



**Quantitative Analysis of Public Comment
Submitted During the Scoping Phase of the
Proposed Forest Plan Amendment for the Valle
Vidal.**

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Compiled By Theodore B. Hughes
Comment Analyst**

Forest Plan Amendment for the Valle Vidal: Scoping Phase

Donated to the American people in 1982, the Valle Vidal of New Mexico is a spectacular wildlands landscape located in the heart of northern New Mexico's Sangre de Cristo Mountains within a lush mountain basin. Beloved by New Mexicans and people around the world, abundant populations of wildlife, including mule deer, black bear, mountain lion, wild turkeys, and native Rio Grande cutthroat trout, call the Valle Vidal home. Most famously, vast alpine meadows within the Valle Vidal provide habitat for one of New Mexico's premier elk herds – an elk herd that relies on the health and integrity of not simply the Valle Vidal, but the broader landscape, to survive and prosper.

The Forest Service proposes to amend the Carson National Forest's Forest Plan to incorporate *A Vision, Management Highlights, and Standards and Guidelines for Management Area 21 – Valle Vidal Unit*. According to the Forest Service, the integration of a clear management direction for the Valle Vidal in the Forest Plan will establish legal standing and provide public involvement required by the National Forest Management Act. The Forest Service states that this proposal reflects current multiple-use management of the Valle Vidal as described in the 1983 Multiple Use Area Guide, but with several resources emphasized: wildlife (especially elk), native fisheries, outdoor recreation, and high scenic integrity. The Forest Service states that the proposed Forest Plan amendment also includes a recommendation for a special area designation of the "Upper Ponil Botanical Area." Management area direction for eligible Wild & Scenic Rivers that was determined in a previous Forest Plan amendment would apply to Management Area 18 delineations within the Valle Vidal.

The Carson National Forest received a request in 2002 to lease approximately 40,000 acres within the Valle Vidal Unit for natural gas development. The subject area encompasses all the land within the Forest Service boundary east of a geologic feature called the Rock Wall. Before the Carson National Forest can consent to the offering of the Valle Vidal for lease sale, a Land Management Plan amendment and leasing analysis must be completed as described in the Code of Federal Regulations (36 CFR 228.102). The Land Management Plan amendment began in 2005 and is scheduled to be completed in the fall of 2006. The Leasing Analysis, which would determine whether or not to lease a portion of the area for oil and gas development, is scheduled to begin upon completion of the Land Management Plan amendment. A Reasonable Foreseeable Development Scenario was completed in 2004 to gain better information about the potential for oil & gas resources within the area.

BACKGROUND

The Forest Plan Amendment planning process giving rise to these scoping comments began formally on June 14, 2005 with a Notice of Intent to Prepare an Environmental Impact Statement. However, it is important to note that Forest Plan Amendment planning

process truly began in May 2002 with the submission of an “Expression of Interest” for the eastern 40,000 acre area of the Valle Vidal by El Paso Corporation to the Santa Fe Office of the Bureau of Land Management. After El Paso Corporation was rebuffed due to other management priorities, in June of 2003, El Paso Corporation met with the White House Task Force on Energy Project Streamlining, an entity established pursuant to Executive Order 13212 to expedite energy-related projects. Soon after, the White House Task Force on Energy Project Streamlining sent a memorandum to the Forest Service requesting an expedited response from the Forest Service concerning a “status report on the described project” – i.e., an analysis of whether or not “environmental conditions would restrict or prohibit the exploration of natural gas within the Valle Vidal Unit of the Carson National Forest.” Subsequently, the Forest Service contracted out the preparation of a Reasonably Foreseeable Development Scenario to assess the Valle Vidal’s mineral resources, a document that did not account for the Valle Vidal’s ecological resources.

SCOPING PROCESS

The Carson National Forest collected approximately 54,029 public comments during the three month scoping period for the Valle Vidal Forest Plan Amendment, with approximately 51,779 of these comments submitted via email.

QUANTITATIVE ANALYSIS

The Carson National Forest will be preparing an official “scoping report” detailing the unique and specific comments and information sources generated through the scoping process. However, this scoping report will likely not include any sort of official tally of comments supporting or opposing drilling for gas within the Valle Vidal. It would be beneficial to know quantitatively what the comments say and/or support. In addition, it would be useful to have a collection of the comments submitted by any involved agencies and elected officials.

Carson National Forest provided the Oil & Gas Accountability Project (OGAP) with 1 CD and a box of hard copy letters containing 1,648 unique comments and 52,381 form letters for a total of 54,029 submissions. Of the total submissions, 54,019, or 99.98%, were against oil and gas exploration within Valle Vidal. Of the total submissions, 9, or 0.02%, were supportive of oil and gas exploration within the Valle Vidal. A total of 2,962 comments were submitted by New Mexicans, of which 2,954, or 99.7%, were against oil and gas exploration within the Valle Vidal, and 7 comments, or 0.2%, were in support of oil and gas exploration within the Valle Vidal. Of the 1,648 unique comments submitted, 1,638, or 99.4%, were against oil and gas exploration in the Valle Vidal, or supported protection of the Valle Vidal, while 9, or 0.6%, were in support of the proposed action. Of the 1,648 unique comments submitted, 1,327 or 80.5% were submitted by New Mexicans. In addition, of the 2,962 total comments submitted by New Mexicans, 1,327, or 44.6%, were unique comments. Finally, of the 1,327 unique comments submitted by New Mexicans, 1,320, or 99.5%, were against oil and gas exploration in the Valle Vidal

or supported protection of the Valle Vidal, while 7, or 0.5%, supported oil and gas exploration in the Valle Vidal.¹ The following tables support these data.

Number and percentage of all comments that oppose leasing the Valle Vidal for oil and gas development and/or express support for protection of the Valle Vidal	
Total comments submitted	54,029
Total opposing drilling	54,019
Percentage opposing drilling	99.98%
Total comments supporting drilling	9
Percentage supporting drilling	0.02%

Number and percentage of all New Mexico comments that oppose leasing the Valle Vidal for oil and gas development and/or express support for protection of the Valle Vidal	
Total New Mexico comments submitted	2,962
Total New Mexico comments opposing drilling	2,954
Percentage of New Mexico comments opposing drilling	99.7%
Total New Mexico comments supporting drilling	7
Percentage of New Mexico comments supporting drilling	0.2%

¹ New Mexico Senator Pete Domenici’s letter did not state a clear position, and this accounts for the slight discrepancy in some of the table totals.

Number and percentage of all commenters who submitted unique letters that oppose leasing the Valle Vidal for oil and gas development and/or express support for protection of the Valle Vidal	
Total unique comments submitted	1,648
Total unique comments opposing drilling	1,638
Percentage of unique comments opposing drilling	99.4%
Total unique comments supporting drilling	9
Percentage of unique comments supporting drilling	0.6%

Number and percentage of New Mexican commenters who submitted unique letters	
Total New Mexican comments submitted	2,962
Total New Mexican unique comments submitted	1,327
Percentage of New Mexican unique comments submitted	44.8%
Total unique comments submitted	1,648
Total New Mexican unique comments submitted	1,327
Percentage of total unique comments submitted by New Mexicans	80.5%

Number and percentage of New Mexican commenters who submitted unique letters that oppose leasing the Valle Vidal for oil and gas development and/or express support for protection of the Valle Vidal	
Total unique comments submitted by New Mexicans	1,327
Total unique comments submitted by New Mexicans opposing drilling	1,320
Percentage of unique comments submitted by New Mexicans opposing drilling	99.5%
Total unique comments supporting drilling	7
Percentage of unique comments supporting drilling	0.5%

State and Federal Agencies and Elected Officials Comment

The New Mexico state agencies and Attorney General are very concerned about the impacts oil and gas exploration would have on the social and environmental resources of the Valle Vidal. They call for strengthened and additional Standards and Guidelines that would protect these resources, and that an analysis of the impacts of oil and gas development is included in the amendment EIS, rather than in a separate leasing process. Three members of Congress submitted comments. Representative Tom Udall opposes oil and gas exploration in the Valle Vidal, and Representative Heather Wilson, opposes oil and gas exploration in the Valle Vidal at this time. Pete Domenici, one of New Mexico's two senators, does not clearly state an opinion in his letter.

Breakdown of Letters Submitted by New Mexico State and Federal Agencies and Elected Officials Regarding the Valle Vidal	
Agency or Official	Summary of Comment
State of New Mexico Office of State Engineer	Protect, improve water resources, and consider oil and gas development in amendment, not separate analysis.
State of New Mexico Department of Cultural Affairs Historic Preservation Division	Amendment analysis uses outdated prescriptions and management area definitions. No recognition of heritage resources in Standards and Guidelines. CNF should contact historic users and acknowledge heritage resources in amendment.
State of New Mexico Environment Department	Concerned with adverse impacts of oil and gas exploration on surface water quality, nonpoint source pollution, and ground water quality.
State of New Mexico Department of Game and Fish	Encourages CNF to include a complete analysis of oil and gas leasing impacts within the proposed draft EIS, as the impacts could overwhelm the effects of all other actions combined.
New Mexico Energy, Minerals, and Natural Resources Department	Deeply concerned that proposed amendment does not address the Valle Vidal Unit's suitability for oil and gas development. Considers leaving this to leasing stage unacceptable. Improve forest and watershed health and wildlife habitat and protect recreational values.
State of New Mexico Attorney General	Due to ecological and social importance of Valle Vidal to the people of New Mexico, strongly opposes oil and gas development.

Breakdown of Letters Submitted by New Mexico State and Federal Agencies and Elected Officials Regarding the Valle Vidal	
Department of Interior Bureau of Land Management.	BLM does not comment on the Valle Vidal. Two letters to members of the public informing them of CNF's preparation of a management plan for the Valle Vidal.
Tom Udall, U.S. House of Representatives	Opposes oil and gas exploration in the Valle Vidal. Is introducing legislation to permanently protect the Valle Vidal from mineral extraction.
Heather Wilson, U.S. House of Representatives	Opposes oil and gas exploration in the Valle Vidal "at this time," due to the area's outstanding recreational, scenic, and wildlife attributes.
Pete Domenici, U.S. Senate	Does not make a clear stand. Seems to be a boilerplate response to Martin Chavez, the Forest Supervisor. Wants to introduce legislation that "helps our country with its future energy needs as well as protects our environment."

Theodore B. Hughes worked for the U.S. Forest Service's Content Analysis Team for three years as a data technician and writer/analyst, before the team's privatization. The team compiled documents of public concerns for land managers within the USFS, BIA, USFWS, NPS, BLM, and other federal agencies.