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31 May 2024

Allie Bettinger  
Bureau of Land Management  
Las Cruces District Office  
1800 Marquess Street  
Las Cruces, NM 88005

**RE: Gila Lower Box Recreation Area Management Plan Draft Environmental Assessment; NMERT Project No. NMERT-3509**

Dear Ms. Bettinger,

The New Mexico Department of Game and Fish (Department) has reviewed the Recreation Area Management Plan (RAMP) Draft Environmental Assessment (EA) for the Gila Lower Box Area (Area). This letter constitutes the Department's official comments regarding the RAMP EA.

Overall, the Department supports actions that will improve boating, camping, and fishing access and actions that will limit dispersed camping and unauthorized motorized travel in the RAMP planning area. Therefore, the Department supports the adoption of Alternative B – Proposed RAMP.

Page 54, section 3.4.2.1 of the EA states, "Under all alternatives, the BLM would consider the potential for seasonal closures to reduce impacts from visitors, which would limit recreation opportunities during certain times of the year, if implemented." The Department does not support closures that would reduce hunting and fishing opportunities. The Department strongly recommends that any closures consider hunting seasons and popular fishing seasons (i.e., late spring through summer) to reduce impacts to hunters and anglers.

Per a 2019 status report for the Narrow-headed Gartersnake (*Thamnophis rufipunctatus*) in southwestern New Mexico (Jennings et al. 2019), no gartersnakes were detected in the RAMP planning area as of 2019. However, surveyors did find non-native Bullfrogs (*Rana catesbeiana*) in the Area during these 2019 surveys. Thus, the

Department recommends minimizing the creation of permanent ponds that would benefit and possibly lead to the spread of this non-native species.

Records from previous and ongoing surveys of the Gila Lower Box Wilderness Study Area (WSA) by the Department's Fisheries Management Division indicate that Loach Minnow (*Tiaroga cobitis*) and Spikedace (*Meda fulgida*) have not been found in the WSA since 2003. Thus, the Department does not anticipate any adverse impacts to these species from the actions outlined in the RAMP EA.

Department staff conducted surveys for the Southwestern Willow Flycatcher (*Empidonax traillii extimus*; SWFL) and Yellow-billed Cuckoo (*Coccyzus americanus*; YBCU) on the State Land Office (SLO) property east of Nichols Canyon in 2022. Multiple SWFLs and YBCUs were detected in the local riparian habitat; thus, both bird species are likely to occur in the RAMP planning area. Thus, the Department recommends conducting an analysis of the effects of increased hiking traffic in the proposed developed areas on local SWFL and YBCU breeding territories.

Section 3.2.2.1 of the EA describes the Gila Lower Box Saltcedar Removal Project. For this project, saltcedar trees would be removed using a combination of herbicide injection for larger trees and cutting smaller trees down and applying herbicide to the stumps. Although saltcedar is an invasive species, removal of all saltcedar in the RAMP planning area would result in habitat loss, particularly for the SWFL, which is known to successfully nest in saltcedar trees along the Gila River. To mitigate potential loss of habitat for the SWFL, the Department recommends planting dense native vegetation in areas where saltcedar has been removed. For more information regarding exotic plant removal in SWFL Critical Habitat, which is present in the RAMP planning area, the Department recommends referring to the "Special Management Considerations or Protections" section of the U.S. Fish and Wildlife Service's [Designation of Critical Habitat for Southwestern Willow Flycatcher](#) document. For additional recommendations regarding riparian vegetation restoration and planting, please refer to the Department's project guidelines for [Habitat Restoration and Management of Native and Non-native Trees in Southwestern Riparian Ecosystems](#).

Thank you for the opportunity to review the RAMP EA. Please contact Jack Marchetti, Aquatic/Riparian Habitat Specialist, at [jack.marchetti@dgf.nm.gov](mailto:jack.marchetti@dgf.nm.gov) or (505) 479-1269 if you have any questions.

Sincerely,

Virginia Seamster, Ph.D.  
Assistant Chief for Technical Guidance

## References:

Jennings, R. D., B. L. Christman, and J. T. Giermakowski. 2019. 2019 Status Report: Narrow-headed Gartersnake (*Thamnophis rufipunctatus*) Surveys in Southwestern New Mexico. New Mexico Department of Game and Fish, Santa Fe, New Mexico, USA.