments. 43 CFR Section 1610.4-2(d) provides that<br>> the BLM may change planning criteria as planning proceeds if we determine that public suggestions or study and assessment findings make such changes desirable.<br>After further review and consideration of scoping comments and comments received from the public on the Draft RMPA/EA, the BLM has adjusted the Proposed RMPA to close four of the 10 vacant allotments initially identified. In addition, the language regarding the Explanatory Statement from the Consolidated Appropriations Act has been removed throughout. |

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| | | Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | this RMPA, and we believe the statement is irrelevant to the BLM's decision of whether to retain vacant grazing allotments on the Monument. | |
| 085 | Livestock Grazing | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte | Given the Monument's already-arid environment and the drying climate, we are concerned that unsustainable grazing practices and insufficient monitoring and management of rangeland health could have adverse impacts on Monument objects, wildlife, soils, vegetation, and riparian resources. Under the circumstances, it appears that the | BMPs for livestock grazing can be found in Appendix D of the Proposed RMPA/EA. Additionally, grazing-management language with respect to Monument objects has been added to Appendix C, Section C.3.2, of the Proposed RMPA/EA. VEGR Management Action 6 and LG Management Action 5 (Appendix C, Sections C.2.7 and C.3.2, respectively) have also been revised to |

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| | | National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter | retention of the eight allotments is unnecessary, especially given the lack of range fencing and water infrastructure. We do, however, recognize livestock grazing as a traditional use, and appreciate its cultural significance to the local community. Many of our concerns around rangeland and ecological health would be significantly alleviated through the BLM's strict adherence to the BLM's fundamentals of rangeland health and the New Mexico Statewide RMPA/ Environmental Impact Statement (EIS),78 which adopted statewide standards for public land health and guidelines for livestock grazing management. Proclamation 8946 provides that the "[l]aws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on lands under its jurisdiction shall continue to apply with regard to the lands in the monument."79 We urge the BLM to ensure that land health evaluations, NEPA analyses, and permit adjustments are conducted on a regular basis to timely address and prevent adverse impacts to Monument objects. | address concerns regarding potential impacts from grazing within playas. Implementation and funding decisions will be made as part of the budgeting process and are not RMP decisions. It is outside of the scope of this RMPA/EA to address concerns regarding the BLM's "strict adherence" to New Mexico Land Health Standards and Guidelines. As stated in revised Section 3.2.14.2 of the Proposed RMPA/EA, 55 of the 62 allotments in the Monument are in Category A (i.e., meeting or exceeding land health), based on the most recent land-health evaluations. |

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| | | • Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | | |
| 086 | Livestock Grazing | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos | We are also concerned about the proposal to allow new livestock grazing in the area north of the Cerro del Yuta Wilderness boundary for the stated purpose of achieving vegetation management objectives. The BLM asserts that this grazing would "promote seed propagation, reduce undesired grasses, and promote new growth for wildlife utilization. This would provide long term benefits to the livestock-grazing program by allowing grazing north of the Cerro del Yuta Wilderness and to wildlife by reducing caespitose grasses."80 The use of grazing to manage vegetation is controversial, and we are concerned that this proposal may decrease overall soil, vegetation, and landscape health in this area, to the detriment of wildlife and the ecosystem. If the BLM proceeds with this aspect of its proposal, the BLM should commit to monitoring the success of | Please refer to Sections 3.2.3.2 and 3.2.14.2 of the Proposed RMPA/EA, which have been updated with additional context. Map B.2 shows the area of proposed treatment north of Cerro del Yuta. No streams, wetlands, or riparian areas are within this area. |

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| | | • Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | prescriptive grazing practices, to promptly changing this approach if unsuccessful, and to maintaining and implementing additional livestock exclosures along streams, wetlands, and riparian areas to protect watershed health and sensitive wildlife habitat. | |
| 087 | Livestock Grazing | Anthony Colin. New Mexico | NMDA does note, however, that there are inconsistent acreages identified to be | For Alternatives B and B1, Allotment 628 is 826 acres, and allotment 621 is 926 acres, |

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| | | Department of Agriculture | closed to grazing. Pages 6 and 10 of the Finding of No Significant Impact (FONSI), and pages 72, 73, 88, and 89 of the RMPA/EA, all identify two allotments to be closed, totaling 1,749 acres. Page 9 of the FONSI and page 50 of the RMPA/EA similarly identify two allotments to be closed, but refer to a total of 1,772 acres. NMDA suspects that 1,749 acres is the correct figure, as it is the difference between the proposed and no action alternative figures (39,089 and 37,340 acres, respectively) presented on page C-7 of Appendix C. | for a total of 1,772 acres. However, as noted in Section 2.4, Section 3.2.14, and Appendix C, *LG Management Action 4*, Alternative B has been updated to make a total of four vacant grazing allotments unavailable (i.e., 3,578 acres) under the Proposed RMPA. The Proposed RMPA/EA and FONSI have been updated throughout, including Appendix C, Table C-1. |
| 088 | Livestock Grazing | Anthony Colin, New Mexico Department of Agriculture | Furthermore, the presentation of 39,089 acres on page 5 of the FONSI generates confusion about the true nature of the proposed action, reading, "the Proposed Action would result in […] closing 39,089 acres to livestock grazing…." If 37,340 acres will be closed to grazing under the no-action alternative, then the additional 1,749 acres closed under the proposed action is what the proposed action would result in. NMDA requests that the BLM clarify all references to the acreage that will be closed to grazing | The Proposed RMPA/EA has been updated, and Alternative B would make a total of four vacant grazing allotments unavailable. In total, 40,927 acres would be unavailable for livestock grazing under Alternative B as updated for the Proposed RMPA. This change has been applied to the Proposed RMPA/EA and FONSI. |
| 089 | Livestock Grazing | Anthony Colin, New Mexico Department of Agriculture | NMDA requests clarification of vacant and Reserve Common Allotments (RCAs), and how the allotments could obviate the need for AUM reductions proposed by other management actions. Appendix C, LG Management Action 6, Alternative B states that RCAs would be available to: "permittees or lessees whose Taos Field | Vacant allotments would have Animal Unit Months (AUMs) apportioned: (1) by application request by qualified applicant; and (2) through site-specific NEPA analysis and best-available data. AUMs are tied to the specific land within an allotment and cannot be allocated to other allotments. The RCA has AUMs determined by the |

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| | | | Office-administered allotments are not available due to drought, vegetation manipulations, and wildfire or when monitoring indicates a change or rest is needed in their respective allotments. Although available for use under these or similar circumstances, these allotments would not be available by application," (pg. C-78). However, it is still not clear whether RCAs will be made available to permittees in response to the possible AUM reductions resulting from various management actions in Appendix C. For example, would the wildlife-related timing restrictions proposed in WL Management Action 12 be included as "these or similar circumstances?" | range program, and any use of the RCA would be at or below that level of AUMs. The Proposed RMPA does not propose to reduce the amount of any permitted AUMs within the Monument. |
| 090 | Livestock Grazing | Anthony Colin, New Mexico Department of Agriculture | The ability of vacant allotments to offset AUM-loss is similarly murky. The clearest description is found in the *2012 Taos Resource Management Plan* (Taos RMP), which states that, "livestock grazing will remain a tool [in vacant allotments] to be used to help comply with the Standards for Rangeland Health."1 Evaluating the foreseeable effects of management actions on AUMs requires clear understanding of how vacant allotments and RCAs are managed. For example, one current statement in the RMPA/EA and Appendix C mentions that livestock grazing allotments will be assessed for cultural sites and efforts will be made to eliminate or minimize conflicts, but it doesn't specify the mechanisms involved. This distinction becomes crucial when | Please see comment response for Comment Number 089. The 43 CFR Part 4100 Grazing Regulations guide the BLM when there is a decrease in public land acreage, which could result from exclosures and land sales. If the acreage were significant enough to warrant a decrease in permitted use, then the decision would be based on site-specific NEPA analysis through consultation, cooperation, and coordination with affected interests, including the New Mexico Department of Agriculture (NMDA), and would be protestable and appealable in accordance with the Federal regulations. |

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| | | | considering the implications of excluding livestock grazing from identified cultural sites and whether permit holders can compensate for lost AUMs through the use of vacant allotments or RCAs, within the limits set by their permits. NMDA understands that specificity in an RMP can potentially hamper management flexibility. However, additional discussion, even in general terms, about the mechanisms available to permittees/BLM would aid the reader in understanding the full scope of the proposed actions' effects, and their relationship to BLM's 'no net loss of AUMs' objective. | |
| 091 | Livestock Grazing | Anthony Colin, New Mexico Department of Agriculture | Given this recognition of grazing's utility, NMDA requests that the BLM consider allowing new range improvements on Lands with Wilderness Characteristics (LWC) when such improvements contribute to the beneficial effects of livestock grazing and, therefore, the Monument's ecological values protected by the Proclamation. Both LWC Management Action 1 and the Taos RMP allow BLM to, "restrict construction of new structures and facilities unrelated to the preservation or enhancement of wilderness characteristics." However, NMDA argues that many range improvements, such as livestock watering infrastructure, can be designed not only to preserve wilderness characteristics, but also to protect and improve the resource values of the Monument and Proclamation itself. Without this | LWC MA 1 is consistent across all alternatives and states:<br>> Management to protect wilderness characteristics—naturalness, solitude, and opportunities for primitive recreation, as defined by Section 2(c) of the Wilderness Act of 1964—outside of designated wilderness or WSAs may be applied administratively in one or more of the following ways…"<br>The language that the commenter is referring to provides flexibility and demonstrates the tools that the BLM could use on LWC lands. Alternative B does not explicitly restrict range improvements, such as water developments and fencing. Impacts on LWC land from proposed range improvements would be addressed at the site-specific NEPA-analysis level. |

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| | | | management flexibility, and given the significant spatial overlap between the proposed Cerro de la Olla LWC and an existing RCA (Allotment 00610; Appendix B), the restrictions of LWC Management Action 1 Alternative B (above) would seem to directly conflict with LG Objective 4 ("maintain and continue improvements within established reserve common allotments") and LG Management Action 6 ("[RCAs] would be managed and maintained for use by permittees"). The cleanest way to resolve this and other resource conflicts would be to explicitly allow sustainable livestock grazing within LWC. | |
| 092 | Livestock Grazing | Anthony Colin, New Mexico Department of Agriculture | BLM should provide single definitions of "surface-disturbing activities" and "traditional use resources" for clear and consistent use throughout this RMPA/EA. Absent this addition, BLM should clarify in the RMPA/EA Section 3.2.2 that grazing is not a surface disturbing activity. NMDA appreciates BLM's use of the single term "surface-disturbing activities" in this RMPA/EA. However, BLM creates confusion around the intended definition of "surface-disturbing activities," by giving examples that conflict with the definition implied in other parts of the document. A clear definition of the term would remove all confusion. For example, on page 32 of the RMPA/EA, section 3.2.2.2, BLM includes livestock grazing as a surface disturbing activity, asserting that, "surface-disturbing activities, such as | A definition for *surface-disturbing activities* has been added to Section 3.1.1, *Analytical Assumptions*, of the Proposed RMPA/EA. Section 3.2.2.2 has been revised to remove livestock grazing from the list of surface-disturbing activities with potential to affect traditional use resources.<br>Section 3.2.2 of the Proposed RMPA/EA defines *traditional uses* and *traditional use resources* as follows:<br>*Traditional use* includes subsistence activities, traditional livestock grazing, and a variety of cultural uses. *Traditional resources* can include archaeological sites, structures, topographic features, habitats, plants, wildlife, and minerals that Native Americans, Hispanic, or other groups consider essential for the |

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| | | | recreational uses, transportation or trail improvements, and livestock grazing, could directly and permanently adversely affect traditional-use resources and access to them." However, the practices in Section 3 of Appendix D seem to limit the scope of "surface-disturbing activities" to spatially discrete activities that require the removal or deposition of topsoil and subsoil, such as construction, excavation, spill/contamination mitigation, etc. NMDA must conclude that the inclusion of livestock grazing as a surface-disturbing activity in section 3.2.2.2 of the EA is not the BLM's intended understanding, because the RMPA/EA correctly identifies livestock grazing as a traditional use in multiple locations (e.g. pg. 72, pg. G-7). | preservation of traditional culture and traditional values. |
| 093 | Livestock Grazing | Anthony Colin, New Mexico Department of Agriculture | Furthermore, in section 3.2.2.1. of the RMPA/EA, BLM gives examples of traditional uses and traditional resources, followed by the use of the term traditional-use resources. BLM does not define traditional-use resources, but clearly identifies "traditional livestock grazing" as a traditional use. However, later in the section, BLM implies that livestock grazing has a negative impact on traditional uses: "Under Alternative B, the BLM would make two vacant allotments unavailable for livestock grazing, […] which would reduce the potential for adverse effects on traditional- use resources from livestock grazing within these allotments," NMDA | Proposed RMPA/EA Section 3.2.2.2 has been revised for clarification in response to the comment. |

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| | | | requests that BLM clarify what is meant by "traditional-use resources" and clarify in RMPA/EA section 3.2.2.2 of the proposed action, how a traditional use activity, such as livestock grazing, can have an adverse impact on traditional-use resources, and consequently, how closing two vacant grazing allotments would mitigate those impacts. Otherwise, it is counter-intuitive that one traditional use can have adverse impacts on traditional uses as a whole, since one may presume that traditional uses are compatible and that removing access to a traditional use would be detrimental to traditional-use communities. | |
| 094 | Livestock Grazing | Anthony Colin, New Mexico Department of Agriculture | In Section 3.2.6.2, BLM should consider specifying that livestock grazing can be compatible with, and have positive impacts on, soil health. On page 45 of the RMPA/EA, BLM asserts that, "the types of management actions that could adversely affect soil resources include activities from vegetation management, wildland fire management, land tenure and use authorizations, livestock grazing, recreation management, and vehicle use." However, livestock grazing's impact on soil health can range from positive to negative, and greatly depends on site-specific environmental factors.2 In fact, while some of these activities can have adverse impacts on soil health, BLM duly notes that with proper management, these adverse effects can be avoided or minimized in both the short and long- | A change was made to Proposed RMPA/EA Section 3.2.6.2 to acknowledge the potential beneficial indirect effects of livestock grazing on soil productivity. |

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| | | | term. Additionally, BLM touts livestock grazing as a useful vegetation and wildland fire management tool, which in turn promotes healthy soils. Therefore, rather than solely reference adverse impacts, it would be more appropriate for BLM to either also reference the potential compatibility of grazing with soil health improvement, or to simply save any analyses for site-specific documents. | |
| 095 | Livestock Grazing | Cyndi Tuell, Western Watersheds Project | Contrary to statements in the EA, the monument proclamation does not identify livestock grazing as a monument object or traditional use of this area. Therefore, the Bureau could reduce or eliminate livestock grazing authorizations within the monument and indeed, may need to do so in order to protect the monument objects identified in the proclamation which include a wide variety of wildlife and cultural resources. Unless livestock grazing is furthering the purposes of the monument designation, its authorization should be reconsidered. The Bureau has failed to acknowledge that monument lands are subject to a high level of conservation-centered management and instead has used the Multiple Use, Sustained Yield lens to make management decisions | Section 302(a) of FLPMA states that public lands are to be managed under the principles of multiple use and sustained yield<br>> except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it will be managed in accordance with such law.<br>For this planning effort, the area will therefore be managed in accordance with FLPMA and the enabling legislation that created the area (Presidential Proclamation 8946). From the Proclamation:<br>> This corner of the Río Grande del Norte landscape was traversed by traders and other travelers during the eighteenth and nineteenth centuries, who traded furs and other goods and later brought woolen articles from New Mexico's sheep grazing communities to markets throughout the Southwest.<br>The Proclamation goes on to state<br>> Laws, regulations, and policies followed by the BLM in issuing and administering |

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| | | | | grazing permits or leases on lands under its jurisdiction shall continue to apply with regard to the lands in the monument, consistent with the purposes of this proclamation. |
| 096 | Livestock Grazing | Cyndi Tuell, Western Watersheds Project | We strongly object to the inclusion of a provision to allow livestock grazing as a vegetation management/maintenance tool in the Ute Mountain area Alternative B and B.1 would allow the use of livestock as a vegetation management/ maintenance tool in the Ute Mountain area under the assumption that it would promote seed propagation, reduce undesired grasses, and promote new growth that wildlife can utilize. 2024 Toas RMPA at 20. The RMPA indicates that the use of livestock for vegetation management/maintenance is specific to facilitate the removal of caespitose grasses, but there is no information in the EA or any associated documents available on the project webpage to indicate that these types of grasses are not native to the project area. Indeed, some species of caespitosa are identified as important range and wildlife grasses or as grasses that are used for range improvement. See Grasses of New Mexico, attached with these comments at Exhibit 1. It is unclear which specific species of grasses are being targeted, and there is no information in the EA or associated documents to indicate these grasses are problematic. The Bureau did not identify this as an issue during | Please refer to revised Sections 3.2.3.2 and 3.2.14.2 of the Proposed RMPA/EA. Prescribed grazing as a vegetation-management treatment is consistent to all alternatives, as shown in VEGT Management Action 11. The language contained in LG Management Action 4 of<br>the area north of the Cerro del Yuta WSA boundary would be considered to allow livestock grazing as a vegetation-management/maintenance tool<br>would mean informed decision making through site-specific NEPA analysis. As shown in *Synthesis Paper: Targeted Livestock Grazing: Prescription for Healthy Rangelands*, targeted grazing to remove decadent vegetation for the goal of enhancing wildlife-forage quantity and quality is an effective tool (Bailey et al. 2019). The BLM has considered the information provided by the commenter and believes that LG Management Action 4 provides appropriate tools and flexibility for managing the area north of Cerro del Yuta, when determined necessary by range specialists and wildlife biologists. |

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| | | | scoping and has not provided any information, scientific or otherwise, that would support the use of livestock for this purpose. This provision must be removed. There is nothing in the EA to indicate the Bureau considered our specific recommendations for management direction, goals, objectives, and allocations. | |
| 097 | Livestock Grazing | Cyndi Tuell, Western Watersheds Project | There is nothing in the EA and associated documents available on the project webpage to indicate the Bureau has considered the specific recommendations we made in our scoping comments. As part of this project, the Bureau is updating livestock grazing management direction, goals, objectives, and allocations for allowable uses and in our prior comments we strongly encouraged the Bureau to recognize that the Multiple Use Sustained Yield (MUSY) concept is not applicable to the monument lands managed by the Bureau the same way it applies to non-NLCS lands. Instead, the Bureau has doubled down on its commitment to the MUSY concept and eschewed its responsibility to adhere to a higher standard, which is to protect natural and cultural resources and allow livestock grazing only where it is consistent with the monument Proclamation, which says: Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on lands under its jurisdiction shall continue to apply with regard to the lands in the monument, | Section 302(a) of FLPMA states that public lands are to be managed under the principles of multiple use and sustained yield<br>> …except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it will be managed in accordance with such law.<br>For this planning effort, the area will therefore be managed in accordance with FLPMA and the enabling legislation that created the area (Presidential Proclamation 8946). The Presidential Proclamation states:<br>> Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on lands under its jurisdiction shall continue to apply with regard to the lands in the monument, consistent with the purposes of this proclamation.<br>As noted in Appendix C, Section C.3.2, of the Proposed RMPA/EA, the Taos Field Office authorizes grazing to comply with the fundamentals of rangeland health (USDI- |

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| | | | consistent with the purposes of this proclamation. | BLM Grazing Regulations, 43 CFR Part 4100 § 4180.1) and the New Mexico Statewide RMPA/EIS (BLM 2001), which adopted statewide standards for public land health and guidelines for livestock-grazing management. The assessment and adjustment process for authorized livestock grazing occurs on an allotment basis and is conducted through trend monitoring, Assessment, Inventory, and Monitoring (AIM) data and a land-health evaluation, followed by appropriate NEPA analysis, in compliance with Grazing Regulations 43 CFR Part 4100, subparts 4110, 4120, 4130, 4160 and 4180. Allotment evaluations usually occur prior to permit/lease expiration, where permits and leases are typically issued on a 10-year basis. Implementation-level management and site-specific NEPA analyses for livestock grazing will consider compatibility and the impacts of grazing on objects of scientific and historic interest. Monument objects will be protected through the implementation of tools such as exclosures, adjustments to permitted use (i.e., AUMs), season, and class of livestock.<br>The Proposed RMPA includes several specific management actions relating to livestock grazing and the protection of Monument objects and other resource values, including cultural resources and playas (CUL Management Action 11, CUL Management Action 15, LG Management Action 5, and VEGR Management Action 6), vegetation (VEGR Management Action 6 |

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| | | | | and VEGT Management Action 11), wildlife and special status species (WL Management Action 3, WL Management Action 7), and special designations (NHT Management Action 1). |
| 098 | Livestock Grazing | Cyndi Tuell, Western Watersheds Project | The Proclamation has a superior position of authority over BLM's grazing regulations. We again offer the following suggestions for changes to the management direction, goals, objectives, and allocations, specific to the monument lands. The deletions are shown as strikethrough and the additions are in ALL CAPS. 2.2.4 Livestock Grazing Goals Manage the public rangelands to PROTECT MONUMENT OBJECTS ~~provide for a sustainable level of livestock grazing consistent with the principles of multiple use and sustained yield.~~ Manage livestock grazing on the public rangelands to CONSERVE, PROTECT ~~provide maintenance or enhancement of~~ OR ENHANCE the natural resources. Objectives ~~Maintain existing desirable rangeland conditions and improve rangeland health utilizing best grazing management practices,~~ ONLY ALLOW LIVESTOCK GRAZING WHERE LAND HEALTH IS meeting or exceeding New Mexico Standards for Public Land Health and Guidelines for Livestock Grazing Management (2001) AND WHERE MONUMENT OBJECTS ARE NOT HARMED BY GRAZING. ~~Avoid net loss~~ REDUCE OR ELIMINATE THE NUMBER of animal unit months (AUMs) within the | Per Presidential Proclamation 8946:<br>> Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on lands under its jurisdiction shall continue to apply with regard to the lands in the monument, consistent with the purposes of this proclamation.<br>Please also refer to the BLM's response to Comment Number 006. |

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| | | | planning area where practical. Identify and implement vegetation improvements on a landscape scale to increase forage quality and quantity for ~~both livestock and~~ wildlife and to support and sustain local communities. ~~Establish reserve common allotments to provide forage reserves for conservation benefits and management flexibility.~~ General Management Guidance (delete entire section for monument management plan) AS GRAZING PERMITS EXPIRE, GRAZING AUTHORIZATIONS WILL NOT BE RENEWED. LIVESTOCK GRAZING WILL NOT BE AUTHORIZED WITHIN THE MONUMENT UNLESS IT CONSERVES, PROTECTS, AND ENHANCES MONUMENT OBJECTS. Allowable Uses and Management Actions (delete entire section for monument management plan) WHEN GRAZING PERMITS EXPIRE, GRAZING AUTHORIZATIONS WILL BE PHASED OUT AND AUMS WILL BE ELIMINATED. VACANT ALLOTMENTS WILL NOT BE REAUTHORIZED. RESERVE COMMON ALLOTMENTS WILL NOT BE AUTHORIZED WITHIN THE MONUMENT. | |
| 099 | Livestock Grazing | Cyndi Tuell, Western Watersheds Project | The materials made available during the scoping period indicated the Bureau had identified the following planning criteria: Livestock grazing allotments will be reevaluated to determine if they provide value to the Monument's values and objects. In our scoping comments we asked the Bureau to provide more information regarding this planning | 43 CFR Section 1610.4-2(d) provides that<br>> the BLM may change planning criteria as planning proceeds if we determine that public suggestions or study and assessment findings make such changes desirable.<br>Following the review of comments received during scoping and subsequent planning |

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| | | | criteria. Specifically, we asked the following: what does the reevaluation of allotments entail? Will the Bureau identify forage capability for each allotment or pasture? Will this analysis provide information on how livestock use will damage forage availability? Or, will the evaluation make a determination as to whether or not current livestock grazing provides value to the monument? If this is the case, we again argue that livestock grazing should be eliminated from monument lands. Rather than response to our question, the planning criteria has changed to: Management for livestock grazing allotments within the Monument boundary, and allotments partially within the Monument, would be guided by decisions in the RMPA/EA. This is a significant change and has occurred without explanation. We recommend the previous planning criteria (Livestock grazing allotments will be reevaluated to determine if they provide value to the Monument's values and objects) be restored and that our questions are answered, so that the Bureau can avoid a NEPA violation. | and analyses through the Draft RMPA/EA, the Proposed RMPA/EA has been revised at Section 3.2.14.2 to include information from the most recent land-health evaluations completed for grazing allotments within the Monument. Of the 62 allotments within the Monument, 55 (i.e., 89 percent) are in Category A (i.e., meeting or exceeding land health).<br>As noted in Appendix C, Section C.3.2, of the Proposed RMPA/EA, the Taos Field Office authorizes grazing to comply with the fundamentals of rangeland health (USDI-BLM Grazing Regulations, 43 CFR Part 4100 § 4180.1) and the New Mexico Statewide RMPA/EIS (BLM 2001), which adopted statewide standards for public land health and guidelines for livestock-grazing management. The assessment and adjustment process for authorized livestock grazing occurs on an allotment basis and is conducted through trend monitoring, AIM, and a land-health evaluation, followed by appropriate NEPA analysis, in compliance with Grazing Regulations 43 CFR Part 4100, subparts 4110, 4120, 4130, 4160, and 4180. Allotment evaluations usually occur prior to permit/lease expiration, where permits and leases are typically issued on a 10-year basis. Implementation-level management and site-specific NEPA analyses for livestock grazing will consider compatibility and the impacts of grazing on objects of scientific and historic interest. Monument objects will be protected through the implementation of tools, such as |

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| | | | | exclosures, adjustments to permitted use (i.e., AUMs), season, and class of livestock. Site-specific analyses during the permitting process would provide a more thorough understanding of grazing management and its effects on land health and Monument objects. |
| 100 | Livestock Grazing | Cyndi Tuell, Western Watersheds Project | Reconsideration of livestock grazing authorizations We continue to support the current management direction that closes the Rio Grande corridor and riparian areas/wetlands to livestock grazing in the Lower Gorge, and in the Rio San Antonio, Wild Rivers zone, and Ute Mountain zone. Similarly, we continue to recommend that all vacant allotments remain vacant and that they are permanently closed. We noted in our prior comments that new surveys of seeps and springs, cultural resources, sagebrush distribution, sensitive species, wildlife corridors, among other resources, have been conducted in recent years that add to the Bureau's catalogue of the best-available information and are indicators of changed circumstances that may require adjustments to grazing authorizations. However, this information appears to have been ignored. | Please refer to Section 2.5 in the Proposed RMPA/EA. The BLM will continue to use adaptive management and best-available science throughout the life of the plan. Regarding the other specific resources, please refer to the impacts analysis for those resources in the Proposed RMPA/EA. |
| 101 | Livestock Grazing | Cyndi Tuell, Western Watersheds Project | We recommended that livestock be excluded from playa areas to protect ecosystem services, water quality, air quality and the integrity of the playa bed. As we noted previously, hydrology is the primary driver influencing most natural | The Taos Field Office assesses impacts from any proposed actions and permitted uses, such as livestock grazing, on Monument objects of value through site-specific NEPA analysis. Additionally, VEGR Management Action 6 and LG Management |

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| | | | functions in wetlands (Euliss et al. 2008) and any agricultural influence on hydrology will likely alter the magnitude of ecosystem service delivery. (Smith et al 2011) Livestock trampling of playa beds increases dust emissions during controlled wind tunnel tests on a playa in southern New Mexico. (Baddock et al. 2011) Once the soil surface is disturbed, it is highly susceptible to wind erosion (United States Department of the Interior 1998).1 We recommended that, before the Bureau develops specific grazing regimes for conservation of playas, it should identify specific management goals. The Bureau needs to determine whether playa complexes are to be managed holistically as part of the greater landscape or for specific taxa, especially those that are rare or endangered, such as special-status plants, large branchiopods, or amphibians. Because livestock grazing is at best a marginal economic endeavor, it is important for the Bureau to understand and disclose whether the costs associated with livestock production in playas is economically unfeasible and whether or not the ecological costs are too great to allow grazing in playa areas. In other words, a thorough cost-benefit analysis should be completed. The costs associated with necessary monitoring should be included in this analysis. | Action 5 (Appendix C, Sections C.2.7 and C.3.2, respectively) have been revised to address concerns regarding potential impacts from grazing within playas. The BLM would work cooperatively with permittees to study the impacts of grazing on playas through comparison of grazed and ungrazed playas (LG Management Action 5). Several additional management actions address playas, including F Management Action 4, which would prohibit the modification of playa surfaces and require surveys to identify priorities for restoration. The BLM is not required to conduct a cost-benefit analysis and does not customarily do so for the development of land-use plans or associated NEPA analyses. |
| 102 | Livestock Grazing | Cyndi Tuell, Western | Lack of information necessary to inform public review and comment The 2024 | The Proposed RMPA/EA has been revised at Section 3.2.14.2 to include information |

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| | | Watersheds Project | Taos RMPA, at page 21, refers to statewide standard for rangeland health and to land health evaluations as a means of justifying livestock grazing authorizations through separate NEPA processes. However, neither the standards nor any land health evaluation has been provided for public review or comment and the public has not been provided with any schedule identifying any timeline by which grazing allotments will be evaluated. | from the most recent land-health evaluations completed for grazing allotments within the Monument. Of the 62 allotments within the Monument, 55 (i.e., 89 percent) are in Category A (i.e., meeting or exceeding land health). The New Mexico *Standards for Public Land Health and Guidelines for Livestock Grazing Management* were approved in 2001; the Record of Decision can be found online at: https://www.blm.gov/sites/blm.gov/files/Standards%20for%20Public%20Land%20Health%20and%20Guidelines%20for%20Livestock%20Grazing%20in%20New%20Mexico.pdf. This reference is also provided in Appendix I of the Proposed RMPA/EA. |
| 103 | Monitoring and Mitigation Protocol | Cyndi Tuell, Western Watersheds Project | The Science Plan should be maintained and revised regularly with participation of all permitted science research and public information taking place within the Monument, especially with regard to the public participation obligations under the Archaeological Resources Protection Act especially 16USC470ii(c) [public awareness programs] and 16USC470jj [cooperation with private individuals]. We have reviewed the Taos Science Plan. Cultural and traditional resources should be the first priority in the Science Plan. They are not! Revision of the Science Plan should build relationships with and regularly consult with interested parties inside and outside the National Historic Preservation Act, Section 106, process. The results of this regular consultation will identify opportunities for better | Revisions to the *Río Grande del Norte National Monument Science Plan* are beyond the scope of the development of the Proposed RMPA/EA and Monument Management Plan. The science plans of National Conservation Land units are considered "living" documents; needs that emerge during the course of implementing a science plan may be added to the plan on an as-needed basis to meet the unit's scientific mission. |

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| | | | management. Reports of scientific investigations provide information the public can use for many reasons. If information in reports is sensitive then reports still needs to be made available to the public within redacted documents. Exemptions and justifications are an important aspect of the release process when there is any removal of text or graphics from reports and records. | |
| 104 | Monitoring and Mitigation Protocol | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | Monitoring of Archeological Resource Condition through Volunteer Agreements. In general BLM monitoring of important resource conditions needs to be greatly expanded. If BLM is not currently staffed to fulfill meaningful monitoring responsibilities a corps of volunteers will help, and the BLM needs to make a commitment to actively recruit assistance from members of the public. The BLM must report progress to meet this and other commitments on a regular basis. A good example of a case where volunteers add value is found in the New Mexico SiteWatch program. SiteWatch has had an important and historical role in which volunteers monitor significant archeological sites within the Monument. Yet this role and similar participation by volunteers is not acknowledged within BLM documents for past contributions or for future usefulness at the Monument. Instead, Section 1.4.6 of the plan evades any in-depth discussion of volunteers and many other activities. It alleges these contributions are treated sufficiently | CUL Management Action 12 in the Proposed RMPA/EA Appendix C, Table C-2, states that the BLM will regularly monitor sites and areas of high cultural significance. It also notes that the Site Stewards Program would continue to monitor site conditions and increase the BLM's presence at sites. |

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| | | | through general agency policy, regulation, or administrative actions. | |
| 105 | National Trails | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | Additionally, we encourage the BLM to take additional steps aimed at increasing coordination with the National Park Service and management consistency for the OSNHT. The BLM should ensure that the trail is well identified on the landscape, and interpretive signs should be placed where the trail crosses high use areas for the education and awareness of the public | NHT Management Action 1 in Proposed RMPA/EA Appendix C, Table C-19, notes that the BLM will continue to work in partnership with the National Park Service (NPS) to manage the Old Spanish National Historic Trail (OSNHT) and provides specific protective-management prescriptions for the trail corridors on public lands under each alternative. This includes an activity-planning action regarding inventory, research, and signage. NHT Goal 1 also establishes a goal for the BLM to provide effective and accessible orientation, interpretation, and education programs and activities on the trail. |
| 106 | National Trails | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers | The EA section 3.2.17.2 states (page 59): Under Alternative B, management decisions for the OSNHT would be similar to Alternative A, except that new strategies and updated information would be incorporated to increase agency coordination and consistency for OSNHT management the across the planning area. Overall, incorporation of the OSNHT Comprehensive Strategy (BLM and NPS 2017), the Multi-Agency National Trails System Memorandum of Understanding (NPS 2017), and recent BLM policies and technical references relating to the management of National Historic Trails provide greater beneficial effects, when compared to Alternative A. The EA needs to specify how the updated information | NHT Management Action 1 in Proposed RMPA/EA Appendix C, Table C-19, provides specific protective management for the OSNHT and prescriptions for the trail corridor on public lands under each alternative. NHT Goal 1 also establishes a goal for the BLM to provide effective and accessible orientation, interpretation, and education programs and activities on the OSNHT. |

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| | | • Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, | would change management practices compared to alternative A. Furthermore as discussed below the commitments made in the Taos RMP (2012) with regard to the Special Designation of the OSNHT have not been documented to have been met. As it stands since there is little or no evidence that the commitments in 2012 have been met or even pursued in good faith that alternative B, the agency proposal would have any different outcome. | |

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| | | WildEarth Guardians | | |
| 107 | National Trails | Mark Henderson | The proposed Taos RMPA does not carry through with BLMs commitments in the Taos RMP (2012) and under the National Trails System Act (NTSA) for administration and management of the Old Spanish National Historic Trail. The draft Taos RMPA does not take account of the Special Designation of the Old Spanish National Historic Trail in 2002 (PL [Public Law]) and especially the 2017 Comprehensive Management Strategy (CAS) for the OSNHT which provides direction for administration and Management of the OSNHT. Special Designations are normally specifically treated in RMPs because of the specific responsibilities prescribed by law. The viewshed and management corridor of the OSNHT need to be specified in the RMPA amendment consistent with BLM Manual 6280 – Management of National Scenic and Historic Trails and Trails Under Study or Recommended as Suitable for Congressional Designation https://www.blm.gov/sites/blm.gov/files/uploads/mediacenter_blmpolicymanual6280.pdf The Taos RMP (page 33) states: National historic trails: Preserve the associated high-potential historic sites and high-potential historic route segments, physical remnants and contributing features; and interpret the historic aspects of the trails for the protection of | NHT Management Action 1 in Proposed RMPA/EA Appendix C, Table C-19, provides specific protective management for the OSNHT and prescriptions for the trail corridor on public lands under each alternative. This management action establishes the OSNHT trail corridor as Visual Resource Management (VRM) Class II, which is consistent with BLM Manual 6280, and specifies that the Taos Overlook segment would be managed as a high potential segment per the BLM's *Comprehensive Administrative Strategy*, BLM Manual 6250, BLM Technical Reference 6280, the 2016 Multi-Agency National Trails System MOU, and Proclamation 8946. NHT Goal 1 also establishes a goal for the BLM to provide effective and accessible orientation, interpretation, and education programs and activities on the trail, and NHT Goal 3 establishes a goal to implement the National Trails System Act (NTSA) and administer National Historic Trails to protect their setting, visual integrity, cultural resources, and physical traces. |

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| | | | the resource, and enhance understanding and enjoyment of these trails in cooperation with trail-administering agencies and nonprofit partners. The RGDNNM RMPA needs to address specify how this objective will be met especially with reference to Volunteer Trails Assistance under Section 11 [16USC1260] of the NTSA especially with regard to the Old Spanish Trail Association, New Mexico Site Watch, Taos Archaeological Society, Taos County Historical Society and Friends of Rio Grande del Norte National Monument. | |
| 108 | National Trails | Mark Henderson | In addition the draft RMPA does not carry through on commitments made in the Taos RMP (2012) for Continuing Management Guidance for National Scenic and Historic Trails (section 2.4.3.3) in the selected alternative in the Taos RMP (2012 page 68) which states: Continuing Management Guidance Manage four National Scenic or Historic Trails, including the Santa Fe, Camino Real de Tierra Adentro and Old Spanish National Historic Trails; and the Continental Divide National Scenic Trail under guidance of the National Trails System Act of 1968, the enabling legislation for each trail, and activity plan guidance. (Only two of these trails cross public lands in the planning area-the Camino Real and the Old Spanish trails. Management for each trail is summarized in Appendix A.) Evaluate trail resources present (found through survey or other | NHT Management Action 1 in Proposed RMPA/EA Appendix C, Table C-19, provides specific protective management for the OSNHT and prescriptions for the trail corridor on public lands under each alternative. This management action establishes the OSNHT trail corridor as VRM Class II, which is consistent with BLM Manual 6280, and specifies that the Taos Overlook segment would be managed as a high-potential segment per the BLM's *Comprehensive Administrative Strategy*, BLM Manual 6250, BLM Technical Reference 6280, the 2016 Multi-Agency National Trails System MOU, and Proclamation 8946. NHT Goal 1 also establishes a goal for the BLM to provide effective and accessible orientation, interpretation, and education programs and activities on the trail, and NHT Goal 3 establishes a goal to implement the NTSA and administer the National Historic Trails to protect their setting, visual |

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| | | | means) and determine which values they possess. Trail resources include physical traces of the trail (e.g., ruts, swales, campsites, artifact scatters, etc.) or may be associated with visitor uses and research, so that the evaluation would include an analysis of the opportunities for interpretation, opportunities for recreational use, and opportunities for research. Within five years after approval of the RMP, a management plan would be developed to layout goals for the trail including inventory, changing VRM classes, and resource development to provide visitor opportunities. Within five years after approval of the RMP, carry out archaeological inventory to help define the cultural and temporal settings of trail segments. Collect, analyze, and curate important artifacts associated with the trails. Use these resources along with historic information to interpret these national historic trails.[comment end] | integrity, cultural resources, and physical traces. |
| 109 | National Trails | Mark Henderson | In addition the RGdNNM RMPA does not specify associated actions in the Taos RMP (2012) to acquire lands in the Lower Gorge Copper Hill Planning Unit adjacent to the Monument (page 112) Along the Old Spanish National Historic Trail, the BLM would acquire available private lands (approximately 520 acres) with trail resources by purchase or exchange, and State trust lands (approximately 960 acres) containing trail resources by exchange. | NHT Management Action 1 in Proposed RMPA/EA Appendix C, Table C-19, provides specific protective management for the OSNHT and prescriptions for the trail corridor on public lands under each alternative. This includes a land-tenure action to acquire available private land with trail resources or access to trail resources by purchase or land exchange under all alternatives. |

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| 110 | National Trails | Mark Henderson | In addition the RGDNNM RMPA must address the commitments made for the Orilla Verde Lower Gorge Zone, Taos Valley Overlook Zone and Horseshoe Curve Zone (Taos RMP 2012 page 127-128) which make commitments regarding marketing, management, monitoring and administration of the OSNHT within these Zones now within or immediately adjacent to the RGDNNM. The Taos RMP Taos Overlook Zone especially commits to provide: Interpretive information would include the Old Spanish Trail and Camino Real as well as other themes from the 2006 Taos Valley Overlook Plan. The Taos RMPA needs to follow through on this commitment and place more emphasis on the Taos Overlook on the historic landscape in the period of significance of the OSNHT (from 1829-1848) and the "vicarious understanding of the historic users of the trail" in this high potential segment of the OSNHT as identified in the CAS. Of special note is the commitment to monitoring, especially of the Taos Overlook Zone in accordance with the 2006 Taos Overlook Plan (page 128): Monitoring: Vehicle counters, trail register, visitor survey or interviews every 2-5 years. Indicators: Visitor complaints of crowding, unauthorized trails, and visible erosion. Potential adaptive management for impacts could include limiting the number of SRPs for guided trips and special events. | NHT Management Action 1 in Proposed RMPA/EA Appendix C, Table C-19, provides specific protective management for the OSNHT and prescriptions for the trail corridor on public lands under each alternative. This includes an activity-planning action regarding inventory, research, and signage and a monitoring action to monitor site conditions using site stewards and BLM staff under all alternatives. |

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| 111 | National Trails | Mark Henderson | The RGdNNM RMPA needs to report on the results of this monitoring and impacts on the OSNHT as a result. The 2006 Taos Overlook Plan needs to be revised for the change in emphasis on conservation of the landscape and establishment of a management corridor with priority given to the historic sightseeing open air recreation in a designated management corridor in accordance with the NTSA as specified in the CAS (2017) for the OSNHT and the BLM Technical References (2020) for management of National Scenic and Historic Trails ( https://archive.org/details/nationalscenichi00nati and https://archive.org/details/nationalscenichi00nati_0). The Taos RMPA for the RGdNNM also needs to establish a management corridor for the OSNHT consistent with the CAS which states a 5 mile on each side (10 mile wide) management corridor for the OSNHT. The Taos RMP (page 144) only includes a "mile wide buffer). | NHT Management Action 1 in Proposed RMPA/EA Appendix C, Table C-19, provides specific protective management for the OSNHT and prescriptions for the trail corridor on public lands under each alternative. This includes an activity-planning action regarding inventory, research, and signage and a monitoring action to monitor site conditions using site stewards and BLM staff under all alternatives. |
| 112 | National Trails | Mark Henderson | The Taos RMP also states (page 334): All of the above defined segments of the Old Spanish Trail would be considered high potential by the Taos Field Office. These trail segments would be protected from surface disturbance and the visual nature of the trail would be preserved. The BLM has not kept this commitment with respect to the OSNHT segment at the Taos Overlook now within the Rio Grande del Norte National Monument. Now that | NHT Management Action 1 in RMPA/EA Appendix C, Table C-19, provides specific protective management for the OSNHT and prescriptions for the trail corridor on public lands under each alternative. This management action establishes the OSNHT trail corridor as VRM Class II, which is consistent with BLM Manual 6280, and specifies that the Taos Overlook segment would be managed as a high-potential segment per the BLM's *Comprehensive* |

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| | | | the Monument is designated for landscape conservation, the impacts of mechanized use on the vicarious appreciation of the OSNHT needs to be reassessed with respect to the viewshed and conflict between mechanized recreation within the 10 mile wide management corridor now designated in the OSNHT CAS. | *Administrative Strategy*, BLM Manual 6250, BLM Technical Reference 6280, the 2016 Multi-Agency National Trails System MOU, and Proclamation 8946. NHT Goal 1 also establishes a goal for the BLM to provide effective and accessible orientation, interpretation, and education programs and activities on the trail, and NHT Goal 3 establishes a goal to implement the NTSA and administer National Historic Trails to protect their setting, visual integrity, cultural resources, and physical traces. |
| 113 | National Trails | Mark Henderson | In summary the EA for the RGDNNM Plan Amendment does not provide sufficient specificity or evidence of maintenance of the Taos RMP (2012) with regard to the OSNHT to support the conclusion in the proposed FONSI Issue 17d that: Management decisions under the Proposed Action for the Old Spanish National Historic Trail would provide beneficial effects through updated information that would increase agency coordination and consistency for the management of the Old Spanish National Historic Trail across the planning area. | NHT Management Action 1 in RMPA/EA Appendix C, Table C-19, provides specific protective management for the OSNHT and prescriptions for the trail corridor on public lands under each alternative. This includes an activity-planning action regarding inventory, research, and signage and a monitoring action to monitor site conditions using site stewards and BLM staff under all alternatives. |
| 114 | Planning Process | Mark Henderson | Given past performance under the 2012 RMP and non-compliance with directives from the Proclamation to develop management plans for the Monument in a timely manner, meaningful action to assure future performance is needed. To that end, we suggest BLM include in the revised plan completion metrics for goals, external review, documented | The Proposed RMPA/EA and Monument Management Plan have been prepared in full compliance with the BLM's land-use planning regulations at 43 CFR 1610 and other BLM policy pertaining to the management of National Monuments. |

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| | | | consultations with a full range of interested parties, regular monument manager reports of challenges and progress made, and, assignment of targets with progress and completion milestones. A clear presentation of assignments and responsibilities for achievement of these goals is required. | |
| 115 | Planning Process | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | All BLM activities are covered by policy, regulation, or administrative actions. To use an excuse that regular checks of conditions of resource values are not subject to consideration in the RMP because that activity is covered in general sources elsewhere misses the point of a plan specific to a unique place with uniquely valuable resources. There is every reason why the objectives, goals, and actions given in the RMP should provide specifics that build on agency operational directives, rules, and guidelines. To function properly objectives, goals, and actions must incorporate commitments, measurable milestones, a discussion of the tools to meet them, and a means to identify any need for change. For example, the SiteWatch activities are designed to produce records of changing archeological site conditions. These records can indicate when there is a need to restore damage to objects in the Monument or a need to modify management plan goals, objectives and actions. | See comment response for Comment Number 114. |

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| 116 | Proposed New Alternative | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | The Bureau should have considered and analyzed an alternative that would allow for Voluntary Permanent Retirement of livestock grazing In our scoping comments, we asked the Bureau to consider an alternative that would authorize the permanent retirement of grazing allotments that are voluntarily waived by the permittee back to the Bureau. The Management Plan could allow permits to be waived back to the agency for permanent resource protection. The option of permanent voluntary retirement of permits and associated grazing privileges represents an equitable solution to wildlife conflicts with agricultural operations on public lands. It provides security to livestock producers facing declining economic returns, increasing price instability, a shrinking available workforce, drought, fire, and climate impacts, and other challenges, and allows the Bureau to redesignate lands to other uses, including wildlife habitat, recreation, and hunting. The permit waiver system represents the increasing public interest in maintaining natural systems and restoring native species, and allows land managers to facilitate the win-win resolution of grazing conflicts which impact not only native species, but also water quality and the recreational experience of users. Allotments already vacated for resource protection, either through land management actions or through the | The most current guidance, *Relinquishment of Grazing Permitted Use on the Bureau of Land Management Administered Lands* (IM-2013-184) states:<br>> If the Land Use Plan (LUP) states the area is open to grazing, the Authorized Officer (AO) has three choices: receive applications for livestock grazing from qualified applicants; review the RMP for compliance or initiate a LUP amendment to designate the allotment(s) as a RCA(s); or consider a LUP amendment/ revision to allocate forage for a different purpose.<br>> If the most recent allotment evaluation still reflects the current situation and conditions, and rangeland health standards or other criteria established by the AO are being met, then the forage should be allocated to other qualified applicants. No further analysis is needed.<br>This guidance is consistent with the analysis in the Proposed RMPA/EA.<br>The BLM must manage the Monument pursuant to the multiple-use and sustained-yield mandates of FLPMA and the specific direction in Presidential Proclamation 8946, which states:<br>> Laws, regulations, and policies followed by the BLM in issuing and administering grazing permits or leases on lands under its jurisdiction shall continue to apply with regard to the lands in the monument, consistent with the purposes of this proclamation. |

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| | | | voluntary relinquishment of grazing preference, would then be closed. There is nothing in the EA or associated documents on the project webpage to indicate that the Bureau considered voluntary grazing permit retirement. This failure to consider a reasonable alternative is a violation of the National Environmental Policy Act. | During alternatives development, the BLM considered the impacts of livestock grazing on objects identified in Presidential Proclamation 8946, as well as other natural and cultural resources. After considering potential conflicts between livestock grazing and other objects and resources, the BLM determined that there were no issues or conflicts that required the complete elimination of livestock grazing within the Planning Area for their resolution. In response to comments received on the Draft RMPA/EA, the BLM has revised the Proposed RMPA to make two additional vacant allotments unavailable for grazing (627 Dunn Bridge and 623 Hot Spring; see Proposed RMPA/EA Appendix C, LG Management Action 4). The BLM considered a reasonable range of alternatives in compliance with NEPA, the *BLM NEPA Handbook*, the *BLM Land Use Planning Handbook*, and other applicable laws, policies, and regulations. |
| 117 | Purpose and Need | Cyndi Tuell, Western Watersheds Project | We are given no means to quantify the extent of resource deterioration that has occurred over the past ten-plus years. Information on management performance is not made available to the public in the draft Plan and preliminary Draft Environmental Assessment, or elsewhere. Monument visitation seems to have vastly increased with established parking areas often beyond capacity. We are aware of anecdotal evidence of damage to rock art resources, of the expansion of invasive plants along approved and unauthorized | The purpose and need for which the BLM is updating its management of the Monument is presented under Section 1.2 of the Proposed RMPA/EA. Existing conditions for Monument resources are summarized in each Chapter 3 section of the Proposed RMPA/EA. |

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| | | | travelways and of wildfire risk from increased visitation. All these examples and others need to see increased attention. The BLM should look beyond the Lower Gorge and Wild Rivers section of the Monument to consider expansion of the area that will require a Monument Pass for entry. The Taos Resource Management Plan, now over ten years in place, consists of objectives essentially similar or the same as those in the new draft management plan. | |
| 118 | Range of Alternatives | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | I have a specific concern regarding the situation concerning the road above the John Dunn Bridge, going west from the bridge. This road, County Road B-017, has historically been an important access and river crossing for vehicular traffic. It has been closed for several years due to issues with maintenance. I understand that your management plan has to take a larger area wide approach to specific issues, and does not give detail regarding individual roads, but as a user of this road, it has specific concern for me. As the owner of a local Land Surveying Business, as a Local Taos Resident who recreates in this area, and as a member of Taos Search and Rescue, having this Rio Grande river crossing open and accessible is an important consideration for me. Besides the obvious consideration for Life and Safety of the residents and users of the land west of the Gorge, I believe that vehicular crossings of the Rio Grande gorge are an important historical | Summary and Comment Response 2 (see **Error! Reference source not found.**) |

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| | | | component of this area. Rio Grande river crossings are necessarily few and far between, and I cannot understand a management plan of the area that purports to address significant cultural uses of this area to not consider the opening and continued maintenance of this important road. | |
| 119 | Recreation | Not Provided | We are therefore very supportive of the BLMs statements that the more focused recreation of Alternative B will aid in the public's appreciation of the Monuments objects as recreation trails are tools for conservation of sensitive resources. However, we want to emphasize the value of more remote exploratory recreation that is away from crowds that offers a special experience that these lands should offer. While it is understandable that the recreational focus will be on these higher use zones and that trail amenities might not be provided for in lesser visited, non-SRMA, areas, the roads and any existing trails there are of value for bike packing, remote gravel/dirt road rides and dispersed camping and simply for the value of being alone in this monument landscape. | Opportunities for recreational improvements, including additional facilities, are available outside of administratively designated special recreation management areas (SRMAs) and zones. Recreational opportunities will continue to be available outside of designated SRMAs, including dispersed camping, hiking, biking, and other recreational uses, as designated in the Monument Management Plan. |
| 120 | Recreation | International Mountain Bicycling Association | Appendix F: Recreation Management F.3.2.1 Concern: Horesthief Mesa RMZ desired characteristics state "retain current middle-country to back-country setting" and "Average of up to six encounters with up to four people per encounter." This is unreasonable for a | Given the anticipated presence of smaller groups and the potential of seeing multiple groups during periods of high use, the management for Horsethief Mesa has been revised to capture the middle-country setting and operational characteristics. |

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| | | | popular recreation area with an approved TMP for additional trails and recreation resources. Proposal:<br>• Amend desired Physical characteristics to provide for a "middle-country" setting<br>• Amend Social characteristics to 14 encounters per outing (akin to the proposed Taos Valley Overlook RMZ.)<br>• Amend Operational characteristics to include the development of new trails in the area. | Section F.3.2.1 of Appendix F, *Recreation Management*, has been revised based on this comment. |
| 121 | Recreation | Loren Bell, Enchanted Circle Trails Association | Create SRMA/RMZ for Rio Grande Gorge Area Given the current usage and future addition of the Rio Grande Trail, the BLM should be forward-thinking on the need to accommodate additional recreational usage in the area. Including this area in the Plan as an SRMA/RMZ will recognize the need for recreational infrastructure development such as the expansion of the existing trailhead, an additional trailhead on the north side of HWY64, and other likely developments associated with the Rio Grande Trail and increased usage in the area. While the current rest stop is under DOT [U.S. Department of Transportation] management, the areas immediately surrounding it receive significant recreational usage, and should be proactively managed by BLM for recreation. | Opportunities for recreational improvements, including additional facilities, are available outside of administratively designated SRMAs and zones. In general, SRMAs would be maintained or modified to include only those areas that are intensively managed for recreation, have unresolved conflicts, or have other management challenges. Recreational opportunities along the Rio Grande Gorge rim, particularly near the Gorge Bridge, are well established, such that the BLM does not need special management decisions in order to maintain or improve recreational opportunities. |
| 122 | Recreation – Biking | Loren Bell, Enchanted Circle | Under the BMPs document, the BLM strives to set standardized buffers and surface disturbance stipulations as a way | BMP buffers outlined in the Proposed RMPA/EA provide areas where surface- and noise-disturbing activities would be avoided |

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| | | Trails Association | to protect wildlife and riparian habitat. However, in a landscape with steep cliffs that are home to raptor nests and sheer cliffs that drop to riverways and other riparian zones, these buffers and stipulations can be misconstrued.<br>• Noise-disturbance and management activities will be avoided or minimized within 1 mile of raptor nests during the nesting and brood-rearing period. Unoccupied raptor nests will be protected from removal or destruction, including a year-round protection of a 0.25-mile buffer of suitable habitat around any known occupied and unoccupied nests.<br>• Surface disturbance will not be allowed within up to 0.5 mile of the outer edge of 100year floodplains, playas, all artificial water developments (e.g., tanks, guzzlers), and riparian habitat (e.g., seeps, arroyos). Exceptions to this requirement will be considered on a case-by-case basis.<br>• The top of a cliff can be within a 0.5 linear mile of a river that is 1000 feet below. A surface disturbance at the top would arguably have little impact on the river below. The intent of this BMP is to protect nesting raptors or the riparian zone and yet this overly broad and ambiguous restriction could have undue negative impacts on otherwise appropriate recreational use. Likewise a raptor buffer is generally meant to | or restricted. The raptor- and migratory bird–nest avoidance buffers and timing restrictions have been developed using the best-available science specific to each species, including their response and adaptability to disturbance, breeding season, and life-history strategies. The BLM would consider exceptions to these requirements on a case-by-case basis. |

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| | | | minimize the visual and auditory impacts of adjacent activities that would impact nesting birds. Nests that are located down the side of a cliff might technically fall within the 0.25 mile buffer but effectively they are out of sight and sound of an activity on a linear trail on the rim. Noise does not travel well over and down a cliff edge. Again, this arbitrary restriction could unnecessarily limit appropriate recreation if interpreted literally.<br>RECOMMENDATION: The BLM should be more clear in its intent and the purpose of the proposed restrictions so that managers can navigate the nuances of real life management implications and not be overly restricted by generalized rules that fail to provide the flexibility needed to balance access and resource conservation. | |
| 123 | Recreation – Hot Air Ballons | International Mountain Bicycling Association | Assertion 2. Hot air balloons flights below the rim of the gorge in this area is detrimental to the wildlife. A google search of "effects of hot air balloon flights on wildlife" returns only one article, where German farmers claim (without evidence) that balloons can scare their animals if balloons fly very low. If this were a significant issue for wildlife, I believe that there would be more information available, and the BLM would provide an accompanying scientific study supporting their claims of wildlife disruption. The animals in this area have grown up with | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | hot air balloons coming and going most days, every day of their lives – it is a known and usual part of their lives, no more stressful than rain storms. Balloons are less disrupting to them than automobiles, hikers, and other activities in this area that the BLM is making no effort to limit. | |
| 124 | Recreation – Hot Air Ballons | Kelly Allebach | Given the early morning timing of flights, there is almost no disruption of anyone else's ability to enjoy the national monument from the ground. Indeed, the hot air balloons meet all the criteria for balancing the public's diverse approaches to recreation. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |
| 125 | Recreation – Hot Air Ballons | Hugh Powell | Hot air balloon flights below the rim detract from the recreational experience in this SRMA and are detrimental to other recreational users. To favor one recreational activity over another would be viewed as a one-sided recreation system. I believe the BLM believes in multi-use management. It has been accomplished successfully across the country since the existence of the BLM. Why is hot air ballooning the only activity being looked at as "detrimental"? I believe that is an arbitrary statement without data to support it. For example, to say a river rafter is more important than an angler, is more important than grazing or hiking? These comparisons have not been looked at in recreation use along the Rio Grande del Norte. It is inevitable that not all recreation users will find the other users | The EA does not single out hot-air balloons and acknowledges that the effects of all SRP activities would continue to affect resources, such as wildlife, in areas and times of high use.<br>See Summary Comment and Response 1 for additional information (**Error! Reference source not found.**) |

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| | | | as not affecting their experience in some way. To call it detrimental would be capricious and discriminatory. We have to share the water and the space. These areas (Black Rock) are accessible recreation areas and not pristine. They are high use areas for a multitude of reasons. For some, a hot air balloon ride may be the only way to experience the grand awe of the Rio Grande Gorge. Hot air ballooning is also apart of the New Mexico culture. If there is a ban on hot air balloons affecting other recreational users the way it is proposed, there should be data to support this and a long-term study on the feasibility. The local economy is highly dependant on these unique experiences as well. Please consider at the least, a system, permits or limited operating periods that can balance all recreational uses in the Rio Grande del Norte. | |
| 126 | Recreation – Hot Air Ballons | Not Provided | What does "detrimental" mean in this context and where is the data to support that it is "detrimental" to wildlife? Does it affect population or reproduction? Which wildlife species? Has a study been done to correlate the specific species and this "detrimental" effect? Other recreational activities should be considered in this study as well. Hand picking one recreational activity as detrimental and not studying others would be viewed at as discriminatory. | The EA does not single out hot-air balloons and acknowledges that the effects of all SRP activities would continue to affect resources, such as wildlife, in areas and times of high use. The only mention of the term *detrimental* appears in the *Environmental Consequences* section for Special Designations (Section 3.2.17.2), where increased visitation to Wild and Scenic Rivers could result in detrimental ecological effects, including increased refuse or discarded items, the introduction or spread of nonnative species, reduced fish |

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| | | | | populations (through increased fishing pressure), or aquatic-habitat degradation. |
| 127 | Recreation – Hot Air Ballons | Not Provided | I am writing to offer my perspective on the issues related to the proposed ban of hot air ballooning below the rim of the Black Rock SRMA. In regards to the consideration of this activity being disruptive, I don't think this is the case. Ballooning generally takes place very early in the morning due to the wind, and it is inherently a minimally disruptive activity. Hot air balloons are quiet, and the have minimal environmental impact relative to other forms of recreation, such as 4-wheelers. They are also, in my opinion, viewed favorably by other participants who are using the space for various kinds of recreation. In regard to the point of ballooning disturbing wildlife, I believe many of the same points are true. Because it is quiet and takes place above the ground, wildlife is minimally impacted, and doesn't seem to be disturbed or bothered. I don't believe the stated reasons for this prohibition on ballooning are supported by the reality of the situation, and I encourage the reviewing body to continue to allow ballooning below the rim of the Black Rock SRMA. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |
| 128 | Recreation – Hot Air Ballons | Brett Whitaker | I would greatly oppose any furthered restrictions on ballooning into the Rio Grande Gorge, which as I understand is currently (and respectfully) limited to very narrow calendar windows to ensure the | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | protection of certain wildlife. It is my experience that the very few and select balloon outfits, operators and pilots that operate in this area are among the most professional in the industry. Furthermore and importantly so, each operator that I have had the pleasure of meeting are stewards who aim to protect the Rio Grande del Norte National Monument, as they understand the rarity, uniqueness and balance of the fragile land and ecosystem. | |
| 129 | Recreation – Hot Air Ballons | Daniel Ashe | As a general comment about being able to fly in a hot air balloon over the Rio Grande del Norte National Monument, I cannot overstate the profound impact that this proposed change would have on the hot air balloon companies operating in the area. These companies bring tourism to the area from all corners of the globe, create jobs and contribute to the local economy. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |
| 130 | Recreation – Hot Air Ballons | Not Provided | I challenge this review board to provide empirical evidence that will objectively prove disallowing commercial ballooning and improving conditions for special status species is mutually exclusive; meaning species of special concern can only thrive without the presence of the ballooning. It is also very likely a decision to disallow commercial ballooning over the Rio Grande Gorge area will hurt the local Taos economy and re-direct travelers looking to balloon to larger urban centers (Albuquerque) which also | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | drives down demand for lodging, restaurants and alike. | |
| 131 | Recreation – Hot Air Ballons | Not Provided | • -Hot air balloon flights directly provide a unique perspective of the Rio Grande del Norte National Monument's key features, including its diverse wildlife, geologic formations, and scenic landscapes.<br>• A balloon flight allows visitors with physical limitations to access and experience otherwise inaccessible areas of the Monument's beauty.<br>• Hot air balloons offer a low-impact method for visitors to observe the Monument's wildlife and landscapes from above. This aerial viewpoint complements existing resources and avoids disturbing the very aspects the Monument protects.<br>• Early morning hot air balloon flights provide a unique, high-altitude perspective of the Rio Grande Gorge unmatched by ground-based activities. This complements existing recreational opportunities like rafting and hiking.<br>• Hot air balloon flights offer a unique experience that directly complements the reasons for the Monument's designation. Passengers can observe the Monument's geology, wildlife, and landscapes from a unique vantage point. This experience complements existing activities like rafting and hiking. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| 132 | Recreation – Hot Air Ballons | Not Provided | The gorge experiences significant human activity throughout the day, including rafting trips, climbing, hot springs soaking, and vehicular traffic. Compared to this, early morning balloon flights do not exert additional pressure on wildlife habitat. If this assertion were held true, the BLM would need to completely shut down ALL human activity within this section of the gorge and the rim on both sides with ample setbacks for wildlife. There is no reason to discriminate against recreational ballooning. Imposing restrictions on hot air balloon flights would be an unnecessary limitation on a safe and enjoyable recreational activity. The unique perspective offered by ballooning serves to enhance public appreciation for the gorge just as rafting and fly fishing do. Perhaps the BLM should consider the UNESCO [United Nations Educational, Scientific and Cultural Organization] Biosphere Reserve model where there are core protected areas with no commercial activities or buildings allowed, buffer zones, and transitional zones. The areas in which balloons are piloted are in transitional zones along with other human uses. I urge the BLM to reconsider these restrictions and allow for responsible hot-air balloon operations within the Rio Grande del Norte National Monument. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |
| 133 | Recreation – Hot Air Ballons | Not Provided | In response to concerns about wildlife in the area, I don't see any studies cited that | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | show a negative impact on wildlife. Any possible impact is surely no more than that caused by any recreational activity, and much less than some. Again, the balloons are quiet, and there is no opportunity for interaction between the passengers & any wildlife | |
| 134 | Recreation – Hot Air Ballons | Nancy and Randall Peterson | he BLM's proposed revise to the Management Plan explicitly prohibiting hot air balloon flights below the rim of the Rio Grande gorge seems contrary to the 'adaptive management strategy' the BLM says it will apply to outdoor recreation. Including specific prohibitions singling out hot air ballooning seems like a targeted effort, from our perspective. | The EA does not single out hot-air balloons and acknowledges that the effects of all SRP activities would continue to affect resources, such as wildlife, in areas and times of high use.<br>See Summary Comment and Response 1 for additional information (**Error! Reference source not found.**) |
| 135 | Recreation – Hot Air Ballons | Daniel Vaughan, Taos Ski Valley Chamber of Commerce | As a general comment about being able to fly in a hot air balloon over the Rio Grande del Norte National Monument, there are two considerations the Bureau of Land Management should additionally review. First, the motion to cease hot air balloon flights below the rim will have detrimental and unimaginable financial impacts on the businesses that provide the hot air flights. This is, in no uncertain terms, the very livelihood of local businesses. Not just the pilots and crew who spent years and thousands of dollars and hours learning the technical skills to safely fly and navigate a hot air balloon, but the restaurants who feed the customers who, like me, come to the town for hot air balloon flights, that will be | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | harmed if the flights are not permitted as they currently are. | |
| 136 | Recreation – Hot Air Ballons | Not Provided | Assertion 2. Hot air balloons flights below the rim of the gorge in this area is detrimental to the wildlife. Have there been studies done on how the hot air balloons flying below the rim of the gorge effect wildlife, specifically any different than the human noise you would hear on a day to day basis? | Summary Comment and Response 1 (see **Error! Reference source not found.**)<br>BMP buffers outlined in the Proposed RMPA provide areas to avoid or restrict surface and noise-disturbing activities. The raptor- and migratory bird–nest avoidance buffers and timing restrictions have been developed using the best-available science specific to each species, including their response and adaptability to disturbance, breeding season, and life-history strategies. |
| 137 | Recreation – Hot Air Ballons | Rosemary Swan | the balloon trip I took included a number of older visitors who otherwise would be unable to experience the river below the rim. I think this represents a user segment that benefits from the availability of balloon tours. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |
| 138 | Recreation – Hot Air Ballons | Not Provided | As a general comment about being able to fly in a hot air balloon over the Rio Grande del Norte National Monument, the opportunity to fly in a hot air balloon over the Rio Grande del Norte National Monument provides a unique opportunity to see the landscape and appreciate the area for all of its beauty. A hot air balloon experience is a unique way for people to enjoy and appreciate the vastness of the landscape and its wildlife without directly disturbing the attributes or the resources of the area. The balloon flight into the Rio Grande Gorge is one of the most unique balloon flights in the country for the very same reasons the Monument was | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | designated. The landscape, geology, wildlife, and experience of flying through the Gorge is a remarkable opportunity that complements the other recreational opportunities in the Monument. This experience was specifically why we choose to come to Taos to take a hot air balloon ride. Seeing the Gorge from the air in a hot air balloon ride was truly a remarkable way to appreciate all the Monument has to offer. | |
| 139 | Recreation – Hot Air Ballons | Amy Kassel | Another important note is that due to some physical limitations, I am unable to climb and hike and seeing below the rim of the gorge in the balloon, afforded me the experience that I would otherwise not have been able to enjoy. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |
| 140 | Recreation – Hot Air Ballons | Joni Younts | I was alarmed to read that your proposed action, Alternative B, includes the prohibition of hot-air balloon flights below the rim of the gorge (RMPA page 78). The proposed restriction is based on faulty reasoning and an absence of actual evidence, and must be removed from the proposed action. Your staff have asserted that terminating balloon flights would yield direct benefits to recreational users. The NEPA process is intended to create informed federal decisions, but the RMPA fails to actually identify the benefits to recreational users while also ignoring the fact that balloonists are themselves recreational users of the Monument. BLM should not be imposing judgement decisions of which users qualify as | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | legitimate, especially when balloonists have shorter duration and fewer impacts than the mountain bikers, rafters, hunters, and anglers which are specifically identified as stakeholders. | |
| 141 | Recreation – Hot Air Ballons | Brian Cribbin | Similarly, the assertion that the management decision will reduce indirect adverse effects to wildlife is not supported by any evidence presented in the RMPA, including appendices. Under wildlife and special status species, the detailed Description of Alternatives (Appendix C) lists no fewer than 10 goals, 35 objectives, and 27 actions. Nowhere in the comparison between Alternatives A & B has your Wildlife Specialist identified either an adverse effect of balloonists or a complimentary positive impact of excluding them from the Monument. The RMPA barely notes there would be adverse effects on commercial hot-air balloon vendors. A brief sentence disregards the truth: floating through the gorge is a unique experience which cannot be matched elsewhere in the hot-air ballooning world. Prohibiting this activity would do more than have a limited or transitory adverse effect to balloonists, it would harm them directly and place BLM in the position of choosing which forms of outdoor recreation should be part of the local tourism industry. The federal government does not have that authority. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| 142 | Recreation – Hot Air Ballons | Brian Cribbin | I am an experienced balloon pilot and have flown throughout the US and globally. I have flown the gorge many times and rank it among the best flying locations anywhere in the world. I am grateful that this land is protected and appreciative of the opportunity to use it for ballooning. Professionally, my background is in fixed wing aviation with knowledge and expertise on aircraft operations and FAA [Federal Aviation Administration] regulations. I'm specifically compelled to write in hopes of clarifying and eliminating any safety and regulation concerns. From a safety standpoint, flying in the Rio Grande Gorge does not present any additional safety concerns than a flight above the gorge. When we fly just after sunrise, the winds in the gorge are calm and follow the flow of the river – a common slow moving drainage wind we often find in similar terrain around the world. The winds during this period are remarkably consistent and due to the consistent source of the wind, downward flow of cool air from the higher elevations, there is no risk of crosswinds that could push a balloon off course. Due to a balloon's slow and consistent movement with the wind, it provides the opportunity to fly in and around terrain features such as a gorge. In ballooning, we call this contour flying and it is a foundational maneuver taught in the early stages all pilot training. Additionally, the maneuvers required to fly | Summary Comment and Response 1 (see **Error! Reference source not found.**).<br>The EA makes no case regarding the safety of the flights below the rim of the gorge. Proposed management of hot air ballons under the Proposed RMPA is aimed at reducing adverse conflicts with wildlife and special status species, as well as preserving recreational user experiences for those within the Monument. |

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| | | | into the gorge are well within the performance limitation of a hot air balloon as defined in the FAA [approved aircraft flight manual of each balloon type. In non congested airspace – which the area in and around the gorge is defined as by the FAA – there are no regulations that prohibit an aircraft from descending near the ground when done within the performance limitations of the aircraft. The proposed restriction of flights into the gorge would contradict existing FAA airspace regulations and is most likely beyond the jurisdiction of the Bureau of Land Management. In the US, balloon flights operate daily in similar canyons and gorges, some of which occur on state and federal land. Further, I believe that ballooning in the Rio Grande Del Norte National Monument provides a perspective that is unique and valuable to visitors. A balloon flight into the gorge provides the intimate experience of smelling the sage and pine aromas, hearing the flowing water, and seeing the intricate detail of the rock formations followed by a gradual transformation to a more macro perspective of the entire National Monument and its place in the wider landscape of the region as the balloon gains altitude above the gorge. A micro to macro experience only available by balloon. Instead of prohibiting this amazing experience, I hope and encourage the BLM Taos Field Office to explore ways to partner with Rio Grande | |

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| | | | Balloons to share this experience with visitors as I'm confident it will be their lasting memory of a visit to the Rio Grande Del Norte National Monument. | |
| 143 | Recreation – Hot Air Ballons | Joe Zvada | The document assumes that balloons are disturbing recreational users and wildlife. There is no documentation that shows results of a survey of Monument users where people have been complaining about balloons floating over the picturesque landscape. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |
| 144 | Recreation – Hot Air Ballons | Catherine Hummel | Similarly, the RMPA does not include a report from a wildlife biologist that shows animals are stressed by early morning balloon flights. If no such study has been done, then the conclusion put forth in the RMPA is invalid. If a rigorous study of wildlife impacts by hot air balloons is available but not included in the RMPA, then the RMPA's conclusions are still invalid because the chain of evidence has been broken. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |
| 145 | Recreation – Hot Air Ballons | Catherine Hummel | BLM banning these flights without providing any documentation or scientific studies that balloonists harm, or even stress out, wildlife and other recreational users seems imprudent in regards to supporting a very unique and discerning local tourist activity. BLM staff must remove the ban on hot air balloon flights in the gorge from the preferred alternative. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |
| 146 | Recreation – Hot Air Ballons | Not Provided | Hot air balloon rides below the rim are a unique and non-invasive way to see the | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | environment and geology of canyon. They also allow access to people who otherwise wouldn't be able to see the canyon from anywhere but the road. My elderly aunts were able to enjoy a flight last year, for example, and wouldn't have been able to hike down to the canyon or go on a rafting trip. If the gorge were intended to be a wildlife preservation area, then it would make sense to ban fishing, rafting, any motor vehicle access to the area, and restrict hiking access, but since it isn't, I think it would be a great loss to selectively prohibit this wonderful way to enjoy the gorge. | |
| 147 | Recreation – Hot Air Ballons | Not Provided | I have read through this numerous times and it appears that there are two assertions being made in this specific Proposed Action under Alternative B: 1. "The proposed management would provide direct beneficial effects on recreational users by preserving the recreational experience throughout the SRMA" This language seems to imply that hot air balloon flights below the rim have a detrimental effect on recreational users and that the presence of a hot air balloon below the rim of the gorge disrupts the recreational experience throughout the Black Rock SRMA. This has not been my experience and I do not think this is accurate. I would question what this assertion is based on, for the following reasons: a. There is typically very little, if any, spatial and temporal overlap with other recreational activities or the general | Summary Comment and Response 1 (see **Error! Reference source not found.**)<br>Based on the revised management regarding hot air balloon flights below the rim (see Section 3.2.15 of the EA), the proposed management under Alternative B would provide benefits to recreational users seeking solitary or primitive recreational experiences outside of the John Dunn Bridge Recreation Management Zone (RMZ). The continued allowance of hot air balloon flights below the rim under the revised stipulations will allow for the continued use by vendors and the protection of wildlife species. |

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| | | | public in the proposed Black Rock SRMA. Hot air balloon flights happen right around sunrise, when there is very little other recreational activity in the Gorge. Permitted commercial recreation activities such as guided rafting, climbing and fly fishing typically do not start until well after balloon flights are out of the gorge and therefore do not constitute any sort of conflict (See Attachment A). There are also typically not many other recreational users in the gorge this early in the morning. On those occasions when we do see people in and around the gorge during our flight time, whether walking to/from and soaking in the Black Rock Hot Springs or camping on the West Rim, the responses are overwhelmingly positive (waving, smiling, curious, inquisitive, enthused, in awe, amazed, etc.). Many of the people we have interacted with said that seeing a hot air balloon was the highlight of their morning. Based on my experience over the last six years flying in this area, hot air balloons are a beneficial experience to most other recreational users. b. As stated on Page 30 of the Draft Taos RMPA/EA, the proposed Black Rock SRMA under Alternative B is one of "…three new Special Recreation Management Areas (SRMAs) to focus management on the high-use areas within the Monument…" Much of the area of the Gorge within the proposed Black Rock SRMA, particularly at the John Dunn Bridge, hosts a relatively | |

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| | | | high amount of recreational activity throughout the rest of the day (after any potential presence of hot air balloons), such as people camping in their cars, soaking in the hot springs, vehicular activity, picnicking on the "beach" on the East bank of the river, listening to music, guided and recreational fishing, a significant volume of recreational and guided rafting / kayaking trips, local residents walking / biking / walking dogs (often off-leash) on the East rim, etc. If this were an area with more wilderness characteristics and limited access like much of the rest of the Gorge, I could understand the desire to keep the recreational experience commensurate. However, the assertion that the presence of a hot air balloon below the rim of the gorge in this area would disrupt or detract from the recreational experience of this area does not seem accurate based on the high level of myriad recreation uses here throughout the day and the fact that there are generally few, if any, other people there while balloons might be flying in the gorge. | |
| 148 | Recreation – Hot Air Ballons | Sol Lothe, Rio Grande Balloons, LLC | Although not specifically stated in the Draft Taos RMPA/EA, the BLM Taos Field Office (primarily the Wildlife Biologist) has repeatedly raised concerns over the past several years that the Gorge is a "confined space" and that there are "safety concerns" and "Aviation Regulations" related to hot air balloon flights below the rim of the Gorge, | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | perhaps implying a public-safety issue. I am concerned that the proposed year-round restriction on hot air balloon flights below the rim of the gorge has been influenced by this inaccurate understanding of hot air ballooning and that it is perhaps part of the thinking behind the assertion that the presence of a hot air balloon below the rim of the Gorge may be a conflict with other recreational users. I have sent several emails to the Taos BLM Field Office over the past few years with the intention of clarifying any misunderstanding that might be present around this issue. I have included these emails here, along with letters from Pat Cannon, President of the Balloon Federation of America, and Joe Zvada, a very experienced hot air balloon pilot and aviation management professional, in an attempt to further alleviate any remaining Aviation safety or regulatory concerns. See Attachment B. | |
| 149 | Recreation – Hot Air Ballons | Sol Lothe, Rio Grande Balloons, LLC | 2. "The proposed management would also reduce indirect adverse effects caused by the presence of hot- air ballons below the rim by reducing adverse conflicts with wildlife and special status species." This language asserts that hot air balloons flights below the rim of the gorge in the proposed Black Rock SRMA are detrimental to the wildlife and habitat. I do not believe this to be an accurate assessment based on the best available data (or observation and analysis of conditions and responses in similar | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | areas), for the following reasons: a. I am in agreement that it is important to protect the myriad resources within the National Monument, but also am coming from the perspective of six years and around 1300 flight hours of direct experience and observation of the wildlife while piloting a balloon in and around the Gorge, including Bighorn sheep, Mule Deer, Raptors, Swallows, Herons, etc. As I have communicated to the BLM Taos Field Office several times over the past few years (see Rio Grande Balloons SRP file), my direct observation is that flying a balloon into or over the Gorge does not appear to be a disturbance to the wildlife or habitat in this proposed Black Rock SRMA. My observation, and assertion, is that the wildlife is habituated to hot air balloon activity since there have been balloons flying in this specific area for decades (since the 1990s). It is not clear to me that there is sufficient data available to make an informed decision on whether a year- round restriction on hot air balloon flights below the rim of the gorge would provide any more protection that the current seasonal restriction. A useful source of observations and analysis of conditions and responses in a similar area, specifically related to Raptors, can be found in a 2009 The Journal of Wildlife Management article: Golden Eagle Indifference to Heli-Skiing and Military Helicopters in Northern Utah (see Attachment C). The entire study is | |

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| | | | largely applicable to this specific proposed Management Action under Alternative B, but the takeaway is succinctly summed up in the final paragraph: "Unorthodox scientific findings such as the surprising indifference of golden eagles to helicopters that we found in our study highlight a growing conundrum all too common in human disturbance-wildlife research. First, participating agencies and organizations must recognize species-, site-, and circumstance-specific research is prerequisite for effectively assessing any potential human impacts on wildlife. However, second and equally critical, when such research is successfully executed, those same responsible management entities should accept and incorporate scientifically valid results, whether or not those results are consistent with expectations or tradition. Continuing to manage otherwise undermines the integrity of resource management and leaves the resource more vulnerable to real threats in the future." | |
| 150 | Recreation – Hot Air Ballons | Sol Lothe, Rio Grande Balloons, LLC | b. Although sound measurements of hot air balloon activity were conducted by BLM Biologists in coordination with Rio Grande Balloons in early Spring of 2021, (see Attachment C) it is not clear what the results of the measurements were or that the measurements alone provide sufficient basis for determining any potential impacts on wildlife. As noted on | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | page 1283 of the Journal of Wildlife Management "Golden Eagle Indifference to Heli-Skiing…"study referenced above, "Animals do not hear sound in the same way humans do. Therefore, it is critical to determine the approximate frequency range of the target species' hearing sensitivity for comparison with an appropriately measured, sound energy spectrum of the stimulus, to determine what portion of stimulus sound energy is likely affecting the target species. To establish cause-and-effect relationships amidst the wide array of variables affecting sound characteristics and propagation, stimulus sound must be recorded in the field simultaneously with behavioral response and in proximity to the target species." The Literature Cited section at the end of this study includes a fairly exhaustive, and very useful reading list of related research prior to this study's publication date, but there is also more recent research available related to this topic, one useful example being the 2020 University of Minnesota Final Technical Report, Detection and Perception of Sound by Eagles and Surrogate Raptors, available here: https://www.osti.gov/servlets/purl/1763993 I would suggest that further research and data gathering should be conducted before resting on the conclusion that the presence of hot air balloons in the gorge is a disturbance to wildlife, including Raptors. | |

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| 151 | Recreation – Hot Air Ballons | Sol Lothe, Rio Grande Balloons, LLC | c. Hot air balloon flights below the rim of the gorge do not physically touch the terrain (unlike rafting, picnicking, camping, climbing, fishing, hiking 2 miles to Stagecoach hot springs on the approved trail on the East bank of the river, walking to the Black Rock hot springs, and the proposed Management Action to provide a Rio Grande Trail connection from Horsethief Mesa to JDB [John Dunn Bridge] area) and therefore have no direct impact on habitat in the way that most other recreational or permitted commercial activities do. d. Buffer zones, seasonal restrictions and BMPs for recreational use related to hot air balloons are either already in place under Alternative A (the existing/current SRP restriction on hot air balloon flights below the rim of the gorge during the Raptor nesting BMP seasonal buffer of January 1-August 31) or are already proposed in Alternative B under 3.2.3.2 Fish and Wildlife – Environmental Consequences: "Buffer zones, seasonal restrictions, and BMPs for recreational use would be applied to maintain the integrity of wildlife habitat and known avian nest sites. These measures would directly and indirectly benefit wildlife by avoiding or minimizing noise, human presence, and related disruptions to wildlife associated with seasonal recreational activities." Note that, as suggested in Comment b, above, "noise" should be clearly defined and relevant to | BMP buffers outlined in the Proposed RMPA provide areas where surface- and noise-disturbing activities would be avoided or restricted. The raptor- and migratory bird–nest avoidance buffers and timing restrictions have been developed using the best-available science specific to each species including their response and adaptability to disturbance, breeding season, and life-history strategies.<br>See Summary Comment and Response 1 for additional information regarding hot air balloons (**Error! Reference source not found.**) and REC Management Action 9 in Appendix C for detailed description of management actions specific to hot air balloon flights below the rim. |

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| | | | the species of concern (primarily Raptors). Appendix D: Best Management Practices, Section D.10 Wildlife and Riparian Habitat defines the Seasonal and Spatial buffers. It should be noted that these buffers are already included in the existing management in Alternative A and are already part of the existing SRP Stipulations for hot air balloon flights in the form of a seasonal restriction on flights below the rim. | |
| 152 | Recreation – Hot Air Ballons | Sol Lothe, Rio Grande Balloons, LLC | e. I would also like to suggest that the existing blanket restriction on flights below the rim of the gorge from January 1 through August 31 does not apply the BMPs appropriately and does not correlate the appropriate spatial buffer for each species with the corresponding seasonal buffers. Seasonal and spatial buffers are supposed to be applied together around specifically identified active nest sites such that: if a Golden Eagle nest site is identified as active, a spatial buffer of 0.5 mile will be applied from January 1-August 31; and if an Osprey nest site is identified as active, a spatial buffer of 0.25 mile will be applied from April 1-August 31, etc. These corresponding spatial and seasonal buffers should be applied, together, only after the area in question is surveyed for active nests. If these spatial / seasonal buffers are applied correctly (together), then allowing flights below the rim, outside of the spatial buffers (during the corresponding seasonal buffers) would | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | still meet the BMPs and provide for protection of Raptor wildlife and habitat. Based on the reasons stated above, it is not clear to me that a year-round restriction on hot air balloon flights below the rim of the gorge is justified or would provide any additional protections for wildlife and habitat, since the protections already generally in place in Alternative A utilize BMPs to meet this need. The proposed clarifications to the BMPs in Appendix D further support the protections in Alternative A. | |
| 153 | Recreation – Hot Air Ballons | Sol Lothe, Rio Grande Balloons, LLC | Suggested revisions to the Draft Taos Resource Management Plan Amendment / Environmental Assessment 1. I would ask you to consider that the proposed Management Action of a year-round restriction on hot air balloon flights below the rim be removed from Alternative B of the Taos RMPA/EA and the associated Appendices (Appendix F Recreation Management F.3.2.2 John Dunn Bridge RMZ and F.3.2.3 Black Rock Rim RMZ – Management Actions: "Restrict hot-air balloon flights below the rim to protect wildlife and their associated habitat."), as well as from Issue 15c in the FONSI, for the following reasons: a. As noted in my comments on the assertions above, the existing management in Alternative A already addresses potential conflicts with wildlife through the SRP stipulations of seasonal and spatial buffers for active Raptor nests, therefore there is no additional 'conflict' to resolve by | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | implementing a year-round restriction on hot air balloon flights below the rim of the gorge outside of these existing seasonal buffers. b. "Adaptive Management" is referred to throughout the Draft Taos RMPA/EA often. The inclusion of this SRP-specific Management Action (a year-round restriction on flights below the rim) within Alternative B does not leave room for adaptive management of this SRP activity and essentially locks this management decision in place for the duration of the Taos RMPA. I would question the data and methods behind this proposed management action and, in order to allow the opportunity for adaptive management, and would suggest that management actions for hot air balloons be applied at the administrative level of the existing SRPs, rather than at the planning-level in the Taos RMPA. This would allow the BLM to evaluate the effectiveness of any associated management actions, more accurately analyze current resource conditions related to this recreational activity and, if necessary, adjust management approaches based on the best available data. Based on my direct observation in the environment, I believe that the assumptions being made regarding impacts to wildlife and habitat are not reflective of the actual circumstance. As suggested in the Golden Eagle study reference above, "species-, site-, and circumstance-specific research is | |

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| | | | prerequisite for effectively assessing any potential human impacts on wildlife." c. The planning-level decision of defining the proposed SRMAs in Alternative B largely makes sense and appears to be a logical step in managing these "high-use" areas. However, this very specific, SRP-related proposed Management Action involves a nuanced issue with perhaps insufficient environmental analysis, does not fit the overall planning-level decisions of the RMPA, and should not be included in Alternative B, especially since Alternative A (as it relates to this specific issue) already responds to the purpose and need by using BMPs to protect active Raptor nesting habitat. | |
| 154 | Recreation – Rock Climbing | Sol Lothe, Rio Grande Balloons, LLC | As stated in the Taos BLM Field Office Programmatic Environmental Assessment, there was no significant impacts with Climbing Fixed Hardware Authorization. In addition, the Fixed Hardware FONSI stated that "under the proposed action, the burden on climbing route developers could be significantly increased." A comment period on the Climbing Fixed Hardware EA was established and comments were submit. On March 29th 2023, the Taos BLM stated "we are currently preparing our responses to those public comments and finalizing the EA. We expect to have a decision on this action soon." From my discussion with the Taos BLM Field Office, in over a years time there has been little or no work done on it since. The BLM | See Summary and Comment Response #6 (see **Error! Reference source not found.**) |

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| | | | staff explained that they have not had the staff nor the time to address the policy. Since the Taos BLM Field Office doesn't have an inventory of all the climbing areas/routes, they can't declare what areas/routes are current or new. In addition, Alternative A does not align with National or district BLM policy. Nationally, the use of fixed anchors are permitted on BLM lands and there is no CFR within the BLM that prohibits the use of fixed anchors. Further more, there is ample precedent for the use of fixed hardware on BLM lands. With regard to wilderness areas, the BLM national policy even allows for the placement of fixed hardware. In conclusion, I can't support Alternative A because the Taos BLM Field Office has historically shown for over two decades that it can't administer its' own resource management plan and that their plan doesn't not align with the National BLM precedent or policies and places an undo burden on route development. | |
| 155 | Recreation – Rock Climbing | Not Provided | First of all, when the idea of the Rio Grande Del Norte National Monument was presented to the public, the BLM stated that historical and traditional activities would continue to exist unburdened. Since evidence exists that Ancestral Puebloans were technical rock climbers, rock climbing is clearly a historical/traditional use. Since modern rock climbing and the establishment of new routes and its associated fixed hardware has been occurring in the area | Rock climbing is an authorized use in the Monument, but *authorized use* is not synonymous with *unregulated use*. Management is necessary to ensure that authorized uses are not in conflict with each other, Monument objects and values outlined in Presidential Proclamation 8946, and the mission of the BLM. The BLM Taos Field Office is completing a programmatic EA focused on fixed hardware, as well as |

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| | | | since at least the early 1970s, I believe that modern climbing should be considered as a historical and traditional use | route development and creation, which is consistent with the 2012 Taos RMP. |
| 156 | Recreation – Rock Climbing | Not Provided | Secondly, it meets all my same critiques and concerns with Alternative A mention before hand. Also, I can't support the current language with respect to raptors. I believe that the language should state that climbing "could" instead of "would" be prohibited. Also it needs to clearly define what conditions justify such closures and an appeal process should exist. This policy should be based on national best practices with current scientific studies. The BLM should also have the responsibility to identify areas and any restrictions on climbers must be equal to any other user group. For example, if a red tail nest is located near the John Dunn bridge and a climbing area is nearby, then any restrictions on climbing within that zone must be applied to other user groups such as fisherman and boaters. Historically, climbers have demonstrated that they can coexist with raptors and even help wildlife officials identify raptor sites. At the near by Carson National Forest, climbers have successfully worked with wildlife officials to coexist without burdensome restrictions. | BMP buffers outlined in the Proposed RMPA provide areas where surface- and noise-disturbing activities would be avoided or restricted. The raptor- and migratory bird–nest avoidance buffers and timing restrictions have been developed using the best-available science specific to each species including their response and adaptability to disturbance, breeding season, and life-history strategies.<br>Active nest buffers are stated in the Proposed RMPA, and the distance is dependent on species (see Appendix C, Section C.2.3, *WL Management Action 13*). An *active nest* is defined as nest building, a pair copulating, incubation, eggs, nestlings, or fledglings present or a nest that has been occupied within the last 7 years. A whole cliff will be closed if an active nest were found.<br>The BLM would consider exceptions to these requirements on a case-by-case basis. |
| 157 | Recreation – Rock Climbing | Not Provided | I am an active and engaged member of the New Mexico rock climbing community and my comments are related to the | Summary and Comment Response #6 (see **Error! Reference source not found.**) |

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| | | | "Rock Climbing" paragraph on page 79 of the Plan Amendment. 1. This paragraph does not outline BLM's plan for the replacement/management of EXISTING hardware on existing routes. This document must articulate the plan for existing hardware so the details are clear to both BLM staff and the climbing community. I propose the following language be added "Existing climbing hardware can be replaced without approval of the BLM, unless the hardware is located within a closure area." | |
| 158 | Recreation – Rock Climbing | Anna Brown | 2. This paragraph sets forth a ROUTE SPECIFIC permit process for new hardware which will be cumbersome and time intensive for both BLM staff and the climbing community. The permit process should be changed to a process whereby the BLM assesses larger areas of land at the same time to determine approved climbing cliffs within that area. | Summary and Comment Response #6 (see **Error! Reference source not found.**) |
| 159 | Recreation – Rock Climbing | Anna Brown | 3. This paragraph allows for closures in raptor-nesting areas without defining the process that will be used to determine the closure or the distance of the closure. Will a whole cliff be closed if there is an active nest? Will the closure be 50 feet in either direction from an active nest? What defines an active nest? Will BLM have a program in place to actively locate and monitor nests annually? | The BLM has been locating and monitoring active raptor nests annually for 20 years. Active-nest buffers are stated in the Proposed RMPA, and the distance is dependent on species (see Appendix C, Section C.2.3, *WL Management Action 13*). An *active nest* is defined as nest building, a pair copulating, incubation, eggs, nestlings, or fledglings present or a nest that has been occupied within the last 7 years. A whole cliff will be closed if an active nest is found. |

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| 160 | Recreation – Rock Climbing | Anna Brown | 4. This paragraph allows for cliff closures within 50 feet of cultural resources. An example of a cultural resources is defined as a "petroglyphs". What else falls under the definition of a "cultural resources"? Shouldn't everything that qualifies as a cultural resources be defined in this paragraph so both BLM staff and the climbing community know what will dictate a closure. | As outlined in Section 3.2.1 *Cultural Resources*, the BLM defines *cultural resources* as follows:<br>> *Cultural resources* are past and present expressions of human culture and history in the physical environment. They represent physical locations of human activity, occupation, or use and can refer to historical or architectural objects, sites, structures, or places with potential public and scientific value, including locations of traditional cultural, ethnic, or religious significance to a specific social or cultural group.<br>In addition to this definition, the Draft EA provides several examples of archaeological and cultural artifacts found within the Monument. |
| 161 | Recreation – Rock Climbing | Anna Brown | 5. The paragraph states that Alternative B will have a "slight direct adverse effects on recreational climbing opportunities". I object to this assertion. For historical context, the climbing community has waited 10+ years for the BLM to implement a climbing hardware permit plan for the public land within the Taos District. To-date, no plan has been produced. This has effectively instituted a climbing hardware ban for the area and created significant ambiguity and uncertainty within the climbing community. Alternative B introduces additional climbing hardware permit requirements/process/analysis that BLM staff must manage and administer. I do not have faith that BLM can effectively | Summary and Comment Response #6 (see **Error! Reference source not found.**) |

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| | | | manage this proposed permit process in a timely manner. I believe Alternative B added a layer of bureaucracy that cannot be administered effectively by BLM staff and this will create significant adverse effects on recreational climbing opportunities within the Monument. It is unfair for BLM to institute processes that they cannot administer internally in a timely manner. | |
| 162 | Recreation – Rock Climbing | Anna Brown | The DRAFT RMPA/EA, Alternative B recognizes climbing as an appropriate activity and states: 'Alternative B would also provide additional clarifications regarding the use of rock-climbing hardware. Under Alternative B, only new rock-climbing routes requiring fixed hardware would require pre-approval by the BLM through site-specific NEPA analysis and would be subject to NHPA Section 106.' Previously the Taos BLM Field Office did not have an approval process set for new route development within the monument. Our organizations have worked with the Taos BLM staff for over a decade to establish a process that both protects the resource and allows for rock climbing and the placement and replacement of fixed anchors in the monument. The BLM should continue to work closely with the local climbing community to finalize the Climbing Fixed Hardware Authorization and a set of standards and guidelines for the | Summary and Comment Response #6 (see **Error! Reference source not found.**) |

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| | | | appropriate placement of new fixed anchors in the monument. | |
| 163 | Recreation – Rock Climbing | Katie Goodwin, Access Fund | Currently under Alternative B, new route development will be required to go through a site-specific NEPA analysis and subject to NHPA Section 106 review. We suggest this process be further refined to be clearly articulated to route developers and processed in a timely manner. We request a broader programmatic approach for the NEPA analysis be implemented which would assess larger areas such as an entire cliff line or climbing zone. This would reduce the amount of administrative burden for both BLM staff and route developers. | Summary and Comment Response #6 (see **Error! Reference source not found.**) |
| 164 | Recreation – Rock Climbing | Katie Goodwin, Access Fund | The two general types of fixed anchor permits are: case-by-case and programmatic. Case-by-case involves a review of each proposed action (i.e. new fixed hardware placement) and programmatic allows climbers to engage in specific activities (without individual review), within specific areas, after the land managers conduct an initial assessment of the climbing resource. Programmatic regulation, which applies a zoned approach (e.g., zones programmatically approved open for new development), tends to result in better outcomes and greater stakeholder support because it limits unnecessary burden and integrates climber input. We request the BLM implement a programmatic approach to permitting | Summary and Comment Response #6 (see **Error! Reference source not found.**) |

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| | | | new climbing routes that require the placement of fixed hardware. The BLM would conduct an initial assessment or NEPA review of a broader area of interest to climbers and determine where route development would be allowed based on the presence or absence of sensitive natural resources or historic properties. Programmatic permits could be granted to climbers who complete a BLM training that ensures that first ascensionists are educated on BLM's regulation, aware of sensitive resources to avoid, and are informed of areas open for new climbing route development. Climbers commitment to self reporting new route development would be mandatory. Options for self reporting programs include inventories managed by mountainproject.com, a local climbing organization or the BLM. Land manager site visits may be necessitated prior to allowing new fixed anchors on undeveloped cliffs. | |
| 165 | Recreation – Rock Climbing | Katie Goodwin, Access Fund | This idea would replace the need for an individual NEPA analysis for every new route that requires fixed hardware (i.e. case-by-case basis) proposed in the future. Instead, a larger area could be authorized for fixed anchor placement based on an evaluation of existing resources and potential impacts. A timeline should be assigned and clearly communicated to new proposed route analysis to ensure the analysis is completed in a timely and efficient | Summary and Comment Response #6 (see **Error! Reference source not found.**) |

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| | | | manner and does not risk being delayed for an extended period of time and in effect become a fixed anchor moratorium. | |
| 166 | Recreation – Rock Climbing | Katie Goodwin, Access Fund | The BLM should articulate a clear fixed anchor policy to promote climber safety in the monument. The fixed anchor policy should provide provisions to allow climbers to maintain and replace existing anchors as necessary. The continued use and maintenance of fixed anchors is essential to preserving the outstanding recreational value of the monument. The placement and replacement of fixed anchors can be done in a way that minimizes user impact and appropriately balances environmental, cultural, and recreational needs. We suggest the following principles be included in the fixed anchor policy: ? Do not require an authorization process for the replacement of old or dangerous fixed anchors. Replacing a worn-out fixed anchor often requires little to no new impact to the rock and is necessary for the safety of climbers. Local climbing stewards should be able to replace such anchors at will. ? Recognize power drills as an appropriate and practical tool for placing and maintaining fixed anchors in the front country (non-wilderness areas). Power drills are prohibited in designated wilderness. ? Hardware standards based on modern industry standards are clearly outlined. ? Timeline and process for a climber to apply for a new route | Summary and Comment Response #6 (see **Error! Reference source not found.**) |

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| | | | installation is clearly outlined and readily accessible for interested parties. | |
| 167 | Recreation – Rock Climbing | Katie Goodwin, Access Fund | We suggest the following paragraph replace the current Rock Climbing paragraph on page 76 of the DRAFT RMP/EA6: Rock Climbing Alternative B would also provide additional clarifications regarding the use of rock-climbing hardware. Under Alternative B, only new rock-climbing routes requiring fixed hardware would require pre-approval by the BLM through a programmatic zone/area-specific site-specific NEPA analysis and would be subject to NHPA Section 106. Under Alternative B, the replacement of fixed hardware on existing rock-climbing routes would not require pre-approval by the BLM. Additionally, climbing would be prohibited within raptor-nesting areas during specified timeframes and within 50 feet of cultural resources, such as petroglyphs. Seasonal raptor closures could be implemented using modern adaptive management practices to ensure closures are limited to sections of a cliff line near an active nest instead of broad area/cliff closures. Climbing could be prohibited up to 50 feet away from historic properties (cultural resources eligible to the National Register of Historic Places), such as petroglyphs. This management would provide long-term direct beneficial effects on the cultural resources within the Monument and slight direct adverse effects on recreational climbing opportunities. | Summary and Comment Response #6 (see **Error! Reference source not found.**).<br>A minimum buffer of 50 feet from cultural resources would be applied. Presidential Proclamation 8946 identifies *cultural resources* as objects of value, not limited protections solely to historic properties under Section 106. Replacement of existing fixed hardware on existing rock-climbing routes would be subject to NHPA Section 106. As a result, all cultural resources within the Monument would be managed as if eligible for Section 106 listing. Please refer to revised REC Management Action 5 in Proposed RMPA/EA, Appendix C, Section C.3.3. |

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| | | | Overall, Alternative B would reduce the long-term adverse effects on Monument objects and values by providing additional protections to cultural resources from recreational use. | |
| 168 | Recreation – Rock Climbing | Katie Goodwin, Access Fund | Raptor Management The DRAFT RMPA/EA states, 'climbing would be prohibited within raptor-nesting areas during specified timeframes.'7 We request the BLM implement modern adaptive management practices, based on the 21st century body of scientific literature, when issuing seasonal closures. The thinking around raptor management has evolved in recent years. Blanket closures-where entire cliffs and/or climbing areas are shut down for a portion of the year-are becoming less common. Adaptive, monitoring-based management is the new standard. Blanket closures are not always based on bird behavior, climber-use patterns, or terrain. Increasingly, wildlife biologists and climbers are instituting management or seasonal closure areas that cover a limited section of cliff line, based on site-specific conditions and data. Adaptive management practices are bolstered by partnerships between climbers and land managers, and by establishing volunteer monitoring programs for which climbers are particularly well suited, thanks to their knowledge of local crags and ability to access cliff sites. The Access Fund has published a handbook on raptor management.8 The handbook is the | BMP buffers outlined in the plan provide areas where surface- and noise-disturbing activities would be avoided or restricted. The raptor- and migratory bird–nest avoidance buffers and timing restrictions have been developed using the best-available science specific to each species, including their response and adaptability to disturbance, breeding season, and life-history strategies.<br>Active nest buffers are stated in the Proposed RMPA, and the distance is dependent on species (see Appendix C, Section C.2.3, *WL Management Action 13*). An *active nest* is defined as nest building, a pair copulating, incubation, eggs, nestlings, or fledglings present or a nest that has been occupied within the last 7 years. A whole cliff will be closed if an active nest were found.<br>The BLM would consider exceptions to these requirements on a case-by-case basis. |

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| | | | result of years of effort to compile every relevant article related to managing recreation, specifically climbing, in raptor habitat, and it includes a 20 page reference list in Appendix A (a living document that is linked to the handbook). The handbook was reviewed and edited by Hawkwatch, USFWS, and North Carolina Wildlife Resources Commission. It represents the latest knowledge base and mitigation models for protecting raptors. We suggest that BLM utilize the most current, science-based models for protecting nesting raptors which can be viewed in this handbook. | |
| 169 | Recreation – Rock Climbing | Katie Goodwin, Access Fund | Cultural Resources Access Fund and NM CRAG respect and support the need to protect cultural resources from degradation and damage. The DRAFT RMPA/EA states, 'climbing would be prohibited.. within 50 feet of cultural resources, such as petroglyphs.'9 Overall this seems like a decent starting place to ensure protection of cultural resources. We request that this buffer be open to adjustment based on the location and aspect of a new proposed route. In addition we request a change to 'climbing could be prohibited.. up to 50 feet away from historic properties (cultural resources eligible to the National Register of Historic Places), such as petroglyphs.' This assessment would be completed through the newly proposed NEPA analysis and potential Section 106 review. In some cases a smaller buffer may be | Summary and Comment Response #6 (see **Error! Reference source not found.**)<br>A minimum buffer of 50 feet from cultural resources will be applied; because setting new routes for climbing and the replacement of existing hardware constitute a potential to affect cultural resources, a NHPA Section 106 process would be initiated for these actions. Presidential Proclamation 8946 identifies *cultural resources* as objects of value, not limited protections solely to historic properties under Section 106. As a result, all cultural resources within the Monument are managed as if eligible for Section 106 listing. |

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| | | | appropriate and should be decided through the NEPA analysis (or Section 106 process if appropriate) depending on the type of historic property, how it is eligible to the NRHP (for example, climbing next to an NRHP-eligible historic road with extensive vehicular traffic may not result in an adverse effect and no buffer would be necessary), and the nature of any potential adverse effects, rather than implementing a static 50 foot buffer in all cases. | |
| 170 | Recreation – Rock Climbing | Katie Goodwin, Access Fund | Further, we have concern that using the term cultural resources is overly broad in this management context for Alternative B, with no definition of the term 'cultural resources' provided in the DRAFT RMPA/EA. Access Fund and NM CRAG understand that the "BLM manages cultural resources guided by law, regulation and policy"10 and would like a clear definition provided in the DRAFT RMPA/EA as to which laws or regulations they are referring to that use such a broad term as term cultural resources in comparison to historic properties, which has a clear regulatory context in Section 106 and is key to how the BLM treats NRHP-eligible cultural resources and avoids, minimizes (or mitigates) adverse effects from their other undertakings on the Taos FO [Field Office], in New Mexico, or across the United States. For example, using a broad term such as cultural resources with the proposed buffer restrictions under Alternative B11 could | As outlined in Section 3.2.1 *Cultural Resources*, the BLM defines *cultural resources* as follows:<br>> Cultural resources are past and present expressions of human culture and history in the physical environment. They represent physical locations of human activity, occupation, or use and can refer to historical or architectural objects, sites, structures, or places with potential public and scientific value, including locations of traditional cultural, ethnic, or religious significance to a specific social or cultural group.<br>In addition to this definition, the Draft EA provides several examples of archaeological and cultural artifacts found within the Monument.<br>See Comment Response Number 21, above, for additional context related to cultural resources. |

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| | | | result in a BLM staff person asking climbers not to climb within 50 feet of a single historic can, an isolated occurrence, or even a piece of historic refuse less than 50 years old. Using the term historic properties would avoid these issues and provide consistency in management. | |
| 171 | Recreation – Rock Climbing | Katie Goodwin, Access Fund | The proposed RMP as it pertains to climbing is overly restrictive with respect to fixed anchors and will severely curtail climbing and the establishment of new routes, as well as necessary replacement of fixed anchors on existing routes within Rio Grande del Norte National Monument. The RMP should allow for the establishment of fixed anchors as long as cultural sites are not impacted, without the requirement of a lengthy application and review process. Rock climbing is an important activity with the Monument, and climbers are a significant user group. | Summary and Comment Response #6 (see **Error! Reference source not found.**) |
| 172 | Recreation – Rock Climbing | Paul and Vibeke Drakos and Wilberg | If anything, I would support a few simple rules,that I think nearly all climbers would respect, over any type of ban.<br>• Camouflage all bolt hangers so as to blend in to the rock and not shine in the sun. Properly done, a simple rattle can self etching primer lasts forever and is very difficult to see.<br>• Require all bolts and hangers be 316 stainless ( not 304). This would virtually eliminate having to ever replace bolts. Also the added cost would make most climbers be sure | Summary and Comment Response #6 (see **Error! Reference source not found.**) |

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| | | | they have a quality climb before bolting up a route.<br>• Consider a no climb zone around historic areas of X number of feet.<br>• Seasonal Closure around a known nesting site. I think you'll find that most climbers are environmentally conscious and continuing to allow access will be a low impact recreation that includes a broad range of people. | |
| 173 | Recreation – Visitor Use and Enforcement | Not Provided | If there will be no new law enforcement personnel added with the proposed plan, at the very least, the BLM should provide more visible (official) signage throughout the Monument advising visitors of proper, legal trails, roads and private property. This includes updating signage at all major points of entry to the Monument. In addition, this includes better signage delineating non-thoroughfares and Monument border vs. private property. The wanton trespassing issue is out of control and fences have been knocked down, trees have been cut down (to the tune of Felony level), and the litter left from trespassers is atrocious. While it may not be the one-size-fits all cure, it's a step in right direction based on the current and projected increase in visitor traffic to the monument that would warrant more signage/visitor guides. | Summary Comment and Response 5 (see **Error! Reference source not found.**) |
| 174 | Recreation – Visitor Use and Enforcement | Not Provided | The draft documents state that visitation at the Monument has significantly increased (Section 3.2.5.1, Visitation, page 27), but there are no data given that | Additional visitor data and information has been added into Section 3.2.15 of the Proposed RMPA/EA, outlining visitor-use trends. Appendix F, *Recreation Management* |

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| | | | would allow the public to assess the increase or its resulting impacts. The Plan includes no change to accommodate the impacts of visitation increases. BLM can't have it both ways. There are significant changes in the forces that erode resource values. These shifting forces require a meaningful evaluation of a need for change in the 2012 strategy. One case where BLM could present relevant information about increased visitor traffic is at the Rio Grande Lower Gorge and Wild Rivers Special Recreation Management Areas. Visitor traffic in these regions has grown. A permit system and Monument Pass are already required for access. BLM must have data available that it could present on this aspect of visitation. Once visitor use information is quantified it seems likely that a sufficient RMP and environmental review would include consideration of the need to establish a pass system for roads within the Monument and an action to monitor traffic on roads. At the very least the plan should establish thresholds for change in access policies | *Areas*, outlines proposed management of high-use use recreation areas to better protect Monument objects, while providing recreational and visitor opportunities with the Monument.<br>As discussed in REC Goal 3 in Appendix C, the BLM will manage<br>…for appropriate levels of use, facilities, management and services, and administrative controls in each recreation area to ensure the protection of Monument objects and values. |
| 175 | Recreation – Visitor Use and Enforcement | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | Collection of information on Visitor Use and Adaptive Management where visitation is harming Monument Resources. Sections 3.1.3; and 3.2.1.2 note that "Increased visitation and recreation could also cause direct permanent and adverse effects on cultural resources." Since 2021 the Monument has seen a dramatic increase | Additional visitor data and information has been added into Section 3.2.15 of the Proposed RMPA/EA, outlining visitor-use trends. Monitoring of cultural resource sites within the Monument is conducted by resource specialists within the BLM Taos Field Office. Sites are monitored for the effects of visitation and natural processes, minimally every 10 years and with the |

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| | | | in visitors and recreation (BLM 2021 Monument Manager's Report). A lack of baseline data (visitor statistics, cultural resources categories, and changes in condition and a monitoring plan is a problem. Under these conditions there is no basis for an evaluation of impacts to resources or for effective restoration and rehabilitation of damage to the objects within the Monument was needed. | renewal of grazing-allotment permits. The BLM continues to monitor and track visitor information on an annual basis.<br>As outlined in Recreation Goal 3, the BLM will continue to<br>Manage for appropriate levels of use, facilities, management and services, and administrative controls in each recreation area to ensure the protection of Monument objects and values.<br>Balance public demand, setting objectives, and fiscal responsibility with the protection of resources. |
| 176 | Recreation – Recreational Shooting | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | We support closures and rules prohibiting the discharge of firearms near highly developed/improved areas of the Monument, including the Rio Grande Canyon, but a one-mile closure is not appropriate for improvements that may be developed in other areas of the Monument, unless they are supported by a proper justification for not following the BLM and the state's 150-yard prohibition as stated above. The DEIS's [Draft Environmental Impact Statement] one-mile prohibition results in unnecessary closures and will create confusion among the public, likely leading to unwarranted citations. We are hopeful that the BLM will reconsider its decision not to address the one-mile prohibition. | The Taos RMP and the *Rio Grande Corridor Plan* (BLM 2000a) offer guidance on excluding shooting from specific zone or areas within the Monument due to high visitation/development/recreational areas. Under the No-Action and Proposed Action Alternatives, the Monument would allow recreational target shooting throughout the Monument, except for at developed recreational areas, including Wild Rivers and Orilla Verde, as well as the Taos Valley Overlook RMZ, which is also closed to hunting due to the terrain and because of concentrated use in the area.<br>The BLM would continue to monitor target-shooting impacts and consider restrictions on recreational target shooting, if necessary, during area-specific implementation planning to avoid or correct public safety issues, conflicts between recreational uses, and adverse impacts on Monument objects or values. |

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| | | | | The Proposed RMPA/EA does not include any management that prohibits the discharge of firearms within 4 miles of a recreational site, but rather within the recreational areas noted above. |
| 177 | Recreation – Recreational Shooting | • Congressional Sportsmen's Foundation<br>• Public Lands Foundation | We are concerned, however, over the decision in the DEIS not to analyze the one-mile recreational shooting prohibition relative to improvements (Ref. 2.6 Alternatives Considered, but Eliminated from Detailed Analysis). The one-mile prohibition to be imposed in the Monument is inconsistent with the prohibitions posted by the BLM, as well as by the state of New Mexico. The BLM's website linking to Recreational Shooting and subsequent linking to New Mexico BLM states, "Firearms must not be discharged within 150 yards of developed recreation areas, buildings, campsites, occupied areas, recreational areas or domestic livestock." New Mexico's Statute, Section 30-7-4 – Negligent use of a deadly weapon – states under Section A (4), "discharging a firearm within one hundred fifty yards of a dwelling or building, not including abandoned or vacated buildings on public lands during hunting seasons, without the permission of the owner or lessees thereof. Further, the New Mexico Department of Game and Fish 2023-2024 General Rules, consistent with State law, states under the heading of "Prohibitions," "Discharge a firearm within 150 yards of a dwelling or building (not including abandoned or vacated | The Taos RMP and the *Rio Grande Corridor Plan* offer guidance on excluding shooting from specific zones or areas within the Monument due to high visitation, development, and/or recreational areas. Under the No-Action and Proposed Action Alternatives, the Monument would allow recreational target shooting throughout the Monument, except for at developed recreational areas, including Wild Rivers and Orilla Verde, as well as the Taos Valley Overlook RMZ, which is also closed to hunting due to the terrain and because of concentrated use in the area.<br>The BLM would continue to monitor shooting impacts and consider restrictions on recreational target shooting, if necessary, during area-specific implementation planning to avoid or correct public safety issues, conflicts between recreational uses, and adverse impacts on Monument objects or values.<br>This Proposed RMPA does not include any management that prohibits the discharge of firearms within 1 mile of a recreational site, but rather within the recreational areas noted above. |

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| | | | buildings on public land) without the permission of the owner or lessee." (emphasis added) | |
| 178 | Resources not Analyzed in Detail | • Congressional Sportsmen's Foundation<br>• Public Lands Foundation | One particularly significant omission within the EA/RMP is the lack of consideration of circumstances at the Rio Grande Gorge Bridge. The bridge as listed on the National Register of Historic Places, is one of the objects the Monument designation protects. It is also the second most visited cultural property in Taos County. It represents a gateway that offers many opportunities for public understanding of the landscape of the Monument and the region. The RMP fails to recognize these potentials and that should change. | The Rio Grande Gorge Bridge is administered by the New Mexico State Highway Department and not the BLM. The management of the bridge is outside the scope of the BLM and this Monument Management Plan. Management outlined in the Monument Management Plan will not affect the historic nature of the Rio Grande Gorge Bridge. |
| 179 | Soils | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | Draft EA, Section 3.2.6.2 page 45 final paragraph Alternative B states that the designation of an additional 183 acres of ROW would result in "short-term direct adverse effects… but long-term beneficial effects on soil health and productivity across the Monument by providing for greater opportunity for co-location of utilities." Recommend specifying how the Monument will actively prevent further soil erosion from occurring in these new and other existing ROW corridors, thereby preventing erosion-related, short-term direct adverse effects from becoming long term. | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 180 | Soils | Jack Marchetti, New Mexico | As noted elsewhere in these comments, we are concerned that the proposed designation of new ROW corridors and | Summary Comment and Response 4 (see **Error! Reference source not found.**) |

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| | | Department of Game and Fish | the proposed use of livestock grazing for vegetation management under Alternative B could have significant impacts on soil health and productivity. Given the importance of soil health to climate stability, air and water quality, and plant and animal communities, the BLM should reconsider these proposals and ensure that all project level decisions minimize the potential for erosion and soil damage. | |
| 181 | Special Recreation Permits (SRP) | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation | I strongly encourage you to revise the language in the proposals, even if that means providing for some new goals and safeguards, so that balloonists and their fortunate guests can continue to enjoy the opportunity of visiting the gorge in that unique way. | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | • Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | | |
| 182 | Special Recreation Permits (SRP) | Ted Alcorn | Additional Acknowledgement: The disallowance of hot-air ballon flights below the rim would result in adverse effects on commercial hot-air ballon vendors. • No doubt this is the case. And it should be a consideration for maintaining strength in the local | Summary Comment and Response 1 (see **Error! Reference source not found.**) |

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| | | | economy. But the real concern is "Why eliminate the offer of hot-air balloon flights to the detriment not only of the providers, but for those of us who deeply appreciate this beautiful way to savor the Rio Grande Norte National Monument?" | |
| 183 | Special Recreation Permits (SRP) | Not Provided | In the Draft, the Horsethief Mesa RMZ desired conditions state "retain current middle-country to back-country setting" and "Average of up to six encounters with up to four people per encounter." We are concerned that this is unreasonable for a popular recreation area The BLM completed the Horsethief Mesa TMP in 2022 and there were decisions made to increase mountain biking opportunities. As part of the Bureau of Land Management's efforts to expand recreation access on Taos FO, the BLM considered and incorporated portions of the Enchanted Circle Trails Association's conceptual trail plan for the Horsethief Mesa area during the travel management plan update. Local mountain bike trail advocates now have approval to build a new trailhead and 15 miles of new trail. With these new trails will come new visitation and appreciation of this landscape. It would therefore seem more appropriate to manage the Horsethief Mesa RMZ as a "middle-country" setting with 14 encounters per outing, more akin to the Taos Valley Overlook RMZ. | Given the anticipated presence of smaller groups—with the potential of seeing multiple groups during periods of high use—management for Horsethief Mesa has been revised to capture the middle-country setting and operational characteristics.<br>Section F.3.2.1 in Appendix F, *Recreation Management*, has been revised based on this comment. |
| 184 | Special Status Species | International Mountain | We also approve of WL Management Action 1, which would direct the BLM to | The BLM will continue its coordination with the New Mexico Department of Wildlife |

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| | | Bicycling Association | consider areas within the Monument for introduction, augmentation, or reestablishment of fish and wildlife species and to work with the New Mexico Department of Game and Fish and U.S. Fish and Wildlife Service to support monitoring, augmentation and reintroduction efforts.18 As part of implementing this action, we encourage the BLM to consider restoring American bison to the Monument's landscape, and to study the possibility of reintroducing an additional population of native Río Grande cutthroat trout to the Agua Caliente. | Services to identify and support opportunities for the reintroduction of fish and wildlife species. The BLM is currently in the process of evaluating the feasibility of Rio Grande cutthroat trout to the Agua Caliente, which is outside of this planning effort. |
| 185 | Special Status Species | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos | The BMPs include spatial and temporal buffers for active bird nests and prairie dog towns.21 Regarding migratory birds, the BLM notes that the primary nesting season is from May through July, except for pinyon jay, which may start breeding as early as March.22 But the Appendix does not include the distance by which surface-disturbing activities must avoid active migratory bird nests. We recommend that the BLM incorporate appropriate provisions to ensure protections for active migratory bird nests during the breeding and nesting season. | The Proposed RMPA/EA lists specific buffers for special status species. Because it is not always possible to apply a standard buffer, nest buffers for other migratory birds would be determined on a case-by-case basis, depending on disturbance factors, including species, nest location, human activity, activity duration, and noise level. |

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| | | • Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | | |

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| 186 | Special Status Species | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds | The Draft RMPA/EA sets forth a list of federally listed, proposed, and candidate species, as well as designated critical habitat, that occurs or has the potential to occur within the Monument.24 These include the Southwestern willow flycatcher (endangered with critical habitat), yellow-billed cuckoo (threatened), Río Grande cutthroat trout (candidate), monarch butterfly (candidate), and silverspot butterfly (threatened).25 However, the list in the Draft RMPA/EA appears to omit several species that occur or have the potential to occur within the planning area, including New Mexico meadow jumping mouse (endangered), tricolored bat (proposed endangered), Mexican spotted owl (threatened), Río Grande cutthroat trout (candidate).26 Although the list of special status species is dynamic and subject to change over the life of the Monument Plan, we recommend that the BLM review and update its list of species to ensure a current comprehensive list is included in the final Monument Plan. | The Proposed RMPA/EA at Section 3.2.4, Table 3-2, has been updated to address species that are listed or proposed for listing with an additional column to briefly discuss the presence/absence of suitable habitat in the planning area. |

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| | | • Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | | |
| 187 | Special Status Species | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation | We encourage the BLM to adopt additional management prescriptions for the pinyon jay (Gymnorhinus cyanocephalus), which is a BLM Sensitive Species and is identified as a Migratory Bird of Conservation Concern in the 2012 Taos RMP. In 2023, the U.S. Fish and Wildlife Service (USFWS) found that a petition to list the pinyon jay as endangered presented substantial scientific information to indicate that an ESA listing may be warranted; the final listing decision has not yet been made.28 We appreciate that the BLM has added the pinyon jay (which was not included in | The following BMP and a reference to the Conservation Strategy have been added to Appendix D of the Proposed RMPA/EA: "*2.3.* When possible, conduct treatments outside of pinyon jay breeding season (late February–early June)." A buffer of 500 meters around a known breeding colony would allow for colony shifts across years. A patchy mosaic of suitable nesting habitat, with older age class and larger size trees being retained (Pinyon Jay Multi-State Working Group 2020). |

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| | | • Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO) | the scoping documents) to the list of sensitive species, and that the BLM has recognized the species' decline and management needs. Specifically, the Draft RMPA/EA provides that "[p]roject-related surveys for this species will allow for appropriate management decisions and conservation of this species."29 We recommend that the BLM incorporate more specific management provisions or BMPs for piñon-juniper woodlands, pinyon jay nesting colonies, and other closely associated bird species. When designing management prescriptions and implementation actions, the BLM should reference the evolving science and research, including new information being published on the New Mexico Avian Conservation Partners (NMACP) website30 and the Conservation Strategy for Pinyon Jay published by the Partners in Flight, Pinyon Jay Multi-State Working Group. | |

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| | | • Andrew Rothman, WildEarth Guardians | | |
| 188 | Special Status Species | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, | The Bureau must also follow its own internal policies that mandate species protection. BLM Manual 6840 "provide[s] policy and guidance for the conservation of BLM special status species and the ecosystems upon which they depend on BLM-administered lands." The objective for species that are not currently listed under the ESA [Endangered Species Act] is to "initiate proactive conservation measures that reduce or eliminate threats to Bureau sensitive species to minimize the likelihood of and need for listing of these species under the ESA." BLM Manual 6840. The Bureau's State Director has the additional responsibility of "[e]nsuring that when BLM engages in the planning process, land use plans and subsequent implementation-level plans identify appropriate outcomes, strategies, restoration opportunities, use restrictions, and management actions necessary to conserve and/or recover listed species, as well as provisions for the conservation of Bureau sensitive species," and "[e]nsuring that land use and implementation plans fully address appropriate conservation of BLM special status species." We do not see these mandates reflected in the EA. | As detailed in Section C.2.4 in Appendix C of the RMP/EA, the BLM will continue to implement existing goals, objectives, and management actions and has identified additional goals, objectives, and management actions to meet their responsibilities, as outlined in BLM Manual 6480, related to the conservation and recovery of federally listed species and the conservation of BLM special status species. |

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| | | Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | | |
| 189 | Transportation and Access | Cyndi Tuell, Western Watersheds Project | If there will be no new law enforcement personnel added with the proposed plan, at the very least, the BLM should provide more visible (official) signage throughout the Monument advising visitors of proper, legal trails, roads and private property. This includes updating signage at all major points of entry to the Monument. | Summary Comment and Response 5 (see **Error! Reference source not found.**) |
| 190 | Transportation and Access | Not Provided | In addition, this includes better signage delineating non-thoroughfares and Monument border vs. private property. The wanton trespassing issue is out of | Summary Comment and Response 5 (see **Error! Reference source not found.**) |

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| | | | control and fences have been knocked down, trees have been cut down (to the tune of Felony level), and the litter left from trespassers is atrocious. While it may not be the one-size-fits all cure, it's a step in right direction based on the current and projected increase in visitor traffic to the monument that would warrant more signage/visitor guides. | |
| 191 | Transportation and Access | Not Provided | TU strongly supports the BLM's proposal to develop a Travel Management Plan (TMP) to provide appropriate access to RGDN while minimizing conflicts among users and impacts to resources, including wildlife habitat, riparian area, wetlands, and cultural resources. To minimize the ongoing degradation of resources, the BLM should work to obtain the funding and resources needed to complete the TMP project as soon as possible. | As funding and resources are available, a TMP would be completed to provide for appropriate access to the Monument, while minimizing conflicts among users and impacts on resources.<br>Additionally, see Summary Comment and Response 5 (**Error! Reference source not found.**). |
| 192 | Transportation and Access | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | RGDN currently experiences negative impacts from illegal and unmanaged motorized activities. The Draft RMPA/EA reflects that increased off-highway vehicle (OHV) use within the Monument can negatively impact cultural resources, traditional uses, wildlife and habitat, geologic resources, and visual resources including dark night skies. Unmanaged and illegal OHV use within the Monument also disturbs soils, accelerates erosion and water quality degradation, and increases wildfire risk. Given these concerns, we strongly support the BLM's proposal to develop a Travel Management | See Appendix C, *TRA Management Action 1*, which states:<br>Maintain existing travel consistent with existing travel management decisions and Presidential Proclamation 8946. In accordance with Presidential Proclamation 8946, except for emergency or authorized administrative purposes, motorized-vehicle use in the Monument is limited to designated roads. Non-motorized mechanized vehicle use is limited to designated roads and trails.<br>As funding and resources are available, a TMP would be completed to provide |

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| | | | Plan (TMP) to provide appropriate access to RGDN while minimizing conflicts among users and impacts to resources, including wildlife habitat, riparian area, wetlands, and cultural resources. To minimize the ongoing degradation of resources, the BLM should work to obtain the funding and resources needed to complete the TMP project as soon as possible. | for appropriate access to the Monument, while minimizing conflicts among users and impacts on resources. Additionally, Summary Comment and Response 5 (see **Error! Reference source not found.**). |
| 193 | Transportation and Access | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | We ask the BLM to take immediate steps to enforce existing regulations and limitations, and to address the significant consequences of unmanaged and illegal motorized use within the Monument. Increased signage and regular, coordinated law enforcement efforts in conjunction with the New Mexico Game and Fish Department would go a long way in dissuading illegal OHV activity. We encourage the Taos Field Office to work with organizations like Friends of RGDN to advance volunteer sign placement and illegal road decommissioning projects. | Summary Comment and Response 5 (see **Error! Reference source not found.**) |
| 194 | Transportation and Access | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | Expansion of Mechanized roads and trails within the Monument for recreation use is not consistent with the purposes of landscape conservation within the Monument. Mechanized recreation should be confined to existing roads and trails in the travel plan and alternatives for expanded mechanized use of roads and trails for recreation use should be considered outside the Monument. Another example that is counter to the | The Proposed RMPA does not propose expansion of mechanized roads and trails within the Monument. See Appendix C, *TRA Management Action 1*, which states:<br>Maintain existing travel consistent with existing travel management decisions and Presidential Proclamation 8946. In accordance with Presidential Proclamation 8946, except for emergency or authorized administrative purposes, motorized-vehicle use in the |

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| | | | landscape preservation directive of the Proclamation is the suggestion of an expansion of mountain bike and mechanized vehicle use in a National Monument. That expansion would also require an EIS and consideration of alternatives on lands outside those under Monument protection. Development of mechanized trail systems within the Monument (Horsethief Mesa and Taos Overlook) is incompatible with the Monument Proclamation 8946. Taos Field Office travel management plans correctly seek to stabilize mechanized use on existing roads and trails in the Monument. We have no objection to mechanized use, but Horsethief Mesa and Taos Overlook have high archeological and historic site density: rock art and artifact scatters in the Horsethief Mesa area and the Old Spanish National Historic Trail at Taos Overlook. The BLM development of mechanized travel is not compatible with a priority on protection of these resources over recreational use. | Monument is limited to designated roads. Non-motorized mechanized vehicle use is limited to designated roads and trails."<br>Furthermore, and as funding and resources are available, a TMP would be completed to provide for appropriate access to the Monument, while minimizing conflicts among users and impacts on resources.<br>Regarding proposed eBike and mountain-bike management, please refer to Summary Comment and Response 7 (see **Error! Reference source not found.**). |
| 195 | Transportation and Access | John Martin, William Fawcett, Scott Henderson, David Love, Paul McGuff, and Hank Saxe | Given these concerns, we strongly support the BLM's proposal to develop a Travel Management Plan (TMP) to provide appropriate access to RGDN while minimizing conflicts among users and impacts to resources, including wildlife habitat, riparian area, wetlands, and cultural resources.94 To minimize the ongoing degradation of resources, the BLM should work to obtain the funding and resources needed to complete the | Summary Comment and Response 5 (see **Error! Reference source not found.**) |

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| | | | TMP project as soon as possible. We also urge the BLM to take immediate steps to enforce existing regulations and limitations, and to address the significant consequences of unmanaged and illegal motorized use within the Monument. Increased signage and regular, coordinated law enforcement efforts in conjunction with the New Mexico Game and Fish Department would go a long way in dissuading illegal OHV activity. We encourage the Taos Field Office to work with organizations like Friends of RGDN and Backcountry Hunters & Anglers for volunteer sign placement and illegal road decommissioning projects. | |
| 196 | Transportation and Access | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers | It is unclear if off-highway vehicles (OHV) will be addressed in this plan. Although it will be addressed in the Travel Management Plan (TMP), providing clear guidance on what areas are open or closed to OHVs should be outlined. This also applies to E-bikes and mountain bikes that have been known to cause significant damage to many BLM-managed lands. | As outlined in TRA Management Action 1, in accordance with Presidential Proclamation 8946, except for emergency or authorized administrative purposes, motorized-vehicle use in the Monument is limited to designated roads. Nonmotorized mechanized-vehicle use is limited to designated roads and trails. No areas of the Monument are currently designated as off-highway vehicle (OHV )-open; the Proposed RMPA would not designate any OHV-open areas and would close an additional 5,120 acres to motorized use (which currently occurs on designated routes). Refer to Section 3.2.16, *Transportation and Access*, for more information. |

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| | | • Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, | | |

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| | | WildEarth Guardians | | |
| 197 | Transportation and Access | Miya King-Flaherty – Sierra Club Rio Grande Chapter | Work with the county (Taos) to keep the John Dunn Bridge open year round. I will protest any plan that does not plan to keep John Dunn Bridge open year round, minus emergencies. It is a public safety access for VFD [Volunteer Fire Department] access Honda Seco to support Carson VFD. | Summary and Comment Response 2 (see **Error! Reference source not found.**) |
| 198 | Vegetative Communities | Tim Henson | BLM should consider expanding Section 3.2.12.1 and Table 3-8 in the RMPA/EA to include the entire New Mexico Noxious Weed List. Section 3.2.12.1 and Table 3-8 in the RMPA/EA include only those species that are currently present in the Monument. A more prudent approach would include the entirety of the New Mexico Noxious Weed List, including watchlist species. Doing so will afford the RMPA/EA greater utility in the face of changing conditions in the Monument. Even if they have not been documented within the Monument itself, many of the species on the list have been detected in neighboring counties of Northern New Mexico3. If such species are ever introduced to the Monument, inclusion of the full list in this RMPA/EA will increase the likelihood that BLM will detect and document their presence, thus increasing the effectiveness of the early detection and rapid response strategy mentioned in ISN Management Action 1 (Appendix C, page C-67). Information about the current | Section 3.2.12.1, *Affected Environment*, describes the existing condition of invasive species/noxious weeds in the Monument. Table 3-8 in that section simply lists the species designated by NMDA as noxious weeds that have been documented in the decision area since commencement of the 2017 weed-mapping effort. Those species that are not currently found in the decision area are not excluded from management considerations under the 2012 Taos RMP. Ongoing weed monitoring and mapping by the BLM and additional management actions under Alternative B, such as the utilization of AIM survey data, which documents all species occurring in the survey area, regardless of NMDA classification, and coordination with the state, including for changes to the NMDA list, would increase opportunities to identify and treat new infestations of invasive species/noxious weeds. Language clarifying the role of the NMDA list has been added to the Proposed RMP. |

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| | | | presence/absence of species can still be reported by adding a new column for it to Table 3-8. However, including the full New Mexico Noxious Weed List, including watchlist species, will improve BLM's management of future threats. | |
| 199 | Vegetative Communities | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers<br>• Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation | We located one recent study of the vegetation within the project area and provided information from that study below. We previously provided this information in our scoping comments, attached as Appendix A. However, this reference is not included in the references list for this project (Taos RMP/EA RDdN Appendix G). Please provide an explanation as to why this information was ignored. * Tala. 2022. Vegetative Changes within Areas of Critical Environmental Concern in Taos and Rio Arriba Counties of Northern New Mexico 2000-2020. Master of Science GIS Final Project. University of Arizona 2022. http://hdl.handle.net/10150/664144 This study looks at the vegetative changes within the Bureau of Land Management's ACEC designated areas from 2000 and 2020 to determine if the Bureau of Land Management's protective measures have helped mitigate drought effects within the region. The study area covers approximately 327,040 acres within Taos and Rio Arriba counties. Using surface reflectance and Normalized Difference Vegetation Index (NDVI) analysis, datasets are compared for changes in vegetation health over 5-year increments | Relevant information presented in this report has been included in Section 3.2.7 of the Proposed RMPA/EA. Additionally, BLM AIM) data to characterize vegetation and ecological site conditions have been incorporated into Section 3.2.7 of the Proposed RMPA/EA. |

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| | | • Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, WildEarth Guardians | – 2000, 2005, 2010, 2015, and 2020. Precipitation over the temporal extent is taken into consideration when determining land use and vegetative changes. Precipitation changes from 2000 through 2020 do not account for the vegetative changes observed. Climate change, prolonged drought, and growth of human infrastructure are but a few of the conditions contributing to habitat loss. We can see this loss through the vegetative changes that are being seen across the world. Management practices, or the lack thereof, as seen in the BLMs ACEC designated areas of northern New Mexico could also be contributing to these changes. Through the data analysis, we can see that there are significant changes in vegetative cover in all four ACEC designated areas between 2000 and 2020. These changes, however, cannot be directly contributed to one specific issue and are probably a result of many contributing causes. More research should be done to define the actual causes in these specific areas. Unfortunately, it appears as though the Bureau has completely ignored all of the scientific literature we provided with our prior comments and has provided absolutely no explanation for this oversight. | |
| 200 | Water Resources | Anthony Colin, New Mexico | While the BLM has addressed many of our original water quality recommendations requested in our September 2023 comments, we would | The BLM has no specific regulatory authority with regard to use of water or enforcement of water-quality laws. The BLM's role includes the management of |

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| | | Department of Agriculture | like to re-state the remaining two topics that should be clearly stated in the final MMP Amendment. ¦ Collaborate with NMED and other stakeholders in the development of Total Maximum Daily Loads (TMDLs) for all river and stream segments in the Monument. ¦ Implement Monument wide Low Impact Development and Green/Natural Infrastructure practices to control storm runoff and protect water quality. | activities in compliance with the Clean Water Act, Wild and Scenic Rivers Act, and other applicable laws and regulations. As noted in Section 3.2.9 of the Proposed RMPA/EA, any proposed project would comply with NMED's antidegradation policy to ensure that watershed health priorities are achieved by promoting an improved strategy to address 303(d)-listed impairments within the Monument.<br>Thank you for recommending consideration of Low-Impact Development and Green/ Natural Infrastructure practices to control storm runoff and protect water quality, which can be considered during future implementation-level planning. |
| 201 | Water Resources | Cyndi Tuell, Western Watersheds Project | We would also recommend further language about BLM programs for monitoring water quality. A description of recent work by BLM on studying the springs and playas is fantastic, but a paragraph on BLM plans and requirements for future water quality sampling would strengthen this section and clarify that BLM currently conducts water quality sampling in the Monument. Section 3.2.9 should outline a process for developing and implementing a water quality restoration implementation plan. This implementation plan should include concrete steps and deadlines for action. Points to cover include: * Identification of potential sources of impairment. Why are these rivers not meeting water quality standards? * What measures can BLM | Change made. The BLM added a description of water-quality monitoring within the Monument in Section 3.2.9 of the Proposed RMPA/EA.<br>Regarding the request to outline a process for implementing a water quality–restoration implementation plan, the BLM would continue to participate in and provide expertise for public lands water resources (see WR Management Action 1), continue to participate in local watershed-planning efforts, and develop and maintain partnerships with other agencies, organizations, and individual parties to develop and implement watershed-restoration projects that address any water-quality impairments (see Proposed RMPA WR Objective 6). Future implementation-level management processes would include |

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| | | | take to restore water quality within the Monument? Are there management changes that can be made? Are there specific restoration projects that could be prioritized to address the impairments? * If grazing is causing impairment, what actions will the BLM take? * If recreation is causing impairment, what actions will the BLM take? * Measures that BLM could take to address temperature impairments such as protecting and restoring shade and riparian habitat. * An examination of the relationship between flows and water quality impairments, specifically temperature. | opportunities for consideration of the water quality–restoration implementation steps requested in the comment. |
| 202 | Water Resources | Shannon Romeling, Amigos Bravos | We are concerned that the proposed designation of new ROW corridors could have negative impacts on water quality through increased erosion during and after construction activities. We support the Best Management Practices outlined on page D-6 of Appendix D and suggest the addition of a BMP stating: "Visual monitoring of erosion impacts will be conducted daily during construction activities and water quality tests will be conducted following any visual identification of high erosion impacts in the river." | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 203 | Water Resources | Shannon Romeling, Amigos Bravos | The Monument currently suffers negative water quality impacts from illegal and unmanaged motorized activities. To minimize the ongoing degradation of water resources, the BLM should work to obtain the funding and resources needed | Implementation and funding decisions will be made as part of the budgeting process and are not RMP decisions. |

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| | | | to complete the TMP project as soon as possible. | |
| 204 | Water Resources | Shannon Romeling, Amigos Bravos | for clarity and additional priority in the Plan, we request that the BLM include the ONRW designation as a separate section in the list of Special Designations in the Monument (Section 3.2.17, page 83) Suggested language for Outstanding Waters Special Management Area Prescriptions: ¦ New or increased degradation of water quality is prohibited in the designated ONRWs in the Monument except for short-term degradation associated with state approved restoration or public safety activities. ¦ Restoration to protect and promote water quality and the values for which the ONRW was designated (exceptional recreational and ecological attributes) will be encouraged. 2 Memorandum of Understanding between the N.M. Env't Dep't and the USDA [U.S. Department of Agriculture], Forest Service Southwestern Region (May 2, 2023), attached as Exhibit 1. ¦ Shared protocols with the New Mexico Environment Department for managing ONRWs on the Monument will be developed. | Outstanding National Resource Water (ONRW) designation affords the highest level of protection against degradation that can be afforded for a waterbody under the State of New Mexico's Water Quality Standards (20.6.4 New Mexico Administrative Code). Because the BLM cannot designate ONRWs, the discussion of their management is most appropriate in Section 3.2.9 and Appendix C, Section C.2.9, *Water Resources*, of the Proposed RMPA/EA. Refer to Appendix C, *WR Management Action 6*, for the specific management prescriptions requested. As noted in WR Management Action 1, WR Management Action 3, and WR Management Action 6 in Appendix C, the BLM will consult and coordinate with NMED to develop shared protocols for implementing and managing applicable portions of the RMP related to water resources. |
| 205 | Water Resources | Shannon Romeling, Amigos Bravos | The monument is home to some of the most prolific springs in the state. Lava Tube Springs alone emits 6,000 gallons a minute and is thought to be the largest in the state. Springs in the Monument are identified as "object[s] of historic or scientific interest" are thus, along with | Appendix C, Section C.2.5, *GEO Goal 1*, of the Proposed RMPA/EA has been revised to include the evaluation of impacts on and threats to geologic features, including springs, playas, and lava tubes (and other objects of historic interest). The BLM has completed biological and flow surveys for |

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| | | | numerous other resources, singled out for preservation. The MMP should outline a process to study and characterize these springs and to identify any potential threats to both the quantity and quality of the water that is discharged from these springs. Potential threats to include in analysis include: ¦ Dewatering and impacts to flows in the Monument springs from the wells associated with Abeyta settlement. BLM has identified "investigating the potential effects of new wells on springs along the Rio Grande (Abeyta settlement)" as a high priority research need.3 The dewatering of springs may be in direct conflict with Wild and Scenic protections. We urge BLM to investigate this issue and determine the impact from these wells to the Monument springs and engage with the Bureau of Reclamation in discussions about how to mitigate any impacts. ¦ A groundwater plume from the Chevron tailings facility is thought to be moving towards the Rio Grande. BLM should collaborate with NMED, MMD and EPA [U.S. Environmental Protection Agency] in both characterizing the potential water quality impacts from groundwater contamination at the Chevron mine and identifying mitigation options. | springs and seeps within the Monument. A proposed gain/loss study will be carried out over the next 5 years to evaluate flows, changes in flows, and potential impacts on flows in the future, with the intent of pursuing Federal reserve water rights. |
| 206 | Water Resources | Shannon Romeling, Amigos Bravos | Wetland and floodplains are vitally important to the health of the watershed and the riparian zone. Please include further emphasis on the need for environmental flows to sustain and | Please refer to Appendix C, *WR Goal 3*, whereby the BLM would emphasize the need for environmental flows that sustain and reestablish floodplains and wetlands, as well as the need to actively restore and |

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| | | | reestablish these areas, as well as the need to actively restore and protect them. | protect them. Appendix C, *WR Management Action 2*, would require coordination with the State Engineer, under the *Riparian and Aquatic Habitat Monitoring Plan* (BLM 2000b), to acquire water rights as necessary for essential surface flows. Additional management prescriptions for the protection and restoration of these resources can be found elsewhere in Appendix C, including WE Management Action 4, ACEC Management Actions 1 and 2, VEGR Management Action 3, VEGR Management Action 6, and VEGR Management Action 7. |
| 207 | Water Resources | Shannon Romeling, Amigos Bravos | We support the proposed Management Plan's additional protections for playas, including the prioritization of restoration projects, a prohibition on modifications in and around playas, the protection of cultural and aquatic resources associated with playas, and a proposal to work cooperatively with livestock permittees to assess grazing impacts on playas. We further suggest 3 BLM Taos Field Office, Rio Grande del Norte Science Plan, p. 54 (2019). that BLM include language around taking appropriate steps to exclude livestock from these areas as needed and to address the impacts of illegal OHV activity in these waterbodies. | Refer to Appendix C, *TRA MA 1*, which states:<br>> Maintain existing travel consistent with existing travel management decisions and Presidential Proclamation 8946. In accordance with Presidential Proclamation 8946, except for emergency or authorized administrative purposes, motorized-vehicle use in the Monument is limited to designated roads. Nonmotorized mechanized vehicle use is limited to designated roads and trails.<br>No areas within the Monument would be open to cross-country travel; enforcement and issuing citations for illegal activities can be addressed through administrative actions (see Proposed RMPA/EA, Section 1.4.6.). Existing livestock exclosures along streams, wetlands, and riparian areas would continue to be maintained per the terms and conditions of existing cooperative |

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| | | | | agreements. The Proposed RMPA/EA, Appendix C, *VEGR Management Action 6* and *LG Management Action 5*, have been updated to include exclosures for riparian, wetlands, and playas to protect critical wildlife habitat or other Monument objects, as necessary. The BLM would continue to work cooperatively with permittees to study the impacts of grazing on playas (Appendix C, LG Management Action 5). The science plans of National Conservation Lands units are considered "living" documents; scientific needs that emerge during the course of implementing a science plan may be added to the plan on an as-needed basis to meet the unit's scientific mission. |
| 208 | Water Resources | Shannon Romeling, Amigos Bravos | The BLM should perform follow-up hydrogeologic modeling of the springs, including the geochemical, geologic, and hydrologic analyses and interpretation of all the data that was collected in the 2007 study, as well as any necessary ongoing data collection and analysis. | Hydrologic modeling and related analysis of springs within the Monument are not within the scope of this RMPA/EA; however, the BLM may consider these activities during future revisions of the *Río Grande del Norte Science Plan*. The science plans of National Conservation Lands units are considered "living" documents; scientific needs that emerge during the course of implementing a science plan may be added to the plan on an as-needed basis to meet the unit's scientific mission. |
| 209 | Water Resources | Shannon Romeling, Amigos Bravos | Draft EA, Section 3.2.7.2 page 50 paragraph 3 Currently states, "Alternative B replaces the concept of proper functioning condition, which typically applies to riparian areas, with the concept of desired ecological conditions and function for terrestrial vegetation- | Clarification was made in Section 3.2.7.2 to indicate that *desired ecological condition* is a portrayal of the land or resource conditions that are expected to result if goals and objectives are fully achieved. |

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| | | | management actions." Recommend clarifying how "desired" is defined, and whether this definition aligns with the Monument's goal of protection, preservation, and restoration of important resource values. | |
| 210 | Water Resources | Claire Catlett, Marc Space, and Nick Streit, Trout Unlimited | Appendix D, Section D.2 page D4 BMP 20 Recommend including the following in BMP 20: "Design water-crossing structures to provide a seamless connection of aquatic habitat and streambed substrate." | Change made. Suggested BMP added to Proposed RMPA/EA Appendix D. |
| 211 | Water Resources | Jack Marchetti, New Mexico Department of Game and Fish | Appendix D, Section D.2 page D-4 BMP 21 Recommend changing the minimum requirements for culverts ("pass a 50-year storm event") to "pass, at a minimum, a 100-year storm event" due to the increasing frequency and intensity of severe storm events as a result of climate change. | Change made. Suggested BMP added to Proposed RMPA/EA Appendix D. |
| 212 | Water Resources | Jack Marchetti, New Mexico Department of Game and Fish | Appendix D; Section D-9 Page D-10 BMP 7b ii Currently states, "Before entering another water body, boats and recreational equipment should be sprayed with high pressure and/or hot water (above 104 degrees) or dried for at least 5 days." Recommend changing to the following: "Before entering another body of water, conveyances should be completely Clean, Drain and Dry. Conveyances that are arriving from out of state are required to receive an inspection by NMDGF or other certified inspectors. Hot water decontamination may be | Change made. BMP revised in Proposed RMPA/EA Appendix D as requested. |

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| | | | required if inspectors determine that the risk of AIS introduction is high." | |
| 213 | Water Resources | Jack Marchetti, New Mexico Department of Game and Fish | Concern 2: Item #5 similarly states that "Surface disturbance will not be allowed within up to 0.5 mile of the outer edge of 100-year floodplains, playas, all artificial water developments." Such blanket linear restriction does not consider the topography of the Monument and could be used to restrict new recreation opportunities. While the section does allow for "exceptions," the default should emphasize case-by-case evaluation. Proposal 2: Amend language to allow surface disturbance unless there is a documented site and project-specific potential impact on a floodplain or riparian habitats. | No change. The BMP clearly states that exceptions to this requirement will be considered on a case-by-case basis. |
| 214 | Wild and Scenic Rivers | Jack Marchetti, New Mexico Department of Game and Fish | As further discussed in Part G (Visual Resources) above, we have significant concerns that the BLM's proposal to designate a 600' ROW corridor across the Rio Grande gorge will negatively impact the outstandingly remarkable values that led Congress to designate the Río Grande as a Wild and Scenic River. Under the Wild and Scenic Rivers Act, the BLM must manage the Wild and Scenic River corridor to preserve the river's natural and primitive conditions. The BLM should reconsider the ROW proposal. | Summary Comment and Response 4 (see **Error! Reference source not found.**) |
| 215 | Wilderness and Wilderness Study Areas (WSAs) | Loren Bell, Enchanted Circle Trails Association | We understand that the BLM has proposed to manage only 5,120 acres as a WSA (above 8200' in elevation) "to account for existing access, wildlife- | Through discussions after receiving comments during scoping and cooperating agency review periods of the Draft RMPA/EA, the BLM Taos ID Team decided |

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| | | | habitat improvements, and other resource uses." However, existing access, wildlife-habitat improvements, and other appropriate resource uses already are fully accounted for by the congressional proposal through the applicable wilderness management standards and the carefully-delineated boundaries of that proposal. The Draft RMPA/EA ignores those boundaries and standards, instead using the very coarse approach of a standard elevation for a boundary. Once the Monument Plan is finalized, we recommend that the BLM implement the non-impairment standard by taking steps to prevent unlawful motorized incursions around the existing gate at the bottom of the old road. | on the 8,200-foot contour line for the boundary which: (1) meets the minimum acreage requirements; and (2) reduces potential future conflicts with multiple-use management, while meeting the LWC requirements, and provides continued access to traditional uses of the Monument, such as fuelwood harvest. As an example, in consideration of traditional uses, the BLM acknowledges the use of chainsaws for the harvest of fuelwood, which could not be accommodated through cherry-stem roads. Additional context has been added to Section 3.2.17 of the Proposed RMPA/EA. |
| 216 | Wildland Fire | • Sally Paez, New Mexico Wild<br>• Nick Streit, Friends of Río Grande del Norte National Monument<br>• Jeremy Romero, National Wildlife Federation<br>• Mike Fiebig, American Rivers | Appendix D, section D.6 page D-7 BMP 1 The BMP states that "Prescribed burning will be performed during conditions that will meet objectives" however it is not clear what the "objectives" are. Recommend clarifying this, and including that "slash piles should be burned during the winter to avoid unintentional mortality of small animals that may inhabit the piles during warmer seasons." | The BMP in Appendix D of the Proposed RMPA/EA has been updated to read "Prescribed burning will be in accordance with the agency-approved burn plan." |

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| | | • Rachel Conn, Amigos Bravos<br>• Jesse Deubel, New Mexico Wildlife Federation<br>• Romir Lahiri, Conservation Lands Foundation<br>• Roberta Salazar, Rivers and Birds<br>• Bryan Bird, Defenders of Wildlife<br>• Diane Reese, Sierra Club Rio Grande Chapter<br>• Andrew Black, EarthKeepers 360<br>• Michael Casaus, The Wilderness Society<br>• Max Trujillo (HECHO)<br>• Andrew Rothman, | | |

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| | | WildEarth Guardians | | |

## J.1.1 References

Bailey, D. W., J. C. Mosley, R. E. Estell, C. F. Andres, M. Horney, J. R. Hendrickson, J. W. Walker, K. L. Launchbaugh, and E. A. Burritt. 2019. *Targeted Livestock Grazing: Prescription for Healthy Rangelands.* Synthesis Paper. Rangeland Ecology & Management 72(6). November. Available: https://www.sciencedirect.com/science/article/pii/S1550742419300399. Accessed: July 12, 2024.

Pinyon Jay Multi-State Working Group. 2020. *Conservation Strategy for the Pinyon Jay (*Gymnorhinus cyanocephalus*).* Version 1. Available: https://partnersinflight.org/resources/conservation-strategy-for-pinyon-jay/. Accessed August 1, 2024.

Seltzer-Rogers, Heather. 2024. *Class I for the Río Grande del Norte National Monument Management Plan, Rio Arriba and Taos Counties, New Mexico*. Chronicle Heritage Technical Report No. 23-583. Albuquerque, NM: Chronicle Heritage, LLC.

Tala. 2022. *Vegetative Changes Within Areas of Critical Environmental Concern in Taos and Rio Arriba Counties of Northern New Mexico 2000–2020*. Master of Science Geographic Information Systems Technology Final Project, University of Arizona.

U.S. Department of the Interior, Bureau of Land Management (BLM). 2000a. *The Rio Grande Corridor Final Plan and Record of Decision*. Available: https://w3.spa.usace.army.mil/urgwops/eis_admin_record/Ref150.PDF. Accessed: August 27, 2024.

_____. 2000b. *Final Environmental Impact Statement for Riparian and Aquatic Habitat Management in the Taos Field Office, New Mexico. Volume 2: Proposed Riparian and Aquatic Habitat Management Plan*. Taos, NM. BLM/NM/PL-00-008-1040.

_____. 2001. *New Mexico Standards for Public Land Health and Guidelines for Livestock Grazing Management*. January. Available: https://www.blm.gov/sites/blm.gov/files/Standards%20for%20Public%20Land%20Health%20and%20Guidelines%20for%20Livestock%20Grazing%20in%20New%20Mexico.pdf. Accessed: February 9, 2024.

_____. 2008. *BLM National Environmental Policy Act Handbook H-1790-1.* Available at: https://www.blm.gov/sites/blm.gov/files/uploads/Media_Library_BLM_Policy_Handbook_h1790-1.pdf. Accessed August 1, 2024.

_____. 2019. *Río Grande del Norte National Monument Science Plan*. Unpublished Report.

Walston, L. J., H. M. Harmann, K. L. Wescott, E. A. Zvolanek, K. E. Rollins, and L. R. Fox. 2016. *San Luis Valley–Taos Plateau Level IV Ecoregion Landscape Assessment*. Prepared for U.S. Department of Interior, Bureau of Land Management, Colorado State and New Mexico State Offices. Available: https://www.blm.gov/sites/blm.gov/files/uploads/Landscape%20Assessment%20Final%20Report.pdf. Accessed: August 27, 2024.

**Acronyms**

| Term | Definition |
|---|---|
| ACEC | Area of Critical Environmental Concern |
| AIM | Assessment, Inventory, and Monitoring |
| AO | Authorized Officer |
| AUM | Animal Unit Month |
| BLM | Bureau of Land Management |
| BMP | best management practice |
| CAS | Comprehensive Management Strategy |
| CE | Categorical Exclusion |
| CEQ | Council on Environmental Quality |
| CFR | Code of Federal Regulations |
| DEIS | Draft Environmental Impact Statement |
| DOT | U.S. Department of Transportation |
| EA | Environmental Assessment |
| e-bike | electric bicycle |
| EIS | environmental impact statement |
| eMTB | electric mountain bike |
| EPA | U.S. Environmental Protection Agency |
| ESA | Endangered Species Act |
| FAA | Federal Aviation Administration |
| FEIS | Final Environmental Impact Statement |
| FLPMA | Federal Land Policy and Management Act |
| FO | Field Office |
| FONSI | Finding of No Significant Impact |
| FR | *Federal Register* |
| FY | Fiscal Year |
| GHG | greenhouse gas |
| IMBA | International Mountain Bicycling Association |
| IPCC | Intergovernmental Panel on Climate Change |
| JDB | John Dunn Bridge |
| LUP | Land Use Plan |
| LWC | Land with Wilderness Characteristics |
| MMP | Monument Management Plan |
| Monument | Río Grande del Norte National Monument |
| Monument Management Plan | *Río Grande del Norte National Monument Management Plan* |
| MOU | Memorandum of Understanding |
| mph | miles per hour |
| MUSY | Multiple Use Sustained Yield |
| NDVI | Normalized Difference Vegetation Index |

| Term | Definition |
|---|---|
| NEPA | National Environmental Policy Act |
| NHPA | National Historic Preservation Act |
| NLCS | National Landscape Conservation System |
| NM CRAG | New Mexico Climbers Resource and Advocacy Group |
| NMACP | New Mexico Avian Conservation Partners |
| NMCRIS | New Mexico Cultural Resources Information System |
| NMDA | New Mexico Department of Agriculture |
| NMDGF | New Mexico Department of Game and Fish |
| NMED | New Mexico Environment Department |
| NOI | Notice of Intent |
| NPS | National Park Service |
| NTSA | National Trails System Act |
| OHV | off-highway vehicle |
| ONRW | Outstanding National Resource Water |
| OSNHT | Old Spanish National Historic Trail |
| PL | Public Law |
| RCA | Reserve Common Allotment |
| RGDNNM | Río Grande del Norte National Monument |
| RMP | Resource Management Plans |
| RMP | Resource Management Plan |
| RMPA | Resource Management Plan Amendment |
| RMZ | Recreation Management Zone |
| ROW | right of way |
| SMART | specific, measurable, attainable, relevant and time-specific |
| SRMAs | special recreation management areas |
| SRP | Special Recreation Permit |
| Taos RMP | *2012 Taos Resource Management Plan* |
| TMDLs | Total Maximum Daily Loads |
| TMP | Travel Management Plan |
| TU | Trout Unlimited |
| UNESCO | United Nations Educational, Scientific and Cultural Organization |
| USC | United States Code |
| USDA | U.S. Department of Agriculture |
| USFS | U.S. Forest Service |
| USFWS | U.S. Fish and Wildlife Service |
| VFD | Volunteer Fire Department |
| VRM | Visual Resource Management |
| WSA | Wilderness Study Area |