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14 August 2026

U.S. Department of the Interior, Director (630)
Bureau of Land Management (BLM)
1849 C St. NW, Room 5646
Washington, DC 20240

RE: Considering Lands with Wilderness Characteristics (A2407-014-004-065516; #O2509-014-004-125222), Management of Wilderness Study Areas (A2407-014-004-065516; #O2509-014-004-125222), and Management of Designated Wilderness Areas (A2407-014-004-065516; #O2509-014-004-125222). NMDOW Project No. NMERT-6264.

Dear Director,

The New Mexico Department of Wildlife (NMDOW), Energy, Minerals, and Natural Resources Department's Forestry Division (Forestry Division), and New Mexico Department of Agriculture (NMDA), collectively, the State Agencies, appreciate the opportunity to provide input regarding potential revisions to the BLM's existing manuals 6320-Considering Lands with Wilderness Characteristics (LWCs), 6330-Management of Wilderness Study Areas (WSAs), and 6340-Management of Designated Wilderness Areas (Proposed Action). The State Agencies provide the following comments regarding the Proposed Action. Pertinent to all three manuals, the State Agencies appreciate the opportunity to review all land use planning documents. In order to provide the best information available, the State Agencies request that ample time, preferably 30 days or more, is provided to comment on land use planning documents. The State Agencies also appreciate the option to comment online and request the BLM retain these electronic methods for comment.

Comments Regarding Manual 6320 - Considering LWCs

LWCs provide important habitat for wildlife. NMDOW appreciates the BLM's attention to, and consideration of, these significant areas and the benefits they provide. NMDOW and NMDA also appreciate the inclusion of state agencies when making decisions relating to the management of LWCs.

In the event of any revisions to [Manual 6320](#) (BLM 2024), NMDA requests that sections A(1)a through A(1)c (Pages 1-3 through 1-5) be preserved in substantively the same form, excepting the clarification and plant-related additions requested by the other State Agencies below. Section A(1)b is of particular importance for ensuring that existing uses, such as livestock grazing, are not unduly subjected to any de facto management of LWCs as if they were designated Wilderness areas.

Page 1-4 of [Manual 6320](#) (BLM 2024) discusses 'Factors for Consideration of LWCs'. Section a(4) within this list addresses external impacts to LWCs. Within this section, there is a mention of the potential for impacts to be "pervasive and omnipresent". This phrasing is rather vague and open to interpretation and inconsistent application across BLM field offices. NMDOW and the Forestry Division suggest the BLM add more detail to this section and consider providing definitions and representative examples of such impacts to improve clarity.

For example:

- Does seeing or hearing one mine from a ridgeline count?
- Does hearing oil and gas infrastructure only on windy days count?
- Is a single transmission line "pervasive"?
- What if you hear aircraft several times a day?

Furthermore, NMDOW appreciates the inclusion of all resource types during land use planning processes and the potential for the consideration of decisions which protect LWCs (Page 1-7). NMDOW suggests the contents of sections A(2)b through g (Pages 1-6 to 1-8) are preserved in the event of any changes to the manual in order to provide for the highest level of attention to biological resources, including wildlife and wildlife habitats, during the land use planning process as it relates to LWCs.

The Forestry Division recommends explicitly recognizing rare and endemic plant species, intact native plant communities, and botanical diversity as important biological resources when evaluating LWCs. These areas often contain some of New Mexico's least-disturbed habitats and may support rare species, endemic flora, or unique plant communities found nowhere else.

The Forestry Division also recommends retaining language that recognizes the ecological processes necessary to maintain these plant communities, including:

- Natural fire regimes, where appropriate
- Maintaining and enhancing hydrologic processes
- Biological soil crusts and intact soils
- Native pollinator habitat and ecological interactions
- Landscape connectivity

Manageability and External Impacts

The Forestry Division recommends broadening the discussion of external impacts to include ecological effects, not solely visual or auditory impacts. Activities occurring outside LWCs may substantially affect ecological integrity through:

- Invasive species spread
- Unauthorized off-highway vehicle use and route creation
- Adjacent mining or energy development and associated dust deposition
- Livestock concentration, particularly around wetland or water sources
- Altered hydrology or groundwater withdrawal
- Habitat fragmentation
- Altered wildfire regimes

For rare plants, these indirect impacts may be as significant as visual or noise impacts. For example, dust from adjacent mining or energy development may alter soil conditions or affect plant growth by blocking light needed for photosynthesis, thereby also lowering carbon capture; groundwater withdrawals may degrade certain plant populations; and invasive species may fundamentally alter fire regimes and native plant communities. The Forestry Division recommends that these ecological impacts be explicitly considered when evaluating manageability and wilderness characteristics.

Comments Regarding Manual 6330 - Management of WSAs

There are currently 111 WSAs covering 725,961 acres in New Mexico. Like LWCs, WSAs provide important habitat for wildlife in New Mexico, and NMDOW appreciates the BLMs consideration of these areas in [Manual 6330](#) (BLM 2024).

In section C(2)e - Legacied uses (Page 1-11), BLM states “that legacied use [leases] may be acquired by a new operator.” NMDA asks that this provision be retained in the event of any manual updates. This provision ensures that grazing may continue on lands that were being actively grazed before the WSA was identified and designated. Additionally, NMDA requests clarification that a transferred permit will still be treated as a pre-existing use.

In section D(3)a.v – Livestock management developments (Page 1-15), BLM states that new permanent livestock management developments may not result in an increase in Animal Unit Months (AUMs). However, new livestock developments may be approved if they ‘protect or enhance wilderness characteristics’ and this exception should be retained.

In section D(3)c - Changes in grazing practices (Page 1-16), BLM discusses the use of Rangeland Health Standards (a.k.a. Land Health Standards) for adjusting authorized grazing within WSAs. However, BLM has recently proposed to amend its regulations governing Land Health Standards (see DOI 2026b) such that they will be relocated from BLM’s grazing regulations (43 Code of Federal Regulations [CFR] part 4100) and applied to all authorized users and permittees equally (proposed 43 CFR part 1700). NMDA suggests that [Manual 6330](#) be similarly amended for consistency should the rule proposed in DOI (2026b) be finalized. Specifically, NMDA requests that discussion of Land Health Standards, causal factor determinations, and appropriate actions should be removed from section D(3)c and placed in a new section that discusses them with respect to all permitted uses.

As contained on Pages 1-33 to 1-39 of [Manual 6330](#) (BLM 2024), NMDOW appreciates the inclusion of wildlife-specific guidance. Overall, NMDOW suggests this section of the manual remain unchanged to provide for the highest level of protection for wildlife and wildlife habitats within WSAs.

Regarding section D(11)g - Removal of non-native species (Page 1-38), NMDOW recommends consultation with appropriate state agencies be added as a requirement prior to any removal activities to ensure the protection of all wildlife and that activities are conducted in accordance with applicable state laws and permitting requirements.

NMDOW suggests the evaluation of impacts to a WSA from actions proposed on public lands adjacent to these areas, as included in section E(1)a (Page 1-39), be retained in the event of any changes to the [Manual 6330](#) (BLM 2024). NMDOW also recommends the general exclusion of categorical exclusions (CXs or CEs) from allowable National Environmental Policy Act (NEPA) documentation for actions relating to WSAs, as included under section 2 (Page 1-40), be retained in the event of any changes to the manual to ensure full consideration for all possible impacts to these areas.

The Forestry Division furthermore recommends that management of WSAs explicitly emphasize the protection of intact native plant communities and sensitive botanical resources, recognizing that these communities form the foundation of healthy wildlife habitat.

Regarding Invasive Plant Management

- Minimize disturbance during treatment activities.
- Avoid widespread aerial herbicide applications where they may affect native or rare plants or alter natural plant communities.
- Avoid introducing additional invasive species.
- Avoid impacts to rare plant populations.
- Consider treatment timing to avoid flowering and seed production of sensitive species.

Regarding Surface Disturbance

- Minimize new ground disturbance.
- Avoid unnecessary soil disturbance.
- Restore disturbed areas using locally appropriate native plant materials.
- Minimize invasive species spread from adjacent disturbed lands.

Comments Regarding Manual 6340 - Management of Designated Wilderness Areas

There are currently 18 designated Wilderness areas covering 479,770 acres in New Mexico. The protection of these areas provides immense benefits to wildlife and wildlife habitats, and the continued protection of these areas is crucial to the conservation of these resources across the state. The State Agencies have the following suggestions regarding potential changes to [Manual 6340](#) (BLM 2012), organized by section or new topic.

Manage for Public Purposes

As included in section A(4) - Manage for Public Purposes (Pages 1-7 to 1-9), NMDOW appreciates that scientific and conservation purposes are included as public purposes and suggests these are retained in any changes proposed to the manual.

Continuation of Livestock Grazing

Section C(8)b - Continuation of livestock grazing (Page 1-28) discusses the conditions under which livestock grazing may continue in designated Wilderness areas. NMDA suggests that BLM incorporate into [Manual 6340](#) a provision that is currently in [Manual 6330](#) (section C(2)e, Page 1-11). This provision allows grazing authorizations to be transferred to new operators. Additionally, as requested above regarding [Manual 6330's](#) provision, NMDA also requests here that transferred permits retain their status as pre-existing uses, as applicable.

Recreational Use

Recreation should be managed to minimize trampling, collection, unauthorized trail development, and off-route travel in areas supporting sensitive plant populations or fragile biological soil crusts.

Research

The Forestry Division recommends retaining and strengthening provisions that support scientific inventory and long-term monitoring of rare plant populations. Long-term monitoring is an essential management tool for detecting ecological change, informing adaptive management, and evaluating conservation outcomes.

Restoration and Vegetation Management

Section C(15) - Restoration and Vegetation Management (Pages 1-45 to 1-48) provides protection and allowances for management regarding important wildlife habitats, and NMDOW suggests this section remains largely unchanged in the event of any proposed changes to the manual.

Vegetation management should emphasize preservation of native genetic diversity through the use of locally appropriate native plant materials and restoration of natural ecological processes.

The Forestry Division also recommends continued evaluation of indirect effects from adjacent development, including mining, energy development, roads, and groundwater alteration, where these activities may fragment habitat, facilitate invasive species, increase dust deposition, or otherwise affect rare plant populations within designated Wilderness.

Restoration and management should maintain native plant communities and the ecological interactions that sustain them, including native pollinator interactions necessary for the persistence of rare flowering plants.

Wildlife

Section C(21) - Wildlife (Pages 1-56 to 1-63) is beneficial and NMDOW suggests this section remain largely unchanged to provide for the utmost protection for wildlife occurring within designated Wilderness areas.

Use of Chemicals

Regarding chemical use, section C(21)c.v (Pages 1-59 to 1-60), the State Agencies suggest consultation and collaboration with appropriate state agencies be included as a prerequisite for any chemical use in Wilderness areas. While chemical treatments can be beneficial in some circumstances, they have the potential to cause harm to many species and require careful planning to be used safely and effectively.

Analysis of Impacts to Wilderness Character from Activities Outside of Wilderness Areas

NMDOW strongly recommends section D(2) – Analysis of Impacts to Wilderness Character from Activities Outside of Wilderness Areas (Pages 1-64 to 1-65) be retained in the event of any proposed changes to [Manual 6340](#) (BLM 2012). Though activities outside of Wilderness areas are not precluded by designation, these activities can have major impacts on Wilderness areas and should be adequately analyzed in all applicable NEPA documents to provide for increased protection of these areas and allow for appropriate mitigation measures to be implemented as needed.

The Forestry Division similarly recommends retaining requirements to evaluate indirect effects from adjacent development, including mining, energy development, roads, and other activities that may alter hydrology, increase dust, facilitate invasive species, or fragment habitat supporting rare plant populations.

Climate Resilience (new topic)

Intact wilderness landscapes serve as important climate refugia for many rare and endemic plant species. Management should maintain ecological connectivity and natural ecological processes that improve plant resilience to drought, wildfire, invasive species, and climate change.

Thank you for the opportunity to review and comment on the Proposed Action and for BLM's 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.

If there are questions regarding management of native plant communities and/or rare plants and their habitat, please contact State Botanist Erika Rowe at (505) 699-6371 or erika.rowe@emnrd.nm.gov.

For questions regarding NMDA's comments, please contact Dana Hawkins at (575) 649-0880 or dhawkins@nmda.nmsu.edu.

Sincerely,

Michael B. Sloane
Director

References

[BLM] Bureau of Land Management. 2012. Management of Designated Wilderness Areas (BLM Manual 6340). U.S. Department of the Interior, Bureau of Land Management, Washington, D.C., USA.
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