

-Scoping Report -

**Fire and Fuels Management Plan Amendment
and
Environmental Assessment
for
BLM Lands in New Mexico and Texas**

September 2003

**U.S. Department of the Interior
Bureau of Land Management
New Mexico State Office**

**Planning and Environmental Coordination
New Mexico State Office**

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LIST OF ACRONYMS AND ABBREVIATIONS

BLM	Bureau of Land Management
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
EA	Environmental Assessment
FLPMA	Federal Land Policy and Management Act
NEPA	National Environmental Policy Act
NOI	Notice of Intent
RMP	Resource Management Plan
RMPA	Resource Management Plan Amendment

INTRODUCTION AND BACKGROUND

Scoping is a process required in the early stages of preparing a Resource Management Plan Amendment (RMPA) and Environmental Assessment (EA) to encourage public participation and solicit public input on the scope and significance of the proposed action (40 Code of Federal Regulations [CFR] 1501.7). Comments received during scoping help the BLM identify issues and concerns, help determine the level of analysis needed, and help develop alternatives.

OVERVIEW

The BLM New Mexico/Texas/Kansas/Oklahoma State Office (NMSO) proposes to amend nine Resource Management Plans (RMPs), Carlsbad 1988, Farmington 2003, Mimbres 1993, Rio Puerco 1986, Roswell 1997, Socorro 1989, Taos 1988, Texas 1996, and White Sands 1986, in eight Field Offices: Albuquerque, Amarillo, Carlsbad, Farmington, Las Cruces, Roswell, Socorro, and Taos. The purpose of the amendment is to incorporate current fire management policy into RMPs, to restore fire as an integral part of fire-adapted ecosystems in order to meet resource management objectives, to improve the protection of human life and property through the reduction of hazardous fuels, and to establish consistent methods of managing fire and fuels on public lands in New Mexico and Texas.

The amendment will form the foundation for revision of the eight Field Office Fire Management Plans (FMPs). The amendment will promote a more efficient and economical management approach to improving the health of public lands. The amendment's goals are to: 1) establish Field Office-wide objectives for fire and fuels management; 2) delineate fire management areas; 3) identify broad vegetation treatments; 4) identify general restrictions on fire management practices; and 5) determine the criteria by which the broad treatment areas can be changed.

The amendment will be based on the Federal Fire Policy (1995) and the Federal Wildland Fire Management Policy (2001) and will guide full implementation of the FMPs for each Field Office. Currently, land use planning in New Mexico and Texas does not incorporate direction from the Federal Fire Policies or current BLM policies and handbooks. Therefore, a plan amendment and National Environmental Policy Act (NEPA) analysis are needed. An Environmental Assessment (EA) will be prepared to analyze the potential impacts of the proposed management direction on critical elements and resources of the human environment such as wildlife habitat, livestock grazing, invasive plant species, socio-economics, and health and human safety. One Decision Record (DR) that amends the nine existing RMPs within eight Field Offices will be prepared.

PLANNING AREA DESCRIPTION

The planning area includes all surface lands managed by the BLM in New Mexico and Texas, including El Malpais National Conservation Area and Kasha-Katuwe Tent Rocks National Monument, but not lands for which the BLM only administers the sub-surface, or mineral estate.

The BLM administers some 13.4 million acres of surface public lands in New Mexico, and approximately 11,000 acres of surface public lands near Amarillo in Potter County, Texas. For maps showing these areas, see the Fire and Fuels management Plan Amendment and Environmental Assessment Pre-plan or its link on the New Mexico State Office internet site (www.blm.nm).

SCOPING PROCESS

During the scoping process, the lead agency responsible for the preparation of the document (in this case, the BLM) solicits comments from relevant agencies and the public, organizes and analyzes all of the comments received, and then identified the issues that will be addressed during the planning and environmental analysis; that is, the scope of analysis for the RMPA/EA. The duration of the scoping process is at least 30 days. For this document, the scoping period was 60 days. The remainder of this scoping report describes the scoping activities and summarizes the comments received.

SCOPING ACTIVITIES

The BLM's intent during the scoping process was to inform agencies and the public about the RMPA/EA and solicit their comments in order to identify issues and questions to consider when developing the plan amendment. During the scoping period, the BLM announced the commencement of the RMPA/EA through various means, invited written comments, and held public scoping meetings and some agency meetings. These activities are described below.

Announcements

The RMPA/EA and scoping meetings were announced through the *Federal Register*, a flyer listing the public meeting schedule, newspaper advertisements, the New Mexico BLM Web site, and media releases.

Federal Register

The RMPA/EA National Environmental Policy Act (NEPA) and public scoping process began officially with the publication in the *Federal Register* of BLM's Notice of Intent (NOI) to amend nine Resource Management Plans (RMPs) in eight Field Offices in New Mexico and Texas, prepare an EA, and conduct public scoping meetings. The NOI was published on May 7, 2003.

Scoping Notice, Scoping Information Bulletin, Flyer

In addition to the NOI, the BLM prepared a **scoping notice** to send to the entities on mailing lists provided by the eight Field Offices in New Mexico and Texas, which includes Federal, State, County, and local agencies; organizations; special-interest groups; and other interested parties. The scoping notice included brief information about the RMPA/EA and an inquiry as to whether the recipient wished to remain on the RMPA/EA mailing list. The notice announced upcoming

public scoping meetings and provided Field Office phone numbers where the public could get additional information about the public meeting schedule. The scoping notice was distributed to over 2,600 individuals, agencies, and interested organizations in mid-May 2003. The mailing list will be reviewed and updated throughout the RMPA/EA process.

In addition to the scoping notice, a **scoping information bulletin** was posted on the New Mexico BLM Web site. The scoping information bulletin provided a brief history and background information, a description of agency environmental responsibilities, an explanation of the planning process, project schedule, preliminary planning criteria, resource concerns, and the types of decisions that might result.

The scoping notice was the first of several information planning bulletins that will be distributed to the entities on the mailing list and/or posted on the Web site at key points of the process to keep the public informed of progress.

In early May 2003, Each BLM Field Office posted **flyers** with information about upcoming public meetings at community gathering places within their Field Office area, including libraries, convenience stores, and post offices.

Paid Advertisements

BLM paid for advertisements to be published in local and regional newspapers. Paid advertisements were published as shown in Table 1.

Table 1. Paid Advertisements

Newspaper	Date Published
<i>The Farmington Daily Times</i>	May 18, 2003
<i>The Amarillo Globe News</i>	May 28, 2003
<i>The Santa Fe New Mexican</i>	June 1, 2003
<i>The Taos News</i>	May 29, 2003
<i>The Las Cruces Sun News</i>	June 8, 2003
<i>Socorro El Defensor Chieftain</i>	June 7, 2003
<i>The Roswell Daily Record</i>	June 15, 2003
<i>The Carlsbad Current Argus</i>	June 15, 2003
<i>The Albuquerque Journal North</i>	June 15, 2003
<i>The Albuquerque Journal</i>	June 12, 2003
<i>The Albuquerque Tribune</i>	June 12, 2003

Media Release

Media releases introducing the project and announcing the scoping meetings were issued on May 7 and 12, 2003 by the BLM to local and regional newspapers, television, and radio as shown in Table 2.

Table 2. Media to which Media Releases Were Sent

Newspapers/Magazines	Location	TV/Radio	Location
<i>The Deming Headlight</i>	Deming, NM	KSPA	Alamogordo, NM
<i>The Rio Grande Sun</i>	Espanola, NM	KOB	Albuquerque, NM
<i>The Ruidoso News</i>	Ruidoso, NM	KTZA	
<i>The Santa Fe Reporter</i>	Santa Fe, NM	KCCC	Carlsbad, NM
<i>The Taos News</i>	Taos, NM	KDEM	Deming, NM
<i>The Truth or Consequences Herald</i>	Truth or Consequences, NM	KYKK	Hobbs, NM
<i>The Truth or Consequences Sun</i>	Truth or Consequences, NM	KGRT	
<i>El Defensor Chieftain</i>	Socorro, NM	KMVR	Las Cruces, NM
<i>The Albuquerque Tribune</i>	Albuquerque, NM	KBCQ	Roswell, NM
<i>The Carlsbad Current Argus</i>	Carlsbad, NM	KBIM	Roswell, NM
<i>The Alamogordo Daily News</i>	Alamogordo, NM	KRSY	Roswell, NM
<i>The Farmington Daily Times</i>	Farmington, NM	KVSF	Santa Fe, NM
<i>The Gallup Independent</i>	Gallup, NM	KNFT	
<i>The Hobbs Daily News-Sun</i>	Hobbs, NM	KKIT	Taos, NM
<i>The Las Cruces Sun News</i>	Las Cruces, NM	Fox TV	Albuquerque, NM
<i>The Roswell Daily Record</i>	Roswell, NM	KRQE TV	Albuquerque, NM
<i>The Albuquerque Journal North</i>	Serving northern NM from Albuquerque	KOAT TV	Albuquerque, NM
<i>The Santa Fe New Mexican</i>	Santa Fe, NM	KNME TV	Albuquerque, NM
<i>The Associated Press</i>		KSUT	
<i>The Albuquerque Journal</i>	Albuquerque, NM	KANW	Albuquerque, NM
<i>Outside Magazine</i>	Santa Fe, NM	KUNM	Albuquerque, NM

Several newspapers ran stories on the project and on the public scoping meetings, including the *Farmington Daily Times* and the *Roswell Daily Record*.

Web Site

A web site was established to provide project information (linked from the New Mexico State Office web site at www.nm.blm.gov). The scoping information bulletin, maps showing fire management units statewide and for each field office, information about the National Environmental Policy Act (NEPA), the public meeting schedule, a comment form, a comment email address, and information regarding contacts were posted on the web site in early May 2003.

Public Scoping Meetings

Thirteen public scoping meetings were conducted by the BLM, as shown in Table 3.

Table 3. Public Scoping Meetings

Field Office	Location	Date (2003)*	No. Attendees**
Farmington	Bloomfield Cultural Center, Bloomfield, NM	Thursday, May 22	5
Amarillo	Amarillo Field Office, Amarillo, TX	Wednesday, May 28	2
Taos	New Mexico State Office, Santa Fe, NM	Monday, June 2, 6-8 p.m.	4
Taos	Taos Field Office, Taos, NM	Tuesday, June 3, 6-8 p.m.	3
Taos	U.S. Forest Service Tres Piedras Ranger District, Tres Piedras, NM	Wednesday, June 4, 6-8 p.m.	1
Taos	Village Council Chambers, Questa, NM	Thursday, June 5, 6-8 p.m.	0
Taos	Luna Community College, Learning Resource Center Lecture Hall, Las Vegas, NM	Friday, June 6, 6-8 p.m.	0
Las Cruces	Las Cruces Field Office, Las Cruces, NM	Monday, June 9	6
Socorro	Holiday Inn, Socorro, NM	Tuesday, June 10	7
Socorro	Eagle Guest Ranch Restaurant, Datil, NM	Wednesday, June 11, 6-8 p.m.	4
Roswell	Roswell Field Office	Tuesday, June 17	1
Carlsbad	Carlsbad Field Office	Wednesday, June 18	4
Albuquerque	Albuquerque Field Office	Thursday, June 19	5
Total			42

* Meetings from 5 to 8 p.m. unless otherwise indicated.

**BLM employees not included in count.

Maps and posters illustrating or explaining components of the RMPA/EA were stationed around the meeting room for those in attendance to review. Representatives of the BLM State Office (John Selkirk, Fire and Aviation Specialist, David Borland, Fire Ecologist, and Signa Larralde, Project Manager) and Field Office (typically, the Field Office Manager or Deputy Manager and the Fire Management Officer) were available to explain the displays and answer questions.

Each meeting began with a welcome address by the BLM Field Office Manager or Deputy Manager, followed by three brief power point presentations. The first presentation outlined basic concepts of fire ecology. The second presentation outlined the RMPA/EA purpose and need, described the planning and EA process, outlined preliminary issues identified by the BLM, presented the project schedule, and discussed opportunities for public participation. The third presentation outlined how the RMPA/EA integrates with the Fire Management Plans and project plans for on-the-ground implementation, and also discussed opportunities for public participation.

After the presentation, verbal and written public comments and questions were encouraged. Comment forms were available for members of the public to take home, as were one-page project fact sheets and scoping information bulletins.

Agency Coordination

As a part of scoping, a list of Federal and State agencies was compiled. Field Offices coordinated with local offices of Federal and State agencies and with county and city governments. The New Mexico State Office coordinated with regional and state offices of Federal and State agencies.

A briefing meeting was held on May 20 at the New Mexico State Office in Santa Fe to provide information to Federal and State agencies about the project; and to gather information about preliminary issues, ideas, and concerns. An invitation was extended by telephone to the following agencies:

- ❑ The New Mexico State Land Office
- ❑ The New Mexico Department of Forestry
- ❑ The U. S. Forest Service Region 3 Office
- ❑ The Southwest Regional Office of the Bureau of Indian Affairs
- ❑ The Natural Resources Conservation Service
- ❑ The New Mexico Association of Counties
- ❑ The U.S. Fish and Wildlife Service

The meeting was attended by representatives of the U.S. Fish and Wildlife Service and the New Mexico Association of Counties.

Subsequently, invitations to meet with individual agencies for briefings on the project were extended by telephone to the New Mexico State Land Office, the New Mexico Department of Forestry, the U.S. Forest Service Regional Office, the Bureau of Indian Affairs, and the New Mexico Department of Game and Fish. As of the date of this report, meetings have been conducted with the following agencies:

- ❑ U.S. Forest Service Regional Office
- ❑ NM Department of Game and Fish

BLM will continue to communicate with the above agencies throughout the planning process. The BLM's Resource Advisory Committee was briefed on the RMPA/EA on June 5, 2003.

Letters have been sent to the U.S. Fish and Wildlife Service to initiate Endangered Species Act Section 7 consultation and to the New Mexico State Historic Preservation Office to invite their participation in the project.

Cooperating Agencies

To date, the BLM has invited the following organizations to participate in the process as cooperating agencies:

- ❑ The U.S. Forest Service Jicarilla Ranger District, Bloomfield, NM
- ❑ The Albuquerque Area Office, Bureau of Reclamation, Albuquerque, NM
- ❑ The Western Colorado Area Office, Bureau of Reclamation, Grand Junction, CO
- ❑ The NM Department of Game and Fish, Santa Fe, NM

As of the date of this report, none of the organizations have formally requested to be cooperating agencies. The NM Department of Game and Fish and the U.S. Fish and Wildlife Service have expressed an interest in attending the interdisciplinary team meetings.

Collaboration with Tribes

A letter requesting tribal consultation on the RMPA/EA was sent to each of the tribes in Table 4, as well as to natural and cultural resource contacts in tribal government.

Table 4. Tribes Sent Consultation Letters

Acoma Pueblo	San Carlos Apache Tribe
Apache Tribe of Oklahoma	San Felipe Pueblo
Cochiti Pueblo	San Ildefonso Pueblo
Comanche Nation	San Juan Pueblo
Fort Sill Apache Tribe	Sandia Pueblo
Hopi Tribe	Santa Ana Pueblo
Isleta Pueblo	Santa Clara Pueblo
Jemez Pueblo	Santo Domingo Pueblo
Kiowa Tribe of Oklahoma	Southern Ute Tribe
Laguna Pueblo	Taos Pueblo
Jicarilla Apache Tribe	Tesuque Pueblo
Mescalero Apache Tribe	Ute Mountain Ute Tribe
Nambe Pueblo	White Mountain Apache Tribe
Navajo Nation	Ysleta del Sur Pueblo
Picuris Pueblo	Zia Pueblo
Pojoaque Pueblo	Zuni Pueblo

A copy of the scoping information bulletin was enclosed with each letter.

Letters with the scoping information packet were also sent to all Navajo Nation Chapters in New Mexico. Follow-up phone calls were made to every tribe to ensure that the information had been received. Letters were re-sent if necessary.

Zia Pueblo requested a meeting to discuss the RMPA/EA, which took place on August 5, 2003. Sandia Pueblo requested a meeting, but to date has not returned phone calls to schedule it.

ISSUE SUMMARY

INTRODUCTION

The scoping period commenced with the publication of the NOI in the Federal Register on May 7, 2003 and ended on July 5, 2003. During this period, comments were submitted to the BLM in writing on comment forms, in letters, and by email. Oral comments were summarized from notes taken during the public scoping meetings and agency coordination meetings. The BLM will continue to consider public comments throughout the RMPA/EA process. All of the comments and questions were compiled, reviewed, and sorted by topic to identify the issues that will be addressed in the RMPA/EA. The remainder of this section summarizes the comments received.

PUBLIC COMMENTS AND ISSUES

Written Comments

A total of four letters or emails from Federal, State and local agencies and 23 letters, notes, emails, and comment forms from the public were received by the BLM. These comments are summarized in Table 5.

Verbal Comments: Public Scoping Meetings

A total of 42 people attended the 13 public scoping meetings, as summarized in Table 3. Verbal comments were summarized from notes taken at each meeting. A brief summary of issues raised during each meeting is presented in Table 6.

Comment Summary

Process

- One comment stated that BLM should be completing an EIS rather than an EA because of the complexity of the issues.
- One comment asked how, specifically, the RMPA/EA will be coordinated with the BLM-wide vegetation treatment EIS, now in progress.
- Cooperation and collaboration among agencies was emphasized as necessary.

Purpose and Need

- Public comments strongly supported the purpose and need for the RMPA/EA, as outlined in the Introduction of this document. All the objectives of the RMPA/EA were supported.

Treatments

- Some comments clearly favored mechanical thinning and non-fire treatments over prescribed burning and wildfire use, especially thinning of small diameter trees.
- Other comments stressed that fire must be returned to its natural place in the ecosystem through prescribed burns and wildfire use.
- One comment indicated that grazers must play an important part in ecosystem restoration and must be included in plans to return fire to its place in the ecosystem.

Issues

- Resource protection, including protection of wildlife habitat, cultural resources, soils, riparian areas, control of invasive species, and Special Management Areas, was strongly supported by many comments.
- Protection of air quality was the issue that received the most comments.

Methods

- Limiting road construction was favored by many comments, although one comment noted that existing roads are necessary for fire management and evacuation.
- Many comments favored non-intrusive methods of fire management for resource protection.

Long-term Management and Monitoring

- Many comments favored a strong scientific emphasis with an independent advisory group to review projects.
- Many comments favored a strong adaptive management program.
- Many comments favored long-term monitoring of treatment areas.

Forest Products/Economics

- Local economics were a concern of many comments.
- Several comments favored biomass use.

Table 5. Written Comments from Scoping

Subject	Comments
Adaptive Management	<ul style="list-style-type: none"> • Include Adaptive Management so that lessons learned from past successes or failures can be incorporated into future management. • Found an Adaptive Management program on collaboratively developed vision and goals for the ecosystem under consideration. • Relevant information should be compiled, analyzed, quality-controlled, interpreted, and made universally available. • Conduct inventory and monitoring to establish baseline conditions, trends, and the range of natural variability of resources. Conduct research to clarify specific questions about the ecosystem. • Report Adaptive Management results promptly, discuss them with the stakeholders, and use them for outreach, where appropriate. • Syntheses and models should be used to expose gaps in data and to evaluate policy options with uncertain response directions. • Sound and continuing external scientific peer-review helps guarantee scientific credibility. • A rigorous information management program is required to archive and interpret long-term changes. • Monitoring and research results must be fed back into the Adaptive Management process to improve program integrity.
Air quality	<ul style="list-style-type: none"> • Take care of our air and land. • My general impression is that air quality in the Taos areas has declined during the past ten years, based on observation of haze. • I am concerned that BLM's emphasis is almost entirely towards managed fires with little information about the environmental effects on air quality. No industry in American could or should get away with such light treatment of a vital public issue. • BLM has offered no data from air quality sampling sites around prescribed fires for comparison of results versus projections. • BLM has not addressed the suite of organic compounds that are emitted when wood is dried and burned, some of which may be on the EPA's volatile organic compounds or hazardous air pollutants lists. • I recommend that BLM comprehensively study the suite of emissions that result from a fire, resulting in data on the pounds of particular matter and the various organics emitted per acre burned. Then, EPA and/or other experts should evaluate the health hazards both for people working the fires and the general public downwind from [them]. • Strict air regulations would apply to electrical power generators operating on wood thinnings, thus eliminating the air quality concerns associated with open burning. • [Commenter submits an Albuquerque Journal article addressing elimination of manmade haze at nine key scenic areas in NM.]
Biological treatment – grazing	<ul style="list-style-type: none"> • I want to ask that you seriously consider re-incorporating grazers into the scheme to reduce fire-prone material and that this component be as crucial to you as reintroducing fire regimes.
Biomass use	<ul style="list-style-type: none"> • I am a partner promoting the idea of an electrical generation plant which would be fueled by biomass thinnings from federal, state, pueblo, and private lands. • Wood thinnings can be used as fuel for electrical power generation. • [Commenter submits a press release dated June 19, 2003, from Gale Norton, Secretary of the Interior, announcing an initiative to encourage the use of woody biomass byproducts as sources of renewable energy.]
BLM-wide Vegetation Treatment EIS	<ul style="list-style-type: none"> • The BLM-wide Vegetation Treatment Environmental Impact Statement must be finalized before any analysis can be tiered to it. • Does the BLM intend to tier this fire and fuels management plan to the vegetation Treatment EIS?

BLM-wide Vegetation Treatment EIS, continued	<ul style="list-style-type: none"> • When is the anticipated completion of the Vegetation Treatment EIS? • Will the same data sets in both environmental documents be used to describe fuel reduction and restoration planning across the state of New Mexico? • Specifically, how and to what degree will the fire and fuels management plan amendment be “closely coordinated” with the Vegetation Treatment EIS (as stated in the pre-plan)? • How will BLM incorporate the findings of an as-yet-[un]finished EIS to develop appropriate alternatives in the current fire and fuels planning effort? • Among the actions that should be taken into consideration as part of the cumulative impact analysis are vegetation treatment prescriptions proposed by the Vegetation Treatment EIS.
Chemical treatment	<ul style="list-style-type: none"> • High value trees in high use areas should be treated with Vita Agri with VPX from Vita Products, Inc., an organic that has shown great promise in the fight against the bark beetle but that has met with much government resistance.
Coordination and collaboration	<ul style="list-style-type: none"> • Coordination with other Federal, State, tribal, and private land entities is critical. • There should be another map showing interagency planning on a watershed basis (combining BLM, US Forest Service, National Park Service, etc.) • Do the BLM, Forest Service, and New Mexico Department of Game and Fish talk to each other about these problems? • Please keep foremost the larger goal of serving well the interests of the people of the United States, who own these lands. The overall costs and benefits for all the people come before the narrower interests of specific interest groups. •
Cultural resources	<ul style="list-style-type: none"> • How does the archaeological clearance process promote or delay prescribed burns? • Within existing BLM fire management plans, protection of cultural resources has been treated passively. •
Fire Management (general)	<ul style="list-style-type: none"> • Be careful with fire and water. We have to. Don’t sell us out. • We applaud establishing consistent methods of managing fire and fuels on public lands in New Mexico and Texas. [3 comments received expressing this issue or concern.] • The goal of hazardous fuels reduction is excellent. [2 comments received expressing this issue or concern] • Please do not make short term decisions that reduce the likelihood of fire in the short term while increasing it in the long run. For instance, in forested areas, do not remove large trees to pay the price of removing brush/small trees/slash. • Ecosystem management, including attention to threatened and endangered species, should not be held hostage to fire management.
Fire Management Categories	<ul style="list-style-type: none"> • An assessment of the health of the watersheds is a criterion for changing one fire management category to another. • A ranking system of where prescribed fire should be done is a criterion for changing one fire management category to another. • The categories are out of date. They were applicable to Fire Management on Public Land several decades ago. Emphasis on fire management has changed due to changes in physical condition, political will, public desires. • A new category to identify concerns and practices in WUI should be established. • Cultural resources listed on the National Register should be identified as a category, and a more aggressive fire management strategy (similar to the “fire wise” plan adopted by most Public Land Management Agencies) should be adopted for them.

Fire Management Categories, continued	<ul style="list-style-type: none"> • Change B to unplanned wildland fire. Combine C and D into one category with a checklist for significant constraints. • Almost all of the Albuquerque Field Office and much of the Las Cruces Field Office lands are designated FMU “B” (unplanned wildfire is not desired because of current conditions). We wish to know how and why these designations were made for a significant portion of BLM lands that do not occur near or adjacent to urban areas.
Fire Suppression	<ul style="list-style-type: none"> • Fire suppression has altered the fire regime negatively. • Fire once helped renew the forest, but is now often highly destructive due to years of fire suppression. • This plan amendment must move management practices away from the fire suppression strategies of the past and embrace a return to natural fire conditions embodied by frequent low intensity fires.
Forest management	<ul style="list-style-type: none"> • I’d like to see better management of the forests.
Forest products/economics	<ul style="list-style-type: none"> • We must develop forest products consistent with the products the naturally functioning forest offers. • We must develop forest products that keep the majority of the work in the local area. • Firewood collecting, recreation, and watershed protection, traditional forest uses in northern New Mexico, are valid uses of forest lands when managed to prevent environmental damage. • Markets for small diameter log products are not well developed, but there are many opportunities for locally-based industries. • The public doesn’t have to be spoon-fed cut and stacked material. Many families enjoy a day in the woods cutting their own firewood. • Public firewood demand cannot absorb all the thinning needed. • Composting is a possible outlet for some wood thinnings but I’m not aware of any organized project at this time. • Electrical power generation through use of wood thinnings is potentially a large steady demand that would provide good jobs for the community. There are several successful wood-fired power plants operating in the United States. • Use of wood thinnings for electrical power generation would partially offset the cost of thinning, thus allowing the BLM budget to cover more ground. • I recommend that BLM allocate part of its Fire and Fuels Management budget to seriously look at the beneficial alternative of generating electricity through biomass use rather than open burning. This would allow the public to enjoy a healthier environment with economic benefit while the BLM achieves its objectives. • Offer incentives to landowners to thin out brush and undergrowth. • Timber sales for small diameter trees are not economically viable.
Grasslands	<ul style="list-style-type: none"> • Montane grasslands have declined substantially due to grazing and fire exclusion.
Grazing	<ul style="list-style-type: none"> • Grazing has altered the fire regime negatively.
Invasive Plants	<ul style="list-style-type: none"> • Alternatives should prevent the spread of invasive plants and control noxious weeds. [2 comments received expressing this issue or concern.]
Logging	<ul style="list-style-type: none"> • Logging has altered the fire regime negatively. • High levels of resource extraction have been destroying our forest ecosystems. • It is stupid to import lumber from Canada and let our mature trees burn.

Mechanical treatments	<ul style="list-style-type: none"> • Small scale timber harvest can restore forests if managed ecologically. • The dominant forest product today is small diameter logs – posts, poles, and firewood –from thinning from below undertaken to reintroduce fire and other biological processes. • The underlying goal of mechanical thinning must be to restore the health and functioning of ecological processes. • Selective removal to approximately 100 mixed conifers per acre is recommended. Less density than this leads to exposed forest floor, which dries more quickly and is more prone to wildfire. • Access for harvest of hardwoods for fuel such as oak should be stepped up where appropriate. • Implement thinning and other mechanical fuel reduction treatments where vegetation structure must be modified to accommodate natural fire. • Thin from below – cut and remove small trees to meet objectives for habitat and fire regime restoration. • Thinning alone may successfully reduce fire hazard but is very unlikely to meet ecological objectives unless combined with prescribed fire. • Do not unnecessarily degrade soils during thinning operations. Employ low-impact equipment and use it properly. • Treat thinning slash and other surface fuels with prescribed fire. • Cut the timber as it matures and clean up the waste. • Of the treatment alternatives, I prefer mechanical thinning, particularly if beneficial uses are available for part of all of the removed material. • Thinning has the following advantages: It can be selective, such as removing only dead pinon. It can be partially mechanized in moderate terrain. It generates negligible air emissions. The general public can benefit by having access to firewood.
NEPA	<ul style="list-style-type: none"> • Preparing one document for the planning area ensures consistency between Field Offices and promotes collaboration among the offices and interested public. • Given the scope of the planning effort, we urge the BLM to develop an Environmental Impact Statement (EIS). • An EA will be a grossly insufficient level of analysis, given the significant diversity in the physical, political, social, and economic landscapes across the planning area.
Objectives	<ul style="list-style-type: none"> • We encourage the BLM to develop alternatives to address: safe human communities; wild, self-sustaining ecosystems in healthy condition; managed ecosystems in healthy condition. • The first objective should be protection of the landscape’s natural and cultural resources, including historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest. • Focus on water and watershed health. [2 comments received expressing this issue or concern] • Protect riparian areas. • Low elevation, dry forests offer the clearest opportunities for thinning and prescribed fire to restore wildlife habitat while making forests resistant to uncharacteristically severe fire. • Avoid disturbing soils. • Address the most pressing problems first. Funds are quite limited, but the job is not.

Other	<ul style="list-style-type: none"> • I am very interested in attending a certified prescribed burning training program. • BLM may be interested in buying our land. Please respond. • [No comment received; request to stay on mailing list includes a newspaper commentary on negative effects of oil and gas development.]
Prescribed fire	<ul style="list-style-type: none"> • Prescribed fire, even in areas adjacent to dwellings, is essential to the maintenance of resilient and crown-fire-resistant forests. • Where natural fire is not safe, its beneficial role can be sustained through prescribed burning or by managing the ecosystem to be resilient to uncontrolled wildfire. • BLM managers should maximize the use of prescribed fire in places where wildland fire use is not safe. • I am concerned that there is almost no attention given to alternatives to control[led] burns. •
Project design and monitoring	<ul style="list-style-type: none"> • Ecological criteria and objectives for project design, implementation, and monitoring must be developed and overseen by a technical advisory panel with expertise in forest and rangeland ecology. • Ecological criteria must be developed before projects are designed and implemented. • A technical advisory panel should include at least three independent scientists with expertise in forest ecology and restoration in the Southwest. • The monitoring and evaluation program must be charged to evaluate short- and long-term ecological effects of restoration treatments. • Every burnable acre should be accurately portrayed by maps according to vegetation type, frequency, distribution, historical and current fire condition class. • Monitoring should be an integral part of planning and should be included in the cost of projects. [2 comments received expressing this issue or concern.] • Will monitoring occur at the project level along or also as an aggregate of the plan revision? • What monitoring criteria will be incorporated to address how effectively the amended plans address the stated goals and objectives? • How will monitoring be funded? • What specific outcomes, beyond simply project implementation, does BLM intend to monitor?
Protection of human life and property	<ul style="list-style-type: none"> • Reduce hazardous fuels to improve the protection of human life and property – excellent. • We applaud improving the protection of human life and property through the reduction of hazardous fuels.
Public input	<ul style="list-style-type: none"> • How <u>can</u> we make our voices heard? • I tried to reach the numbers written on this brochure [scoping notice] to inquire on meetings to be held. No one knows anything about it. • There are grammatical errors in the scoping information bulletin. • One of the presenters seemed nervous and could present a more professional appearance.
Recreation	<ul style="list-style-type: none"> • Consideration should be given to hunters and sportsmen on when to “just let it burn” for natural caused wildfires, near to or during the hunting seasons – a lot of time and a lot of money is spent by these individuals while in our state. • The land, the management of the land, the Game Dept., and the reintroduced game are all paid for by us the taxpayers and sportsmen.
Resource Management Plans	<ul style="list-style-type: none"> • We applaud incorporating current fire management policy into existing Resource Management Plans (RMPs). • BIA and Tribes are interested in knowing of changes in your RMPs.

Restore fire's place in the ecosystem.	<ul style="list-style-type: none"> • Fire needs to be restored to its natural place in the ecosystem. [5 comments received expressing this issue or concern] • Fire thins the forest and creates conditions beneficial to wildlife and people alike. • Fire is the keystone ecological process for Ponderosa Pine forests of the Southwest. • We must reestablish natural processes and learn to manage our needs within the parameters set by them. • Establish fire regimes approximating those that shaped forest ecosystems prior to fire suppression and industrial-scale logging and livestock grazing. • RESPONSIBLE use of fire as an integral part of fire-adapted ecosystems should be part of the program, but as we all know, unfavorable burn conditions in the past have led to catastrophes. • I cannot emphasize too strongly the need to re-establish a natural fire regime consistent with the protection of other resources. • If you are reintroducing only fire, then you are not, in any way, recreating a "natural system" because there were also millions of grazers in the mix.
Restoration	<ul style="list-style-type: none"> • Protect areas subject to restoration treatments from future logging. • Replant trees in deforested areas where appropriate. • Inoculate the soil in sterile or burn areas. Earth Magic AG is BEAR approved and shows great potential in re-vitalization. • BLM should incorporate restoration into each alternative. • BLM should use the wealth of scientific literature on restoration in fire management guidelines. • Alternatives should be address comprehensive ecosystem and watershed restoration.
Roads	<ul style="list-style-type: none"> • To minimize disturbance to wildlife and to re-establish the large-scale pattern of fire across the landscape, reduce road densities in project areas, build no new roads, and prohibit activities in roadless areas. • Avoid road construction or improvement and protect roadless areas. • If you were really interested in fire prevention and extinguishing fires near BLM lands, you would never have allowed the Tres Lagunas Road to be closed by the landowners and taken off the county's maintenance rolls. I understand that another main access road, A076 is about to be closed. These are the only access roads for getting fire fighting personnel and equipment through those areas and providing an escape route for people. • The BLM should maintain fire trails through the 40 acre privately owned blocks in the old Criswell Ranch area. They all have easements around them. • Getting fire fighting personnel and equipment into a burning area before it spreads to BLM lands is more important than putting up no smoking signs. So is providing safe escape routes for area residents from fires, whether they start on BLM property or surrounding properties. • Roads built to harvest timber would never help fight fires. •
Small diameter trees	<ul style="list-style-type: none"> • Due to past management practices, there are far too many small trees and not enough large ones, especially Ponderosa Pine, in the Southwest. • Dense forests of small trees impoverish watersheds and negatively impact wildlife habitat and recreation.

Small diameter trees, continued	<ul style="list-style-type: none"> • Preserve all trees over 16 inches in diameter at breast height or established prior to 1900 and provide for their replacement over time. [2 comments received expressing this issue or concern]
Soils	<ul style="list-style-type: none"> • Alternatives should have negligible adverse effects on soils.
Special Management Areas	<ul style="list-style-type: none"> • BLM needs to specifically address protection of special values and remote and undeveloped character of the landscape. [3 comments received expressing this issue or concern] • BLM should adopt appropriate processes and prescriptions to address Special Management Areas in this planning amendment. • Alternatives should consider landscape context and protect rare habitats, such as old growth and populations of rare fish and wildlife. • Establish more wilderness. • Tailor any wildfire management prescription to reflect and enhance the values of Special Management Areas.
Treatments	<ul style="list-style-type: none"> • Grasslands can be restored by a combination of mechanical removal and reintroduction of fire. • Removing fuel and fire ladders would help.
Wildfire use	<ul style="list-style-type: none"> • Ecosystem management, particularly in Ponderosa Pine, requires a long-term commitment to frequent periodic fire. • The agency should recognize that in some areas, stand-replacing fires at long intervals are the norm – emphasize education and discourage development in these areas. • Where safe, fire should play its natural role, free of human control. • Apply wildland fire use on the public lands increasingly.
Wildland Urban Interface (WUI)	<ul style="list-style-type: none"> • Fire protection of structures should not be placed at the top of the plan’s priorities. • Property owners must take primary responsibility for the fire-safety of their property. • Define WUI to provide protection for urban developments adjacent to agency lands but exclude unrealistic protection for isolated dwellings or small groups of buildings surrounded by agency land. • Do not thin intensively beyond 1/8 mile into forested areas, so as not to compromise ecological integrity and aesthetics that make forest communities desirable places to live. • In WUIs, remove smaller trees first, cut bigger trees only as necessary to create the desired spacing, and do not remove trees over 16” in diameter. • Promote the National Fire Plan fuel reduction efforts focused on areas where property and structures are most at risk. • Concentrate efforts and resources on WUI areas. • Critical WUI areas contiguous to BLM lands should be identified and special plans developed. This should also apply to inholdings within BLM land. Attempts to cover these concerns and opportunities within the existing fire management categories mask their importance.
Wildlife habitat	<ul style="list-style-type: none"> • Plan individual projects to help identify fire timing, intensity, and location concerns relative to state-protected wildlife and important habitats. • Involve NM Department of Game and Fish habitat specialists from each Area Operations office (Albuquerque, Raton, Roswell, Las Cruces) early in the planning process for individual prescribed fire/fuels treatment projects. • Do you give any consideration to the spring hatching of turkey chicks and tree dwelling animal birthing prior to prescribed burns and “let it burn” policies?

Table 6. Verbal Comments Summarized from Public Scoping Meetings

Subject	Comments
Air quality	<ul style="list-style-type: none"> • Air quality needs to be protected. BLM needs to be held to the same air quality standards as industry during prescribed burns. [Taos] • BLM needs to divulge more information regarding air quality effects of prescribed burns to the public as part of NEPA documents. [Taos]
Chemical treatment	<ul style="list-style-type: none"> • Some ranchers are unfamiliar with chemical treatments. [Datil]
Coordination and collaboration	<ul style="list-style-type: none"> • The Fire Management Unit map suggests a great deal of cooperation between BLM and adjacent Federal and State agencies. Do the agencies agree about fire management strategies on adjacent lands? [Santa Fe] • How will the various Federal and State agencies interact in fire planning? [Las Cruces] • Interagency cooperation on fire management will be critical. The objective is to have an area-wide interagency fire plan. [Socorro] • Coordination with other agencies is critical. It is unclear at present within the Department of Interior how agencies with fire programs, such as BLM, will support the fire management needs of agencies without fire programs, such as the Bureau of Reclamation. [Albuquerque]
Cultural resources	<ul style="list-style-type: none"> • Cultural resource clearances need to be completed in a timely way to support fire projects. [Albuquerque]
Fire Management Categories	<ul style="list-style-type: none"> • A separate fire management category needs to be established to protect significant cultural resources, such as those listed on the National Register. [Santa Fe] • A separate fire management category needs to be established to protect Wildland-Urban Interface (WUI) areas. [Santa Fe] • The Fire Management categories are too detailed and too complex. They need to be simplified. [Las Cruces] • There should be fewer Fire Management polygons rather than many. [Las Cruces]
Fire Suppression	<ul style="list-style-type: none"> • Fire suppression needs to be aggressive when fire danger is high or extreme in order to prevent catastrophic fires due to inadequate response. [Santa Fe]
Forest products/economics	<ul style="list-style-type: none"> • Stewardship contracting is important to local ranchers. How could local ranchers clear pinon-juniper from their allotments instead of BLM? Local ranchers are cooperators in stewardship. [Socorro] • Biomass should be made available for economic use. [Albuquerque]
Invasive Plants	<ul style="list-style-type: none"> • Fire crews should be used to eradicate salt cedar in the off-season. [Socorro]
Logging	<ul style="list-style-type: none"> • The administration seems to want to encourage logging under the guise of fire management. [Tres Piedras]
NEPA	<ul style="list-style-type: none"> • Burdensome government regulations are preventing effective fire management. [Taos]
Prescribed fire	<ul style="list-style-type: none"> • The plan amendment/EA appears to emphasize wildfire use and prescribed burning to the exclusion of other vegetation treatments, such as biomass use. [Taos] • Don't set burn quotas that can't be met. [Las Cruces]
Project design and monitoring	<ul style="list-style-type: none"> • Monitoring of treatments needs to be carried out for several years, and in a systematic way so that data are comparable. [Albuquerque]
Resource Management Plans	<ul style="list-style-type: none"> • How can Field Office issues and needs be captured in a statewide plan? [Las Cruces]

Roads	<ul style="list-style-type: none"> No new roads should be constructed to allow firewood cutting near or at Navajo Lake State Park. Access into the state park needs to be controlled. [Farmington]
Treatments	<ul style="list-style-type: none"> BLM needs to make sure that the RMPA doesn't overly restrict its flexibility in fire use. [Las Cruces] The RMPA should allow for the on-the-ground land manager to decide actions as needed, rather than restrict actions. [Las Cruces]
Wildfire use	<ul style="list-style-type: none"> Fire use is a good thing. [Las Cruces]
Wildland Urban Interface (WUI)	<ul style="list-style-type: none"> Fire prevention in WUI areas should be proactive; there should be patrols and public education. [Las Cruces] Make sure WUI areas are addressed in planning. These should be designated as "no fire" areas. [Las Cruces] Unincorporated housing developments in Catron County need to be protected against fire. It is critical to make sure fire departments and programs know where they are. How do Volunteer Fire Departments work with BLM to protect these communities? [Datil]
Wildlife habitat	<ul style="list-style-type: none"> Be careful in planning prescribed burns so that you don't burn too much habitat in one hunting unit. [Las Cruces] Burning is essential for rehabilitation of wildlife habitat. [Albuquerque]
Watersheds	<ul style="list-style-type: none"> Watersheds are the essential areas that need to be considered in fire planning. [Albuquerque]

Draft Planning Criteria

The following draft planning criteria were published in the NOI and have been identified to guide the development of the plan amendment/EA:

- Compliance with all legal mandates of the Federal Land Policy and Management Act of 1976, the National Environmental Policy Act of 1969, the Federal Advisory Committee Act, the Administrative Procedures Act, and the BLM planning regulations in 43 CFR part 1600, as well as other laws, executive orders, and regulations;
- Consistency with Fire Plans of other agencies and State, Tribal, and local jurisdictions.

Data Summary/Data Gaps

Preparation of the Fire and Fuels Management Plan Amendment will rely primarily on existing information that is currently available. Preliminary resource data and GIS themes required for preparation of the proposed amendment were identified in Appendix 2 of the Preparation Plan.

Vegetation data are being compiled and updated, based on the National Land Cover Data available in combination with the New Mexico GAP vegetation data. Vegetation treatment histories (including data on past prescribed fires, mechanical treatments, and chemical treatments) are being compiled and/or digitized, along with fire histories. An important part of the analysis will be Fire Regime Condition Class maps for the BLM lands. These maps reflect the degree to which the current vegetation across the landscape varies from its historic fire regime. The scale of available maps may not be ideal for the analyses.

Summary of Future Steps in the Planning Process

INTRODUCTION

The RMPA/EA process, which is scheduled for completion by September 30, 2004, consists of the following nine basic steps:

- 1) identification of issues
- 2) development of planning criteria

- 3) inventory data and information collection
- 4) management situation analysis
- 5) formulation of alternatives
- 6) estimation of effects of the alternatives
- 7) selection of the preferred alternative
- 8) selection of the plan amendment
- 9) monitoring and evaluation

The BLM is presently working to complete Steps 1 through 5 above.

The comments and issues identified through scoping and subsequent discussions will assist in determining the scope of the studies to be completed and addressed in the RMPA/EA. The Study team will compile an inventory of resource information by gathering data representing the existing condition of the human, natural, and cultural environment within the planning areas. Using the issues identified during the initial scoping phase, data collected, and existing management direction from the current RMPs, the team will conduct an analysis to determine 1) resource condition objectives, 2) program constraints, 3) general management direction.

A range of reasonable alternatives, including an alternative considering no action, as required by NEPA, will be developed and analyzed in the EA. Potential impacts of the alternatives will be assessed and the results of the analysis will be documented in a preliminary RMPA/EA, which the public will be asked to review in spring 2004. Comments on the preliminary RMPA/EA received from agencies and the public will be considered and incorporated into the Proposed RMPA/EA, to be completed in summer 2004. After a Governor's Consistency Review and public protest period, the BLM will issue a Decision Record and an approved RMPA, scheduled for September 2004.

The BLM will continue to consider public comments through the RMPA/EA process. Periodic updates on RMPA/EA progress will be sent to those on the mailing list. Information about RMPA/EA progress can also be obtained from its link on the New Mexico State Office web site, www.blm.nm.