



New Mexico Department of Agriculture

Office of the Director/Secretary

MSC 3189

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December 17, 2007

Ms. Linda Rundell, State Director
Bureau of Land Management
New Mexico State Office
P.O. Box 27115
Santa Fe, New Mexico 87502-0115

Dear Ms. Rundell:

Response to the proposed designation of certain Bureau of Land Management (BLM) lands in Doña Ana County as Wilderness or National Conservation Area has varied across many groups. All stakeholders have expressed concern about protecting open space and natural resources in Doña Ana County. The effects that restrictions associated with different land designations would have on users of public lands is where controversy arises. Some areas proposed for wilderness designation by the New Mexico Wilderness Alliance were determined not to meet the necessary criteria in the 1991 BLM New Mexico Wilderness Study Report. As citizens of Doña Ana County have become more informed on this issue, additional proposals that address common resource concerns have surfaced.

The following comments, prepared by the New Mexico Department of Agriculture (NMDA), address the “Doña Ana County Planned Growth, Open Space, and Rangeland Preservation Act of 2008.”

The proposed land designations, Special Preservation Area (SPA) and Rangeland Preservation Area (RPA), provide for protection of Doña Ana County’s natural resources while also ensuring that multiple use and proper management of federal lands is not restricted. Both designations withdraw affected lands from:

- (1) all forms of entry, appropriation, or disposal under the public land laws;
- (2) location, entry, and patent under the mining laws; and
- (3) operation of the mineral leasing, mineral materials, and geothermal leasing laws.

This would address stakeholder concerns by protecting land from development pressure, yet would not place excessive restrictions on public access and land management.

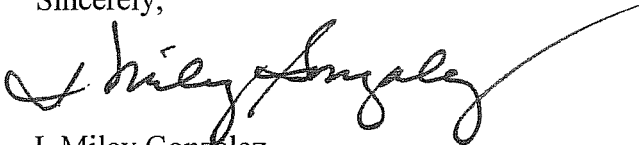
The management plan for RPAs identifies livestock grazing, recreation, wildlife management and scenic values as legitimate uses of federal land and allows land managers the necessary tools

to properly manage the land. The ability to use motorized vehicles for administrative purposes (homeland security and law enforcement; construction, maintenance, and operation of authorized rainfall runoff management systems; construction, maintenance, and operation of authorized rangeland improvements; or to respond to an emergency) is essential for land managers and law enforcement to meet their objectives.

Rangeland improvements are a vital part of every ranching operation that provides multiple benefits to the land. Water systems developed by grazing allotment owners provide much needed water for livestock and wildlife. Vegetation management practices deter invasive plant species from taking over the landscape and preventing desirable forage growth for livestock and wildlife. Water retention structures are important for controlling erosion, mitigating harmful effects of massive runoff events, and increasing aquifer recharge. These management practices require the use of methods and materials not allowed under more restrictive land designations such as wilderness.

NMDA supports land designations that promote the viability of agriculture and address sustainable use and prudent management of natural resources. This is consistent with goals and objectives in NMDA's Strategic Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "I. Miley Gonzalez", with a long, sweeping flourish extending to the right.

I. Miley Gonzalez
Director/Secretary

IMG/jm/lo

cc: Senator Pete Domenici
Senator Jeff Bingaman
Representative Stevan Pearce
People for Preserving Our Western Heritage
Frank DuBois
Carol McCall