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8 June 2026

Tino Aguilera  
Project Manager  
BLM Las Cruces District Office  
1800 Marquess Street  
Las Cruces, NM 88005

***RE: Dingell Act-New Mexico State Land Exchange, DOI-BLM-NM-L000-2025-0001-EA, NMERT Project Number NMERT-6049***

Dear Mr. Aguilera,

Under the congressional directive established by Subtitle C, Part I, Section 1201(d)(3) of the John D. Dingell, Jr. Conservation, Management, and Recreation Act (Dingell Act Public Law 116-9 signed March 12, 2019), the Bureau of Land Management (BLM) has been working with the New Mexico State Land Office (NMSLO) to jointly identify BLM-administered Federal lands and State Trust lands for exchange in southwestern New Mexico (Proposed Action). Overall, the New Mexico Department of Wildlife (Department) encourages the BLM to support the Proposed Action Alternative. The Department also encourages the BLM to include an analysis of biological resources in the Environmental Assessment (EA) associated with the Proposed Action in order to evaluate potential impacts of the land exchange on wildlife and wildlife habitats. In addition to the information provided in the attached New Mexico Environmental Review Tool (NMERT)-generated report for this project (NMDOW 2026), the Department has the following comments on the Proposed Action and provides the following information for inclusion in the EA.

Comments to Minimize Impacts on Wildlife and Terrestrial Habitat

There are 92 special status animal species and 10 special status plant species potentially found within 1 mile of the Proposed Action area. The full species list can be found within the attached NMERT report (NMDOW 2026). Many of these species occur within parcels that would be transferred to the BLM within the boundaries of the Organ Mountains-Desert Peaks National Monument (OMDPNM). However, a significant number are also found within or nearby parcels that will be transferred from the BLM to

the NMSLO. Thus, the Department believes that the inclusion of a more in-depth analysis of quality wildlife habitat, special status animal species, quality vegetation habitat, and special status plant species in the Proposed Action EA is necessary.

The Department recommends the BLM analyze impacts to wildlife and wildlife habitat within parcels proposed to be transferred to the BLM as well as those proposed for transfer to the NMSLO. While wildlife and wildlife habitats within parcels transferred to the BLM may benefit from the increased protections provided by OMDPNM, there is a potential for increased recreation in and visitation to these parcels that may result in increased disturbance to these areas.

Portions of the Proposed Action area, including parcels to be transferred to the NMSLO, appear to be within Crucial Habitat as identified in the Crucial Habitat Assessment Tool (CHAT) layers provided in the NMERT. This indicates that a diversity of species of conservation concern and sensitive or important habitats for wildlife are likely to be found in the Proposed Action area. This further supports the Department's recommendation of the completion of a more thorough evaluation of biological resources in the EA prior to a final decision being made in order to avoid adverse impacts on sensitive wildlife and habitats.

Additionally, the Department would like to note that the following state-endangered plants: night-blooming cereus (*Peniocereus greggii* var. *greggii*), Parish's alkali grass (*Puccinellia parishii*), sand prickly pear (*Opuntia arenaria*), and Sneed's pincushion cactus (*Escobaria sneedii* var. *sneedii*), have been documented near and potentially within the Proposed Action area footprint, including lands proposed for exchange to the NMSLO. The BLM may need to consider analyzing and/or mitigating the Proposed Action's impact on these species. The Department recommends that the BLM – Las Cruces District Office contact Erika Rowe, [Erika.Rowe@emnrd.nm.gov](mailto:Erika.Rowe@emnrd.nm.gov), at the New Mexico Endangered Plant Program of the Energy, Minerals, and Natural Resources Department regarding potential presence of, and conservation needs for, state-listed plants.

Thank you for the opportunity to review and comment on the Proposed Action and for your consideration of these comments. If you have any questions regarding terrestrial habitat or species, please contact Meredith Dalton, Terrestrial Habitat Specialist, at (505) 709-0671 or [meredith.dalton@dqf.nm.gov](mailto:meredith.dalton@dqf.nm.gov).

Sincerely,

Virginia Seamster  
Assistant Chief for Technical Guidance  
Ecological and Environmental Planning Section

## References

[NMDOW] New Mexico Department of Wildlife. 2026. BLM LCDO Dingell Act-New Mexico State Land Exchange. New Mexico Environmental Review Tool Report. New Mexico Department of Wildlife, Santa Fe, New Mexico, USA.

<[https://nmert.org/system/files/project\\_report\\_blm\\_lcdo\\_dingell\\_act\\_new\\_me\\_43604\\_44269.pdf](https://nmert.org/system/files/project_report_blm_lcdo_dingell_act_new_me_43604_44269.pdf)>.