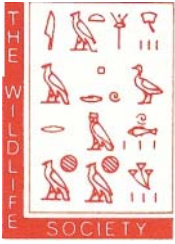


THE WILDLIFE SOCIETY NEW MEXICO CHAPTER



February 16, 2004

Honorable Bill Richardson
State Capitol, Room 400
Santa Fe, NM 87503

Re. State recommendations for Otero Mesa

Dear Governor Richardson:

The New Mexico Chapter of The Wildlife Society (Chapter) is an organization of over 150 natural resource professionals, mostly wildlife biologists, in our state. We are a chapter of The Wildlife Society, an international professional organization founded in 1937 and dedicated to excellence in wildlife stewardship through science and education.

The Chapter applauds your recent Executive Order 2004-005 in response to the Bureau of Land Management's Proposed Resource Management Plan Amendment and Final Environmental Impact Statement for Federal Fluid Minerals Leasing and Development in Sierra and Otero Counties (FEIS). We also support the response of your New Mexico Game and Fish Department to the BLM's FEIS, as described in their letter of 5 February 2004. Their letter addresses important wildlife issues in addition to those at Otero Mesa and the Nutt grasslands.

As your agencies develop a management alternative for Otero Mesa and the Nutt grasslands in southwest Sierra County, the Chapter offers the following recommendations:

- 1) There is a need to clearly define "Otero Mesa", the Nutt grasslands and any internal areas for which oil and gas lease stipulations and conditions may be recommended. Hopefully, simple maps will be provided to the public. These maps should show management projections for federal lands and for intermingled state and private lands so that impending fragmentation of the landscape can be recognized and evaluated.

The FEIS contains several maps but fails to clearly show areas where stipulations are proposed and how these areas are fragmented by non-stipulated BLM lands and by state and private lands. The FEIS and recent public discourse have produced ambiguous interpretations of what and how much land is included in "Otero Mesa". Statistics applying to different areas have been compared, inappropriately, to support positions. This ambiguity must be corrected if the public is to understand and evaluate the state's recommendations.

- 2) We strongly support complete protection for large, contiguous portions of the Chihuahuan desert grassland at Otero Mesa and of the Nutt grasslands. These grasslands are among the least protected, most fragile ecosystems in the state and the nation. A large area at Otero Mesa and another in the Nutt grasslands should be given special federal status, such as Area of Critical Environmental Concern or National Conservation Area. There is potential for at least 2 townships (approximately 50,000+ acres) of mostly grassland habitat in such a reserve, southeast of the McGregor Range. There is potential for at least 1 township of mostly grassland habitat in a reserve, along the Sierra/Luna county line. We recommend that these reserves be established and that BLM negotiate with the State Land Office to trade lands and minerals in order to eliminate state holdings and resulting fragmentation within them.

These recommended reserves would benefit pronghorn herds and recovery of endangered aplomado falcons. They would provide unfragmented grassland areas where wildlife and people may use and enjoy the land beyond the sight and sound of industrial development.

- 3) Elsewhere in the "Greater Otero Mesa" area, fragmentation of wildlife habitats should be minimized. Numerous studies have shown that many species of wildlife avoid areas with structures, noise, and other human disturbance. This is especially true for critical periods such as during reproduction and caring of young. Thus, impacts of development extend well beyond the physical "footprint" of the activity and reduce the habitat effectiveness of large areas.

The FEIS touts the value of limiting oil and gas developments to 5% of the land in portions of the Otero Mesa and Nutt grasslands. However, no map in the FEIS shows how these 5% stipulated lands would be intermingled with other BLM, state, and private lands where "standard lease terms and conditions" would allow higher densities of development. In reality, little country could be more than a mile from an oil or gas well, road, or pipeline under the BLM proposal.

The Chapter recognizes the importance of energy development and production to the state and national economies. However, it is not necessary to develop all the energy reserves in the shortest possible time. This maximizes stresses upon wildlife and habitat for several years or decades. In some cases, populations may never recover. An alternative that could minimize fragmentation of habitats would be to develop oil and gas reserves sequentially across the landscape. For example, policies and regulations could be designed to limit energy development so that no more than half the sections in any township have active, producing oil or gas wells at any one time. Once one of 18 developed sections in a township has been depleted and reclaimed, another section may be entered. This strategy would allow the gradual planned development of all the public's energy reserves. It also would ensure that every township always has a large area of undisturbed habitat and recreation land. Lastly, the strategy would encourage prompt reclamation of lands where energy resources have been depleted.

- 4) As oil and gas resources are developed in New Mexico, we recommend surface-management practices that will minimize impacts upon wildlife and habitat. The practices now required by the Mineral Extraction Agreement for gas development on Vermejo Ranch may provide best management practices that could be used at Otero Mesa and in the Nutt grasslands.

The New Mexico Chapter of The Wildlife Society looks forward to your management alternative for the desert grasslands of Otero Mesa and southwest Sierra County. We are available at your convenience to further discuss this matter at (505) 286-8235 or triley@trcp.org.

Sincerely,

Terry Z. Riley, PhD, President-Elect

cc. Joanna Prukop, Secretary of Energy, Minerals, and Natural Resources
Bruce Thompson, Director NM Department of Game and Fish
Linda Rundell, NM State Director, Bureau of Land Management
Kathleen Clarke, Director Bureau of Land Management
Daniel J. Decker, President The Wildlife Society