

**To:** McKinney Briske[mbriske@blm.gov]; John Bailey[jbailey@blm.gov]  
**From:** Fisher, Timothy  
**Sent:** 2017-06-28T09:58:35-04:00  
**Importance:** Normal  
**Subject:** Fwd: another RGDN request  
**Received:** 2017-06-28T09:58:54-04:00  
RGdN Scoping Report 5.22.14 (1).pdf

Hi McKinney or John

Is there a Executive Summary on the Public Scoping for Rio Grande del Norte National Monument? The Monument Review data call Executive Summary mentions the document but it is not in the google docs folder.

We found the full scoping document but was hoping there is a summary somewhere?

I appreciate you looking.

Timothy J Fisher, Program Lead

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----- Forwarded message -----

From: **Wootton, Rachel** <[rwootton@blm.gov](mailto:rwootton@blm.gov)>  
Date: Wed, Jun 28, 2017 at 9:51 AM  
Subject: Re: another RGDN request  
To: Nikki Moore <[nmoore@blm.gov](mailto:nmoore@blm.gov)>  
Cc: Timothy Fisher <[tjfisher@blm.gov](mailto:tjfisher@blm.gov)>, Sally Butts <[sbutts@blm.gov](mailto:sbutts@blm.gov)>

Hi Nikki,

It actually isn't in the folder. I did find the full public scoping report online. It includes an introduction, which would probably have the information they are looking for, but it is probably too long. Tim is reaching out to McKinney and John Bailey in New Mexico for the executive summary.

The full report is attached and the link is below:

[https://eplanning.blm.gov/epl-front-office/projects/lup/72807/97058/117224/RGdN Scoping Report 5.22.14 \(1\).pdf](https://eplanning.blm.gov/epl-front-office/projects/lup/72807/97058/117224/RGdN_Scoping_Report_5.22.14_(1).pdf)

Best,

Rachel

--

Rachel Wootton  
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[Visit us online!](#)

On Wed, Jun 28, 2017 at 8:02 AM, Nikki Moore <[nmoore@blm.gov](mailto:nmoore@blm.gov)> wrote:

Can we try and track this down for Randy? I guess they referenced it in the data but didn't include it on the drive.

Nikki Moore  
Acting Deputy Assistant Director,  
National Conservation Lands and Community Partnerships  
Bureau of Land Management, Washington DC  
202.219.3180 (office)  
202.288.9114 (cell)

Begin forwarded message:

**From:** "Bowman, Randal" <[randal\\_bowman@ios.doi.gov](mailto:randal_bowman@ios.doi.gov)>  
**Date:** June 26, 2017 at 4:25:29 PM EDT  
**To:** Nikki Moore <[nmoore@blm.gov](mailto:nmoore@blm.gov)>  
**Subject:** another RGDN request

The additional information response has

"A detailed scoping report was completed (see attached Executive Summary Public Scoping, ..."

but I can't find this in the drive; would like to include it in Downey's briefing book

# **Río Grande del Norte National Monument**

## **Resource Management Plan**

### **Scoping Report**



**May 23, 2014**

**Taos Field Office  
226 Cruz Alta Road  
Taos, New Mexico 87571**

**BLM**

**New Mexico • Taos Field Office**



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## **Introduction**

### **Purpose and Need for the Plan**

The Río Grande del Norte National Monument plan (henceforth referred to as the Monument plan) will be developed through the preparation of an environmental assessment in compliance with the National Environmental Policy Act (NEPA) of 1969 and amendment of the 2012 Taos Resource Management Plan (RMP). The purpose of the Monument plan is to provide broad-scale direction for the management of public lands and resources within the Río Grande del Norte National Monument, and to protect the monument objects identified in the Presidential Proclamation establishing the Monument. The Monument plan will present desired outcomes – expressed in terms of goals and objectives for resource conditions and uses – and establish the allowable uses, management actions, and special designations that will enable the BLM to achieve the desired outcomes. The Monument plan will guide the Taos Field Office in the implementation of all its subsequent management actions and site-specific activities within the boundaries of the Monument.

The Río Grande del Norte National Monument was established on March 25, 2013 by Presidential Proclamation under the authorities of section two of the Antiquities Act (34 Stat. 225, 16 U.S.C. 431). The Monument includes approximately 243,000 acres of public land managed by the Taos Field Office of the Bureau of Land Management (BLM) under the land use direction provided in the 2012 Taos RMP. The Presidential Proclamation which designated the Río Grande del Norte National Monument requires the Secretary, through the BLM, to prepare and maintain a management plan specific to the Monument to protect the Monument objects, as described within the proclamation. Further, it is BLM policy that each Monument has an independent Record of Decision or Decision Record (M-6220 1.6 G.2).

Management decisions presented in the Monument plan will be in accordance with the Presidential Proclamation and in accordance with principles of multiple use and sustained yield, as mandated by the provisions of the Federal Land Policy and Management Act (FLPMA) of 1976, which establishes public land policy and sets forth the requirement for the BLM to develop, maintain, and when appropriate, revise or amend land use plans for the management of public lands.

### **Description of the Monument Objects**

The presidential proclamation identifies four objects for which the new National Monument was created to protect: cultural resources, geologic resources, wildlife habitat, and ecological diversity. These objects are summarized in Table 1 and discussed more broadly below.

**Table 1: Summary of Monument Objects**

<b>Object</b>	<b>Key Components</b>	<b>Summary</b>
<b>Cultural Resources</b>	<p>Prehistoric features: rock art, pottery, tools, transitory habitations, hunting</p> <p>Historic features: archeological remnants indicative of exploration, trade, homesteading, ranching, hunting</p> <p>Cultural Landscape: viewshed, cultural settings</p>	<p>The vestiges of human use demonstrated by archeological sites and artifacts found in abundance in the monument.</p> <p>A unique cultural landscape that has remained minimally changed over time.</p>
<b>Geologic Resources</b>	<p>Rift valley</p> <p>Volcanic features</p> <p>Rio Grande gorge</p> <p>Springs</p>	<p>The Taos Plateau Volcanic Field (upon which the Monument is located almost entirely), the Rio Grande gorge (which cut through the plateau), and the springs in the gorge (which provide the majority of the river flow during low flow periods).</p>
<b>Wildlife Habitat</b>	<p>Migratory birds, raptors, Southwestern willow flycatcher, and other bird species</p> <p>North American river otter</p> <p>Bats</p> <p>Gunnison's prairie dogs</p> <p>big game and small mammal species</p> <p>predator species</p> <p>Rio Grande cutthroat trout</p>	<p>The Río Grande del Norte provides habitat for a wide variety of fish and wildlife species that use the Monument year-long or seasonally.</p>
<b>Ecological Diversity</b>	<p>Ecosystem diversity</p> <p>Species diversity</p> <p>Genetic diversity</p>	<p>The health, resilience, and diversity of organisms and ecosystems.</p>



### ***Cultural Resources***

The term “cultural resources” is generally considered to be the collective evidence of the past activities and accomplishments of people. This includes archeological sites and artifacts, as well as cultural landscapes that provide insights into the ways humans have viewed and interacted with the environment through time.

Although few human groups have attempted to live year-round in the harsh landscape of the Río Grande del Norte, the area has a long history of human use demonstrated by an abundance of archeological sites and artifacts. The Río Grande gorge lies within the traditional area of a number of extant tribal groups, but the Monument contains archeological resources that date back at least 11,000 years, long before the emergence of any contemporary cultures. Archaeological remains associated with prehistoric Native Americans include thousands of petroglyphs, small hunting blinds, chipping stations, potsherds, stone tools, projectile points, and the remnants of ancient trails, among other artifacts.

More recent artifacts and images mark the passage of traders, settlers, and Hispanic explorers dating back to the early 18th century, as well as Hispanic homesteading. Most recently, a group of eastern homesteaders attempted to make a living following World War I within the largely waterless and sometimes harsh environment of the Monument. Their story is written on the landscape, along with those of Hispanic sheep herders and other ethnic groups, by the remnants of rustic homes, root cellars, cistern-style water catchments, cast metal toys, and World War I brass uniform buttons that were left behind after the region was mostly abandoned in the mid-1930's.

While diverse peoples have used this area intermittently for thousands of years, its challenging conditions make most of the Monument environment inhospitable for permanent settlement. A long cultural tradition of transitory and nomadic hunting and gathering that lasted for at least 10,000 years, left most of the Monument environment unencumbered by visible human developments. For this reason, the viewshed, cultural settings, and other components of the Monument's unique cultural landscape have remained minimally changed over the years.

### ***Geologic Resources***<sup>1</sup>

The Monument falls within the Río Grande Rift, a continental-scale geologic feature that runs from central Colorado to Mexico and is one of the world's major rift systems. The rift basin, named the San Luis Basin, is 150 miles long, generally between 7000' and 8000' in elevation, and is considered to be the largest high-elevation valley on Earth. In the Monument, the basin is bounded by the Sangre de Cristo Mountains to the east and the Tusas Mountains to the west, part of the San Juan Mountains range.

The Monument is located almost entirely within the Taos Plateau Volcanic Field, the largest and most diverse volcanic landscape in the San Luis Basin rift. At least 40 distinct volcanic vents have been documented on the plateau, mostly within the Monument. Cerro de la Olla, Cerro del Yuta, and other volcanic cones provide visible reminders of the area's volatile geologic past. The volcanoes of the

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<sup>1</sup> Summarized from information provided by Paul Bauer, New Mexico Bureau of Geology & Mineral Resources

plateau have a variety of shapes and compositions ranging from massive, steep-sided lava domes to the 50 cubic miles of Servilleta Basalt that erupted for over millions of years and covered the plateau.

The volcanic rock in the monument has long been a center of research and scientific studies. Important studies include early pioneering work on Earth's paleomagnetic record from the exposures of stacked basalt flows in the gorge, studies of the origin of basalts, and work developing techniques for precise age dating of volcanic rocks.

The Monument also includes the Río Grande gorge, a deep canyon with only a few drivable access points over nearly 70 miles of river. The gorge was rapidly eroded by the Río Grande and its tributaries during Pleistocene time and is the focus of various geologic studies.

Within the Monument, there are three major, perennial Río Grande tributaries: the Red River, the Río Hondo, and the Río Pueblo de Taos. During times of low river discharge, most of the flow of the Río Grande through the Monument comes from the output of hundreds of springs. A study by the New Mexico Bureau of Geology, with collaborations by the BLM, inventoried these springs and estimated that the springs provide about 126 cubic feet per second (55,000 gallons per minute) of continuous, fresh water to the river. The springs of the Río Grande gorge also display a broad variety of sources, ages, and characteristics. Each spring occurrence is the direct result of the specific combination of the geology and the groundwater hydrology at that location.

### ***Wildlife Habitat***

The term *habitat* refers to “the resources and conditions present in an area that produce occupancy – including survival and reproduction – by a given organism. Habitat is organism-specific; it relates the presence of a species, population, or individual (animal or plant) to an area's physical and biological characteristics. Habitat implies more than vegetation or vegetation structure; it is the sum of the specific resources that are needed by organisms. Wherever an organism is provided with resources that allow it to survive, that is habitat. Thus, migration and dispersal corridors and the land that animals occupy during breeding and nonbreeding seasons are habitat.”<sup>2</sup>

The Río Grande del Norte provides habitat for a wide variety of fish and wildlife species. These include:

- Migratory birds such as Canada geese, herons, sandhill cranes, hummingbirds, and American avocets;
- Golden eagles, bald eagles, hawks, falcons, and other raptors;
- the endangered Southwestern willow flycatcher;
- other bird species, such as Merriam's turkey, scaled quail, mourning dove, mountain plover, loggerhead shrike and pinon jay;
- the reintroduced North American river otter;
- several species of bats;

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<sup>2</sup> Hall, L. S., Krausman, P. R., & Morrison, M. L. (1997). The habitat concept and a plea for standard terminology. *Wildlife Society Bulletin*, 173-182.

- Gunnison's prairie dogs;
- big game species such as Rocky Mountain elk, mule deer, pronghorn, and Rocky Mountain bighorn sheep;
- several predator species, including, ringtail, black bear, coyote, grey fox, red fox, kit/swift fox, cougar, and bobcat;
- Rio Grande cutthroat trout.

### ***Ecological Diversity***

Although there is no single published definition for ecological diversity, the Monument proclamation describes ecological diversity in terms of biological diversity (or biodiversity) and ecosystem diversity. Biodiversity refers to the number and variety of living organisms. This includes plant, animal, and invertebrate species as well as microorganisms and fungi. Biodiversity also includes genetic diversity, which is the heritable variation within and between populations of organisms.<sup>3</sup> Ecosystem diversity refers to the number and variety of ecosystems. In addition to the biotic community (i.e. plants, animals, microorganisms, and fungi), an ecosystem also consists of the physical or abiotic environment that sustains the biota. The abiotic environment includes the soil or substrate, the atmospheric conditions, hydrology, weather and climate, topographic relief and aspect, the nutrient regime, and the salinity regime.<sup>4</sup>

Ecological diversity is directly affected by the resistance, resilience, and integrity of the ecosystems. Resistance refers to an ecosystem's ability to maintain its structural and functional attributes when faced with stress and disturbance. Resilience refers to an ecosystem's ability to regain structural and functional attributes that have been harmed by stress or disturbance. Ecosystem integrity involves the condition of ecosystem that displays biodiversity of the system and is capable of sustaining normal ecosystem function.<sup>4</sup> It is impossible to remove all forms of stress and disturbance from an environment, thus the resistance and resilience of the ecosystem play an important role in maintaining ecosystem integrity and health while protecting ecosystem diversity.

In addition to the fish and wildlife species described above, the Monument proclamation identifies several plant species and plant communities as important for contributing to the ecological diversity within the Monument. These include riparian species such as cottonwood and willows; canyon species such as piñons, spruce, aspen, and Douglas fir trees; and sagebrush communities.

### **Description of the Planning Area**

The planning area includes all lands within the Monument boundary identified in the designating proclamation (see Figure 1 and Table 2). This includes approximately 243,000 acres of public land

<sup>3</sup> United Nations Environment Programme. [http://www.unep-wcmc.org/what-is-biodiversity\\_50.html](http://www.unep-wcmc.org/what-is-biodiversity_50.html)

<sup>4</sup> Society for Ecological Restoration International Science & Policy Working Group, 2004. The SER International Primer on Ecological Restoration. www.ser.org & Tucson: Society for Ecological Restoration International.

managed by the Taos Field Office and located within Taos and Rio Arriba counties in northern New Mexico. Management decisions in the Monument plan will apply only to the surface and subsurface estate administered by the BLM and will recognize all valid existing rights.

**Table 2: Land ownership in Monument**

Ownership Category (Surface Only)	Acres*
BLM	242,710
Private	28,850
State of New Mexico	39,170
Total	310,740

*\*GIS acres rounded to nearest tenth*

## Types of Planning Decisions

The land use plan decisions that will be made in the Monument plan fall into two categories: (1) desired outcomes and (2) allowable uses and actions anticipated to achieve desired outcomes. All desired outcomes and allowable uses must protect the Monument objects identified above.

### 1. Desired Outcomes

The Monument plan will identify desired outcomes expressed in terms of specific goals and objectives. Goals and objective are established to direct the BLM's actions towards most effectively meeting legal mandates, regulatory responsibilities, departmental and agency policy or other guidance, and to achieve other important resource needs. **Goals** are broad statements of desired outcomes within the monument and are usually not quantifiable. **Objectives** identify specific desired outcomes for resources. They are usually quantifiable and measurable and may have established timeframes for achievement.

### 2. Allowable uses and management actions anticipated to achieve desire outcomes

**Allowable Uses:** The Monument plan must identify uses (also called allocations) that are allowable, restricted, or prohibited within the monument. These allocations identify lands where uses are allowed and where any limitations on the use are applied. Certain lands may be open or closed to specific uses based on legislative, regulatory, or policy requirements or criteria to protect sensitive resource values.

**Management Actions:** The Monument plan must also identify specific management actions to meet the goals and objectives. These actions include proactive measures, measures that guide day-to-day activities, and establishment of administrative designations.

## Collaborative Planning Process

The BLM Land Use Planning Handbook (H-1601-1) defines collaboration as “a cooperative process in which interested parties, often with widely varied interest, work together to seek solutions with broad support for managing public and other lands.” The BLM is committed to an interactive and dynamic planning process that involves input from the widest possible area.

The process for the Monument plan and accompanying EA began with the publication of the Notice of Intent (NOI) in the Federal Register on January 3, 2014. As outlined in Figure 2, the process continues through scoping, alternatives development, and the development of a draft plan/draft EA, a proposed plan/final EA, a protest period, and the final decision record. A formal public comment period will be provided following the release of the draft Monument plan.

To be added to the e-mail or mailing list to receive future updates on the Monument planning process, including the announcement for the next public comment period, please contact Brad Higdon, Planning and Environmental Specialist, at the BLM Taos Field Office at 575-758-8851.

Future information about the planning process will be posted at this weblink:

[http://www.blm.gov/nm/st/en/fo/Taos\\_Field\\_Office/Taos\\_Planing/rgdnnm\\_management.html](http://www.blm.gov/nm/st/en/fo/Taos_Field_Office/Taos_Planing/rgdnnm_management.html)

## Scoping Process

The BLM follows the public involvement requirements according to the Council on Environmental Quality (CEQ) regulations set forth in Title 40 of the Code of Federal Regulations (CFR), Part 1501.7, which states, “There should be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action.” The scoping process is open to agencies and the public to identify their range of issues to be addressed during the planning process. The BLM solicits comments from relevant agencies and the public, organizes and analyzes all of the comments received, and then identifies the issues that will be addressed during the planning process. These issues are the scope of analysis for the Plan.

The formal public scoping process for the Monument began on January 3, 2014 with the publication of the NOI in the Federal Register. The NOI initiated the public scoping process and served to notify the public of the BLM’s intent to develop a plan for the Monument. The BLM also issued a media release and sent a mail and email announcement of the scoping period to the existing contact list of interested public. Under CEQ regulations, the public comment period must continue for at least 30 days; however, the BLM extended this public comment period until March 6, 2014, which provided just over 60 days for

comment submittal. Although the formal comment period has ended, the BLM will continue to consider all comments received to the best of the agency's ability. However, any future scoping comments received may not be formally published in a scoping report or other document.

The BLM hosted four public scoping meetings to further provide the public an opportunity to become involved and offer comment. A letter announcing the public scoping meetings was sent via email to the existing contact list of interested public. The public scoping meetings were also advertised through media releases, public service announcements, and the BLM's website for the Monument.

### Public Scoping Meetings

Public Scoping Meetings were held from 6:00 p.m. to 8:00 p.m. at the locations listed below.

**Table 3: Public Scoping Meetings**

<b>Date</b>	<b>Location</b>	<b>Number of Participants*</b>
<b>January 28, 2014</b>	Taos, NM: The Sagebrush Inn	127
<b>January 29, 2014</b>	Questa, NM: The Village Hall	30
<b>January 30, 2014</b>	Antonito, CO: Senior Citizens Association	21
<b>February 4, 2014</b>	Santa Fe, NM: BLM State Office	17

*\*Only includes participants that registered at the entrance. Does not include BLM staff.*

All scoping meetings followed a similar format. The initial thirty to forty-five minutes of the meeting was an open house format with BLM resource specialists available to answer questions. Poster-sized maps depicting current management in the Monument were on display throughout the room. This was followed by a twenty minute PowerPoint presentation on the Monument designation and the BLM's land use planning process. The remainder of the meeting was a public forum during which any member of the public had the opportunity to provide comments about the Monument plan.

### Written Scoping Comments

The formal scoping period began with the publication of the Notice of Intent on January 3, 2014 and ended on March 6, 2014. Public scoping comments were accepted as written letters, by fax, or through e-mail.

The BLM received approximately 1,200 submissions from the public during the official public scoping period. Of these, 126 were unique comment letters and 1,110 were form letters.

**Table 4: Public Scoping Comments**

<b>Format</b>	<b>Submissions</b>
Email	100
Mail or fax*	23
Form Letter A	288
Form Letter B	240
Form Letter C	582
<b>Total</b>	<b>1,236</b>

*\*does not include duplicate submissions sent via email*

## Cooperating Agencies

The CEQ's regulations implementing NEPA allow federal agencies (as lead agencies) to invite tribal, state, and local governments, as well as other federal agencies, to serve as cooperating agencies during the NEPA process. In order to serve as a cooperating agency, the potential agency or government must have either jurisdiction by law or special expertise relevant to the environmental analysis. For more information on cooperating agencies, please see the publication "A Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners 2012" which can be downloaded at this link:

[http://www.blm.gov/style/medialib/blm/wo/Planning\\_and\\_Renewable\\_Resources/NEPS.Par.93370.File.dat/BLM\\_DeskGuide\\_CA\\_Relationships.pdf](http://www.blm.gov/style/medialib/blm/wo/Planning_and_Renewable_Resources/NEPS.Par.93370.File.dat/BLM_DeskGuide_CA_Relationships.pdf)

The following agencies/organizations were sent invitation letters to participate as a cooperating agency:

- New Mexico Department of Game and Fish **(Invitation Accepted)**
- Taos Soil and Water Conservation District **(Invitation Accepted)**
- New Mexico State Land Office **(Invitation Accepted)**
- New Mexico State Historic Preservation Officer **(Invitation Accepted)**
- Village of Questa
- San Antonia del Rio Colorado Land Grant
- Taos County
- Rio Arriba County

- Taos Pueblo
- U.S. Forest Service – Carson National Forest
- U.S. Fish & Wildlife Service – Southwest Region

Agencies not listed above may later become cooperating agencies if they are found to have jurisdiction by law or special expertise. Cooperating agency meetings have been held on March 20, 2014 and May 1, 2014. Future meetings will be scheduled through the duration of the planning process.

## **Tribal Consultation**

Letters to initiate tribal consultation were sent to the tribes listed below on January 29, 2014. The letters notified the tribes that the BLM is developing a resource management plan for the new Monument and requested government-to-government consultation between the BLM and the tribes.

- Comanche Indian Tribe
- Hopi Tribe
- Isleta Pueblo
- Jicarilla Apache Nation
- Kiowa Tribe
- Navajo Nation
- Okay Owingeh Pueblo
- Picuris Pueblo
- Pojoaque Pueblo
- San Ildefonso Pueblo
- Santa Clara Pueblo
- Taos Pueblo
- Tesuque Pueblo
- Ute Mountain Tribe
- Zia Pueblo

In-person tribal consultation meetings were held with tribal leaders that accepted the BLM's request for consultation on the dates listed below.

- Taos Pueblo – March 19, 2014
- Picuris Pueblo – April 7, 2014
- Hopi Tribe – April 23, 2014
- Southern Ute Tribe – April 30, 2014

Future meetings will be scheduled if requested by any of the above tribes or at key steps during the planning process, such as the release of the draft Monument plan.



## Public Comments and Planning Issues

This section summarizes the individual comments received during the formal scoping period and the planning issues identified during scoping. Planning issues are defined in the BLM's land use planning handbook as "disputes or controversies about existing and potential land and resource allocations, levels of resource use, production, and related management practices. Issues include resource use, development, and protection opportunities for consideration in the preparation of the RMP. These issues may stem from new information or changed circumstances, and the need to reassess the appropriate mix of allowable uses" (H-1601-1, p. 19).

Planning issues for the Monument plan were identified based on public comments provided during the formal scoping period, input from BLM Taos Field Office staff, and input from cooperating agencies. Each topic identifies planning issues that will be carried forward to be resolved in the Monument plan, items that will be addressed through policy or administrative action, and issues that are beyond the scope of the Monument plan. Issues considered to be beyond the scope of the Monument plan include any issues that are not within the jurisdiction of the BLM, issues outside of the Monument boundary, or issues that will be addressed at the implementation level. Implementation level decisions are those that require site-specific planning and NEPA analysis.

## Aviation

### Public Comment Summary

Concerns regarding military over-flights

- Military training forays by Osprey helicopters within the monument and into the gorge itself is inappropriate and terribly dangerous, having the potential to disturb wildlife and destroy their habitat, and pose a threat to other resources such as archaeological sites as well as human lives.
- Military flights will destroy the quietness, serenity, and tranquility of the Monument.
- The BLM should contact the Cannon Air Force Base and Kirtland Air Force Base to request a "bubble" of restricted air space over the monument.
- The BLM should ask the nearby U.S. Air Force bases, including the Cannon Air Force Base as well as Kirtland Air Force Base, to create restrictive training flight paths over the Monument and refrain from flying below 5,000 feet.
- Military flights should not be allowed within the BLM specified spatial buffers for sensitive avian species which nest within the Monument.
- Low and middle altitude flights should not be allowed with the exception of general civilian aviation and emergency aircraft, such as firefighting, search-and-rescue, and emergency medical response. This restriction should apply not only to those flights considered low altitude by the FAA (500 feet and less above ground level (AGL)), but all low and middle level military flights below 5000 feet AGL.

- The BLM should coordinate with the US Air Force to establish a no-fly zone over the Monument to eliminate threats to wildlife resources and other values, along with area residences.
- The BLM should establish an agreement with regional US Air Force and New Mexico National Guard regional air bases and the regional rescue group that requires air traffic to be educated and aware of the sensitive nesting times and locations within the Monument.
- No military use should be allowed in the monument whether ground-based or air-based.

#### General concerns regarding aviation

- All aircrafts should be excluded from flying lower than 3000 feet above the highest point in the monument, and night-time flights should be limited to 5000 feet above the highest point in the monument.
- The BLM should establish the following air traffic guidelines:
  - Notify all special recreation permittees of sensitive Bird of Prey nesting times and locations, and ask that they respect these sensitive nesting sites.
  - The BLM should establish an agreement with the Taos Airport to inform pilots and commercial operations to recommend Monument flight guidelines for sensitive wildlife raptor times and locations within the Monument.
  - The BLM should establish an agreement with Taos Airport to provide planning input on any development of airport expansion, runways, flight paths, etc.
  - The BLM should provide education and outreach to fixed wing and balloon pilots, perhaps under a contract or agreement with Rivers and Birds to educate them on sensitive nesting times and locations within the Monument (signage at the airport, etc).
  - Taos County should pass a resolution or ordinance that requires air traffic (federal, commercial and private) to be educated and aware of the sensitive nesting times and locations and preferred flight routes within the Monument.
- Only non-motorized commercial tour operators should be allowed in the airspace above the monument (i.e., hot air balloons). Commercial surveillance drones and private flights should not be allowed.
- Chemtrails should be prohibited over the monument, as they negatively affect waters and wildlife.

#### **Issues to be resolved in the Monument plan**

1. *What opportunities exist within the jurisdiction of the BLM to protect sensitive species and resources from the impacts of air traffic over the Monument?*
2. *What opportunities exist for the BLM to collaborate with other agencies, such as the FAA or military bases, to protect sensitive species and resources by placing restrictions on flights over the Monument?*

### **Issues beyond the Scope of the Monument plan**

#### *1. What air traffic restrictions or guidelines should be required by the BLM in the Monument air space?*

It is not within the BLMs jurisdictional authority to impose restrictions or establish guidelines for air traffic. Air traffic is regulated by the Federal Aviation Administration (FAA).

## **Climate Change**

### **Public Comment Summary**

The Monument plan should address the impacts of climate change.

- The Monument plan should identify the potential effects of climate change on monument objects, biodiversity, and other resources. The BLM should then take appropriate measures to increase the landscape's resiliency to these predictable changes and impacts.
- To reduce the vulnerability of the environment to adverse climate change impacts, the BLM should promote ecological resiliency and adaptability by protecting landscape permeability, intact wildlife habitat (in particular core areas and migration/adaptation corridors), healthy watersheds, and wildlife linkages to allow species to migrate towards more suitable environments. The BLM can do this by identifying anticipated climate change impacts and vulnerable resources and, because it may not be feasible to actually prevent those impacts, then taking action to reduce or eliminate impacts from existing stressors to those resources.
- The BLM should use a risk assessment and management approach to address climate change in the Monument plan. An example of this approach has been submitted to the BLM.
- The BLM should consider the effects of climate change and drought in all management decisions, including the protection of old-growth trees, livestock grazing, woodcutting guidelines, woodland thinning projects, and protection of springs and cryptobiotic soils. Special attention should be paid to severe drought and fire danger, both within and adjacent to the Monument.

The BLM should consider using the following resources when analyzing the impacts of climate change:

- Synthesis and Assessment Products of the U.S. Global Change Research Program ("USGCRP")
- The USGCRP's other peer reviewed assessments. In particular, USGCRP's report on climate change impacts to water resources, ecosystems, agriculture and forestry, and other resources in the United States.
- A report entitled Hotter and Drier: The West's Changed Climate, published by the Rocky Mountain Climate Organization and NRDC.
- The BLM should engage the Southern Rockies Landscape Conservation Cooperative (LCC) and the DOI Southwest Climate Science center to compile available data and resources for the landscape, including the Monument, Carson National Forest, and San Luis Valley, to help inform

land use planning processes in this region.

The Monument plan should identify specific concrete mitigation measures to protect the Monument's objects of value from degradation due to climate change, including:

- Proactive habitat protection and augmentation;
- Reduction of other stressors such as recreation, roads, grazing and logging should be analyzed and implemented to improve resiliency of the Monument's resources;
- Restoration projects with a focus on expanding wildlife habitat for sensitive species;
- Efforts to augment flows in the Rio Grande and other rivers in the Monument should be made to reduce high water temperatures and provide aquatic and riparian habitat for wildlife;
- Wildlife corridors should be identified, protected, and improved by reducing current stressors such as roads, utility lines, and recreation.

#### **Issues to be resolved in the Monument plan**

1. *How should the BLM assess the potential effects of climate change on the Monument objects and other important resources?*
2. *How should the BLM address any adverse effects of climate change on the Monument objects and other important resources?*
3. *How can vulnerability to adverse effects from climate change be reduced in the Monument?*
4. *How should the BLM monitor for future effects of climate change in the Monument?*
5. *How might an adaptive management approach be used to address adverse impacts of climate change in the Monument?*
6. *How might adaptive management be used to respond to possible ecosystem variability in the Monument caused by climate change?*

## **Consultation and Coordination**

### **Public Comment Summary**

The BLM needs to coordinate with other agencies and interested public in the region.

- The public needs to be provided information about adjacent and other proposed federal projects; whether those are on public lands or military land and airspace.

- The Monument plan should use a bioregional approach. The lands within the boundary area comprise only a part of the larger bioregion. Avian flyways, watersheds, wildlife migratory pathways, air and water quality and other natural systems extend well beyond the monument boundary.
- The BLM should coordinate planning efforts for the Monument and the BLM Rio Grande Natural Area in Colorado to provide wildlife migration corridor and trail continuity.
- The Monument planning process should be integrated with the San Luis Valley BLM Solar mitigation study currently underway and the BLM Xcel Poncha Pass transmission corridor Environmental Assessment that is currently being analyzed in the northern San Luis Valley. The BLM should compile and share information on strategic planning with the public.
- The BLM should establish an inter-agency, inter-jurisdictional workgroup, with BLM Staff Liaisons, RAC members, and representatives from NMDGF, USFW, USFS, Interstate Stream Commission, State Land Office, and any other State or Federal Agencies with overlapping jurisdiction and shared management of the objects of interest.

A Resource Advisory Council should be established for the Monument.

- A Resource Advisory Council should be established for the Monument to advise the BLM on projects and trends that may accelerate human caused change to the Monument landscape. Such an advisory committee might be modeled after that in use for the Valles Caldera National Preserve under the existing authority of the BLM to establish Resource Advisory Councils.
- Create a diverse Resource Advisory Committee composed of local citizens to advise the BLM on objects of general interest in the Monument.
- The BLM should establish a Resource Advisory Council under the Federal Advisory Committee Act, comprised of concerned citizens, representatives from conservation groups, permittees, land grant heirs, and stakeholders. This RAC should consist of representatives for each of the overarching Monument objects and values. (See Grand Staircase-Escalante National Monument Management Plan at ADV-3, p. 66.)
- The Rio Grande Chapter of the Sierra Club would be happy to volunteer for a seat on a Resource Advisory Committee set up for the Monument.

### **Issues to be resolved in the Monument plan**

1. *How might a bioregional approach be used in developing the Monument plan?*
2. *How can the BLM provide management continuity with lands adjacent to the Monument?*
3. *How can the BLM provide management continuity with the Rio Grande Natural Area in Colorado?*

4. *What are potential impacts of management on inholdings or adjacent land on the Monument objects? What are the potential impacts of management within the Monument on inholdings or adjacent land?*
5. *How does the Monument fit within the BLM's regional mitigation strategy?*

### **Issues beyond the Scope of the Monument plan**

1. *Should a resource advisory council be developed for the Monument?*

The Taos Field Office is advised by the Farmington District Resource Advisory Council (RAC). The Farmington RAC is comprised of 10 members representing a balance of public land resources and users. The RAC meets two to four times annually. All RAC meetings are open to the public and follow the Federal Advisory Committee Act (FACA) rules for transparency and public involvement. For more information on this topic, or to apply to be a RAC member, please visit this website: [http://www.blm.gov/nm/st/en/info/resource\\_advisory.html](http://www.blm.gov/nm/st/en/info/resource_advisory.html)

2. *How will the public be informed about non-BLM federal projects on adjacent land or airspace?*

As required by the National Environmental Policy Act (NEPA), the cumulative effects section of the environmental assessment for the Monument plan will identify all relevant past, present, and reasonably foreseeable actions, including non-BLM actions. The geographic scope for this analysis is generally based on the natural boundaries of the resource affected, rather than jurisdictional boundaries. This will provide context to the decisions made in the Monument plan in light of other relevant projects in the area.

It is the purview of each federal agency, however, to inform the public of the details of projects proposed or implemented under their jurisdiction.

3. *How can the BLM integrate the Monument planning process with other planning efforts?*

Collaboration is a fundamental part of the BLM's land use planning process. Coordination and cooperation are, in fact, provisions of the Federal Lands Policy and Management Act and NEPA. The BLM will collaborate with other federal, state and local agencies throughout the planning process to ensure consistency and continuity of land and resource management across jurisdictional boundaries.

## **Cultural and Historical Resources**

### **Public Comment Summary**

Inventory for cultural resources should be a priority within the Monument:

- The Monument plan should establish a long-term goal to survey all archaeological sites in the Monument.
- The BLM should prioritize cultural resource inventories in the Monument.
- An emphasis should be placed on encouraging, training, and supporting volunteer efforts for inventory and monitoring health of archeological resources within the Monument and buffer zones with supervision from qualified BLM staff or by agreements with non-profit organizations organized to conduct these activities.
- The BLM should complete cultural resource surveys along any proposed routes before they are chosen for designation.
- The BLM must initiate and complete the Section 106 process prior to the designation of roads and routes located within the Monument.
- The BLM should not designate any roads without a proper cultural survey along those roads. The BLM should only designate the minimum road network necessary for the access to and protection of the objects and values of the Monument.
- The Monument region is characterized by several dry playa basins that are associated with various kinds of archaeological records, including rock-lined water management systems and possible rock gardens like those the Pueblo people had in the past. The chronology of these features is not known and they may date from late pre-Hispanic to Hispanic or even recent modern times. Very similar kinds of rock-linings and water management systems occur in the high desert lands of Peru, Argentina, Chile and Bolivia, which date from pre-Hispanic to contemporary times. This makes those in the Monument area to have comparative cultural significance far beyond the Rio Grande area itself. I also have seen, dispersed throughout the area, various types of late Paleo-Indian and early Archaic to early Historic indigenous sites that require attention to preserve them and to define their role in the cultural heritage of the area.

The Monument plan should protect archeological sites and resources.

- The BLM should consider road closures near important archaeological sites to reduce vandalism.
- All roads and trails should remain far enough away from any archaeological site that the archaeology cannot be seen.
- The entire Monument should be designated as a Protected Archaeological Zone.
- The BLM should establish guidelines and objectives to protect the Monument's numerous cultural and historic sites.
- Numerous petroglyph sites in the Monument continue to be newly vandalized and are in need of remediation, including Big Arsenic and the Petaca Boulder.
- There are many cultural sites that are susceptible to vandalism or looting that must be protected by the Proclamation, National Historic Preservation Act, and Antiquities Act. The BLM must take special care so as to avoid vandalism and looting in the Monument.
- The BLM should work with volunteers to remove graffiti over petroglyphs at Big Arsenic Springs.
- Sitewatch volunteers, in coordination with the BLM and with proper training, should be permitted to take actions to protect, restore, or otherwise mitigate impacts to cultural resources caused by inadvertent or illegal activities of site visitors.

- Commodity production or resource uses should be excluded to protect sensitive resources.
- Allocations for management use should only be permitted where natural resources need to be stabilized or restored as a result of vegetation loss (such as from wildfire or storm related damage).

The Monument plan should provide for the conservation of the cultural landscape.

- As stated in the 15-year Strategy for the National Conservation Lands, the BLM will “[m]anage cultural resources within the context of the cultural landscape and adjoining lands to provide the greatest conservation benefit” (15-Year Strategy, Goal 2A(3)). The Monument Proclamation specifically states that “Ongoing explorations and inquiries of this unique cultural landscape have resulted in continuous discoveries that further illuminate northern New Mexico's human history.” The BLM is encouraged to emphasize the management of cultural landscapes and its approach to this in more detail in the RMP.
- The BLM should use a management approach for cultural resources similar to that take by the BLM at Canyons of the Ancients National Monument. The Canyons RMP begins by establishing the goal for cultural resources management as the protection of cultural resources in the monument at a “landscape-level,” and recognizing the “integral and independent relationship between sites” (Canyons RMP, p. 2). The Canyons RMP then proposes to implement this goal by identifying “settlement clusters” in the monument—places where numerous sites are located in proximity to each other—and prohibiting or restricting uses that may directly or indirectly harm those clusters (Canyons RMP, p. 3).

The Monument plan should provide for interpretation and visitation of cultural resources, while still protecting and preserving sensitive cultural resources. (*See “Signage and Interpretation” section starting on page 40 for more comments on this topic.*)

The Monument plan should allow archeological research as long as it does not negatively impact the Monument objects.

- Archeological research is in itself a “traditional use” of the Monument and should be permitted and promoted at pre-Monument designation levels. Any dramatic increase of proposals that would increase the scale of archeological research should be weighed against other resource values and carrying capacity.
- Allocations should stress research, conservation for future use, and maximize non-destructive public use of archeological sites.

The Monument plan should recognize historical resources that were not mentioned in the proclamation.

- Camino Real arterials lie within the Monument. Taos and Ohkay Owingeh Pueblo Indians know it as a Poeh trade path. Ruts still exist. There are no signage markers except from Chimayo to Santa Fe.
- The plan should recognize the homesteads and historic Chili Line, not mentioned in the Presidential Proclamation.



**Issues to be resolved in the Monument plan**

1. *What direct physical impacts to cultural resources might occur in the Monument? How can these impacts be avoided or mitigated?*
2. *What indirect impacts to cultural resources might occur in the Monument? How can these impacts be avoided or mitigated?*
3. *How can cultural resources, as one of the Monument objects, be preserved and protected while still allowing for traditional uses?*
4. *How should monitoring for cultural resources be conducted within the Monument?*
5. *Where should research be allowed in the Monument? What restrictions should be placed on research applications within the Monument?*
6. *Where can interpretation, education, and recreational opportunities associated with archaeology and history be provided while still protecting cultural resources?*
7. *Where should the BLM pursue formal state and national register nominations within the Monument?*
8. *Where should BLM pursue designation of landscape scale cultural resource management areas such as historic districts, multiple property designations, and traditional cultural properties?*
9. *What historical resources not mentioned in the Monument proclamation should be considered in the Monument plan?*

**Issues beyond the Scope of the Monument plan**

1. *Which routes should be closed or relocated to protect cultural and historic resources in the Monument?*

Route designations will be deferred until the completion of the Monument plan. Please see the section on Transportation and Access starting on page 66 for more information on travel management planning.

**Ecological Diversity****Public Comment Summary**

- The BLM should reconsider Alternative B from the 2012 Proposed Taos Resource Management

Plan in light of the new Monument values and focus, which includes ecological diversity.

- The Monument includes large areas of sagebrush that are relatively free of cheatgrass. Sagebrush and native perennial grasses and forbs are important sources of food and cover for wildlife. Protection and restoration of this habitat, including the associated biological soil crusts, should be an important part of the management plan.

### **Issues to be resolved in the Monument plan**

1. *How should the Monument plan provide for the care and management of important ecosystems in the Monument, such as riparian ecosystems, sagebrush communities, pinon-juniper woodlands, winterfat flats, montane coniferous forests, subalpine coniferous forests, coniferous and mixed woodlands, grasslands, shrub-steppe, canyon bottoms, tinajas, and rock crevice/cliffs?*
2. *How should the Monument plan provide for the management of fragile soils?*
3. *How should the Monument plan provide for the management of biological soil crusts?*
4. *How should the BLM monitor and manage for ecosystem resiliency and ecosystem integrity?*
5. *How might the BLM use different ecological states of development to manage ecosites within their natural range of variability?*
6. *How can the Monument plan provide for connectivity of plants and animals across trophic levels and habitat types to provide for genetic diversity and resiliency of diverse populations of species over time?*

## **Fire Management**

### **Public Comment Summary**

- Fire should be recognized in the Monument plan as a natural process in those habitat areas where it plays that role. Naturally ignited fires should be allowed to burn when and where they are part of the natural range of disturbance regimes. Prescribed fire should be used as appropriate to restore areas such as savanna, areas of expanding-contracting pinon-juniper, dry mixed conifer, and very selectively in sagebrush.
- Reintroduction of an appropriate fire regime should be used in open pinon-juniper stands to limit sprouting of unpalatable and invasive shrubs and trees, especially in mid-age to younger stands.
- Widespread fire is not part of the natural range of disturbance in sagebrush. Fire management should seek to create a mosaic of small (< 50 acres) patches of varying age and density

distribution. Circumstances that might result in widespread fire in sagebrush should be met with vigorous suppression. Fire should be used with great caution in any areas infested with cheatgrass. Prescribed fire can be used to fulfill fire's natural role where needed.

- Fire regimes should be restored in woodlands.

### **Issues to be resolved in the Monument plan**

1. *How should the BLM respond to or utilize wildfire within the Monument?*
2. *Are there any areas that are inappropriate for prescriptive fire management?*
3. *How should prescriptive fire management be applied in the Monument?*

## **Forestry and Woodland Products**

### **Public Comment Summary**

- Wood collection permits should only be allowed in certain areas and only provided to local residents for personally use. No commercial wood-cutting should be allowed.
- The BLM should protect old-growth juniper, pinon, ponderosas, and aspen within the monument, which provide important habitat for wildlife, including food and shelter, and provide a record of climate and fire in their rings. No cutting of old-growth trees or clear cutting should be allowed. Signage could be placed where illegal woodcutting is occurring, or plaques could be placed on legacy trees by volunteers indicating not to cut or fall.
- Wood collection permits should be coordinated with forest thinning restoration projects. Any forest thinning projects should only use Taos County contractors, should they be required.
- The BLM should provide the public access to harvest trees and fuelwood killed by disease and pests, such as beetles.
- The Monument likely contains three different stand types of pinõn-juniper: (1) pinõn-juniper savannas, (2) areas of potential pinõn-juniper expansion & contraction, and (3) persistent pinõn-juniper woodlands.
- Neither fire-wooding nor the introduction of fire is appropriate in persistent pinõn-juniper woodlands. Any fire-wooding activities in persistent pinõn-juniper woodlands should be restricted to mid-age or younger trees and should take into account the creation of unplanned roads, routes, and trails and take measures to restore these areas, including any existing routes. The seasonal closures established by the 2012 Taos Resource Management Plan should be continued.

**Issues to be resolved in the Monument plan**

1. *How should pinon-juniper woodlands be managed in the Monument?*
2. *How should the BLM provide for fuelwood and pinon nut collection in a sustainable manner that does not compromise Monument objects or other important resources? How can potential impacts be avoided and mitigated?*
3. *How should the BLM provide for commercial fuelwood and pinon nut collection in a sustainable manner that does not compromise Monument objects? How can potential impacts be avoided and mitigated?*
4. *Should the BLM provide special management considerations for old-growth trees?*
5. *How should the BLM provide for the care and management of aspen groves?*
6. *How can fuel thinning and/or other management actions be used to improve forest health at the landscape level?*

**Hunting and Trapping****Public Comment Summary**

Hunting, fishing, and trapping should continue to be allowed in the Monument.

- The Monument plan should provide seasonal and designated areas for hunting, fishing, and trapping opportunities within the Monument. These provide important recreational opportunities and food supplies to the public and are historical uses of this landscape. No new areas should be closed to hunting. Public notice should be provided for any issues regarding trapping and hunting.

Hunting, fishing, or trapping should not be allowed in some or all of the Monument.

- Hunting should not be allowed in the Monument.
- The Monument plan should designate areas that are closed to hunting to avoid conflicts with hikers and other users.
- The BLM should work with Taos Pueblo and New Mexico Department of Game & Fish to prohibit hunting of big horn sheep within the Rio Grande gorge.
- The Rio Grande gorge between the Orilla Verde and Wild Rivers, is not an appropriate place for hunting. The gorge is home to countless archaeological sites, including petroglyphs, shrines, and artifacts precious to many Native American Tribes, and part of the cultural heritage that is protected by the proclamation. The BLM should protect these resources from the hunting of

bighorn sheep.

- The BLM should coordinate with New Mexico Department of Game & Fish to preclude hunting and trapping within one mile of the gorge to protect raptors, migratory birds, river otter, ring-tailed cats, beaver and other species within the important habitat.
- Trapping is not compatible with the preservation of natural habitat and recreations and should not be allowed in the Monument. Data shows that the majority of the public would like to see trapping eliminated on their public lands. Leg hold traps do not discriminate between legal fur bearers and endangered species or pets. Trapping has been banned in many states, just like market hunting was years ago. Trapping is unnecessarily cruel to wildlife and dangerous to hikers and their pets. The BLM should prohibit leg-hold traps to protect visitors, their pets and the wide array of wildlife, including threatened and endangered species. Local subsistence trapping is being replaced by commercial trappers, and there is very little oversight of trapping by New Mexico Department of Game & Fish.

#### **Issues to be resolved in the Monument plan**

1. *Should any areas within the Monument be recommended to be closed to hunting and/or trapping?*
2. *Should any area within the Monument be recommended for seasonal closures to hunting and/or trapping?*
3. *What are the potential impacts of hunting and/or trapping in the monument on sensitive species or resources, and how might potential conflicts with other users be resolved?*

### **Non-native Species**

#### **Public Comment Summary**

It is important to effectively manage invasive and noxious weeds in the Monument.

- The BLM should collaborate with the New Mexico Department of Agriculture and local conservation districts for the management of invasive and noxious weeds. If nonnative species are used, extreme care should be taken if the plants are being planted near cropland in surrounding communities. Nonnative and invasive species can be detrimental to crop health. In order to mitigate any current or future nonnative and invasive species, the amended RMP should include provisions for vegetative treatments (including chemical treatments) to restore grasslands and to protect grasslands from encroaching brush species.
- There should be a requirement for the use of certified weed-free hay and straw on the monument. This requirement should be enforced, not only on actual hay and straw, but also on

livestock that is brought onto Monument lands. Use of erosion barriers (wood worms/wattles) used in connection with management activities should also require certified weed-free products.

- The goal in Chapter 2.1.12 of the 2012 Taos RMP should be carried forward into the Monument plan: "maintain plant communities free of noxious weeds and invasive species where possible, isolate and control population by an appropriate method, immediately control and eliminate newly discovered outlier occurrences of noxious or invasive species."
- The threat to the Monument from invasive, non-native plants is considerable. This is particularly true in riparian areas where Salt-cedar has become (or is becoming) established. The BLM should consider the careful use of herbicides for the treatment of invasive plants but should not consider use of broadcast applications of herbicide.
- Invasive plants should be removed by the most effective means possible, including herbicides, fire, and mechanical removal. These efforts, however, should not impact other values such as archaeological resources.
- Non-native plant invasions, such as cheatgrass and medusahead, can permanently convert sagebrush habitat and reduce the capacity to support wildlife populations. Care should be given to protecting and restoring sagebrush habitats.
- The BLM should work with the Nature Conservancy volunteers and other groups to eliminate invasive species.
- The BLM should continue to restore the rangeland and historic grassland savannah ecology of the Taos Plateau; and the riparian/aquatic habitat along the Rio Grande.
- The area north of the Taos Junction bridge (including upstream of the confluence with the Rio Pueblo de Taos) is in need of sanitation with respect to invasive plants.

Pesticides and herbicides should not be allowed in the Monument, or should be considered as a last alternative.

- The BLM should prohibit chemical spraying of sagebrush or other invasive plants. The BLM should prohibit all use of pesticides or herbicides within the Monument.
- The BLM should consider all non-toxic alternatives and best management practices, such as mobile goat pens, before the use and application of broad-spectrum herbicides and pesticides in habitat restoration and invasive species removal.
- The BLM should consider non-toxic alternatives before using "low toxicity" herbicides. The BLM should use chemical herbicides only as a last resort to control invasive plant species when non-herbicidal methods are not practical, as other methods have shown to be effective. These poisons are invasive, and cumulative impacts are uncertain.
- The BLM should consider suspending the use of toxic, low toxicity, and non-persistent toxics in the Monument until the Monument plan is approved and it is determined whether or not this activity is compatible with the designating proclamation (BLM Manual 6220 Sec 1.6(D)(2)).

**Issues to be resolved in the Monument plan**

1. *How should weed invasions (terrestrial and riparian) be avoided or mitigated in the Monument?*
2. *What techniques or treatments should be allowed, restricted, or prohibited to remove invasive species? What are the potential impacts of these treatments on the monument objects or other sensitive resources?*
3. *How should the BLM monitor for terrestrial and aquatic invasive species?*
4. *How can the BLM effectively use volunteers or partnerships to fight weed invasions in the Monument?*
5. *Should the BLM allow non-native species to be planted in the Monument for agricultural or other purposes?*

**Issues beyond the Scope of the Monument plan**

1. *Should the BLM allow the use of chemical herbicides in the interim until the Monument plan is approved?*

The Monument will be managed under the guidance provided in the 2012 Taos Resource Management Plan (RMP) until the completion of the Monument plan (see section 2.1.12 starting on page 30 of the 2012 Taos RMP for current guidance on Invasive Species/Noxious Weeds). During this time, any proposed action, including a treatment to remove invasive species, would be required to go through a NEPA analysis which would assess the potential impacts to the Monument objects. Any proposed action with significant negative impacts to the Monument objects, any that would restrict the range of alternatives being considered in the Monument plan, or any that would prejudice a management decision in the Monument plan would not be permitted to move forward until a Monument plan is approved.

**Inventory and Monitoring****Public Comment Summary**

The BLM needs to update inventories of resources found within the Monument.

- The Monument plan must include inventories which update all resource values on which to establish baselines necessary to develop specific quantifiable management objectives.
- The BLM should collect additional baseline scientific data on current density, distribution, and

condition of resources.

- The BLM should provide habitat type maps for the Monument.
- The BLM should compile a database of existing research in the Monument.
- The Monument plan should identify methods for federal, non-federal and non-governmental cooperation for baseline inventory studies.
- Complete an up to date inventory of all cultural and historic sites within the Monument.
- The BLM should allocate resources for necessary scientific studies (wildlife, habitat, hydrologic, etc.), including data collection and analysis, and ongoing monitoring, to manage and protect the Monument's proclaimed objects of interest.
- The BLM should compile and analyze recreation tourism data to get a more comprehensive understanding of the economic impacts of the Monument.

The Monument plan should establish monitoring protocols within the Monument

- The plan must include development of monitoring protocols/timelines that will provide quantifiable, objective data regarding any changes in resource values in order to meet management objectives.
- The BLM needs to establish acceptable rates of change in the Monument and monitor for when thresholds of acceptable change require stabilization, reduction or remediation.
- The BLM needs to apply principles of science-based management to monitoring for human recreational impacts. Carrying capacity from increased visitors in and around the Monument will need to be established, monitored and if exceeding acceptable limits constrained.
- Base funding should be allocated for interdisciplinary monitoring of seasonal and annual variation in vegetation and wildlife in relationship to visitation in the Monument and surrounding areas. This funding should place an emphasis on maintaining a core interdisciplinary staff to establish and maintain the monitoring programs through college, University and Research Museum partnerships following the Cooperative Ecosystem Study Unit concept. In the absence of data to monitor unacceptable impacts on natural and heritage resources the plan should implement a quota system and controlled access system constraining use to levels before designation of the Monument. Guard stations and a permitting system may need to be established.

The Monument plan should allow for on-going research within the Monument.

- All Monument management alternatives should continue to allow and promote research, including inventory, minimally destructive and best practices data recovery, physical protection, public participation in research, nomination of sites to the National Register of Historic Places and consideration of expansion of the Taos Pueblo World Heritage Site to include landscape components.



**Issues to be resolved in the Monument plan**

1. *How should the Monument plan address research and monitoring in the Monument? How might volunteers and partnerships be used to monitor resources in the Monument?*
2. *What general monitoring protocols should be established in the Monument plan? How might monitoring data be used in an adaptive management strategy?*
3. *How should the BLM determine limits of acceptable change within the Monument?*

**Items addressed through policy or administrative action**

1. *What data and inventory needs to be collected for the Monument plan?*

Data collection and inventory is an administrative action and will be assessed prior to development of the draft Monument plan. Currently, the BLM is taking steps to update its inventories of visual resources and lands with wilderness characteristics in preparation for developing the draft Monument plan.

**Issues beyond the Scope of the Monument plan**

1. *How should the BLM prioritize funding for monitoring and scientific studies within the Monument?*

Funding for the BLM is based on an annual appropriation from Congress, which can vary from year to year. Funding decisions are an administrative action and therefore outside the scope of a resource management plan.

**Law Enforcement****Public Comment Summary**

The Monument needs better law enforcement to address the following problems:

- enforcement of a travel management plan;
- off-road vehicular travel;
- illegal wood-cutting;
- littering;
- illegal dumping;
- trespass on private lands;
- vandalism of petroglyphs;
- increased traffic;

- vehicles traveling over the speed limit near Pilar and other locations;
- speeding by DOT vehicles and trucks involved in development in Orilla Verde;
- poaching, illegal hunting of ducks, and hand feeding of the Big Horn Sheep near Orilla Verde;
- people driving their cars into the river, bathing in the river, and washing their dogs in the river.

#### Littering and Illegal dumping considerations

- The BLM should survey and map the illegal dumping problem areas in the Monument.
- The BLM should work with County Waste Management and law enforcement agencies to deter dumping.
- The BLM should provide and maintain dumpsters at key locations in the Monument.
- The BLM should collaborate with local stakeholders on public education about illegal dumping.
- The BLM should collaborate with local stakeholders on River and Lands Day (a locally based volunteer trash clean-up day, usually organized the first day of June) .
- The BLM should organize volunteer trash pick-up days throughout the year.
- The BLM needs to address the trash dumping problem, particularly near the end of road C-110.

#### The BLM needs increased law enforcement.

- The BLM needs increased law enforcement near the Montoso neighborhood and Orilla Verde to deal with illegal activities.
- The BLM needs increased law enforcement along the Rio Grande and adjacent to the stateline and border of the monument along County Road A to deal with the following issues: trespass on private property; depredation of petroglyphs and the river; monument fence being cut at Ute mountain area near the state line; horse-dumping; coralling of game; hunting on the river.
- The monument boundary at the state line is a focal point for people wishing to access the Monument and Rio Grande without taking the long, rough road from the Monument entrance. Since the BLM purchased Ute Mountain, there has been a steady increase in illegal trespass, property damage, trash associated with boaters and people fishing, theft as well as probing and damage of cultural resources on private property. Before the purchase, illegal trespass, trash and illegal hunting practices were limited.

#### **Issues to be resolved in the Monument plan**

1. *Do any additional supplementary rules need to be established to provide for the care and management of the Monument objects or other important resources within the Monument?*

### **Issues beyond the Scope of the Monument plan**

#### *1. How can BLM law enforcement address the following illegal activities?*

- *off-road travel;*
- *violation of seasonal road closures;*
- *illegal wood-cutting;*
- *littering;*
- *illegal dumping;*
- *trespass on private lands;*
- *vandalism of petroglyphs;*
- *vehicles traveling over the speed limit near Pilar and other locations;*
- *speeding by DOT vehicles and trucks involved in development in Orilla Verde;*
- *poaching, illegal hunting of ducks, and hand feeding of the Big Horn Sheep near Orilla Verde;*
- *people driving their cars into the river, bathing in the river, and washing their dogs in the river.*

Law enforcement is outside the scope of decisions to be made in the Monument plan, but all concerns expressed in public comment will be taken into consideration by the law enforcement program. All unlawful activities are explicitly prohibited on BLM-managed lands.

#### *2. How should the BLM address increased traffic in or near the Monument?*

Restrictions in visitation numbers or other traffic reduction strategies are outside the scope of the Monument plan. The BLM monitors visitation in high use areas on an on-going basis and will consider any problems associated with increased visitation in these areas in future implementation level decisions.

## **Land Tenure**

### **Public Comment Summary**

Strong efforts should be made to acquire, through purchase or exchange, any parcels of private or state lands with the Monument boundaries.

The BLM should acquire the current State Park at the Rio Grande Gorge Bridge.

Private lands within the Monument might not be maintained by the landowners.

Is the declaration of “eminent domain” on local property a possibility?

Land acquisitions in the Monument by the BLM could cause an increase in property taxes as the tax base in Taos County is reduced.

The BLM should consider the acquisition of private holdings, especially the Klauer property by the Taos Overlook, within and adjacent to the Monument, in order to curb development, and protect and preserve the pristine and scenic qualities of the Monument's viewshed.

### **Issues to be resolved in the Monument plan**

1. *How should the BLM identify and prioritize potential land acquisitions within the Monument?*

### **Issues beyond the Scope of the Monument plan**

1. *How might land acquisitions affect local property taxes?*

Payments in Lieu of Taxes (PILT) are Federal payments to local governments that help offset losses in property taxes due to non-taxable Federal lands within their boundaries. The formula used to compute the payments is based on population, receipt sharing payments, and the amount of Federal land within an affected county. Any land acquisitions that increase the amount of Federal land within local counties would also lead to an increase in payment values. For more information on this program, please visit: <http://www.doi.gov/pilt/index.cfm>

2. *Would use of eminent domain be considered within the Monument?*

Any land acquisitions within the Monument would be purchased from willing sellers or exchanged for equal valued properties with willing landowners. Use of eminent domain to acquire private inholdings would not be considered within the Monument.

## **Mineral Resources**

### **Public Comment Summary**

Mineral exploration and extraction should not be allowed in the Monument.

- Mineral exploration and extraction, including oil and gas, should not be allowed in the Monument.
- The BLM should retire mineral leases within the Monument boundaries and restore scars left by mining.
- Horizontal drilling for oil and gas resources within the Monument boundary from operations that are technically outside the Monument's boundaries should be prohibited.

There are concerns about possible leaking from an old gas pipe-line that extends under the Rio Grande through the Village of Pilar.

### **Issues beyond the Scope of the Monument plan**

*1. How should mineral resources be addressed in the plan?*

The Monument was withdrawn from all Mineral activity, including oil and gas leasing and horizontal drilling, in the designating Presidential Proclamation.

*2. Are there public safety concerns that need to be addressed for existing gas line infrastructure near the Village of Pilar?*

The existing gas line ROW is not within the Monument boundary and therefore outside the scope of the Monument plan. The ROW holder has the right and responsibility to maintain their ROW in a safe manner.

## **Public Health and Safety**

### **Public Comment Summary**

The BLM should address safety issues associated with transportation in the Monument.

- The BLM should work with the Highway Department and the Taos Town and County to fence the high bridge to reduce suicide from the bridge.
- Vending at the Rio Grande Gorge Bridge creates an unsafe situation for locals and visitors. Vending should not be allowed at the high bridge and vendors should be removed.
- The BLM should work with the New Mexico Department of Transportation to make the intersection of Hwy 68 and SR 570 safer.
- Increased traffic and speeding motorists along SR 570 threaten pedestrians, a bike and hike lane and additional signage should be considered.
- More traffic monitoring and speed limit signage is needed along SR 570 to improve pedestrian safety in Pilar and Orilla Verde and reduce risks of collision with small mammals and birds.

### **Issues to be resolved in the Monument plan**

*1. How might the BLM provide for public safety in remote areas of the Monument or BLM-managed roads on the Monument?*

### **Issues beyond the Scope of the Monument plan**

*1. How might the BLM provide for public safety at the Rio Grande Bridge?*

The Rio Grande Bridge is under the jurisdiction of the New Mexico Department of Transportation, through a right-of-way agreement with the BLM. The BLM does not have authority to fence the bridge or implement other safety measures on the bridge.

The BLM is aware of safety concerns in regards to unpermitted vending near the Rio Grande Bridge and is currently working with the New Mexico Department of Transportation to develop a solution to this problem. This process, however, is outside the scope of the Monument plan.

*2. How might the BLM provide for public safety on federal, state or county roads in or near the Monument?*

Federal, state, and county roads in or near the Monument are not under the jurisdiction of the BLM.

## **Public Participation**

### **Public Comment Summary**

Research in the Monument should include a public participation component.

- All permitted research in the Monument should include a public participation plan appropriate to the research scale and sensitivity and a resource conservation plan.
- The Monument plan should promote participation of the public in archeological research taking place in and around the National Monument, under a "Citizen Scientist" initiative.
- All research on the Old Spanish National Historic Trail within the Monument should maximize volunteer participation in accordance with the provisions of the National Trail System Act.
- New technologies of the digital age should be used to maximize effectiveness of visitors to engage in on-going research and contribute to it.

The BLM should keep Pilar informed about proposed development plans (EAs) through village points-of-contacts.

The BLM should keep the local public informed on a regular basis.

### **Issues to be resolved in the Monument plan**

1. *How should the BLM engage the public in on-going management in the Monument?*
2. *How should the BLM engage the public in on-going research in the Monument?*

### **Issues beyond the Scope of the Monument plan**

1. *How might the BLM utilize new technologies to engage visitors in research?*

The Monument plan will identify broad goals, objectives, and management actions related to public involvement in research and science in the Monument, but the specific details associated with public involvement in research will be developed following the completion of the Monument plan during specific plan implementation activities.

## **Rangeland Management and Grazing**

### **Public Comment Summary**

Livestock grazing should continue to be allowed in the Monument following current management guidelines.

- The tradition of "livestock grazing" must continue to be strong within this Monument. Livestock grazing should be permitted to continue in the Monument as it has for many generations of current permittees.
- Livestock grazing should be given priority over other uses in the monument.
- Livestock grazing numbers should not be reduced in the monument.
- Livestock grazing on BLM allotments helps maintain economic viability for producers and communities and is an important part of the customs and culture in New Mexico.
- Properly managed livestock grazing should be used as a resource management tool to improve wildlife habitat, biodiversity, and overall ecological conditions.
- The plan must allow for continued livestock grazing at current levels, as reductions and other adjustments have been applied in the past to protect resources.
- The plan should not change or decrease livestock grazing in the monument, as this use is important to the survival of the local ranching community.
- Will permits for grazing allotments without a current grazing authorization be reissued or will grazing be excluded?

Livestock grazing should not be allowed in the Monument, or should have new or additional restrictions.

- Traditional livestock should be allowed to graze in the Monument, but cattle grazing permits should not be allowed.
- Livestock grazing should not be allowed in the Monument because of the negative environmental impacts.
- Cattle should not be allowed in riparian areas. Riparian health should be prioritized over livestock watering. The BLM should provide off-site watering infrastructure, restore upland vegetation damaged by grazing, and reduce sagebrush in the monument.
- Grazing in sagebrush areas tends to remove herbaceous understory creating dense sagebrush stands with a sparse understory of annuals and unpalatable perennials. Grazing also disrupts biocrusts that stabilize soil and are nitrogen fixers. Management should seek to retire any vacant grazing allotments in sagebrush areas on the Monument and transition any other allotments in sagebrush habitat to areas more suitable for grazing such as pinon-juniper savanna. Under no circumstances should sagebrush “control” activities such as shaving, chaining, or herbicide use be practiced on the Monument.
- The BLM should consider allocating forage for uses other than livestock grazing if permits or leases are voluntarily relinquished (See BLM Instruction Memorandum 2013-184, available at: [http://www.blm.gov/wo/st/en/info/regulations/Instruction\\_Memos\\_and\\_Bulletins/national\\_instruction/2013/im\\_2013-184\\_relinquishment0.html](http://www.blm.gov/wo/st/en/info/regulations/Instruction_Memos_and_Bulletins/national_instruction/2013/im_2013-184_relinquishment0.html)).
- Grazing harms the ecosystem and brings in invasive species.

#### **Issues to be resolved in the Monument plan**

1. *What are the potential impacts of livestock grazing on the Monument objects? How can any adverse impacts be avoided or otherwise mitigated?*
2. *Should any areas within the Monument be made unavailable for livestock grazing?*
3. *Should voluntarily relinquished grazing permits be allocated to other uses?*
4. *Should the BLM allow the drilling of groundwater wells for livestock grazing? What is the sustainability of this practice and impacts on wildlife?*
5. *What are the impacts of permitted off-road ATV use on the Monument objects? What mitigation, if any, should be required to offset these impacts by grazing operations?*
6. *Should the BLM designate reserve common allotments in the Monument plan?*
7. *How might range improvement projects impact the Monument objects? Should any restrictions be applied to range improvement projects within the Monument?*



8. *Under what conditions would vegetation treatments, such as sagebrush manipulation, be allowed in the Monument? What are the potential impacts of these activities on the Monument objects and other resources? What criteria should be used to determine the appropriate vegetation treatment methods in a given area to minimize impacts while still achieving the treatment objectives?*
9. *What monitoring protocols should be required for pre- and post- treatment monitoring of vegetation projects?*
10. *How might increases in visitor use impact livestock grazing operations? What mitigation is necessary to avoid cattle-visitor conflicts or possible vandalism to livestock facilities if there is increased visitor use in the Monument?*
11. *How can the risk of invasive species introductions through livestock grazing be minimized?*

#### **Items addressed through current management**

1. *Should riparian areas in the Monument be made unavailable for livestock grazing?*

Livestock grazing is currently unavailable in the Rio Grande Wild and Scenic River corridor, along the Rio San Antonio, and within other riparian areas in the monument. This current management will be carried forward into the Monument plan.

## **Recreation and Visitor Services**

### **Public Comment Summary**

#### **Visitor Centers**

- The BLM should improve existing visitor centers and consider building new Visitor Centers for the Monument.
- The BLM should install solar panels and water barrels at the Wild Rivers and Rio Grande Gorge (Pilar) Visitor Centers.
- The BLM should build two new visitor centers: one on Hwy 285 at the New Mexico/Colorado border; and one on Hwy 64 at the Rio Grande Gorge Bridge. The new visitor centers should be: LEED-certified buildings, off-grid and powered by renewable energy (solar panels); built in the traditional Pueblo architecture of this region; have water barrels for the collection of water off the canals, and have a plan to use the collected water. The BLM should highlight to the public that the new BLM visitor centers are energy-efficient leaders in the new renewable energy paradigm.

### Signage and Interpretation

- The BLM should provide improved signage and interpretive information and/or educational opportunities in the Monument.
- The BLM should provide improved signage, trash removal, and educational tours in the Wild Rivers area.
- With increased recreation in Orilla Verde, visitors need to be educated to help prevent impacts to nesting areas, wildlife, rock art, and other resources.
- The Monument should have more geological interpretive signs.
- The BLM should provide the following signage:
  - Taos Plateau Volcano Field
  - Access to Ute Mountain trailheads
  - Rio Grande Rift Geology (based on the current geology study by the USGS)
  - West Rim Bike/Hike Trail from Gorge Bridge to Pilar
  - Road signage
  - Water Plume (underground lava tube from Ute Mountain to the Rio Grande), just west of Ute Mountain
  - Trail signage (limited) for Ute Mountain. Ute Mountain is a difficult and confusing hike because of the dense tree coverage, it is hard to find your way back down to vehicles. It is really a GPS-oriented hike.
  - Directional signage for Cerro de Olla and Cerro de Montoso trailheads
- The BLM should create more interpretive media for cultural resource displays both at Visitor Centers and near sites and/or trails.
  - The BLM should educate the public about leaving artifacts where they lie as well as not altering the landscape by moving rocks.
  - The BLM should map historic sites and areas of significant archaeological interest so the public can visit them.
  - Any publicized, high profile, or highly trafficked cultural sites should have interpretive signage to educate the public and promote stewardship, and these sites should be monitored for impacts and vandalism. The vast majority of sensitive cultural and historic sites should not be publicized or promoted.
  - Some archaeological sites should be protected by not advertising their presence and some should be advertised for visitation while being actively protected. Protection can be by a combination of education and perhaps building enclosures around them.
  - The BLM should consider establishing a system of "archeological resource and visitor use zones." Monitoring plans and thresholds for visitation might be based on the "site type" and other natural resources and season of use.
  - The BLM should consider installing an educational, interpretive kiosk at "high traffic" cultural sites to better educate the Public and to promote respect and stewardship of these cultural sites. BLM should consider driving visitors away from other sensitive sites via its route network or other tactics.

- Interpretive kiosks with digital displays of petroglyphs should be installed at strategic places as a method of sharing the wonders of the Monument with a wider public without risk to the petroglyphs themselves from over-visitation.
  - The BLM should educate the public on traditional values.
- All visitors should be exposed to "Leave No Trace" and "Tread Lightly" principles when entering the Monument. Visitor centers should have displays and signage about protecting resources and "Leave No Trace" practices.
- The BLM should enforce a strict "Pack it in/Pack it out" policy and should not provide any trash receptacles outside the visitor centers.
- The BLM should develop historical sightseeing interpretive information about the Old Spanish National Historic Trail segments inside the Monument, with an emphasis on establishing partnerships with managers of trail related historical sites and exhibits outside the Monument.
- The Monument plan should include a review of opportunities for the interpretation of the natural and cultural features of the Monument.
- The Monument plan should require that within three years, the BLM will complete an interpretation plan for the monument.
- In addition to general topics on the cultural and natural resources of the Monument, educational topics more specific to the Monument might include:
  - The Denver and Rio Grande Railroad—the Chili line—and its impact on the economy and ecology of northern New Mexico;
  - The fragile nature of biocrusts and their importance to desert ecosystems, particularly sagebrush, but various pinyon-juniper systems as well;
  - The emerging science and understanding of pinyon-juniper woodlands, the dynamic forces that produce different stand types, and the likely effects of a changing climate on these ecosystems;
  - The role of the Rio Grande flyway for migratory birds;
  - The role of the Rio Grande Gorge as a nursery for raptors;
  - The Rio Grande Rift and the volcanic/geologic history of the Valley.
- The BLM should collaborate with the Pueblo of Taos to tell the story of Puebloan peoples in the Valley. This might include closure of culturally sensitive sites.
- The BLM should collaborate with all the tribes with important sites in the Monument to tell the story of their peoples. The story of historic passages through the Monument such as the Old Spanish Trail and the World War I homesteads, must also be part of the Monument historic research program.
- Self-guided tours of cultural and natural aspects of the Monument with the development of educational materials for visitors to explore first hand.
- Interpretive information should be provided on outlying features of the Monument, such as Ute Mountain and the San Antonio gorge, as they are little known and seldom visited.
- The BLM should consider including management prescriptions for education and interpretation within the Monument plan based on recent BLM policies.
- More interpretive signs, displays, and trailhead kiosks would better help visitors appreciate this

unique landscape, and encourage them to take care of it, including information on the importance of cryptobiotic soils.

- The BLM should build more informational kiosks with maps of the monument showing and naming the mountains.
- The BLM should provide more public education in "public interface zones" such as Pilar and the High Bridge.

### **Youth and Schoolchildren**

- The BLM should provide educational opportunities for youth and schoolchildren in the Monument.
- The BLM should educate schoolchildren about "Leave No Trace" in schools and in the media.
- The Monument plan should provide opportunities for students to have outdoor experience with "light hand on the land" environmental education components.
- The plan should specify measures to ensure that schools, students, and youth groups are encouraged to visit the monument and learn about the geological, cultural, and natural history of the area, as well as be given the opportunity to participate in stewardship and service learning projects with the BLM.

### **Hiking Trails**

- The BLM should improve or develop new hiking trails within the Monument.
- The BLM should develop an easy, level 1 walking trail for visitors to view petroglyphs that are accessible yet set back and protected. This will help reduce vandalism on other "discovered" petroglyphs.
- The BLM should develop a trail at Sheeps Crossing over to west side of the gorge to provide hiking access to west side, possibly with a bridge or rock crossing (during low water).
- The BLM should construct a footbridge across the Rio Grande somewhere between the Sheep's Crossing and La Junta Point.
- The BLM should develop a Bridge to cross the river from Wild Rivers' La Junta Point to Cebolla Mesa
- The BLM should develop a new trail from the northwest side of the Monument (north of Tres Piedras) over to the Rio Grande Gorge Bridge (hiking and biking).
- The BLM should repair the trails at Wild Rivers.
- The BLM should extend the Vista Verde trail deeper into "the box."
- The BLM should improve trails and clear overgrowth in the El Chiflo area of Wild Rivers.
- The BLM should construct a trail along the rim going north.
- The BLM should construct a trail to the top of Ute Mountain.
- The BLM should construct a new trail on the north side of Ute Mountain.
- The BLM could reduce impacts and help prevent overuse in the monument by developing trails and parking in the lower portions of the Rio Grande around Pilar, outside of the Monument. This area has good fishing but is currently difficult to access.

- The BLM should allow for the development of the Gorge Trail Project - a trail through the Rio Grande Gorge.
- Hiking should be accommodated and managed on the Monument by a reasonable network of trails in a variety of habitats and with a range of difficulty. Having an identified trail network will discourage cross-country travel and minimize the impact of people on fragile resources.
- Currently, there is a primitive trail to the Powerline Rapid in the Lower Taos Box. It requires quite a lot of scrambling to get down to the river. There is a request by many members of the community for a maintained trail to Powerline Rapid. This trail is also used by fisherman to access the river. In addition, having this trail would provide access to hikers to see the lower box and Powerline falls, in particular.
- Bear Crossing trail is used by kayakers to access the Upper Box and is in need of improvement.
- The BLM should extend Miner's Trail upstream to allow access to Garapata Lake.
- The BLM should expand an appropriate network of hiking and biking trails beyond the gorge, as any increase in recreation within the gorge could have detrimental impacts on wildlife and habitat as well as impact the quality of recreational opportunities for solitude and space.
- The BLM should consider developing a Chile Line trail following portions of the historic Chile Line railroad route.
- The BLM should consider a West Rim hiking and biking trail from the Monument's southern end to the Colorado state line.
- The BLM should consider a "Volcanoes" trail going from Chiflo to Pot Mountain to San Antonio Mountain.
- The BLM should develop additional trails at Horsethief trail system, looped system, technical sections, maps, signs, etc.
- The BLM should develop additional trails at the Rift Valley System, with yearly maintenance.
- The BLM should develop new trail at the gorge bridge, either west or east rim going north.
- The BLM should develop new trail from John Dunn Bridge/Hondo to Labatos Bridge
- The BLM should develop new trail systems at Ute Mountain, Cerro de la Olla, and Guadalupe Mountain.
- The BLM should continue to expand the trail system within the Monument with a specific focus on hikers and mountain bikers sharing trails. There is a strong potential to increase tourism and the associated economic impacts of turning Taos into a destination mountain bike area.
- The Monument plan should have a section dedicated to trails. A purposefully designed trail system is light on the land, showcases the land, steers visitors away from sensitive areas, and provides a wide range of experiences.
- The Monument plan should designate a standalone non-motorized trail network that is comprehensively designed to meet the needs of quiet trail users and provides and preserves backcountry recreation experiences.
- The BLM should develop more trails with good signage. This will provide economic development for local bike and horse rentals and trail guides.
- More signing of trails which would insure environmental resource protection.
- The BLM should survey proposed trails and their environs for archaeological sites and route any

new trails to avoid sensitive sites.

- Cultural and biological surveys should be completed before any new trails are constructed to ensure Monument objects and values are avoided.

### **Trailhead Access**

- The BLM should provide improved trailhead access.
- The Monument plan should provide vehicle access to hike Ute Mountain, Cerro Montoso, and Cerro de la Olla for hikers to access the peaks.
- The BLM should build well-signed and easily accessible trailhead parking lots at new trail systems for hiking, biking, and horseback riding.
- The BLM should construct a trailhead for Horsethief trail system
- Access to trailheads should be safe.

### **Repairs or general improvements**

- The BLM should repair, improve, or develop recreational facilities or structures.
- The BLM should designate/improve backcountry river camping sites.
- The BLM should repair the shelters at Wild Rivers.
- The BLM should build a footbridge over the Red River at the Rio Grande confluence. A new bridge should support hikers as well as lamas.
- Picnic tables and trash removal/baskets should be provided riverside and higher on the rim in the John Dunn Bridge area.
- Any repair work in the Wild Rivers area should focus on repairing the bridge, the shelters, some minor trail improvements and minor improvements to the campgrounds Cebolla Mesa and La Junta. No additional work should be done in the area.
- The BLM should consider developing campgrounds outside of the gorge between Pilar and Taos as an alternative to those within sensitive riparian habitat in the Orilla Verde area to protect diverse wildlife species.
- The BLM should install and maintain recycling containers for plastic, aluminum, and glass at heavy use recreation areas.

### **Minimize Development**

- The Monument plan should only allow the minimum amount of development necessary, and should prohibit development or use in certain areas.
- The BLM should not add any national monument or recreation signage in the area.
- The Monument plan should only allow for minimal new signage and only for safety or educational purposes.
- The BLM should educate people on how to use resources in a more sustainable manner, instead

of adding additional infrastructure.

- There should be no new trails or developments allowed in the gorge.
- The BLM should not build any more trails down in the gorge where hiking does not typically occur to avoid disturbances to wildlife.
- A new trail on the west side of the Junction Bridge should not be allowed because it would facilitate the feeding/shooting of Big Horn sheep.
- The BLM should not allow trails from BLM land to Pilar, in particular on the old road that leads west from the village bridge up to the rim, up the pipeline scar, and across Pilar hill/mesa.
- The BLM should not allow trails that follow the rim of the Wild Rivers area. Such trails provide access to sensitive archaeological sites, nesting grounds and wildlife sanctuaries, and the remote and dangerous rocky areas make rescue expensive and potentially harmful to rescuers. The BLM should establish new trails in the Wild Rivers area to funnel visitors to areas of less concern.
- The BLM should enact a moratorium on campground and further trail development throughout the Monument, but especially in Orilla Verde, until the cumulative effect of past, present, and reasonably foreseeable future actions on wildlife and habitat is determined by scientific data; until the old RGCP 2000 is appropriately updated or shelved; and until an inventory (RMP 2012, p. 91) of trails is complete. The RMP 2012 (p. 12) references the intention to evaluate and put into place measures to reduce impacts on wildlife and to assure the compatibility of projects with management objectives for wildlife but no specific data for monitoring the cumulative effects is transparent. The intention expressed (p. 12) includes neither measurable outcomes nor a time-frame within which such monitoring will take place.
- The BLM should not construct new trails or lengthen existing trails within the boundaries or connecting to lands adjacent to the Monument.
- Only foot traffic should be allowed on hiking trails. Horses, bicycles, and motorized vehicles should be prohibited.
- The BLM should not build new primitive and developed campsites. More camping creates more trash which attracts rodents and other animals, more traffic, and bigger fire danger. Any new shelters deemed necessary at existing campsites should be constructed to match the traditional shelters built by the CCC and not the Aluminum structures recently used.
- Zip lines should be prohibited in the Monument.
- No new bridges should be allowed in the Monument.
- There should be no new development for increased tourism and recreational use.
- Hiking and mountain bike trails are great, but more information should be provided to trail users as not to use the trails when muddy.

#### **Hot-Air Balloons**

- Low flying hot air balloons invade the privacy and disturb local residents. Balloons and support vehicles often trespass on private roads and property adjacent to the Monument. Balloonists should restrict their activity to areas where they are authorized to land.
- Hot air ballooning should be restricted to certain times of year in order to protect nesting and migratory birds. One well defined area of launch, with restrictions of the "splash and dash" to be

downstream and within sight of the bridge or something similar should be implemented.

### **Fly-fishing**

- Guided fly-fishing should continue to be allowed in the Monument.

### **Mountain-biking or cycling**

- Mountain-bikes should continue to be allowed in the Monument.
- The BLM should work closely with local mountain biking groups to include widespread mountain biking access and develop new trails.
- The BLM should develop a single track network for mountain biking that is interconnected and encompasses diverse portions of the entire Monument and one major single track that circles the vast majority of the land.
- The BLM should develop a bike path through the Orilla Verde area along highway 570 that extends downstream along the Rio Grande to Velarde.
- The BLM should restrict mountain biking use on Orilla Verde trails and should not allow mountain biking through the Village of Pilar.
- No mountain biking should be allowed in the Orilla Verde part of the monument.
- The BLM should restrict mountain biking, especially along trails close to riparian areas, consistent with the 100-foot “free from disturbance” guidance in the RMP 2012.
- The BLM should develop a bike path along the river.
- Mountain Biking should be limited to the road network on the monument. For the most part, hiking trails should be closed to mountain bikes to prevent erosion, visitor conflict, and resource damage.
- The BLM should provide bike racks at various places in the Wild Rivers and Orilla Verde areas, and a bike lane should be included in any improvements to the Wild Rivers road to encourage cycling as a clean, healthy form of travel.
- No mountain bike trails should be allowed in the gorge. If a trail is allowed, it should be on the west side of the gorge.
- Recreation opportunities in the Horsethief area, such as mountain bike trails, should be enhanced and expanded, similar to those found on the Rift Valley trail. These opportunities will bring economic health to the community, as well as a means of alternative transportation.

### **Motorized Recreation**

- There should be a moratorium on motor vehicle use on the Monument beyond existing marked roads and trails until a travel management plan can be developed. The travel management plan should focus on a minimal set of open roads required to serve the needs of visitors and management.
- The Monument does not need new mountain bike or motorized routes, but there needs to be



routes for motorized access, mountain bikes, and recreation.

- Motorized recreation should continue to be allowed in the Monument.

### **Equestrian Use**

- The BLM should restrict equestrian use, especially along trails close to riparian areas, consistent with the 100-foot “free from disturbance” guidance in the RMP 2012.
- Since horse droppings bring in invasive plants, the BLM should require “horse bags” on trails which allow horses.

### **Birding**

- All Monument literature (maps, brochures, website, etc.) should mention “birding” as a recreational activity.
- The Monument plan should include the following actions:
  - Provide a separate user category for birders on user surveys.
  - Provide scientifically determined bird lists for the entire Monument.
  - Provide knowledgeable birding staff at the Visitors Centers.
  - Provide bird sighting logs at the Visitors Centers.
  - Provide birder-friendly maps of the Monument, similar to those provided at Bosque del Apache, that have been developed by knowledgeable birding staff or contractors.
  - Study the cumulative impact of recreational development on species and habitat loss.
  - Foresee and mitigate conflicts between boat-floater use and birder use during spring migration season.
  - Limit development during spring migration and spring and summer breeding, beginning March 15.
  - Include birding contacts on email notification lists used by the Taos Field Office Recreation Program.

### **Boating**

- Rafting should be cut-back when the river is low.
- The BLM should enforce a river rest time from Oct-March for both commercial and private boating.
- Has data been collected regarding winter rafting use and could it be made available to the public?
- Boating guidelines are adequate through the "Box" and should be continued as is.
- The islands and river right (west) side of Orilla Verde should be preserved as people-free and boat-free habitat for migratory and residential birds and other wildlife.
- Existing management for recreational boating is appropriate for the Monument.
- Motorized watercraft should not be allowed in the Monument.

## Rock-Climbing

- The BLM should continue to allow rock climbing in the Monument.
- Due to the fractured nature of the Basalt cliffs, allowing climbers to add and/or replace safety bolts and anchors is crucial to safely enjoy rock climbing in the Monument.
- Due to the remote nature of many of these cliffs, it is imperative that the driving access on rim top dirt roads be maintained, and remain open to vehicle traffic in order to access the trails leading to these climbing cliffs.
- Vehicular access to rock-climbing cliffs needs to be provided in the Monument. This will prevent people from trying to create new ways to the cliffs.
- Much of the rock in the Monument is not suitable to climbing due to its fractured nature. Because of the limited resource, it is important that the cliffs that are suitable to climbing remain open to climbers, and future development.
- The BLM should continue to allow rock climbing and the development of new rock climbing routes in the Monument, except in areas (and during the season) where Falcons and Eagles are known to nest.
- Commercial rock climbing guiding is needed to allow the public keen insights to this beautiful area while their safety and well-being is professionally provided. Commercial guiding in the Monument is important to the overall economy of Taos.
- The Monument provides year round opportunities to climb in Taos, unlike any of the other higher elevation climbing areas.
- Climbers need to have as little impact as safely possible and practice “Leave No Trace” ethics.
- If selective areas need to be closed to climbing, such areas need to have a factual basis for the closure (for example seasonal raptor closure).
- Climbers generally have been a low impact user group and most of the cliffs in the Monument are not suitable for technical climbing because of poor rock quality. The net result is a dispersed recreational opportunity.
- If particular areas have raptor nests or sensitive cultural values, those areas should be identified and managed through a collaborative, public input process that balances resource protection with legitimate recreation.
- The BLM should monitor climbing and bouldering areas in the Orilla Verde area.
- The BLM should restrict the development and further addition of bolts to rock faces to protect habitat for nesting raptors and seasonally or permanently close climbing areas where Falcons or Eagles are known to nest.
- The BLM should prohibit bouldering and rock climbing within designated archaeological sites.
- Rock climbing and bouldering can have a detrimental effect on birds that nest on cliff locations specifically to avoid disturbance. A careful assessment should be made of cliff-nesting birds and a limited number of appropriate sites for rock-climbing activities should be identified. Rock climbing outside of these sites should be allowed by permit only and conducted to avoid the nesting season. In no case should zip-lines or similar established facilities be allowed.

### Recreation Management Areas

- IM 2011-004 changed recreation management to a three-category system for recreation management areas wherein lands in the planning area can be designated as special recreation management areas (SRMAs), managed as extensive recreation management areas (ERMAs), or classified as public lands not designated as recreation management areas. This new recreation guidance needs to be reflected in the Monument plan.
- The Monument plan should adopt a range of SRMAs and ERMAs and management prescriptions which provide adequate opportunities for non-motorized or quiet recreation experiences and are written to enhance the other values that ultimately contribute to the experiences of the area. BLM should layer designations where necessary to ensure the full suite of Monument objects and values are managed appropriately.
- The management of the Lower ACEC will be effectively divided between at least two different sets of guidance, with the Orilla Verde portion subject to the Monument's plan, and the remainder subject to, presumably, the old 2000 RGCP. The BLM should consider removing the Orilla Verde portion from recreational use or, at the very least, extensive recreational use and instead manage it as an ERMA within the broader Monument plan.

### Special Recreation Permits and Events

- The BLM should allow a "Burning Man" type event on the monument.
- The BLM should relieve Orilla Verde from high visitor use by implementing the following: (1) limit events scheduled in OV to no more than two per year; (2) develop an EA for any rafting events or races consistent with EAs developed for other events, such as competitive mountain biking racing or events.
- The BLM should consider using the model provided by the Price RMP for classification of Special Recreation Permits (SRPs) to define which uses may be appropriate or inappropriate in specific areas. The BLM has not only the discretion to establish SRP guidelines, but also the obligation to do so in order to protect the resources that the RMP is intended to protect and sustain.

### Orilla Verde

The Monument plan should consider the following management decisions in the Orilla Verde area:

- The old Taos road grade should be reclaimed and restored to lessen impacts on water quality, improve wildlife habitat in the area, and ease trespass vehicle traffic.
- The "emergency" facilities at the primitive campground are no longer needed and should be closed. This would enhance wildlife habitat and reduce threats to water quality from the runoff from these areas.
- With the developments at the boat ramp, and particularly with restoration of a portion of the area currently occupied by portions of the primitive camping area, bus parking could be accommodated south of the bridge, away from the bank of the Rio Grande.

### New Opportunities

The BLM should promote new recreational and economic development opportunities, including:

- Horse rentals for the Vista de Questa/Coyote Trail
- Bicycle rentals for the Vista de Questa/Coyote Trail
- Hiking guides for the west side
- Bicycle rentals/guides on the west side of Gorge
- Ziplining, slack lining, and bungee jumping

### Recreational Shooting

- The BLM should close the informal shooting ranges south toward Rio Hondo and north near Spanish Peaks road as both are adjacent to trails, roads, and residences and create a safety hazard. An important cultural site exists adjacent to the northern shooting range.
- Local hiking trails, such as Petaca Canyon Trail and the trail from Golf Course Road, should not be open to hunters as this is a safety hazard for hikers and other recreationists.
- The target range west of the Arroyo Hondo power substation in an old bulldozed stock tank needs to be closed to shooting due to safety issues and proximity to private land.
- The BLM needs to close the area near the end of road C-110 to shooting and enforce the closure with signs and motion activated cameras.

### Visitor Use

- Current visitor use is high along the gorge rim and at the gorge bridge and some sections of accessible river. Taos Plateau is currently very light over the majority of year due to bad roads and mostly unknown features on the landscape. These visitor use patterns should not be changed.
- The BLM should monitor the impacts of increased visitor use on air, sound, and visual quality. Survey data should be gathered to monitor trends in visitor use and visitor experience. The plan should establish quantitative triggers to assess if visitation is degrading natural resources or visitor experience out of acceptable bounds. The plan should establish protective measures such as limitation on the number of visitors or closing certain zones to visitation. The plan should also address visitation displaced within the Monument.
- Tourism is one of the most important economic factors in Taos County, which is one of the poorest counties in the nation, but limiting access to visitors is also important to protect the resource. The current system used to limit river outfitters has a good record of fairness and flexibility necessary to service the public demand. This could be used as an example for the regulation of other endeavors, jeep tours, horseback riding, etc.
- The BLM needs to consider the impacts of increased visitor use along the Rio Grande during low water periods on migratory birds and mammals.
- Increased visitor use in Orilla Verde is creating a conflict for maintaining biodiversity in the area. How will the BLM relieve high use in Orilla Verde and who will determine “high use?” A visitor capacity limit should be considered for the Orilla Verde area to prevent erosion, the exclusion of

wildlife, and the visitor experience from diminishing.

- The Monument plan should address reasonably foreseeable impacts outside the Monument including access acquisitions and locations outside the Monument that are likely to experience increased pressure as a result of increased visitation to the Monument.

### **Night skies**

The Monument plan should provide measures to protect night skies from artificial lighting.

- Night skies are an important part of the Monument and should be protected from artificial lighting.
- The Monument plan should state that night skies are a valuable resource for the Monument and that every effort should be made to protect those skies from artificial lighting, and degradation from outside sources. Best practices for lighting set forth by the International Dark Skies Association should be followed in the Monument.
- The Monument plan should prohibit construction of street lights or parking area lights within the Monument to avoid light pollution.
- The Monument plan should be consistent with the New Mexico Night Sky Ordinance.

### **Other Recreation Comments**

- Recreation in the Monument is deeply dependent upon the integrity of the area's visual resources and wildlife values. Because of this relationship between recreation and wildlife habitat, the BLM should consider reinvesting revenues generated by recreation into wildlife habitat management.
- The BLM should rebuild the Chile Line.
- The government does not have enough money to rebuild the Chili Line.

### **Issues to be resolved in the Monument plan**

1. *How should the BLM manage recreation activities in the Monument?*
  - a. *How can the BLM provide recreation opportunities in the Monument while minimizing impacts to Monument objects and other resources?*
  - b. *Should new recreation opportunities be allowed in the Monument, such as zip-lines or bungee-jumping, etc? If so, where might these be allowed, and what restrictions should be required?*
  - c. *Should new restrictions be considered for any recreation activities such as hiking, hot-air balloons, mountain-biking or cycling, equestrian use, birding, boating, visiting hot-springs, or rock-climbing? What are the impacts of these activities on Monument objects or other important resources?*

- d. *Are there areas in the Monument where the BLM should revisit seasonal restrictions for recreation and/or visitor use?*
  - e. *How should special recreation permits be managed in the Monument?*
- 2. *How should the BLM monitor for potential impacts of visitor use? How should the BLM minimize and mitigate potential impacts of visitor use on the Monument objects or other important resources?*
- 3. *How should the Monument plan address potential impacts of visitor use outside of the Monument?*
- 4. *How should the BLM resolve conflicts or safety concerns related to shooting in the Monument?*
  - a. *Should any additional areas be closed to recreational shooting due to public safety issues or other conflicts?*
  - b. *Should any additional areas be recommended to be closed to hunting due to public safety issues or other conflicts? (See Hunting and Trapping section.)*
- 5. *Should the BLM monitor for impacts of visitation on Monument objects in any areas? If so, what criteria should be used (for example, limits of acceptable change)?*
- 6. *How should the BLM zone for recreation use in the Monument?*
  - a. *Should the BLM designate any new SRMAs or ERMAs in the Monument?*
  - b. *Should the BLM make any changes to existing SRMAs or ERMAs?*
  - c. *Should areas not be designated as recreation management areas in the Monument?*
  - d. *What setting should the BLM manage for in these different areas?*
  - e. *Should the BLM zone for different uses within designated SRMAs or ERMAs?*
  - f. *Should the BLM identify any areas to focus dispersed camping on the Taos Plateau? Should any areas be closed to dispersed camping?*
- 7. *How should the BLM zone for trails and trailheads in the Monument?*
  - a. *What areas should be identified as opened, closed, or limited to future trail and trailhead development?*
  - b. *Should the BLM develop a new trail network system in the Monument?*
- 8. *How should the BLM manage interpretation and public education in the Monument?*
  - a. *Should any new facilities, such as a visitor center, be developed within the Monument?*
  - b. *How should the BLM provide educational opportunities for youth and schoolchildren in the Monument?*
  - c. *Where should the BLM provide on-site educational opportunities and interpretive information in the Monument?*
  - d. *Should the Monument plan identify “public interface zones” to focus public education?*
  - e. *How should the BLM develop an interpretation plan for the Monument?*

9. *What measures are necessary to protect night skies in the Monument from artificial light? What is the potential for designating a dark sky site within the Monument?*

### **Issues beyond the Scope of the Monument plan**

1. *What topics should be covered in an interpretive plan for the Monument? What resources and interpretive materials should be provided at visitor centers?*

The Monument plan will identify broad goals, objectives, and management actions related to interpretation and public education in the Monument, but the specific details associated with interpretation will be developed in a subsequent activity-level plan. Activity-level plans such as interpretation, science, and sign plans provide detailed, site-specific information and are tiered to the overarching Monument plan. All activity-level plans will be developed following the completion of the Monument plan and will be consistent with the goals and objectives in the Monument plan. Suggestions provided by the public will be taken into consideration when developing an activity-level plan for interpretation.

2. *Should new signage or informational kiosks be provided in the Monument?*

The BLM will follow national signage standards as outlined in the 2004 BLM Sign Guidebook and other relevant instructional memos.

The Sign Guidebook is available for download at the following weblink:

<http://www.blm.gov/pgdata/etc/medialib/blm/wy/signs/docs.Par.61916.File.dat/guidebook.pdf>

3. *Should any improvements or repairs be made to existing facilities, structures, bridges, trails, or trailheads? Should the BLM install solar panels, water barrels, or other types of environmental improvements to visitor centers in the Monument? What types of architectural design should be used in Monument buildings? Should the BLM coordinate with the Forest Service to replace the La Junta Bridge at Wild Rivers?*

Specific improvements or repairs to recreational facilities or structures are site-specific actions not addressed through planning-level decisions, but will be addressed subsequent to the Monument planning process. Suggestions provided by the public will be taken into consideration by the BLM when identifying areas where improvements or repairs should be undertaken. The BLM is aware of the need to replace the La Junta Bridge at Wild Rivers and is considering options to address this need.

4. *How should the BLM use funds received from recreation fees?*

Funding decisions are an administrative action outside the scope of the Monument plan. Suggestions made by the public during the planning process will be taken into consideration when future funding decisions are made.

5. *Should any specific recreational facilities or roads be closed?*

The Monument plan will identify broad land use allocations, including areas closed to vehicular traffic or recreational development. Site-specific road closures, however, will be addressed in a travel management plan, and site-specific closure of recreational facilities will be addressed in an activity-level recreation plan. Suggestions provided by the public will be taken into consideration when developing future activity level plans.

6. *Should the Chili Line Train be rebuilt by the BLM?*

Reconstruction of the Chili Line railroad for use by passenger train by the BLM is not a reasonable consideration since it does not fall within the provisions of the Federal Lands Policy and Management Act, which establishes BLM's land and resource management mission.

## Restoration

### **Public Comment Summary**

The BLM should restore important habitat and other areas in the Monument.

- The BLM should restore wet meadows and playas.
- The BLM should take advantage of opportunities to restore habitat by whatever means available. Vegetating bare soil, repairing headcuts and downcuts, harvesting sheet flows for grass production, reclaiming sage land and closed roads, and reconnecting floodplains are some examples of projects that will yield benefits for wildlife as well as traditional and recreational human uses.
- The BLM should actively implement restoration projects identified in relevant watershed restoration plans. Where watershed restoration plans have not been developed, identify and implement restoration projects and mitigation measures to protect and improve water quality in the Monument.

### **Issues to be resolved in the Monument plan**

1. *What opportunities for restoration exist in the Monument? How should these opportunities be prioritized, and what method might be used?*



2. *Are there mining scars, or other land disturbance, within the Monument that require reclamation? How might reclamation on future land acquisitions within the Monument be implemented?*

## **Rights-of-way (ROW)**

### **Public Comment Summary**

The Monument plan should exclude any new rights-of-way (ROW) in the Monument, in particular large-scale utility lines.

- The BLM should consider designating the Monument as a ROW exclusion or avoidance area.
- The Monument plan should exclude any new rights-of-way for the entirety of the Monument, except for road improvements to improve safety or upgrades to existing utility structures that do not extend that structure's footprint.
- The plan should explicitly preclude any new or vastly altered power lines or other utility pipelines from being built within the Monument.
- The proposed electrical transmission will not provide any benefits for the local communities. If allowed it would be unsightly and hazardous to wildlife, cattle and residents. High power lines are known to cause undesired health effects, especially to cattle grazing under them and residents nearby.
- Local residents would not benefit from a transmission line through the Monument; it would just pass through the Monument.
- The BLM should maintain visual quality of the Monument by prohibiting overhead utilities such as power and phone lines.
- A transmission line would negatively affect local property values, degrade the visual resources of Taos County, and negatively impact tourism. The BLM should keep this resource of open space and non-industrialized landscape intact for future generations.
- The BLM should prohibit the development of any new power lines or utility easements within the Monument. The large-scale 230 KV energy transmission corridor suggested by Tri-State Electric would: be detrimental to many of the objects of interest protected by the proclamation, be an ugly scar on the extraordinary visual geological landscape, detract from local tourism and therefore hurt the local economy, cause fragmentation of wildlife habitat, disruption of wildlife corridors, and displacement of the wildlife populations, have a negative impact on major migratory bird routes that make up critical components of the North American Central Migratory Flyway, and would impact cultural resources and their viewsheds, such as the old Chile Line and ancient artifacts.
- Transmission lines or other utility corridors have no place in an area reserved for wildlife, healthy rivers, and human recreation. They would conflict with the principles and values that created the Monument in the first place. Tri-State and other corporations pose a direct threat to the health of the Monument. Any plans proposed by Tri-State should be met with urgent

opposition in the spirit of protecting this area.

- Allowing new power lines in the Monument would be detrimental to the scenic values and hurt local recreation businesses.
- Additional utility line rights-of-way, or upgrades outside the existing utility line rights-of-way, including any new energy transmission corridors, are not consistent with the care and management of the objects identified in the proclamation.
- The construction of Tri-State's proposed 230 kV energy transmission corridor, or any other new utility right-of-way within the Monument, will have negative impacts on the following objects and values, as identified in the Proclamation:
  - Wildlife Habitat - Development of an Energy Transmission Corridor within the monument would cause fragmentation of wildlife habitat, disruption of wildlife corridors, and displacement of the wildlife populations, including the Monument's prize herds of elk and antelope. The construction of any new utility lines will also have a negative impact on major migratory bird routes that make up critical components of the North American Central Migratory Flyway.
  - Visual Resources - Any new utility lines will have a negative impact on the pristine viewshed of the Monument, especially in the northern part of the Monument, where there are both a proposed Wilderness Area and a Wilderness Study Area. Any new utility rights-of way would impair the wilderness character of these areas.
  - Socio-Economics/Tourism – The construction of any new utility lines or energy transmission corridors would have a negative impact on the recreational and wildlife values of the Monument, and therefore diminish the potential number of visitors and tourism dollars injected into the local economy.
- Any upgrades to existing utility rights-of-way must follow laws and regulations for public participation and analyzing impacts to the project area, which include impacts to visual or scenic resources. The BLM should designate the Monument as an exclusion area for new utility rights-of-way as it is inconsistent with the care and management of the Monument objects as required by the Proclamation and BLM policies.
- The plan should prohibit new utility transmission lines and any commercial pipelines to protect the precious scenic beauty, wildlife habitat, and quality of the land and resources within the monument.
- A high capacity utility line anywhere in the Monument would be a desecration of sacred archaeological sites, because viewsheds associated with the archaeological sites provide valuable information about the ancient peoples of the area.
- Allowing a new transmission line in the monument could set a precedent, allowing for other such developments, contrary to the intent of the monument designation.
- There is no evidence that a new high-voltage transmission line is necessary, especially considering that electrical reliability in San Luis Valley and in Taos County can readily be met by locally generated renewable energy.
- A transmission line would hurt the economy in Tres Piedras if constructed nearby.
- Allowing a new transmission line across the monument following the existing line would place

the line across some private property where it could impair the property and degrade its value.

- The Monument plan should specify that any new rights-of-way under consideration will be open for public comment.

The Monument plan should allow for future ROWs, including utility lines and/or improvement of existing utilities.

- The Monument will impact the economy in the San Luis Valley. A transmission line through the Monument should be an allowable use.
- The BLM should consider allowing a transmission line to be run on Highway 285 along existing power poles.
- The BLM should incorporate the maintenance, upgrade, and renewal of existing utility ROW agreements into the Monument plan, including the 37-mile Ojo-Taos 345- kilovolt (kV) transmission line and the 39-mile Hernandez-Taos 115-kV transmission line, which occur parallel to each other and cross the Monument in Sections 23, 24, 26, and 27 in Township 25 North, Range 11 East.
- The current ROW corridor designated in the 2012 Taos Resource Management Plan should be perpetuated in the Monument plan and extended into Section 27 to include the entire length of the transmission lines within the Monument.
- The Monument plan should acknowledge the complex process of transmission planning and require the BLM to work directly with utility owners, operators, and local governments and municipalities when considering future corridors. The outcome of this collaborative approach will conserve Monument values and identify corridors that will allow transmission providers to meet federal reliability standards and the future energy demands of the public.
- With responsible siting and mitigation, the location of transmission facilities can be consistent with the care and management of the objects identified in the Proclamation, including the following resources: cultural and archaeological resources, geological features, ecological diversity, and wildlife habitat.
- Utility considerations should be incorporated into the Monument plan as a fundamental component of renewable development, given the significant extent and proximity of the Monument to the Solar Energy Zones (SEZs) identified on BLM land across the boundary in Colorado.
- The Monument plan should allow a ROW for green energy connectivity to occur between Espanola, NM, and San Luis Valley, CO.
- There might be possible lower service costs for local New Mexico residents if the transmission line is allowed.

### **Issues to be resolved in the Monument plan**

1. *What areas in the Monument should be designated as ROW exclusion and ROW avoidance areas?*

2. *Where might the BLM consider designating a new transmission corridor in the Monument? How would a transmission corridor impact the Monument objects or other important resources?*
3. *What are the potential impacts of new ROWs on the Monument objects or other important resources?*
4. *Should communication sites, such as for cell towers, be allowed in the Monument? If so, where should communication sites be allowed and prohibited?*

## **Rio Grande Corridor Plan <sup>5</sup>**

### **Public Comment Summary**

- Which plan will be in effect for the Pilar stretch of the Rio Grande: Rio Grande Corridor Plan (RGCP) 2000, the new Monument plan, the 2012 Taos RMP, or some hybrid?
- The RGCP 2000 is out-of-date and needs to be re-done.
- The BLM should analyze the conclusions and management decisions of the 2000 Rio Grande Corridor Plan (RGCP), including the boating guidelines, in light of the monument's objects of value, cumulative impacts under NEPA, critical habitat designations for the endangered Southwestern Willow Flycatcher (SWFL), the 2002 recovery plan for the SWFL, protection of the central migratory flyway, and wilderness characteristics.
- What happened to the Rio Grande Corridor Plan's stipulation that BLM would hold a yearly meeting between villagers of Pilar and commercial rafters?

### **Issues to be resolved in the Monument plan**

1. *Which decisions in the Rio Grande Corridor Plan, if any, should be reconsidered in the Monument plan?*

### **Issues beyond the Scope of the Monument plan**

2. *Which plan will be in effect for the Pilar stretch of the Rio Grande: RGCP 2000, the new Monument plan, the 2012 RMP, or some hybrid?*

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<sup>5</sup> The Rio Grande Corridor Plan was completed in 2000 and provides management guidance for public lands along the Rio Grande in New Mexico and Colorado. It was incorporated into the 2012 Taos RMP, and it is available for download at the following weblink:  
[http://www.blm.gov/pgdata/etc/medialib/blm/nm/field\\_offices/taos/taos\\_planning/docs.Par.80725.File.dat/rio\\_grande\\_plan\\_all.pdf](http://www.blm.gov/pgdata/etc/medialib/blm/nm/field_offices/taos/taos_planning/docs.Par.80725.File.dat/rio_grande_plan_all.pdf)

The Monument plan would apply to all BLM-managed areas within the National Monument boundary. The Pilar stretch of the Rio Grande that does not fall within the Monument boundary will be managed under the direction provided in the 2012 Taos RMP, which incorporated the RGCP.

3. *What happened to the Rio Grande Corridor Plan's stipulation that BLM would hold a yearly meeting between villagers of Pilar and commercial rafters?*

Public meetings were held after the summer "recreation" season for several years after the RGCP was completed. Each year fewer people attended the meeting and the final meeting had only two public participants in attendance. Because of the diminishing interest, the meetings were suspended. Most summers the BLM receives 4-6 telephone calls regarding specific incidents on or near the river. Those issues are addressed to the extent possible as they come up.

## Riparian Resources

### Public Comment Summary

- Springs along the Rio Grande contribute significantly to riparian health and should be inventoried, studied, and protected. *(See Soils, Water, Air section for additional comments related to springs.)*
- The plan objectives must provide for the protection and integrity of riparian systems.
- Riparian areas should be managed for non-native species removal.

### Issues to be resolved in the Monument plan

1. *How should the Monument plan provide for the care and management of riparian ecosystems along perennial, intermittent, and ephemeral streams?*
2. *How should the Monument plan provide for the care and management of riparian resources associated with springs, seeps, and wetlands?*
3. *How might the Riparian Aquatic Habitat Management Plan be updated and integrated into the Monument plan?*

## Socioeconomics

### **Public Comment Summary**

- The BLM should analyze the socioeconomic impacts of the proposed management alternatives in accordance with the approach set out in “Socio-Economic Framework for Public Land Management Planning: Indicators for the West's Economy.”
- The BLM Instruction Memorandum 2013-131 directs BLM to utilize estimates of nonmarket environmental values during planning and provides guidance on how to consider non-market values in land use planning and other decision-making processes. This guidance was issued after the Taos RMP was final and should be utilized in this plan amendment.
- Wildlife viewing is important for local tourism.
- The BLM should use the USFWS’s 2013 publication, "Birding in the US: A Demographic and Economic Analysis Report." The BLM should make an effort to attract more birdwatchers to the monument as an opportunity to educate the public and promote tourism in Taos County.
- What are the benefits to Pilar of the new designation?

### **Issues to be resolved in the Monument plan**

1. *How might the Monument promote economic growth in local communities?*
2. *How might local communities such as Pilar be impacted by management of the Monument?*

### **Items addressed through policy or administrative action**

1. *How should the environmental assessment for the Monument plan analyze socioeconomic impacts?*

Decisions on data, reports, or analytic approaches used in development of the environmental assessment for the Monument plan is considered an administrative action, rather than an issue to be resolved in the plan. The BLM will follow all existing BLM policy and guidance in developing the socioeconomic impact analysis for the Monument plan. Suggestions provided by the public on data, reports, or analytic approaches will be taken into consideration when developing the socioeconomic impact analysis.

## Soils and Water

### **Public Comment Summary**

The BLM should study erosion sources and the Monument plan should provide management actions to reduce erosion and siltation.

- Erosion presents an almost ubiquitous threat throughout the Monument, potentially impacting wildlife, fish, livestock as well as traditional and recreational human activities. Efforts should be made to prevent, mitigate, and reverse erosion as opportunities to do so arise.
- The BLM should stop headcutting erosion where caused by roads, trails, and livestock grazing.
- The BLM should conduct a survey of the sediment loading from roads into the tributary arroyos of the Rio Grande and ultimately into the Rio Grande itself. Once problem areas are identified, stormwater controls should be implemented to reduce sediment loading into the Rio Grande.
- The BLM should document sources of sediment loading, such as roads, trails, recreation, etc.
- The Monument plan should include Investigation into the impact of the Monument's road and trail system on water quality as well as on wildlife and identify specific objectives for controlling runoff and other impacts from roads and trails in the monument.
- The BLM should collaborate with other stakeholders such as the county, state, and recreation community to mitigate sources of sediment loading.
- The BLM should implement Monument-wide low impact development and green infrastructure practices to control storm runoff.
- Siltation is the number one threat to fisheries. A siltation control project should be implemented on lower portions of the Rio Grande near Pilar.
- Siltation from seasonal side channels have degraded the lower section of the Rio Grande below the Taos Junction bridge. The BLM should identify and mitigate the dry arroyos that cause siltation during runoff and rain events.
- The BLM should build siltation catchments on side canyons of the Rio Grande to improve water quality.

The Monument plan should address water quantity issues.

- The BLM should re-negotiate the water compact and restore environmental flows to the Rio Grande.
- Considering the diminished river flows, an agreement should be worked out, if possible, to deliver water down the Rio Grande in a spring pulse.
- The BLM should work with Colorado to negotiate more water in the Rio Grande. Water quality is impacted by reduced flows which impacts vegetation and animal species.
- A minimal flow of water coming down Costilla Creek, which seems to be very over-diverted, should be established.

The Monument plan should address water quality issues.

- The BLM should monitor for water quality in the Rio Grande.
- The BLM should thoroughly investigate and identify all water quality impairments in the Monument.
- The BLM should collaborate with NMED, MMD and EPA in both characterizing the potential water quality impacts from groundwater contamination at the Chevron mine and identifying mitigation options.
- The BLM needs to address how discharges from the mine are in direct conflict with the Wild and

Scenic River designation.

- To comply with the state of New Mexico's water quality standards, the BLM is required to take into account not only numeric and narrative criteria but also the New Mexico's Antidegradation Policy when planning and conducting projects and activities.
- The Monument plan should include a specific directive or affirmative statement to maintain and restore water quality in waters located in the Monument. Protecting water resources is essential for complying with the mandate of the Monument's proclamation, with New Mexico's water quality standards, and with the Clean Water Act.
- The Monument plan should include a specific directive or affirmative statement providing that the BLM will assess each potential project in the Monument for compliance with the state's Antidegradation Policy.
- The Monument plan should outline the steps that BLM will take to answer the following questions:
  - Why are these rivers not meeting water quality standards?
  - What measures can the BLM take to restore water quality within the Monument?
  - If grazing is causing impairment, will it be possible to construct riparian fencing in the Monument?
  - What steps will the BLM take to restore shade and riparian habitat in the Rio Grande?
  - What steps will the BLM take to ensure that there is adequate flow?
  - What sorts of recreational activity may be impacting water quality in the upper section of the Rio Grande?
  - The Monument plan 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.
  - The BLM should collaborate with NMED and other stakeholders in the development of Total Maximum Daily Loads (TMDLs) for all river and stream segments in the Monument.
  - All possible non-point pollution protections for the Rio Grande watershed should be implemented.

The BLM should conduct research and protect springs in the Monument.

- The BLM should collaborate with NM Bureau of Geology and Mineral Resources in regards to their work on the springs of the upper Rio Grande.
- The BLM should conduct a survey of all springs in the Monument and measure the flow and water quality of these springs. The BLM should identify potential threats to both the quantity and quality of the water that is discharged at these springs and identify specific management actions to reduce and or mitigate these threats.
- There are more than 170 documented springs that provide a net gain to the Rio Grande of approximately 126 cfs (Bauer, and Johnson 2007). These springs are vital recharge zones for the Rio Grande, help create more favorable conditions for healthy fish habitat, and should therefore be protected. In addition, resources should be allocated to perform the follow up hydro-geologic



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.

- The contribution of this remarkable spring complex to the water resources of the upper Rio Grande Basin suggest a need for special protective designation in the Monument plan.
- Investigators from the NM Bureau of Geology and Interstate Stream Commission located what is believed to be the largest spring in the State of New Mexico, the “Lava Tube Spring,” which discharges 13 cfs directly into the bed of the Rio Grande, making it a feature of great interest to scientists and visitors. Certain of the recharge areas for the Rio Grande Springs have been located, especially on the west side of the gorge, where Monument status may assist in the long-term protection of inflow to the Rio Grande. Further investigation will be needed to identify recharge areas on the east side where future development potentially threatens inflow. Although much of the critical recharge seems most likely to occur on non-BLM lands, attention to their importance within the plan might leverage long-term protection by county or state jurisdictions. Resources must be allocated (from multiple sources, including BLM) to complete the hydro-geologic modeling of the springs, including the geochemical, geologic and hydrologic analyses and interpretation of 2007 data, along with further study to locate recharge areas.
- The BLM should evaluate waters and springs in the Monument for Outstanding National Resource Water (ONRW) designation and nominate appropriate waters.

#### Klauer springs

- The Klauer pipe spring in Orilla Verde should be kept open for public use.
- Klauer springs and other new springs should not be developed.

#### **Issues to be resolved in the Monument plan**

1. *How should the BLM address water quality issues in the Monument?*
  - a. *Should the BLM monitor for water quality in the Monument?*
  - b. *What measures can be implemented to improve water quality in the Monument?*
2. *How should the BLM address water quantity issues in the Monument?*
  - a. *What are the impacts of reduced water quantity on Monument objects and other important resources?*
3. *How should the BLM manage playa lakes in the Monument?*
  - a. *Should the BLM monitor for playa lake inundation?*
4. *How can erosion, sedimentation, and siltation be reduced in the Monument?*
5. *How can impacts to soils from soil disturbing activities be minimized?*

6. *How should the BLM provide for the protection of springs in the Monument?*
7. *How should the BLM monitor and protect ground and surface water resources?*
8. *Should any waters in the Monument be nominated for designation as an Outstanding National Resource Water?*

## Special Status Species

### Public Comment Summary

#### Southwestern willow flycatcher (SWFL)

- Recreational and other activities should avoid or mitigate impacts to sensitive, threatened or endangered species that occur in the Monument, such as the Southwestern willow flycatcher.
- The BLM should implement measures to recover the SWFL (Taos RMP 2012, p. 17).
- The BLM should anticipate the need for additional scientific studies with respect to the SWFL by finding out how the SWFL and other migratory birds actual use the Central Migratory Flyway to reach nesting territories. Right now, the “presence-absence” surveys do little more than record dramatic loss.
- The BLM should update the 1998 Southwestern Willow Flycatcher Management Plan based on new science and the USFWS 2002 Recovery Plan.
- The BLM should consider expanding the Southwestern Willow Flycatcher Habitat area, especially regarding study and possible corridor habitat (revegetation) upgrades.
- The BLM should complete a Biological Assessment (BA) for the Monument plan that includes new findings with respect to recovery efforts taking place in California, Arizona, and southern New Mexico. The BA for the Taos RMP 2012 (p. 21) contradicts findings in the 1998 Southwestern Willow Flycatcher Management Plan and other documents about the habitat requirements for this species, especially with respect to nearby disturbances. Boating can total as high as 25,000 users along the Racecourse in a season (BA, p. 8). The BA (p. 30) further notes that “increased recreation use of the river floodplain, particularly by float boaters, may also disturb nesting birds or damage suitable habitat.” The Taos RMP (p. 21) already calls for long-term effects to be mitigated to recover the riparian function lost.

#### Sage-Grouse

- The Monument plan should acknowledge that areas of the Monument are historic range for Gunnison's Sage Grouse and should require restoration of sagebrush habitat for future repatriation of the species to the Monument.

### Prairie Dog and Black-footed Ferret

- The BLM should perform an updated Black Footed Ferret study, and inventory of Gunnison's and Black Tailed Prairie Dog complexes; to see if any Black Footed Ferrets can be found in the Monument, and to see if a reintroduction is feasible. One Black Footed Ferret needs approximately a 200-acre complex of prairie dogs, in order to survive (Hubbard and Schmidt, 1984. "Black Footed Ferret in NM." p.14). The largest prairie dog complexes within the Monument should be identified and protected in order to ensure a successful future reintroduction.

### Bats

- Troughs, tanks and other livestock-watering facilities are critical watering sites for bats in western forests and so should be maintained and protected. Forest-management practices that eliminate or limit access to water or degrade water quality through siltation negatively affect bats in the west and should be avoided.
- The BLM should conduct a comprehensive bat mist net and acoustic survey throughout the Monument to estimate how many species are present in the Monument.
- The BLM should conduct bat mist net and acoustic surveys in specific locations prior to any forest management that will occur in those areas between April and October. Surveys should focus on areas near large, dead trees to determine if there are any major maternity colonies in the area. This will require radio transmitters in order to track any tree-roosting female species caught back to their maternity roost trees.
- The Monument plan should establish buffer zones around streams to maintain water quality and reduce siltation in the limited but vital resource of streams needed for drinking by bats.
- The BLM should gate any caves known or found to contain bats to minimize disturbance by visitors in the Monument. Constructing gates at Black Rock Springs and Poso Cave is mentioned in the current management in the Rio Grande del Norte National Monument document.

### Other

- The Monument plan should recognize the status of the endemic subspecies of the Yuma skipper butterfly (*Ochlodes yuma*) and address potential threats including climate change which could dry up the springs on which it depends, collecting, flooding, and displacement of common reed habitat by non-native varieties of reed or other invasives.
- The BLM should hire a liaison to work with the NMDGF and USFWS, to better manage Threatened and Endangered Species, as well as Species of Concern in the Monument.
- The BLM should work to restore habitat for the recovery of, or to reintroduce, any Threatened, Endangered, Threatened and Endangered, or Species of Concern within the Monument.
- The BLM should complete a BA for the Monument plan in light of the Central Migratory Flyway. In the 2012 Taos RMP, there is only one statement regarding the Central Migratory Flyway indicating the low priority of the Flyway in present management guidance (BA, p. 22).
- Measure potential habitat loss, especially in Orilla Verde, in light of the goal of "no net loss" of

special species' habitat (RMP 2012, p. 17).

### **Issues to be resolved in the Monument plan**

1. *How should the Monument plan provide for the care and management of Southwestern willow flycatcher habitat in the Monument?*
  - a. *How might the Southwestern willow flycatcher Management Plan be updated and integrated into the Monument plan?*
  - b. *How might designated critical habitat and potential habitat for the Southwestern willow flycatcher be protected and/or enhanced within the Monument?*
2. *Does the Monument provide suitable habitat for Gunnison's sage grouse? What is the potential for reintroduction of Gunnison's sage grouse to the Monument?*
3. *What is the potential for establishing a formal translocation/relocation area for prairie dogs within the Monument?*
4. *How should the Monument plan provide for the care and management of bat habitat in the Monument?*
5. *What is the potential to conduct a black-footed ferret feasibility study in relation to prairie dog colonies?*
6. *What is the status of the Yuma Skipper Butterfly within the Monument, and are any special management considerations needed for its habitat?*
7. *Are there any threatened, endangered, or special status species within the Monument not recognized in the 2012 Taos RMP that must be given management consideration?*
8. *Where should habitat restoration and improvement be prioritized?*
9. *What monitoring for special status species should be used when considering any future proposed action?*

### **Items addressed through policy or administrative action**

1. *Should a Biological Assessment be completed for the Monument plan?*

The decision to prepare a Biological Assessment is considered an administrative action rather than an issue to be resolved in the Monument plan. The BLM will comply with all requirements of the Endangered Species Act when developing the Monument plan, including the development of a

Biological Assessment as required.

### **Issues beyond the Scope of the Monument plan**

1. *Should any new personnel be hired to manage the Special Status Species Program?*

Staffing decisions are not a land use planning decision and are therefore beyond the scope of a resource management plan.

## **Traditional Uses**

### **Public Comment Summary**

- Traditional activities should be allowed to continue on the Monument, including, grazing, pinon gathering, herb gathering, firewood collection, hunting, fishing, trapping, hiking, and amateur prospecting.
- The Monument plan should not impose any changes that impact or change traditional uses.
- Traditional uses should be managed so as not to conflict with Monument objects and values.
- The Monument plan should specify that hunting is a traditional use in the Monument.

### **Issues to be resolved in the Monument plan**

1. *How can traditional uses be managed to minimize impacts to the Monument objects and other important resources?*
2. *Are there any important traditional uses in the Monument that were not identified in the proclamation?*

## **Transportation and Access**

### **Public Comment Summary**

The BLM should conduct an inventory of all roads and trails, distinguishing between user created and legacy routes and system routes.

The BLM must use a legal definition of a road for the purposes of the Proclamation's prohibition on "off-road" motorized vehicle use. BLM IM 2008-014 (reiterating IM 2006-173) defines a road as: "A linear route declared a road by the owner, managed for use by low-clearance vehicles having four or more

wheels, and maintained for regular and continuous use.” A “primitive road” is “[a] linear route managed for use by four-wheel drive or high clearance vehicles. Primitive roads do not normally meet any BLM road design standard.” Thus, primitive roads do not meet a traditional definition of “road,” and should not be designated as roads for the purposes of protecting Monument resources.

The BLM should complete comprehensive travel and transportation management as part of this planning process.

- If the BLM defers travel planning from this process, the Monument plan must set out the process that will be used to complete a comprehensive field office-wide travel management plan.
- The Monument plan should set travel management prescriptions such as route density limits for special management areas, such as lands with wilderness characteristics and ACECs.
- The BLM should address travel management on a landscape-level by evaluating the impacts of all routes in the planning area and tailoring its management prescriptions to account for and mitigate the landscape-wide impacts of these roads in conjunction with the objectives of the Monument plan.
- BLM should identify both existing restrictions on motorized access and other areas that can be damaged by motorized use on all maps used in travel planning. User-created routes should be distinguished from legitimate roads on travel planning maps, and, where they were created illegally, should be excluded from the baseline inventory. Within the Monument plan, the BLM should make any future proposals for additional routes or trails subject to site-specific NEPA, the minimization criteria, and all applicable other laws and regulations.
- The BLM should measure habitat fragmentation, conduct a thorough fragmentation analysis, and inform decisions regarding road closure and other limitations on use in the Monument plan.
- The BLM should use the travel planning criteria set out in the Record of Decision for the Dillon (MT) RMP as an example of criteria that incorporate key aspects of the BLM’s ORV regulations as well as ecological metrics.
- The BLM should create comprehensive travel and recreation management goals and designate routes accordingly.
- The BLM should follow the following eight principles to ensure that only routes which truly serve a valid purpose for the public remain open.
  - Travel management is part of land use planning and should address both recreation and transportation needs from a landscape perspective; therefore, travel planning must be coordinated with recreation management planning.
  - Prior to conducting an inventory or designation of routes, the BLM should assess the present resources, requirements for protection, and which uses for recreation and development are compatible with these resources, requirements and other users.
  - The BLM should use a legal definition of “road” when designating routes.
  - The BLM’s consideration of ORV use should take into account its potential damage to resources and other uses, including exclusion of other users.
  - Where the BLM presents a baseline travel system, it must present route maps in a

responsible manner that does not legitimize or misrepresent the official status of the existing network of unauthorized ways/routes routes.

- The BLM should include a detailed closure and restoration schedule in the plan.
- The BLM should include and implement a monitoring plan.
- The BLM should include and implement education and outreach in the plan.

The Monument plan should prohibit off-road vehicles in the Monument to protect fragile resources.

- Vehicles driving off road during the hunting season are a significant problem on the Monument.
- Cross-country vehicle travel, including bicycles, fragments valuable wildlife habitat, serves as a dispersal source for invasive and/or non-native plants, and is damaging to biocrusts. Travel management should eliminate as many roads and vehicle trails as possible in sagebrush habitat.
- Driving off established roadways has become more and more frequent over the last decade and is causing erosion problems.
- Signs should be placed to warn against off road driving or causing other resource damage and additional signs added for road and trail direction and place identification.
- The BLM should designate additional resources towards ORV education and enforcement.
- The Carrizo Plain National Monument RMP limits motorized vehicles in the monument to street-licensed vehicles only (PRMP 2-114). This helps prevent illegal off-road use in the monument, and it is recommended that the BLM adopt a similar approach in the Rio Grande del Norte National Monument.
- OHV travel, which could further increase with greater visitation to the monument, causes problems, including with fence maintenance.

Roads should be minimized and/or not improved.

- Additional roads and trails should be prohibited to protect the Monument's objects of value.
- Minimal new roadways should be constructed in the Monument.
- The BLM must design a travel plan that minimizes conflicts among users and damage to natural resources. Motorized routes should be evaluated to ensure that they are located and bounded to meet the minimization criteria for purposes of BLM management and enforcement.
- SR 570 should not be expanded to accommodate increased visitor use to the Monument. Rather, restrict or re-direct tourists to other parts of the Monument. The BLM should not construct additional pull-outs along 570.
- No more bridges should be built across the Rio Grande.
- Authorizing more roads and trails within the Monument may increase travel through these areas and negatively impact a wide variety of wildlife species. Increasing roads and trails should be carefully considered, and wildlife impacts should be a major concern when making these decisions.
- Any new trails or roads in the Monument must be evaluated under NEPA and should not impact or threaten the Monuments ecological and cultural resources.
- The BLM has policy direction for units of the National Landscape Conservation System that

requires designation of roads only when required for public health and safety, are necessary for the exercise of valid existing rights, minimize impacts to fragile resources, or further the purposes for which an area was designated. This is, in short, the “minimum road network” necessary for protection of the values for which the unit was designated. The BLM should both analyze a minimum road network alternative and choose it as the best option consistent with BLM policy and for the protection of monument objects.

- The BLM should take measures to prevent proliferation of additional motorized routes.
- The road from Taos Junction Bridge to the Carson paved road should remain un-paved to discourage increased traffic to the Orilla Verde area where visitor use is already heavy. This would have a detrimental impact to wildlife in the area due to increased human traffic and disturbance.

Some existing roads in the monument should be closed.

- If BLM defers the travel management planning process, the Monument plan should provide a baseline route inventory and use that data to institute road closures that cannot wait until the full travel plan is completed.
- Decommission or block off of roads that pass too close to archaeological sites.
- Some roads are unnecessary and should be closed to vehicle traffic to prevent further erosion. Some of the single track trails are eroding quickly, as well and should be assessed for repair or re-routing.
- The BLM should close the last mile at the west end of state line road or Costilla County Road. Closing this segment would not hinder access to private property and would solve several issues including:
  - Protects private property being affected by Monument traffic
  - Limits access to the sensitive resources along the Rio Grande on the Monument and private property
  - Increases the wild, scenic and wilderness values desired.
  - Aligns with the road closure goals of the Secretary of the Interior for Colorado listed in the Rio Grande National Area legislation and the wild and scenic goals of the Monument
  - Facilitates the total closure of access to the roadless area north and west of Costilla Creek on the Monument
  - Saves both Costilla County and Taos County the expense of maintaining one less mile of this unnecessary and remote road.
- Closed roadways should be blocked to effectively prevent motorized travel and restored to appropriate habitat types. Nonnative plants should be controlled in areas of active reclamation. This effort should also include increased enforcement and signage to keep all users from negatively impacting habitats and wildlife.
- The BLM should inventory roads and trails in the Monument and decommission routes deemed to be redundant or, for other reasons, detrimental to other values identified in the Monument plan, or user-created or otherwise undesigned routes.



- Close undesignated routes such as old jeep trails.
- The Monument plan should consider seasonal road / area closures for wildlife, including ungulates and raptors.

Some existing roads and trails should be improved, or maintained.

- Existing roads and trails should be improved for drainage and erosion control
- Add signage that indicates to visitors how far they are from the main highways, in particular US Highways 64 and 285.
- The BLM should improve the following roads:
  - East side of the gorge from Cerro Dump up to and around Ute Mountain
  - West side of the gorge from John Dunn Bridge north to Highway 285 just north of Tres Piedras (B121)
  - West side of the gorge from John Dunn Bridge straight north, and stabilize the rocks that rim it.
  - Road access from Costilla to Ute Mountain
  - The road on the east side of the gorge from Cerro to Ute Mountain.
  - The road going west from Sunshine Valley almost to the rim of the Rio Grande.
  - US Highway 64 between Taos and Tres Piedras.
  - Montoso Road is a primitive road which should be improved.
- If key through roads are not maintained in the Monument, stranded motorists show up on residents' doorstep asking for help. Residents do not want to become a AAA or rescue service for stranded motorists. Please keep the designated, through roads graveled, add culverts where needed in key drainages and re-gravel John Dunn Bridge Road to Hwy 64. Designated, through roads need good year round access for emergency services for residents, visitors and law enforcement.
- The Monument plan should not close any roads across the wide valleys as it impacts the ability to participate in promised traditional uses.

The BLM should not impose new or increased fees to access the monument.

- The BLM should not charge any new fees to access the Monument.
- The BLM should not create an entry check-point to the Monument.
- The BLM should not exclude local citizens from day use access to the Monument with user fees that are unaffordable to many local citizens.
- The BLM should consider the following ways to address this issue:
  - no day use fees
  - no day use fee on week days
  - offer a very affordable annual pass (at \$20)

The BLM needs to address problems associated with public access to hot springs located in the Monument.

- Tune Drive is a private road that the public is using to access the Manby Hot Springs and other recreation activities in the Monument. The road is in bad condition and costs the residents an undue burden to maintain.
- The easement for Tune Road should be transferred to the BLM so federal funds can be used to maintain the road.
- There has been an increase in crime, trash, harassment of wildlife (bighorns) by dogs, and auto break-ins near the Manby hot springs.
- The BLM should only provide to visitors information about the Manby Hot Springs if requested.
- The BLM should prohibit camping and campfires near the Manby Hot Springs and emphasize rules about offenses such as harassing wildlife and littering.
- The BLM should enforce maximum penalties for violations near the Manby Hot Springs.
- The BLM should not improve Tune Drive or the stretch of road from the Manby trailhead to Arroyo Hondo and the John Dunn Bridge area.
- Calle Feliberto does not provide access to hot springs but the public still attempts to use it as an access road. County Road 007 might provide access to the hot springs. The BLM should direct visitors to use County Road 007 instead.

A parking area should be created on BLM land beyond the Arroyo Hondo power substation. The public currently parks on private land to access the Monument in this area.

#### **Issues to be resolved in the Monument plan**

1. *Should any areas be closed to vehicular travel in the Monument . . .*
  - a. *To protect big game wildlife corridors, or critical winter range?*
  - b. *To protect threatened, endangered, or sensitive species habitat?*
  - c. *To preserve the wilderness character?*
  - d. *To protect cultural resources?*
  - e. *To reduce erosion?*
  - f. *To resolve law enforcement issues or to resolve trespass issues on adjacent private parcels?*
2. *Should any new seasonal travel restrictions to protect wildlife be applied in the Monument?*
3. *Should there be any additional vehicular restrictions in the Monument, such as limiting motorized access to street-licensed vehicles?*
4. *Are there any public safety issues that need to be addressed in relation to travel management?*
5. *Should access be provided within the Rio Grande corridor if the NMDGF authorizes a bighorn sheep hunt in the future?*

6. *Should certain roads or trails be improved to provide better access in the Monument?*
7. *How should the BLM address issues associated with public access to the Monument through private roads and parking areas?*
8. *Should vehicular access be restricted at any access locations into the Monument?*

#### **Items addressed through policy or administrative action**

1. *Is the inventory of roads and trails current?*

Inventory and data needs are an administrative action and therefore not a decision to be resolved within the Monument plan. The inventory for roads and trails will be assessed and updated as needed prior to developing a travel management plan for the Monument.

2. *What is the definition of a road for the purposes of the Proclamation's prohibition on off-road motorized vehicle use? Is motorized vehicle use prohibited on primitive roads?*

The definition of "road" is established by BLM policy and is not subject to change through BLM planning activities. A road is defined in BLM Handbook H-8342 as "A linear route declared a road by the owner, managed for use by low-clearance vehicles having four or more wheels, and maintained for regular and continuous use." The designation of routes, including roads, primitive roads, and trails, will be made through a separate activity-level planning effort following the completion of the Monument plan.

3. *Should off-road vehicles be prohibited in the Monument?*

The issue of whether to allow off-road travel was resolved through the designating presidential proclamation, which limited all vehicular travel to designated routes in the Monument, unless for emergency or authorized administrative purposes. Restrictions on what types of vehicles are allowed on designated routes will be addressed in the travel management plan.

#### **Issues beyond the Scope of the Monument plan**

1. *Will comprehensive travel and transportation management be completed within the Monument plan? If not, what process will the BLM use to complete travel management?*

Travel management planning will be deferred until the completion of the Monument plan. It is not practicable to perform travel management planning concurrently with the development of the Monument plan due to limited resources available at the Taos Field Office. The time needed to finalize route inventories within the Monument would also delay development of the Monument plan. A map of the known existing travel network will be developed and a process established to

designate a final travel and transportation network within five years of completing the Monument plan.

2. *How will the BLM manage its roads and trails in the Monument?*
  - a. *Should any existing designated roads within the Monument be improved?*
  - b. *How will the network of routes be minimized to protect Monument objects and values while still providing sufficient transportation access in the Monument?*
  - c. *Are any new signs needed?*

Site-specific travel management decisions will be addressed in a travel management plan following completion of the Monument plan.

3. *Should the BLM impose new or increased access fees to the Monument? How can the impacts of fees on access opportunities for local residents be mitigated?*

New access fees or increases in access fees are outside the scope of the Monument plan. The BLM currently imposes an access fee in two developed recreation areas in the Monument. Any new or increased fees in the Monument would be established in compliance with the Federal Lands Recreation Enhancement Act (FLREA), which limits fees to recreation sites that have a specified minimum level of development and meet specific criteria, and provides public participation opportunities when agencies propose to establish new, or alter existing, recreation fees. For more information on the FLREA, please visit this website:

[http://www.blm.gov/wo/st/en/prog/Recreation/recreation\\_national/recreation\\_fees\\_rea\\_info\\_page.html](http://www.blm.gov/wo/st/en/prog/Recreation/recreation_national/recreation_fees_rea_info_page.html)

## Visual Resources Management (VRM)

### **Public Comment Summary**

- The Monument's scenic beauty is identified as an object of interest, and the Monument plan should protect the scenic beauty as a cultural and historical object of interest. The viewshed should remain unobstructed by new transmission lines or artificial lights which obscure night sky star viewing.
- The BLM should update the visual resources inventory for the Monument and prioritize protection of scenic values. The BLM should keep the public apprised of the values identified through the inventory process, prior to publishing the draft plan with VRM alternatives already developed.
- The BLM should establish clear management direction describing areas inventoried and possessing high scenic importance with clearly defined objectives that limit surface disturbance within important viewsheds, including:
  - Lands managed to preserve their natural values, such as primitive recreation areas and

lands with wilderness characteristics, should be managed as Class I to “preserve the existing character of the landscape.”

- Lands within popular and easily accessible vantage points should be managed for visual resources such as VRM Class II to “retain the existing character of the landscape,” including clear provisions dealing with right-of-way authorizations and other human disturbance.
- ACECs and other special management designations and prescriptions should be used to protect scenic landscapes and lookout points within the resource area with stipulations specifically addressing and managing human development impacts, including VRM Class I to “preserve the existing character of the landscape” or VRM Class II to “retain the existing character of the landscape” as appropriate.
- Visual resource management must be incorporated into the management plan since viewsheds associated with the archaeological sites provide valuable information about the ancient peoples of the area.
- Visual design considerations should be incorporated into all surface disturbing projects regardless of size or potential impacts.

#### **Issues to be resolved in the Monument plan**

1. *What should the visual resource management classes be in the Monument?*
2. *What restoration opportunities exist to enhance visual resources in the Monument?*
3. *How might visual resource management include consideration of the “unique cultural landscape” identified in the presidential proclamation?*

#### **Items addressed through policy or administrative action**

1. *Does the visual resource management inventory need to be updated?*

Inventory and data needs are administrative actions and therefore not decisions to be resolved within the Monument plan. Instead, the BLM is currently taking steps to update its inventory of visual resources in preparation for developing the draft Monument plan.

## **Wilderness Study Areas and other Special Designations**

### **Public Comment Summary**

Wilderness Study Areas

- The BLM should manage the San Antonio Wilderness Study Area (7,050 acres) to preserve its unique wilderness characteristics, and for its eventual inclusion into the National Wilderness Preservation System, as fully designated wilderness.
- Establishing new wilderness areas would serve no purpose, but could lead to impacts from increased visitor use.

#### National Historic Trails

- The Monument proclamation specifically acknowledges that included in the landscape is evidence of historic commercial transportation routes . . . Though not mentioned by name these routes include segments within the Monument boundaries of the Old Spanish National Historic Trail (OSNHT) designated in 2002.
- Management of the OSNHT should not wait for the completion of the Monument plan but should proceed according to the time frames committed for management prescriptions in the Taos RMP (2012, p. 114 - 115).
- Management of segments of the OSNHT within the Monument should be identified and managed for their historic sightseeing opportunities as the dominant management measure for the Trail corridor within the Monument.
- The Monument plan should provide for muscle powered hiking, non-motorized biking and equestrian use of the OSNHT corridor in a manner compatible with minimizing modern sights and sounds. Priority should be given to promoting the "vicarious" sharing of the experience of historic users of the Trail landscape during its period of significance (1829-1848) in a manner that maintains the untrammelled landscape appearance of the Monument.
- Right-of-way acquisition and development of a continuous historic sightseeing trail in the OSNHT corridor from Pilar to the Colorado-New Mexico state line through and adjacent to the Monument should be an aspect of all action alternatives to the Monument access plan.
- An important directive in managing the character of the Monument and the OSNHT is to minimize and mitigate constructed intrusions in the landscapes and viewsheds. The Monument and the OSNHT corridor should be managed as Visual Resource Management Class I.
- The Monument plan should have a section on Forest Service and BLM coordination and cooperation for both the Monument and OSNHT.
- The BLM should use available information developed locally to establish a monitoring program for historic trails and historic trail sightseeing opportunities.
- Locations of historic travel-ways across the Monument should be established by geo-referencing historic maps such as Wheeler Atlases, land grant maps and GLO survey plats so that future activities can account for these resources.
- National Register nominations should be prepared for historic trails including the Old Spanish Trail.
- Research permits should be granted to study trail and trail related archeological components with priority placed on approving proposals which minimize destruction of trail features and maximize protection of trail related artifacts from damage and unauthorized collection.
- The Monument plan should analyze the "West Fork" of the North Branch of the OSNHT and put

in historic context the routes of Roque Madrid (1705), Anza (1779), and Pike (1807) on the west side of the Rio Grande through the Monument.

- The NTSA volunteer provisions should guide volunteer assistance in all trail "planning, developing, maintaining, and managing" of trails within the monument.
- The BLM should consider expanding the current one-mile right-of-way corridor for the OSNHT to ensure that important natural landscape or manmade features are establishing boundaries of the National Trail Management Corridor as required by BLM Manual 6280. The BLM should also acknowledge the natural quiet that still exists within portions of the corridor by designating routes to reduce sights and sounds of motorized travel and freezing the current audible or atmospheric disturbances, as is being proposed for the Trail in other BLM resource management areas.

### **Issues to be resolved in the Monument plan**

1. *How should the Old Spanish National Historic Trail be managed in the Monument?*
2. *How should the Cumbres & Toltec railroad be managed in the Monument?*
3. *Do the existing ACECs within the Monument still require "special management attention" in light of the Monument designation?*
4. *Are there streams within the Monument that have not been considered for their eligibility for Wild and Scenic River designation?*
5. *Are the streams within the Monument eligible for Wild and Scenic River designation suitable for such designation?*

### **Items addressed through policy or administrative action**

1. *How will the San Antonio Wilderness Study Area be managed in the Monument?*

All Wilderness Study Areas will be managed to protect their wilderness characteristics in accordance with the BLM's non-impairment standard, described in BLM Manual 6330, until either designated or released from further consideration by Congress.

## **Wilderness Characteristics**

### **Public Comment Summary**

- The BLM should establish and "maintain a current inventory of lands with wilderness characteristics, and consider managing those lands for protection of those qualities," as per BLM

Manual 6310 and 6320 and the Federal Land Policy and Management Act (FLPMA).

- The BLM should manage the proposed Cerro del Yuta Wilderness (13,320 acres) to preserve its unique wilderness characteristics, and for its eventual inclusion into the National Wilderness Preservation System, as fully designated wilderness.
- The BLM should conduct a GIS-based roadless analysis of the full Monument to determine if an updated wilderness characteristics inventory is warranted, and conduct field inventory for any units that were not inventoried during the Taos RMP revision or were found not to possess wilderness characteristics at that time.
- Impacts to the visual resources of lands with wilderness character should be considered in the establishment of Monument management policy, decisions, or actions.
- The Monument plan should analyze benefits to other resources from managing lands with wilderness characteristics and use that information to make management decisions that benefit Monument objects and other values. Other resources or values that would benefit from protecting wilderness characteristics include: wildlife habitat and riparian areas, cultural resources, scenic values, and recreation.

#### **Issues to be resolved in the Monument plan**

1. *What areas in the Monument should be managed for wilderness characteristics?*

#### **Items addressed through policy or administrative action**

1. *Does the lands with wilderness characteristics inventory need to be updated?*

Inventory and data needs are an administrative action and therefore not a decision to be resolved within the Monument plan. Instead, the BLM is currently taking steps to update its inventory of lands with wilderness characteristics in preparation for developing the draft Monument plan.

## **Wildlife and Fisheries Management**

### **Public Comment Summary**

#### **Small Mammals**

- The BLM should assess the potential for white-tailed jackrabbit restoration/reintroduction.
- The Monument plan should protect and improve wildlife habitat including habitat for smaller animals and predators such as coyotes, foxes, badgers, eagles, and owls, etc.
- The Monument plan should outline a process for developing a river otter monitoring program with options for augmenting the otter population if necessary.



- The BLM should work closely with Amigos Bravos to see what reintroduction considerations can be made for the river otter.
- The BLM should develop public education materials about river otters for Monument visitors.

## Birds

- The BLM should permit falconry, including limited gathering of prairie falcons from the wild.
- The Monument plan should protect the Central Migratory Flyway.
- The Monument plan should prohibit vegetation management, including timber cutting, firewooding, or any other mechanical treatment during the nesting season (roughly April 15-August 15) to protect all nesting species of birds
- Birders outnumber hunters and fisherman in the United States and New Mexico and many analyses have shown that the economic benefits brought by birding also significantly outweigh those other activities.
- Through scientific studies, establish nesting patterns of migratory and year-round birds in order to identify areas that need to be restricted or fenced off from human use either provisionally during specific season or year-round. Consider changing seasonal buffers from disturbing activities from the present cut-off date of April 15 to the earlier date of March 15 in order to protect migrating and early nesting birds.
- The BA (p.12) and the Taos RMP (p. 10-11) call for improving understanding of birds and bird habitat. The Monument plan needs to identify when this new data will be collected, when the inventories will be completed, and when the planned analysis of the data will be available to the public.
- The Monument plan should consider updated and scientifically sound data about migratory birds, winter residents, and summer breeding birds to inform management decisions. The data and analysis used by the BLM should meet the standards of the Data Quality Act.
- The BLM needs to conduct studies to identify important habitat for nesting birds.
- The Monument's bird life is underreported, and scientific research regarding the area's rich bird life has been limited. An integrated management plan is needed to evaluate current and potential human induced changes, climate change, insect infestations, drought, wildfires, and the effects of catastrophic weather events on its various habitats. The management plan should include habitat monitoring and bird surveys for spring and fall migrants, for winter residents, and for breeding species. Bird surveys throughout the entire Monument should occur before decisions are made to designate any areas for specific uses. The BLM should seek the active involvement of Audubon and the eBird "citizen scientists" to help conduct these surveys.
- The BLM should use scientific studies to establish nesting patterns of migratory and year-round birds in order to identify areas that need to be restricted or fenced off from human use either provisionally during specific seasons or year-round.
- The Monument area is important as an avian migratory pathway as well as a breeding area to many species. Roads and vehicular activity negatively affect birds in many ways, including bird-vehicle collisions, mortality from contaminants, habitat dissection and isolation, increased risk of predation and brood parasitism, reduced breeding success, and reduced bird community

integrity. Given the Monument proclamation's emphasis on ecological diversity and wildlife habitat, introduction of new roads and/or motorized vehicular activity should be prohibited. If new road construction or new permitting of vehicular traffic is allowed, no such activity should be begun until the BLM has completed a thorough survey of avian and other wildlife habitat. Critical habitat areas should be permanently removed from consideration. Even foot traffic should be excluded from such sensitive areas.

- Increased pedestrian use of riparian areas in the Orilla Verde area is threatening important migratory bird habitat, including safe roosting and nesting areas.
- The BLM should conduct surveys to identify heavily used nesting and roosting areas and other important wildlife habitat along the Rio Grande and protect them from human intrusions, including foot traffic.
- The BLM should consider reducing or further regulating boater use in the Orilla Verde area to reduce or eliminate the threat boaters pose on nesting birds and suitable bird habitat.
- The Central Migratory Flyway must be considered in all decisions, and studies should be done to help ensure management actions will not interfere with migratory corridors of birds and other animals.
- Bird surveys are needed on the Monument to document migratory species, winter residents and summer resident birds. This data should be entered into E-Bird at the Cornell website to educate people and bring awareness to the area for conservation.
- The BLM handout for the Monument should list bird watching as an activity in the Monument.
- Protection of raptor nesting sites from disturbance, either intentional or inadvertent, should be addressed in the Management plan. In particular, visitor facilities on the rim of the gorge should be constrained to as few locations as possible. Motorized access should be otherwise excluded within one mile of the rim. The Management plan should include consideration of the relocation of the Scenic Rivers Backcountry Byway away from the canyon rim.
- The Monument plan should designate the reach of Rio Grande between the Colorado state line and Sunshine Trail as a "Birds of Prey Area."
- The BLM should re-locate portions of the Overlook Trails which jeopardize sensitive raptor nesting areas.

#### **Big Game / Large Mammals**

- The New Mexico Department of Game and Fish needs to be able to carry out various management actions for big game populations, including bighorn sheep, elk, deer, pronghorn, bear, and cougar to remain healthy. These actions potentially include hunting, capture and transplant of animals out of the Monument, capture and release of animals into the Monument, movement monitoring, ground and aerial surveys, and mortality retrieval.
- Disease transmission from domestic sheep and goats to wild sheep is a primary cause of bighorn sheep mortality in the western US. No domestic sheep and goat grazing should be allowed on the Monument.
- The BLM should consider road closures for critical habitat such as elk calving areas.

- Elk should be protected because they benefit the economies of New Mexico.
- New Mexico has the lowest average age at death in the nation for black bear. This is a chance to give the bears one small area where they might be able to fatten up for denning in late Fall, and not be chased and harried by dog packs.
- The Monument plan should protect and improve wildlife habitat including winter range for ungulates.
- The BLM should consider studying the reintroduction of buffalo in certain areas of the Monument to support the reestablishment of grasses.
- The BLM should provide scientific studies to identify mammal breeding areas to be protected and isolated from the public.

### Fisheries

- The Monument plan should protect important species of fish.
- The Rio Grande within the Monument is a popular angling destination known for quality-size fish and a unique angling experience, and is therefore important to the local economy. This area receives about 37,000 angler days yearly, amounting to more than \$2.2 million spent on angling. The Department of Fish and Game conducts fish stockings to ensure fish populations remain sustainable. The Monument plan should stress the importance of the fishery within the Monument. The Plan should also not conflict with current fisheries management goals.
- The BLM should provide scientific studies to identify fish egg laying areas to be protected and isolated from the public

### Wildlife Corridors

- The BLM should identify and protect wildlife corridors to ensure that usable habitat and migration pathways will remain. The BLM should use the Lower Sonoran Field Office/Sonoran Desert National Monument example to manage and protect these corridors in this plan amendment. In addition, the Carson National Forest has recently initiated planning. The BLM should take the opportunity to work with the Forest Service on connecting wildlife habitat between the Monument and Carson National Forest.
- Wildlife movement corridors should include the following provisions:
  - Right-of-way exclusion areas.
  - Route density standards that will be applied to the travel network to reduce habitat fragmentation (Taos RMP, p. 13).
  - Reclamation of redundant roads or roads that no longer serve their intended purpose to achieve road density objectives and reduce habitat fragmentation, while maintaining road network connectivity (Taos RMP, p. 79).
  - Roads or highways crossing public lands would be designed to facilitate movement of wildlife to reduce mortality of wildlife from vehicle collisions (Lower Sonoran RMP).

- Maintenance or expansion of existing roads would incorporate measures to maintain or restore wildlife habitat connectivity and would incorporate, where appropriate, wildlife underpasses or overpasses (Lower Sonoran RMP).
- No additional fences would be constructed in the migratory corridors except to enhance the viability of big game migration (Pinedale RMP—Trapper's Point ACEC, p. 2-155).

### Other Considerations

- Feral dogs, cats, horses, and pigs should be removed from the Monument by the most effective means possible, even if such means are lethal, to protect wildlife and habitat.
- The BLM should not impede agencies such as the New Mexico Department of Game and Fish or the U.S. Fish and Wildlife Service from managing game, fish, or managing animal trapping activities as long as it doesn't negatively impact other values. The BLM should also not impede these agencies from protecting or restoring native animal, fish, and bird species in the Monument.
- The BLM should work with neighboring property owners such as the Forest Service to ensure that ecologically sound wildlife enhancement opportunities are optimized and to ensure the success of native species restoration efforts.
- The BLM should work to enhance or not impede wildlife viewing opportunities where appropriate. For example, prohibition of free-roaming dogs or other pets may be required at locations where disruption of normal wildlife behavior is a possibility.
- Increased visitation and depletion of water is an important threat to wildlife and fish in the Monument.
- Although federally managed forests specify a minimum number of trees to leave for wildlife, the BLM should leave as many dead, damaged, dying and defective live trees as possible in the Monument.
- The BLM should implement the following recommendations to minimize impacts of noise on wildlife:
  1. Minimize establishment of new roads, rights of way and other activities that allow for increased human activity wherever possible.
  2. Determine the current level of noise throughout the Monument and establish a protocol for monitoring this level into the future.
  3. Promote the importance of quietness throughout the Monument and educate the public on the effects of background noise on animals.
  4. Promote birding throughout the Monument to educate visitors on the importance of being quiet for birds and to provide economic stimulus for the county.
  5. Establish a Noise Measurement Study throughout the Monument as soon as possible.
  6. Promote quietness through education at established visitor centers and through the use of signs at pull offs and trailheads that encourage and promote quiet behavior in the Monument.
  7. Promote birding throughout the park by providing education at visitor centers and through signs about common and rare birds found in the park and proper birding

etiquette.

8. Establish exclosures around areas known to home ground nesting birds.
  9. Limit traffic by promoting car-pooling and not allowing ATV vehicles within the Monument.
  10. Place aircraft flight restrictions over sensitive wildlife areas and disallow Air Force training flights throughout the Monument
  11. Target shooting should be limited to specific locations designated for that activity. Locations should be far from drainage areas and water bodies that could be contaminated by lead-based ammunition.
- The BLM should inventory current wildlife.
  - Ensure safe wildlife traverse across highway 285 as appropriate. Consider wildlife overpasses if needed.
  - Recognize the needs and importance of invertebrate pollinators, grazers, and predators.
  - The BLM must look at wildlife management with the prime objective of conservation, protection and restoration. For example, the BLM should provide measurable outcomes and define time-frames for the wildlife objectives outlined in the Taos RMP (p. 10-11).
  - Wildlife and habitat, as monument values, should receive greater "weight" than trails, campsites, and recreational uses, which can impinge on necessary wildlife grazing, river access, and breeding areas.
  - Funding should be prioritized to wildlife habitat improvement and water instead of parking areas and new trails. The BLM should provide more funding for monitoring and scientific studies to determine the impact of recreational development on wildlife.
  - The Monument plan should continue to allow habitat treatments for the benefit of both game and non-game wildlife species. Examples include thinning of pinyon-juniper woodlands and ponderosa pine forests, improving riparian corridor habitat for special status songbirds, manipulation of sagebrush habitat, seeding and planting, installing water catchments, use of prescribed fire, use of biological controls for nonnative invasive plants, and application of herbicides.

#### **Issues to be resolved in the Monument plan**

1. *How will the Monument plan provide for the care and management of:*
  - a. *prairie dog ecosystems*
  - b. *river otter habitat*
  - c. *raptor habitat*
  - d. *big game habitat*
  - e. *waterfowl and migratory bird habitat, including the Central Flyway*
  - f. *bighorn sheep habitat*
  - g. *reptile, amphibian or invertebrate corridors*
  - h. *fisheries habitat*

- i. butterfly & pollinator habitat*
- 2. *How should the Audubon Important Bird Area designation be considered in the Monument plan?*
- 3. *What are the potential impacts to big game, birds, or other wildlife from transportation in the Monument?*
  - a. Should any areas be permanently closed to roads and/or trails to protect wildlife?*
  - b. Should any roads and/or trails be closed seasonally to protect important wildlife habitat?*
- 4. *What are the potential impacts of domestic sheep grazing on bighorn sheep populations?*
  - a. How can risk of disease transmission be minimized or avoided?*
- 5. *How should water developments and vegetation treatments for wildlife be managed in the future?*
- 6. *What potential wildlife reintroductions should be considered in the Monument?*
  - a. What is the potential for white-tailed jackrabbit restoration/reintroduction in the Monument?*
  - b. What is the potential for Buffalo to be reintroduced into the Monument?*
- 7. *How should wildlife corridors be managed in the Monument?*
- 8. *How might the San Antonio/Pot Mountain Habitat Management Plan be updated and incorporated into the Monument plan?*
- 9. *How might aquatic habitat be managed to support diversity for amphibians?*
- 10. *What are the potential impacts of increased trout fishing on fish populations, habitat, water quality, access in general, and the recreational experience?*
- 11. *What seasonal use restrictions should be applied during migratory and breeding seasons for birds?*
  - a. How might construction or development be seasonally restricted?*
  - b. How might timber cutting, fire-wooding or other vegetation treatments be seasonally restricted?*
- 12. *What are the impacts of boating on the Rio Grande on nesting birds and suitable bird habitat? Are any changes to boating regulations needed to protect bird habitat?*
- 13. *How should feral animals on the Monument be controlled?*
- 14. *What are the potential impacts of un-leashed dogs on wildlife?*

15. *What are the potential impacts of noise and light pollution on wildlife? How can these impacts be minimized or mitigated?*
16. *What are the potential impacts of lead-based ammunition from recreational shooting on wildlife? How can these impacts be minimized or mitigated?*

#### **Items addressed through policy or administrative action**

1. *What inventory data is needed to protect wildlife habitat in the Monument? What future research studies should be conducted?*

Inventory and data collection are administrative actions and therefore not a decision to be resolved within the Monument plan. All relevant BLM inventories will be assessed and updated as needed to address planning-level decisions prior to developing the Monument plan.

2. *Will the BLM continue to coordinate with the other agencies, such as the U.S. Fish and Wildlife Service and the New Mexico Department of Game and Fish, in regards to wildlife management?*

The BLM will continue to cooperate and collaborate with Federal, tribal, and State wildlife management agencies. For more information, please see the general management guidance on pages 11 to 12 of the 2012 Taos RMP. Current guidance on this topic will be carried forward into the Monument plan.

#### **Issues beyond the Scope of the Monument plan**

1. *Should falconry be allowed in the Monument?*

Falconry is managed by the New Mexico Department of Game and Fish, and is therefore not within the jurisdiction of the BLM.

2. *What public education materials about wildlife should be developed?*

The Monument plan will identify broad goals, objectives, and management actions related to interpretation and public education in the Monument, but the specific details associated with interpretation will be developed in a subsequent activity-level plan. Activity-level plans provide detailed, site-specific information and are tiered to the overarching Monument plan. All activity-level plans will be developed following the completion of the Monument plan and will be consistent with the goals and objectives in the Monument plan. Suggestions provided by the public will be taken into consideration when developing an activity-level plan for interpretation.

3. *How should funding be allocated for wildlife monitoring and scientific studies?*

Funding for the BLM is based on an annual appropriation from Congress, which can vary from year to year. Funding decisions are an administrative action and therefore outside the scope of a resource management plan.

## General Comments and Other Resource Concerns

### Public Comment Summary

#### General Management Themes

The Monument plan should emphasize protection of the Monument objects, and conservation in general, over other uses.

- The Monument should be preserved for wildlife, birds, plants, and water. The future uses should remain essentially the same with "light" human impact and minimal or non-motorized use. The land should not be developed for increased tourism and recreational use.
- The BLM must limit or prohibit discretionary uses if they are in conflict with the values that the Monument was designated to protect.
- The Monument plan should focus on protecting the ecological and cultural aspects of the area for generations to come.
- The area should not be developed.
- The Hondo Mesa area should be preserved for very light human use and wildlife. No vehicular traffic or further foot traffic should be allowed.
- Development of any kind should not be allowed in the Monument as it will disturb the existing plant life, wildlife, and the ecosystem as a whole. It is the silence, the ruggedness, and the isolation that makes this an unparalleled and untouched marvel. Access already exists to the monument at several points.
- The plan should give priority to the monument's values such as wildlife habitat, geologic values, and cultural resources over all other discretionary uses.
- The plan should provide for the enhancement of preservation, protection, and interpretation of the archaeological and other cultural resources in the monument.
- The BLM should always abide by the precautionary principle of "do no harm."
- Make conservation the cornerstone of your management of the monument, emphasizing habitat restoration and rehabilitation over accommodating private interests, such as utilities transmission lines and off-road vehicles.
- There should be no further development in the Monument including roads, trails, or motorized vehicle use other than what currently exists for firewood and pinon nut gathering.
- No discretionary uses or impacts, such as transmission lines, OHV use, trail or road construction, or other actions, should be permitted if they compromise existing habitats, ecological diversity,



or cultural or geologic resources, including exploitive uses that may impact the Monument's ecosystem in this time of drought and climate change.

- The plan needs to ensure continued or improved beauty, interpretive signage, and clean water for the hiking, camping, and fishing that draws visitors to Questa, and which are enjoyed by locals.
- The Monument plan should not allow for new land use authorizations which have the potential to impact the monument's resource values.
- The BLM should identify and consider first the Environmentally Preferred Alternatives (NEPA, Section 101) in the establishment of a management plan or any management policy or actions for the Monument.
- The Taos RMP adopted Alternative A of the EIS analysis as being "optimum." Alternative B, analyzed in the Final EIS, placed the greatest emphasis on protection, restoration, maintenance, or enhancement of the ecosystems in the planning area using natural processes, while affording the greatest protection to cultural resources. Alternative B is thus more protective of the Monument's objects and core values. Alternative B should serve as a template on which to build protections for the Monuments objects and core values.

#### **Employment and Volunteer Opportunities**

The BLM should hire new staff for the Monument and provide volunteer opportunities in the Monument.

- BLM should hire necessary staff to manage the objects and values for which the Monument was designated: archaeologist, fisheries biologist, wildlife biologist, hydrologist, ornithologist, interpretive naturalists, park rangers, and seasonal field technicians and provide any necessary training.
- The vacant position of fisheries biologist at the Taos Field Office needs to be filled.
- The BLM should hire local youth for seasonal employment.
- Local youth corps should be used to accomplish resource management work in the Monument.
- The BLM should hire Pilar residents to help patrol the Orilla Verde area, educate visitors, and serve as campground hosts.
- The BLM should hire local artists to create public art for the Monument, such as murals in new visitor centers and site specific sculptures that enhance the cultural experience in the open environment.
- The BLM should hire volunteer interpreters.
- The BLM should utilize New Mexico Site Watch, Taos Chapter volunteers.
- Given staffing and budgetary constraints, the BLM should seek volunteers to help with management and maintenance operations. Volunteers having to travel to the Monument might be provided stays at campgrounds.
- The BLM should hire local contractors for Monument construction and ongoing maintenance.
- The BLM should give local businesses the first opportunity to bid on and perform any improvements in the Monument.

### Pets

There should be increased leash restrictions for dogs in the Monument.

- The BLM should require and enforce dog-leash restrictions in the Monument, except in hunting areas.
- Leash restrictions should be considered by the BLM to prevent dogs from harassing wildlife along the rim trails, while dogs used by hunters should only be allowed in specific hunting zones.
- Dogs should be kept on leash in high-usage areas.

### Noise

The Monument plan should provide measures to protect quietude and soundscapes in the Monument.

- Baseline sound studies should be conducted within the Monument and all sound studies referenced in the EA should be current data and specific to the purpose of protecting quietude within the Monument.
- The preservation of natural soundscapes is important to provide visitors with adequate opportunities for quiet recreation. The BLM should utilize the SPreAD-GIS model to analyze and preserve the natural soundscape of the Monument, especially in special management areas managed for quiet use recreation, including recreation management areas and lands with wilderness characteristics.
- A noise ordinance should be established at developed campgrounds and picnic areas to minimize detrimental impacts to wildlife.

### Other Considerations

- Private property rights, along with access to private inholdings, must be maintained.
- The Monument boundary should be extended to include a corridor from the Lobatos Bridge along the Rio Grande.
- The presidential proclamation which established the Monument reads as if there is a loophole that might allow fracking. This loophole should be removed.
- The trash in the canyon, particularly at the end of road C-110, is unsightly and polluting. The canyon needs to be cleaned up.
- Future direction and protection of the Monument should be placed in the hands of the local people and their locally elected representatives.
- The BLM should keep the monument as wi-fi and cell-phone free as possible.
- Local residents are concerned that the Monument is a first step on the way to forming a National Park and would like more information on whether this is a possibility and what the differences are between the two designations. The Monument should not be designated as a

National Park without first consulting the Village of Pilar.

- The BLM should allow the use of metal-detectors by local residents.
- How will the BLM prevent wild horses from Colorado getting on the Monument?

### Policy and Regulations

The BLM should follow all NEPA requirements and take the items listed below into consideration in the NEPA analysis for the Monument plan.

- The environmental assessment (EA) should pay special attention to the baseline, cumulative impacts, socioeconomic and environmental justice sections. All alternatives and conclusions should be based on the most current data and science available.
- The EA should analyze the direct impacts of the proposed action to: health, socioeconomic and psychological wellbeing of Native American tribes, residents of the area's centuries-old traditional Hispanic land-based communities, and all those who live in and visit from around the world; impacts to livestock and other domestic animals; impacts to wildlife and wildlife habitat; impacts to wilderness areas, Areas of Critical Environmental Concern, and other environmentally sensitive areas; impacts on air and water quality; impacts to archaeologically, anthropologically, historically, spiritually, and culturally significant areas; impacts to scenic areas; impacts to recreation areas; and impacts to tourism.
- The EA must carefully analyze the indirect effects of the proposed action including how the presence of the monument might cause growth inducing effects of visitors to the area and what impacts might result or how the presence of the monument might affect land values and what impacts might this have on the cultural and socioeconomic diversity of current and future residents.
- The cumulative impacts section should consider entire bioregions, not just the area within the Monument boundary.
- A Record of Decision is required under Council on Environmental Quality (CEQ) regulations to identify the environmentally preferred alternative. The CEQ has defined the environmentally preferred alternative as the one that will promote the national environmental policy, as expressed in Section 101 of NEPA.
- The BLM should conduct a full EIS when developing the Monument's management plan. If the BLM decides not to prepare an EIS, it must put forth a convincing statement of reasons that explains why management of the Monument will impact the environment no more than insignificantly. This account proves crucial to evaluating whether the agency took the requisite hard look.
- The data and analyses used by the Taos Field Office should meet the standards of NEPA and the Data Quality Act.

The Monument plan should follow Department of Interior and BLM policies for land use planning and management of National Monuments, and take the items below into consideration when developing the

Monument plan.

- Clearly identify the objects of interest and value, as described in the Presidential Proclamation which established the monument.
- Identify specific and measurable goals and objectives for each object and value, as well as generally for the Monument.
- Identify management actions, allowable uses, restrictions, management actions regarding any valid existing rights, and mitigation measures to ensure that the objects and values are protected.
- Secretarial order 3308 and the BLM's 15-year Strategy for the National Conservation Lands call for landscape level management of NLCS lands. The BLM should work in cooperation with the Forest Service, BLM Colorado in the San Luis Valley, tribes, USFWS, the Southern Rockies LCC, Southwest Climate Science Center, and other entities to do an ecoregional assessment with existing data for areas around the Monument. The BLM should also coordinate with other agencies, governments, tribes and stakeholders at the earliest opportunity possible for day-to-day management.
- BLM's recently released Manual 6220 to provide guidance on National Monuments. This policy includes obligations to clearly identify and inventory monument objects, identify measureable goals and objectives for each object and value, extensive analyses, ensure consistent management with protecting objects and values, and others identified above. The BLM should reconsider Alternative B in the Taos RMP for the protection of the Monument objects and values. This planning process should consider the example for identifying, evaluating impacts and protection of Monument objects set forth in the RMP for the Sonoran Desert National Monument.

#### **Issues to be resolved in the Monument plan**

1. *How might an adaptive management approach be used to provide for the care and management of the Monument objects and other important resources?*
2. *How will the San Luis Valley ecoregional assessment be used in the development of the Monument plan?*
3. *Should any new pet restrictions, such as leash requirements, be applied within the Monument?*
4. *What measures are necessary to preserve the Monument's quietude and soundscape?*
5. *Should wi-fi and cell phone capabilities in the Monument be increased?*
6. *Should the use of metal detectors be allowed within the Monument?*

7. *How will the Monument plan provide continued access to private inholdings?*

### **Issues beyond the Scope of the Monument plan**

1. *Should the BLM hire new staff positions for the Monument? What opportunities does the BLM have to utilize the local work force, such as local contractors, youth corps, and seasonal employees to carry out management actions within in the Monument?*

Hiring and personnel decisions are not land use planning decisions and are therefore outside the scope of the Monument plan. Hiring decisions will be made on an on-going basis and will depend on future need and available resources and will follow all relevant federal policies and regulations.

2. *What volunteer programs should be considered for the management and protection of the Monument objects, values, and resources?*

The Monument plan will identify broad goals and objectives in relation to volunteer opportunities in the Monument (see section on Monitoring and Inventory). The development of specific volunteer programs, however, is outside the scope of the Monument plan. Specific opportunities for volunteers will be identified during subsequent implementation-level planning.

3. *What efforts should be taken to remove trash and eliminate illegal dumping within and adjacent to the Monument?*

Dumping of trash is illegal on public lands. Trash removal is not a land use planning decision, but opportunities to remove trash will be taken into consideration on an on-going basis.

4. *Can the Presidential Proclamation establishing the Monument be amended to eliminate potential "loopholes?" Can the Monument be expanded, such as to include a corridor extending along the Rio Grande to Lobatos Bridge in Colorado?*

Changes to the designating Presidential Proclamation, including the Monument boundary, are outside the authority of the BLM.

5. *Can the Monument be designated as a National Park?*

The Rio Grande del Norte National Monument is managed by the Bureau of Land Management as part of the National Landscape Conservation System (NLCS). National Parks, in contrast, are managed by the National Park Service. The Monument cannot be designated as a National Park and transferred to the jurisdiction of the National Park Service unless done so through an act of Congress.

## Data Needs

Data needs are assessed based on the identified planning issues and the scope of the analysis for the Monument plan, as well as the currency of existing resource information. In many cases, existing resource information will be used in preparation of the Monument plan. This includes data compiled for the 2012 Taos RMP and data provided by cooperating agencies, or other organizations. If existing data is not adequate to address the identified planning issues, new data will be obtained.

The BLM is currently assessing data needs for the Monument plan based on public comment and the planning issues identified during the scoping period. Efforts by the BLM are being made to update its inventories of visual resources and lands with wilderness characteristics, for example.

## Preliminary Planning Criteria

The BLM planning regulations (43 CFR 1610.4-2) require development of planning criteria to guide the preparation of a resource management plan. Planning criteria are the constraints or ground rules that guide and direct the preparation of the plan. They ensure the plan is tailored to the identified issues and that the BLM avoids unnecessary data collection and analyses. Planning criteria are based on applicable laws and regulations, agency guidance, and the results of public participation and consultation and coordination with other Federal, State and local agencies and governmental entities, and Indian tribes.

The following preliminary criteria have been developed for the Rio Grande del Norte National Monument planning process:

- The plan will establish the guidance upon which the BLM will manage the resources and values within the Monument. The Monument plan will supersede the existing 2012 Taos RMP for all lands within the Monument boundary, while lands outside of the Monument boundary will continue to be managed in accordance with the 2012 Taos RMP.
- The plan will provide guidance consistent with the objectives set forth in the establishing Presidential Proclamation. The plan will meet the requirement of the Monument proclamation to protect the objects of geological, cultural, ecological, and wildlife value within the Monument.
- The plan will be completed in compliance with the Federal Land Policy and Management Act, and all other applicable laws, regulations, executive orders and BLM policy.
- GIS and metadata information will meet Federal Geographic Data Committee (FGDC) standards, as required by Executive Order 12906. All other applicable BLM data standards will also be followed.
- The Rio Grande del Norte National Monument planning team will work cooperatively with the State of New Mexico, tribal governments, county and municipal governments, other Federal agencies, and all other interested groups, agencies, and individuals. Public participation will be encouraged throughout the process.

- The plan will not address boundary adjustments for the Monument or proposals to change the proclamation. Boundaries and other components of the proclamation were established by the President and cannot be adjusted administratively by the BLM.
- The planning process will include an Environmental Assessment that will comply with the National Environmental Policy Act.
- The plan will amend, where applicable, management decisions from existing planning documents.
- The plan will emphasize the protection and enhancement of the Monument's objects while at the same time providing the public with opportunities for compatible recreation activities.
- The plan will recognize valid existing rights within the Monument and outline the process the BLM will use to address applications or notices filed after completion of the plan on existing claims or other land use authorizations.
- The lifestyles and concerns of area residents, including traditional uses of the monument, will be recognized in the plan.
- Any lands located within the Monument's administrative boundary that are acquired by the BLM to accomplish purposes for which the Monument was designated will be managed consistent with the plan, subject to any constraints associated with the acquisition.
- The plan will recognize the State of New Mexico's responsibility and authority to manage wildlife. The BLM will consult with the New Mexico Department of Game and Fish as necessary.
- Laws, regulations, and policies other than the Monument proclamation guide the management of grazing. The plan will incorporate the BLM's Standards for Rangeland Health and Guidelines for Livestock Grazing Management. It will include a strategy for ensuring that proper grazing practices are followed within the Monument.
- The planning process will involve American Indian tribal governments and will provide strategies for the protection of recognized traditional uses.
- The BLM will strive to make decisions in the plan compatible with the existing plans and policies of adjacent local, State and Federal agencies, and American Indian tribes as long as the decisions are consistent with the purposes, policies, and programs of Federal law and regulations applicable to public lands and the Monument designation.
- The Plan will identify opportunities and priorities for research and education related to the resources for which the Monument was created. In addition, it will describe an approach for incorporating research into management actions.

## Summary of Future Steps in the Planning Process

Scoping is the first step in the planning process. Several more steps, however, are necessary to complete the Monument plan, including the formulation of alternatives, analyzing the effects of alternatives, selection of the preferred alternative, a public comment period, selection of the Monument plan, a protest period, and issuing the final decision record (see Figure 2).

### Formulation of Alternatives

Alternatives will be formulated by an interdisciplinary (ID) team consisting of BLM Taos Field Office resource specialists and managers and representatives of formal cooperating agencies. This is

accomplished by identifying a range of reasonable combinations of resource uses and management actions that address the issues identified during scoping. The range will include a no action alternative, which would be the continuation of current management from the 2012 Taos RMP.

### **Analyze Effects of Alternatives**

Once the alternatives are developed, the ID-team will analyze the effects of each alternative on the environment. This analysis will be disclosed in the EA associated with the Monument plan and will inform the selection of the preferred alternative.

### **Selection of the Preferred Alternative**

The Monument Manager and Field Manager will recommend to the State Director a preferred alternative that best resolves planning issues and promotes balanced multiple use objectives while ensuring consistency with the designating Presidential Proclamation. The State Director will provide concurrence of the selection of the preferred alternative along with the other alternatives under consideration through release of the draft Monument plan and draft EA (combined in a single document).

### **Public Comment Period**

The release of the draft Monument plan / draft EA will initiate a public comment period that will last a minimum of 30-days. The BLM will inform the public of the comment period through publication of a Notice of Availability (NOA) in the federal register, a media release, and a notification will be sent to the Monument plan mail and email lists. All substantive comments will be responded to in the final EA. Substantive comments are those that suggest the analysis is flawed in a specific way. Generally they challenge the accuracy of information presented, challenge the adequacy, methodology or assumptions of the environmental or social analysis (with supporting rationale), present new information relevant to the analysis, or present reasonable alternatives (including mitigation) other than those presented in the document. Such substantive comments may lead to changes or revisions in the analysis or in one or more of the alternatives. For more information on substantive comments, please visit this weblink:

[http://www.blm.gov/wo/st/en/prog/planning/nepa/webguide/document\\_pages/6\\_9\\_2\\_1\\_examples.html](http://www.blm.gov/wo/st/en/prog/planning/nepa/webguide/document_pages/6_9_2_1_examples.html)

### **Selection of the Proposed Monument plan**

Based on the information in the draft plan and public comments, the BLM will revise the environmental assessment and select a proposed Monument plan. The proposed Monument plan may vary from the preferred alternative identified in the draft plan, however the proposed plan must be within the range of alternatives considered in the NEPA analysis. The proposed Monument plan / final EA (combined in a single document) will be made available to the public.

### **Protest Resolution**



Release of the proposed Monument plan / final EA will trigger a 30-day protest period. During this time any person who participated in the Monument planning process and has an interest that could be adversely affected by the planning decisions may protest approval of the planning decisions. Instructions for filing a valid protest, or more information on the protest resolution process, can be found at this weblink:

[http://www.blm.gov/wo/st/en/prog/planning/planning\\_overview/protest\\_resolution.html](http://www.blm.gov/wo/st/en/prog/planning/planning_overview/protest_resolution.html)

#### **Decision Record**

After all protests have been resolved, a final decision record will be signed by the BLM New Mexico State Director. The decision record identifies the selected alternative as well as the alternatives considered and presents the rationale for the decision. The decision record will then be made available to the public.

## **Contacts**

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Bureau of Land Management  
226 Cruz Alta Road  
Taos, NM 87571-5983

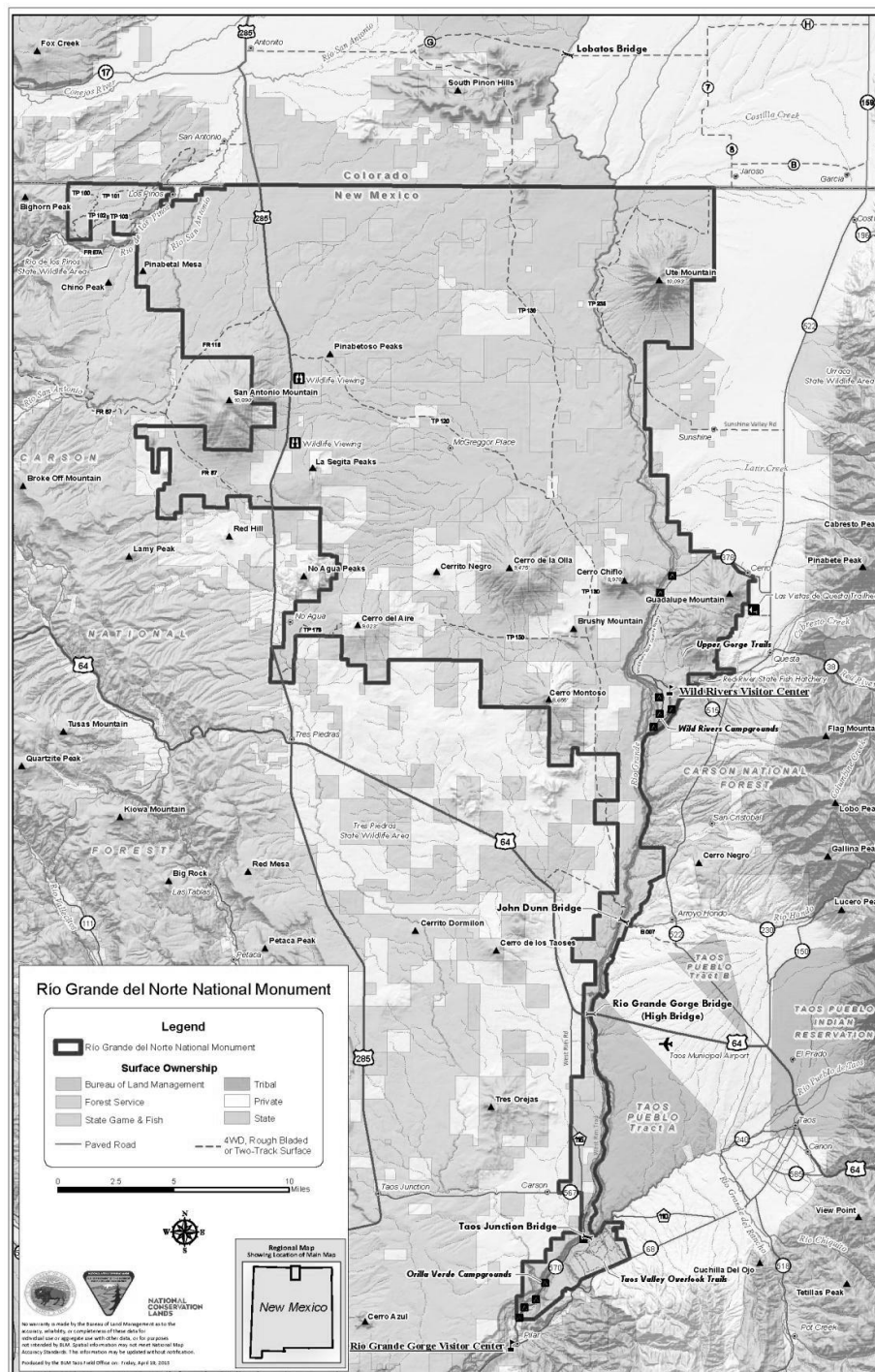
(575) 758-8851

## List of Commonly Used Acronyms

<b>ACEC</b>	Area of Critical Environmental Concern	<b>NEPA</b>	National Environmental Policy Act of 1969
<b>ATV</b>	All-terrain vehicle	<b>NHPA</b>	National Historic Preservation Act of 1966, as amended
<b>AUM</b>	Animal Unit Month	<b>NMDGF</b>	New Mexico Department of Game and Fish
<b>BA</b>	Biological Assessment	<b>NMDOT</b>	New Mexico Department of Transportation
<b>BLM</b>	Bureau of Land Management	<b>NMED</b>	New Mexico Environmental Division
<b>BMP</b>	Best Management Practice	<b>NMHPD</b>	New Mexico Historic Preservation Division
<b>BO</b>	Biological Opinion	<b>NOA</b>	Notice of Availability
<b>CAA</b>	Clean Air Act	<b>NOI</b>	Notice of Intent
<b>CEQ</b>	Council on Environmental Quality	<b>NRHP</b>	National Register of Historic Places
<b>CFR</b>	Code of Federal Regulations	<b>OHV</b>	Off-Highway Vehicle
<b>CWA</b>	Clean Water Act	<b>ORV</b>	Outstandingly remarkable value
<b>CWCS</b>	Comprehensive Wildlife Conservation Strategy	<b>RAC</b>	Resource Advisory Council
<b>DM</b>	Departmental Manual	<b>RGCP</b>	Rio Grande Corridor Plan
<b>DOI</b>	Department of the Interior	<b>RGCT</b>	Rio Grande Cutthroat Trout
<b>DR</b>	Decision Record	<b>RMP</b>	Resource Management Plan
<b>EA</b>	Environmental Assessment	<b>RMPA</b>	Resource Management Plan Amendment
<b>EIS</b>	Environmental Impact Statement	<b>RMZ</b>	Resource Management Zone
<b>EO</b>	Executive Order	<b>ROD</b>	Record of Decision
<b>EPA</b>	Environmental Protection Agency	<b>ROW</b>	Right-of-Way
<b>ERMA</b>	Extensive Recreation Management Area	<b>SHPO</b>	State Historic Preservation Office
<b>ESA</b>	Endangered Species Act	<b>SO</b>	State Office (BLM)
<b>FEIS</b>	Final Environmental Impact Statement	<b>SRMA</b>	Special Recreation Management Area
<b>FLPMA</b>	Federal Land Policy and Management Act of 1976	<b>SRP</b>	Special Recreation Permit
<b>FO</b>	Field Office (BLM)	<b>SSS</b>	Special Status Species
<b>FMP</b>	Fire Management Plan	<b>TAFO</b>	Taos Field Office
<b>FMU</b>	Fire Management Unit	<b>TCP</b>	Traditional Cultural Property
<b>GHG</b>	Greenhouse Gasses	<b>T&amp;E</b>	Threatened and Endangered
<b>GIS</b>	Geographic Information Systems	<b>TJB</b>	Taos Junction Bridge
<b>HMA</b>	Habitat Management Area	<b>USC</b>	United States Code
<b>HMP</b>	Habitat Management Plan	<b>USDI</b>	U.S. Department of the Interior
<b>ID-Team</b>	Interdisciplinary team	<b>USDA</b>	U.S. Department of Agriculture
<b>IB</b>	Information Bulletin	<b>USFWS</b>	U.S. Fish and Wildlife Service
<b>IM</b>	Instruction Memorandum	<b>USGS</b>	U.S. Geological Survey
<b>IPM</b>	Integrated Pest Management	<b>VRM</b>	Visual Resource Management
<b>IWM</b>	Integrated Weed Management	<b>WA</b>	Wilderness Area
<b>JDB</b>	John Dunn Bridge	<b>WSA</b>	Wilderness Study Area
<b>KOP</b>	Key Observation Points	<b>WSR</b>	Wild and Scenic River(s)
<b>MOU</b>	Memorandum of Understanding		

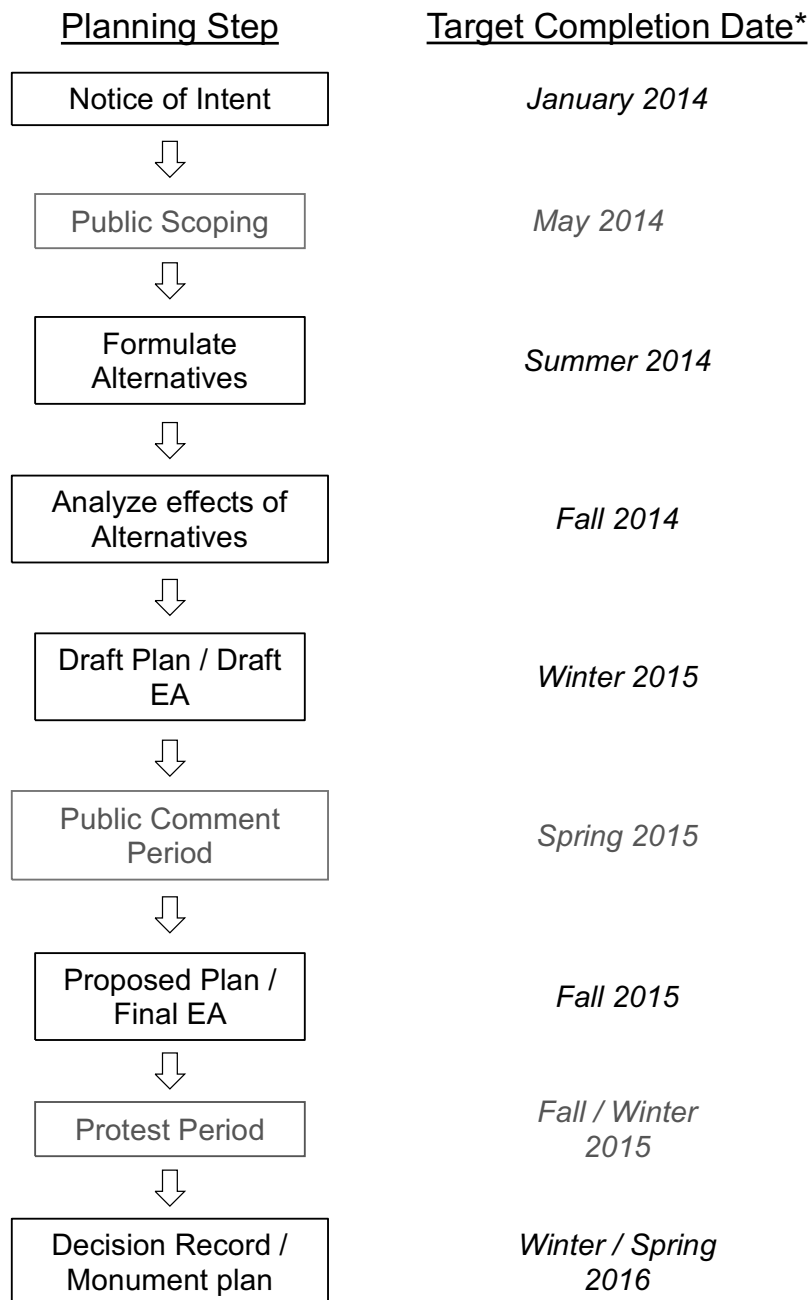
## Figures

**Figure 1: Map of the Río Grande del Norte National Monument**



## Figure 2: Projected Planning Schedule

Steps outlined in red indicate opportunities for public involvement in the planning process.



\* Subject to change.