



November 5, 2018

Hector Gonzalez, RMP Team Lead
Bureau of Land Management, Carlsbad Field Office
620 East Greene Street
Carlsbad, New Mexico 88220
Email: blm_nm_cfo_rmp@blm.gov

Re: Comments on the Carlsbad Draft Resource Management Plan and Environmental Impact Statement

Dear Mr. Gonzalez,

Please accept these comments behalf of Public Lands Solutions and the undersigned groups and businesses regarding the Bureau of Land Management's ("BLM") Draft Carlsbad Resource Management Plan (RMP) and Environmental Impact Statement (EIS). As representatives of the outdoor recreation industry, we write with strong concerns about this RMP as currently drafted including its impacts to recreation opportunities through inadequate measures to minimize natural gas waste and methane pollution.

The outdoor recreation industry is a vital and growing part of New Mexico's economy. Statewide, 65 percent of New Mexicans participate in outdoor recreation each year while our industry generates \$9.9 billion in consumer spending, \$2.8 billion in wages and salaries, and \$623 million in state and local tax revenue to New Mexico each year.¹ In all, outdoor recreation in New Mexico generates 99,000 direct jobs, more than twice as many as the energy and mining sectors combined.²

The outdoor industry and related jobs depend on consumers buying our products to use on public lands and/or booking trips to experience these lands through our services. The user experience is central to our businesses' success, and that experience can be greatly threatened by improperly managed oil and gas development. Outdoor industry employees, live, work, and play in New Mexico, and it is important to us to have clean air for recreation and a high quality of life. Unfortunately, Southeast New Mexico suffers from a reputation for poor air quality, which also makes it difficult to promote the outdoor industry and its thriving economic engine.

The BLM's draft Carlsbad RMP does not include adequate measures to improve and promote the outdoor recreation industry as an important economic driver in this area. What's more, as currently drafted, it will allow for increased waste of New Mexico resources and revenue—funds that could be invested in improved public land access and outdoor recreation opportunities that would further grow the outdoor industry locally.

Moreover, the BLM's analysis of this RMP finds that projected oil and gas development in the area is expected to emit 46,191 metric tons of methane per year, leading to the waste of natural

¹ https://outdoorindustry.org/wp-content/uploads/2017/07/OIA_RecEcoState_NM.pdf

² Ibid

gas worth roughly \$16.5 million per year in 2028. This waste of federal natural gas will negatively impact local air quality, public health, and cause the American public to lose out on millions of dollars in royalty revenue.

* * *

We appreciate the opportunity to comment on this planning process and hope to see BLM take the steps necessary to limit methane waste and pollution in order to secure healthy public lands for New Mexico’s citizens and the potential for a growing and durable recreation economy.

Sincerely,

Jason Keith
Managing Director
Public Lands Solutions
Moab, UT

Alexandra Merlino
Executive Director
Partnership for Responsible Business
Santa Fe, NM

Carrie Hamblen
Executive Director
Las Cruces Green Chamber of Commerce
Las Cruces, NM

Stephen Onstad, Managing Member
EverGreen Building Solutions, LLC
Santa Fe, NM

Glenn Schiffbauer
Executive Director
Santa Fe Green Chamber of Commerce
Santa Fe, NM

W Robert Kreger
President: Kreger Design Build, LLC
Santa Fe, NM

Mindy DeMott, ABR, CRS, RSPS, NAR
Green Designation
Coldwell Banker Trails West Realty
Santa Fe, NM