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Per your request..... print page 18 and page 50 of the report

Todd Willens
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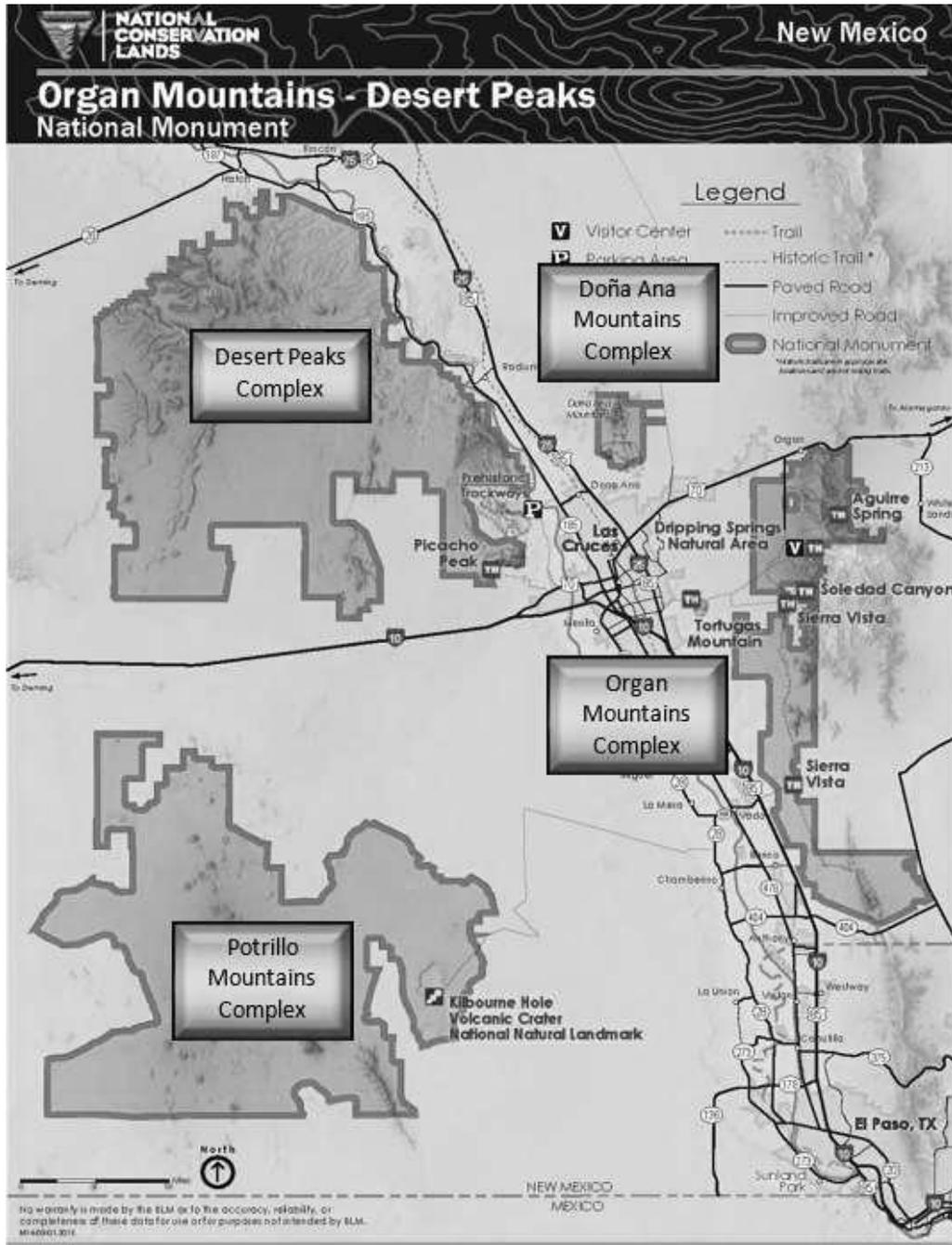
All the best, Todd

--

Downey Magallanes
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Review of Organ Mountains Desert Peaks National Monument

per Executive Order 13792 of April 26, 2017



Submitted by
Western Heritage Alliance

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Executive Summary

This document is being submitted by the Western Heritage Alliance. We represent local businesses, farmer and ranchers, a citizens concerned with natural resources that the Organ Mountains Desert Peaks National Monument now encompasses. The previous administration ignored our voices of concern and abused the Antiquities Act to create a national monument where there were few objects requiring the protection of the Act.

We trust that a thorough review of this monument will be completed as directed by the Executive Order 13792 of April 26, 2017.

We used the following guidelines in reviewing the Presidential Proclamation for the Organ Mountains Desert Peaks National Monument:

- The intent of the Antiquities Act as discussed in 59th Congress House Representative Report 59-2224 and the bill's third reading, Congressional Record-House, June 5, 1906.
- The objects named must be confined to the smallest area compatible with the proper care and management of the objects to be protected.
- The objects are limited to historic landmarks, historic and prehistoric structures and other objects of historic or scientific interest confined to federal lands.
- The objects to be protected are structures from historic and prehistoric tribes and not chips, points or rock art, which do not require a permit to examine or excavate.
- There is no mention in the discussion that refers to tourism, viewsapes or economical benefit.
- This document evaluated the proclamation based on our analysis of items: i, ii, iv, vi of the Executive Order 13792.
- The report evaluates each item for the four separate named land designations: Dona Ana Mountains, Portillo Mountains Complex, Desert Peaks Complex and the Organ Mountains Complex.

Recommendations

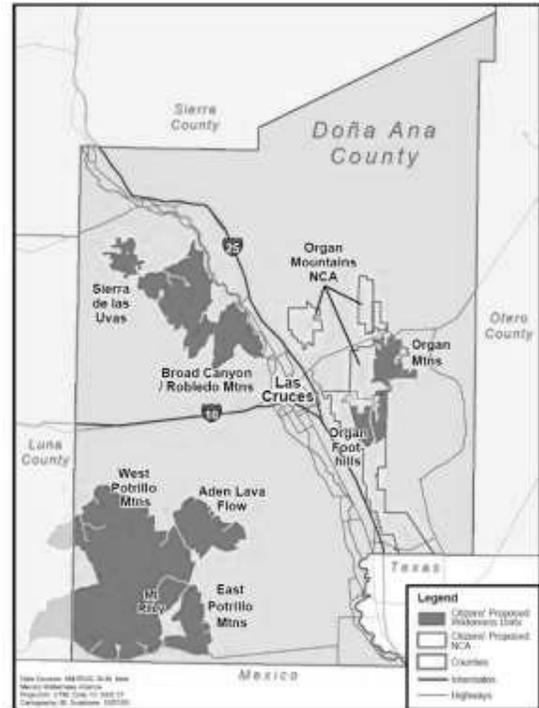
When this document is reviewed and under the guidelines set forth in the EO, we feel that you will conclude, as we have, that the following recommendations should be made to the President:

- Remove the Dona Ana Mountains Complex completely as no named objects were named in the proclamation.
- Remove the Potrillo Mountains Complex and Desert Peaks Complex in their entirety because they do not meet the Acts requirement of confined to the smallest area compatible with the proper care and management.
- The lower portion of the Organ Mountain Complex should be removed because to the critical infrastructure mixed in the monument boundary and no objects requiring the protection of the Act.
- Keep the Organ Mountain footprint, which includes shelter caves that meet the intent of the Act.

We would also like to invite Secretary Zinke to visit with us so we can show him first-hand how the Act was abused in the creation of the Organ Mountains Desert Peaks National Monument.

History of Proposals

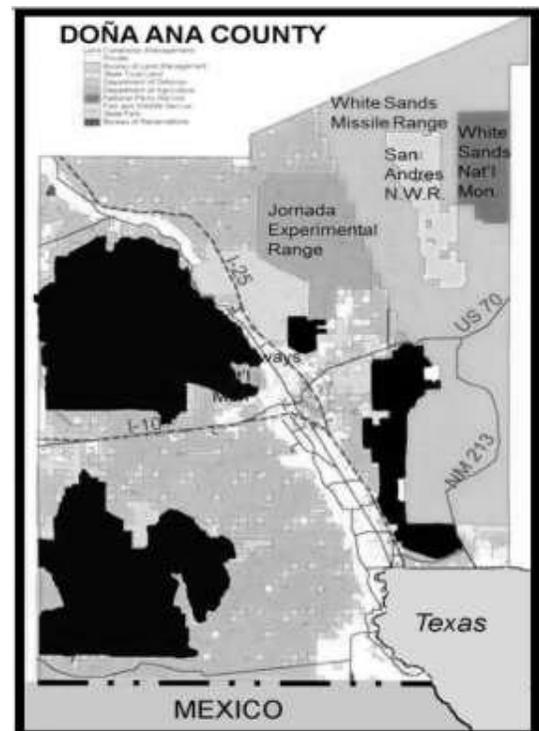
The New Mexico Wilderness Alliance (NMWA) introduced their first map proposing wilderness and NCA designations for almost 50% of the land administered by the BLM in Doña Ana County in 2006



With the election results of 2008, they upped the ante and proposed even more land to be locked up and this time it was all wilderness without any NCA.

With their party controlling the White House, and having a veto proof Senate and House of Representatives, they could not get the bills that they introduced passed.

One of the main reasons was the simple fact that they were abusing the intent of the Wilderness Act by proposing wilderness for lands with hundreds of miles of graded county roads and thousands of other impacts and improvements by man.



Intent of the 1906 Antiquities Act

The question of the intent of the Act is the main purpose of the Executive Order 13792 review.

If the intent were crystal-clear, there would be no reason for the review.

Every side interprets intent differently.

This document will interpret the intent of the Act, based on the act itself and the 59th Congress House Representatives Report 59-2224, dated March 12, 1906, which we feel, clearly gives the INTENT of the Antiquities Act.

<https://coast.noaa.gov/data/Documents/OceanLawSearch/House%20Report%20No.%2059-2224.pdf?redirect=301ocm>

This report was submitted by Iowa Congressman John F. Lacey, who chaired the House Committee on the Public Lands, and was the driving force in the passage of the Act.

He worked closely with an anthropologist named Edgar Lee Hewett. Most of House Report 59-2224 was penned by Hewett.

Here are some of what we consider are the most telling statements that clearly state the INTENT of the Act:

The importance of the large number of **historic and prehistoric ruins** scattered over the semiarid region of the southwestern part of the United States has gradually come to be recognized. Every **cliff dwelling, every prehistoric tower, communal house, shrine, and burial mound is an object** which can contribute something to the advancement of knowledge, and hence is worthy of preservation.

Hewett was very clearly communicating that the objects that were to be protected were **historic and prehistoric ruins**.

This next statement from Hewett specifically calls out **prehistoric tribes**:

The question of the preservation of this **vast treasury of information** relative to our **prehistoric tribes** has come to be a matter of much concern to the American people.

The Act was to preserve the treasury of information relative to our prehistoric tribes.

Next, he specifically addressed what discipline of science the Act would apply to

He was very specific that it was for the **excavation of ruins in the interest of science** - this would be Archaeological Science

He was not calling for anything or everything of interest to science in general

Many others should be **temporarily withdrawn and allowed to revert to the public domain** after the **ruins** thereon have been examined by competent authority, the collections therefrom properly cared for, and all data that can be secured made a matter of permanent record.

General legislation providing for the creation and administration of such parks and providing for **the excavation of ruins in the interest of science only** is urgently needed. It is well known that during recent years an extensive traffic has arisen in relics from these **ruins**. In securing these, **buildings, mounds**, etc., have been destroyed. These relics are priceless when secured by proper **scientific methods**, and of comparatively little value when scattered about either in museums or private collections without accompanying records.

In this statement, he talks about the looting that is taking place and suggests that sites could be temporarily withdrawn and then revert back to public domain once the ruins had been examined.

He says nothing about chips, points, or rock art - just ruins

Not only does Hewett refer to prehistoric tribes several times, he goes into detail on the types of structures that they wanted to protect:

They are of the three great types, **pueblo ruins, cliff houses, and cave dwellings**, with their accompanying **burial mounds, kivas, shrines**, etc." and are practically innumerable, All measures for their preservation should look toward the encouragement of research and the advancement of knowledge and not toward its restriction.

Again, no reference to chips, points, or rock art - just ruins.

Our reading of this report indicates to us that the intent of the Act was to protect and preserve the ruins of prehistoric tribes.

We do not see anything in the act that refers or even implies that it should be used to promote tourism, viewscapes, or economical benefit

The discussion on the bill's third reading: Congressional Record-House, June 5, 1906 records this conversation:

The SPEAKER. Is there objection?

Mr. STEPHENS of Texas. How much land will be taken off the market in the western states by the passage of the bill?

Mr. LACEY. Not very much. **The bill provides that it shall be the smallest area necessary for the care and maintenance of the objects to be preserved.**

Mr. STEPHENS of Texas. Would it be anything like the forest-reserve bill by which seventy or eighty millions acres of land in the United States have been tied up?

Mr. LACEY. Certainly not. The object is entirely different. **It is to preserve those old objects of special interest and the Indian remains in the pueblos of the Southwest**, whilst the other reserves the forest and the water courses."

Clearly, the intent of the Act was to preserve objects left by the prehistoric inhabitants of this country.

For clarity and political correctness, this document will sometimes refer to the prehistoric inhabitants as Native American(s).

Almost every square mile of public land in the western United States will have some trace of the prehistoric people that lived here.

These traces include flint chips, points, and rock art.

If these traces were intended as objects to be protected by the Act, then all public land in the west needs to be declared a national monument.

Section 2 of the Act states "That the President of the United States is hereby authorized, in his discretion, to declare by public proclamation **historic landmarks, historic and prehistoric structures, and other objects** of historic or scientific interest..."

Yes, it states other objects, but it is a colossal stretch to unilaterally claim that every chip, point, or rock art would be considered worthy of national monument protection.

What everyone seems to ignore is Section 3 of the Act, which states:

That permits for the **examination of ruins, the excavation of archaeological sites, and the gathering of objects of antiquity** upon the lands under their respective jurisdictions may be granted by the Secretaries of the Interior, Agriculture, and War to institutions which they may deem properly qualified to conduct such **examination, excavation, or gathering**, subject to such rules and regulation as they may prescribe: Provided, That the **examinations, excavations, and gatherings** are undertaken for the benefit of reputable museums, universities, colleges, or other recognized scientific or educational institutions, with a view to increasing the knowledge of such objects, and that the gatherings shall be made for permanent preservation in public museums

Section 3 focuses on how the scientific examination of the protected objects are to be handled.

It very specifically refers to the **examination and excavation of ruins** several times.

It is a stretch to think the Act was to apply to every chip, point, or piece of rock art.

With the new administration and President Trump's **Executive Order Executive Order 13792** directing the Secretary of Interior to review all national monuments over 100,000 acres created since 1996, we have hope that a true careful review of the Organ Mountains Desert Peaks National Monument will show that most of the monument does not meet the intent of the Antiquities Act and that it clearly does not meet the first requirement of protecting "the smallest area compatible with the proper care and management of the objects to be protected".

This Document will present the reasons why we feel the Organ Mountains Desert Peaks National Monument does not meet the intent of the Antiquities Act of protecting primarily Native American prehistoric and historic objects and most certainly does not meet the clearly stated requirement of protecting "the smallest area compatible with the proper care and management of the objects to be protected.

We are confining our comments to the seven criteria that the Secretary is directed to consider in Executive Order 13792 of April 26, 2017 about the national monument review

We will discuss these criteria complex by complex

Overview

We are confining our comments to four of the seven criteria that the Secretary is directed to consider in Executive Order 13792 of April 26, 2017 about the national monument review

We will discuss these criteria complex by complex

These Criteria are:

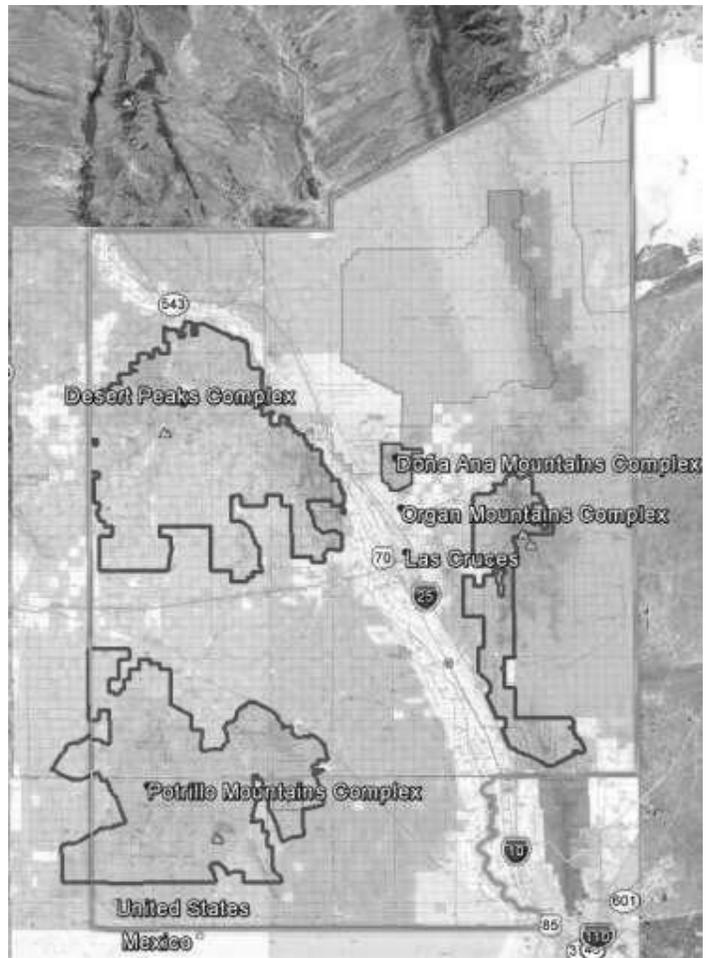
- (1) the requirements and original objectives of the Act, including the Act's requirement that reservations of land "...be confined to the smallest area compatible with the proper care and management of the objects to be protected";
- (2) **whether designated lands are appropriately classified** under the Act as historic landmarks, historic and prehistoric structures, [or] other objects of historic or scientific interest;
- (4) the **effects of a designation on the use and enjoyment of non-Federal lands** within or beyond the OMDPNM boundaries;
- (6) the availability of **Federal resources to properly manage designated areas**; and

(1) the requirements and original objectives of the Act, including the Act's requirement that reservations of land "...be confined to the smallest area compatible with the proper care and management of the objects to be protected";

A monument that is four separate complexes that are separated by two interstates, a major river, and surrounds a city of over 100,000 residents clearly is not protecting the smallest area compatible with the proper care and management of the objects to be protected

The BLM manages 1,150,795 acres in Doña Ana County. The Organ Mountains Desert Peaks National Monument is 496,330 acres.

It takes up 43% of the BLM administrated land in Doña Ana County.



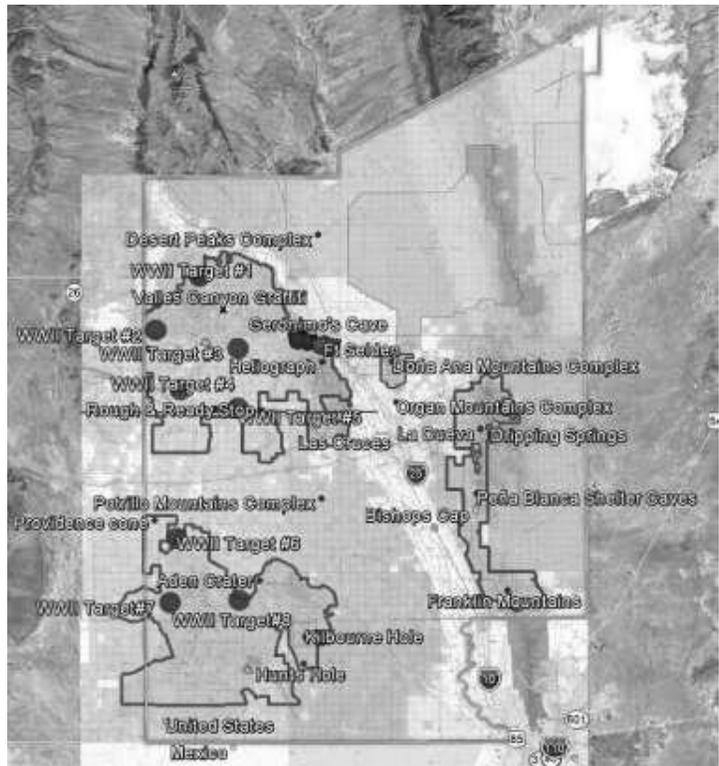
(2) whether designated lands are appropriately classified under the Act as historic landmarks, historic and prehistoric structures, [or] other objects of historic or scientific interest;

The proclamation listed several specific objects as the justification for creating the monument

We will closely examine many of these objects

The proclamation also mentions **Scattered Paleo Indian artifacts**, including those from the Folsom and Clovis cultures.

This includes chips, points, and rock art
 Since these are not specific objects with definite locations, we do not consider them as objects requiring the protection of the Act

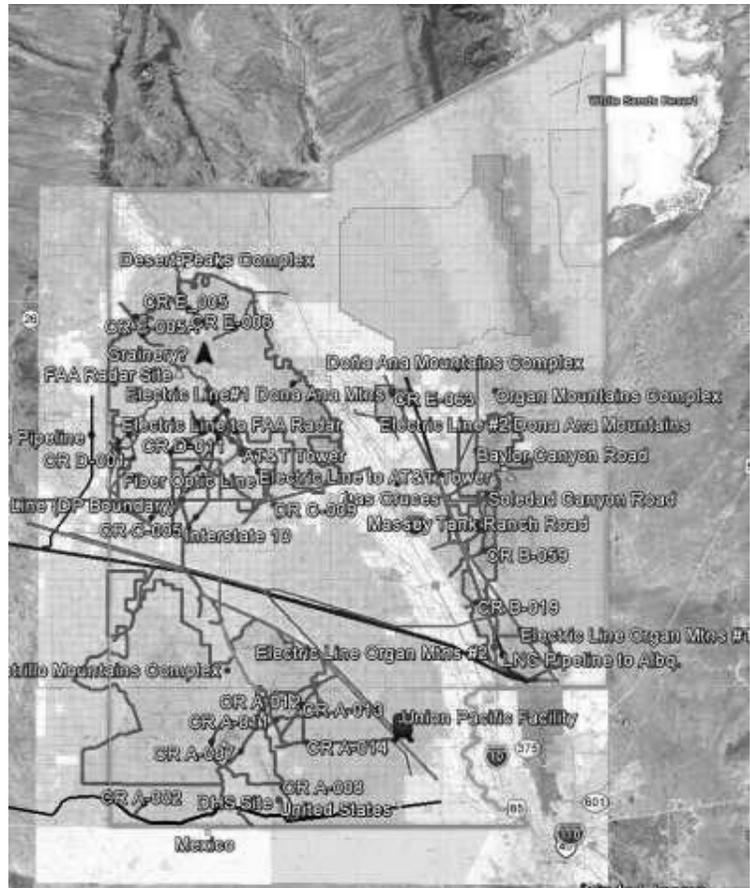


(4) the effects of a designation on the use and enjoyment of non-Federal lands within or beyond the OMDPNM boundaries;

Our response to these criteria will be to examine the effects of designation on **critical infrastructure** that is within or near the boundaries of the monument complexes.

This critical infrastructure includes paved roads, electrical transmission lines, natural gas pipelines, fiber optic lines, and railroads.

Most of these lines extend far beyond Doña Ana County.



(6) the availability of Federal resources to properly manage designated areas; and

Besides four complexes scattered across the whole county, there are multiple Special Management Areas (SMA) for BLM to administer

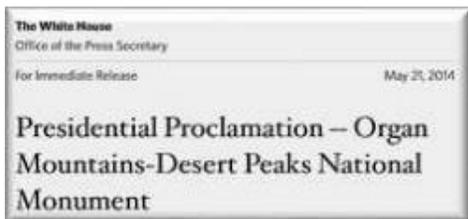
This includes eight WSA's, two ACEC's, two SRMA's, one RNA, and one NNL within the Organ Mountains Desert Peaks National Monument.

Several of these special management areas overlap each other.



Quotes From the Proclamation

Any place you see this color text box and/or logo, these are direct quotes from the proclamation that created the monument



The Organ Mountains Desert Peaks area is important for its ruggedly beautiful landscape and the significant scientific, historic, and prehistoric resources found there. The abundant resources testify to over 10,000 years of vibrant and diverse human history of many peoples. **Objects left behind** by this multi layered history and spread throughout this geologically and ecologically diverse landscape enhance the experience of visitors to the area and represent a vital resource for paleontologists, archaeologists, geologists, biologists, and historians.

Our response to the proclamation statement(s) then follow.

We will typically highlight the particular statement we are responding too.

Doña Ana Mountains Complex

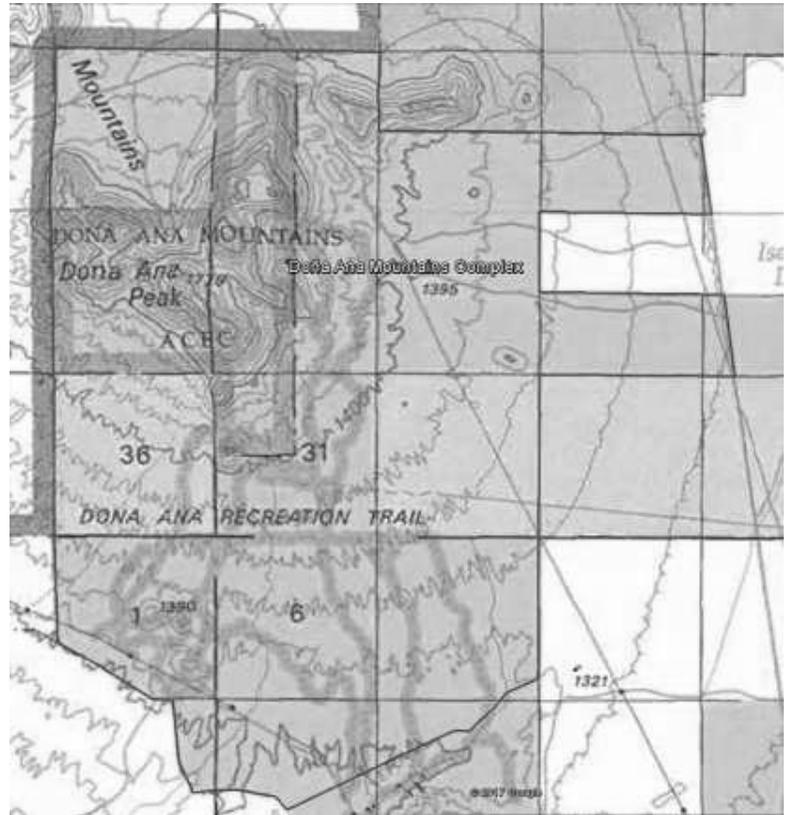
Land Ownership

Public Land - 7,300 acres

State Land - 1,280 acres

Private Land - 0 acres

Actual Complex Size - **8,580 acres**



Archaeological Resources in Doña Ana Mountains Complex

Archaeologically rich, the Organ Mountains-Desert Peaks area features **hundreds of artifacts, rock art, dwellings, and other evidence of the Native peoples of the area**. Three of the many rock art areas are in the Las Valles Canyon in the Sierra de las Uvas, the Providence Cone area in the Potrillo Mountains, and the **Doña Ana Mountains**. **Scattered Paleo Indian artifacts**, including those from the Folsom and Clovis cultures, represent the first people who lived in southern New Mexico and have been found in the Robledo and Potrillo Mountains as well as the Las Uvas Valley.

This is the only mention of the Doña Ana Complex in the proclamation concerning objects

Rock art and scattered Paleo Indian artifacts would not "**require permits for the examination of ruins, the excavation of archaeological sites, and the gathering of objects of antiquity**" as specified in Sec 3 of the Act, so should not need the protection of Sec 2.

There are no specific prehistoric or historic structures within this complex mentioned in the proclamation

Critical Infrastructure in or Near Doña Ana Mountains Complex

The electric line and natural gas pipeline that went through the Organ Mountains complex continue through this complex.

These lines continue all the way to Albuquerque, NM.

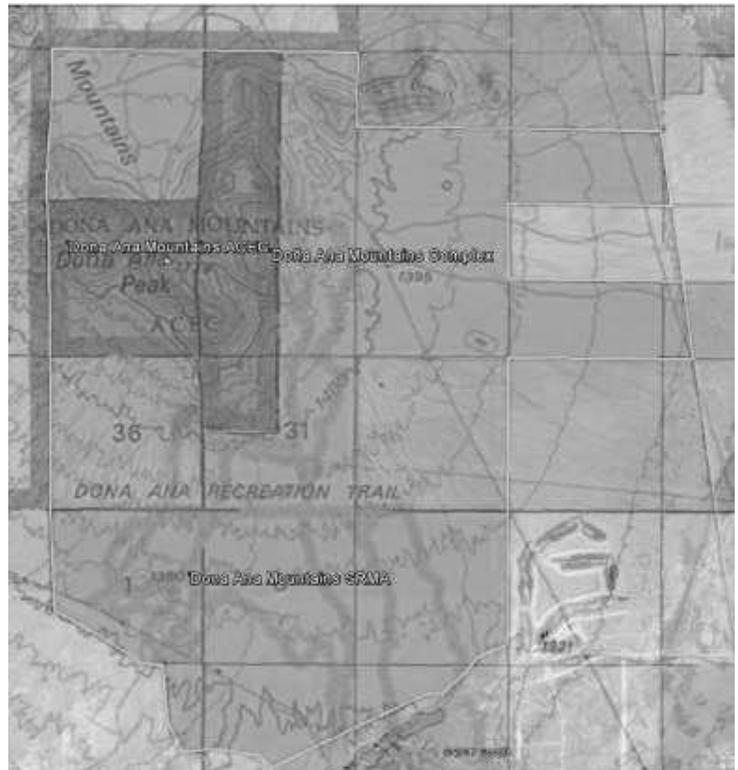
Another electric line cuts through the southwest portion of the complex



Conflicts with Special Management Areas in the Doña Ana Mountains Complex

Doña Ana Mountains Special Recreation Management Area (SPMA)
6,673 acres

Doña Ana Mountains Area of Critical Environmental Concern (ACEC)
1,428 acres



The SRMA encompasses the whole Doña Ana Mountains Complex.

The ACEC overlaps the SRMA



Other Closed Areas that Abut Doña Ana Mountains Complex

Similarly, the Doña Ana Mountains abut one of the Nation's long-term ecological research areas, making them an important feature of many studies in wildlife biology, botany, and ecology.

While this proclamation statement does not refer to an object, it is important to recognize how much land in in this corner of Doña Ana County is off limits.

The 62,080 acre Chihuahuan Desert Rangeland Research Center (NMSU) is closed to public (red line)

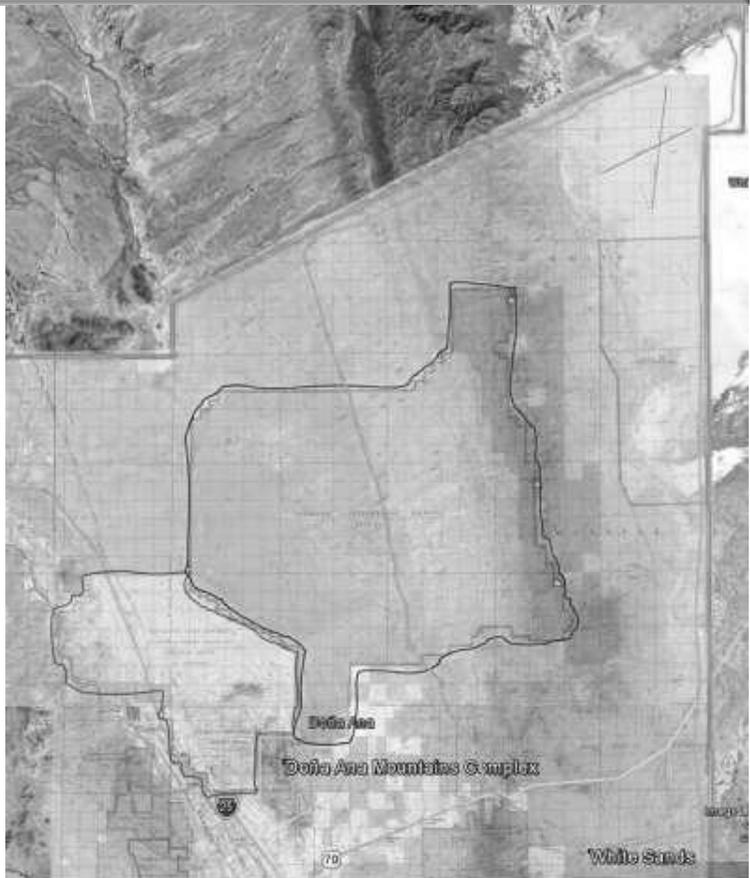
The 109,478 acre USDA Jornada Experimental Range is also closed to the public (blue line)

Then you need to add White Sands Missile Range in the area that is also off limits (cyan line).

Most of the other land around the south and east of complex is either state or private, which is also off limits.

The Doña Ana Complex was the one small place where residents in that area of the county could freely recreate.

Now that small island of open-use space is restricted as a national monument (yellow line).



Three of **the many rock art areas** are in the Las Valles Canyon in the Sierra de las Uvas, **the Providence Cone area in the Potrillo Mountains**, and the Doña Ana Mountains. **Scattered Paleo Indian artifacts**, including those from the Folsom and Clovis cultures, represent the first people who lived in southern New Mexico and **have been found in** the Robledo and **Potrillo Mountains** as well as the Las Uvas Valley.

Archaeological Resources in Potrillo Mountains Complex

This is the only mention of this complex in the proclamation concerning prehistoric objects

Rock art and scattered Paleo Indian artifacts would not "**require permits for the examination of ruins, the excavation of archaeological sites, and the gathering of objects of antiquity**" as specified in Sec 3 of the Act, so should not need the protection of Sec 2.

There are no specific prehistoric or historic structures within this complex mentioned in the proclamation

Listed Objects in the Potrillo Mountains Complex

Providence Cone prehistoric site

WWII targets

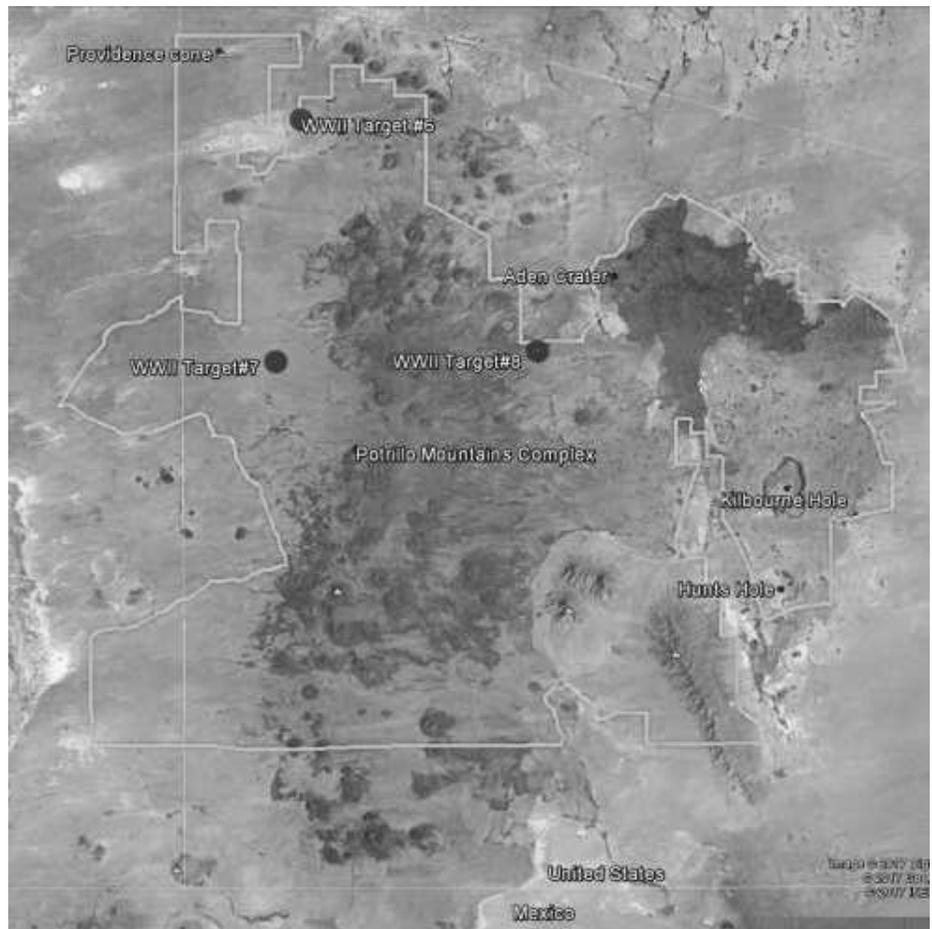
Kilbourne Hole

Aden Crater

There are no specific prehistoric or historic structures mentioned

Scattered Paleo Indian artifacts, including those from the Folsom and Clovis cultures. Includes chips, points, and rock art

Each of these objects are discussed on the following pages.



Providence Cone

Three of the many rock art areas are in the Las Valles Canyon in the Sierra de las Uvas, the Providence Cone area in the Potrillo Mountains,

Providence Cone is on state land, so the Act cannot apply to anything at this site



WWII Bombing Targets in Potrillo Mountains Complex

During World War II, the Army Corps of Engineers constructed 18-acre bombing targets, the remains of which still dot the landscape.



Here are the comments NMWA used to promote the WWII targets as an object

WORLD WAR II AERIAL TARGETS

If you fly over the proposed Organ Mountain-Desert Peaks National Monument, you may be treated to a surprising sight: giant targets built with bladed soil rise out of the Chihuahuan Desert, resembling bullseyes or alien crop circles. They are remnants of a former regional air base and pilot training program essential to helping America win World War II. In 1942, twenty-four targets were built and used extensively by pilots at the Deming Air Base until the mid-1940's. Seven of the targets were built in the Organ Mountains-Desert Peaks region. Each target consisted of four concentric rings, the outermost being 1000 feet in diameter, with a wooden shack resembling a pyramid at the center. Nighttime targets required generators to power a string of lights that formed a large crosshair on the ground. Some of the targets had outlines to simulate the appearance of ships or buildings from the air. The concentric circles were constructed by scraping a shallow,



Nothing about these targets would "require permits for the examination of ruins, the excavation of archaeological sites, and the gathering of objects of antiquity" as specified in Sec 3 of the Act, so should not need the protection of Sec 2.

The Antiquities Act was passed in 1906 and World War II was in the late 1940's.

Did the Antiquities Act provide for future events?

These targets represent massive environmental destruction.

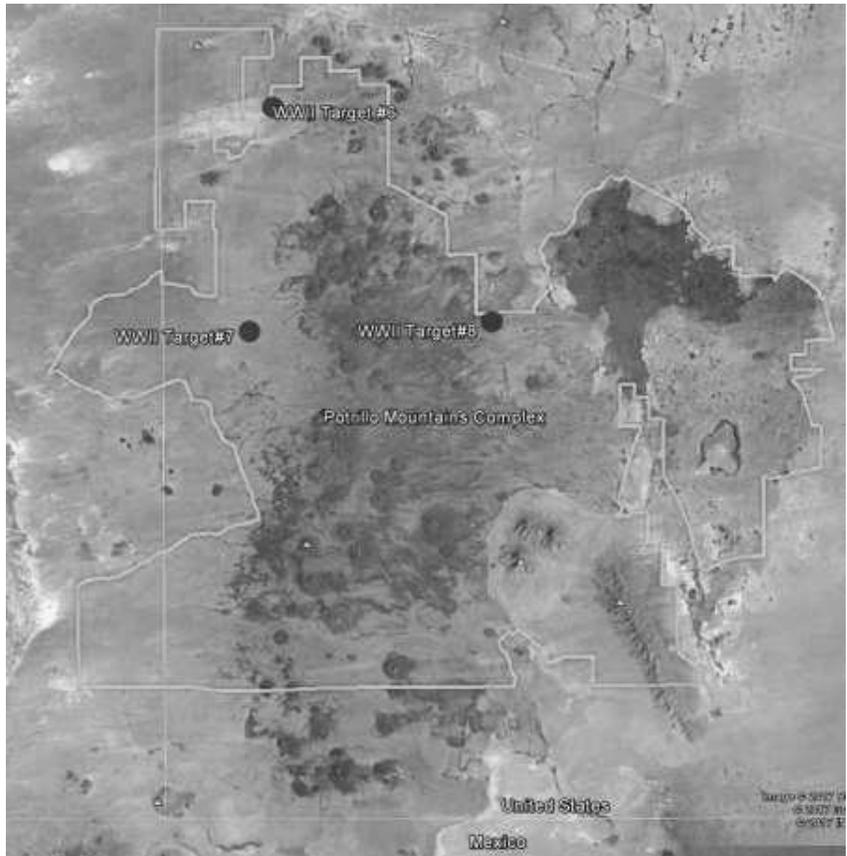
If this area had been a national monument in 1945, these targets would have never been constructed.

The New Mexico Wilderness Alliance comments state that to see these marks, you have to fly over the area.

Unless you know exactly where to look and what you are seeing, they are all but impossible to spot from the ground.

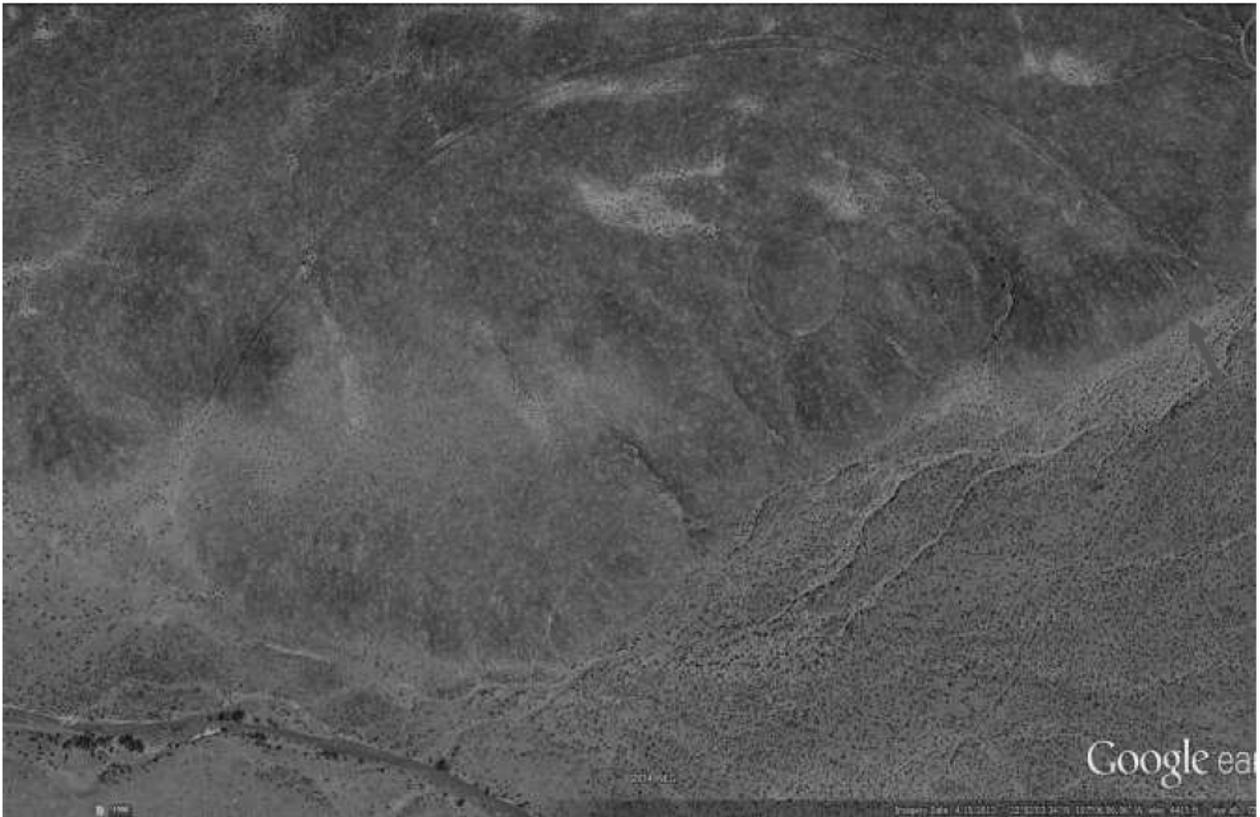
The New Mexico Wilderness Alliance promoted these targets as something worthy of national monument protection, overlooking the fact that they were created by blading miles and miles of target rings across pristine desert.

Then thousands of bombs were dropped on these targets.



Finally, hundreds of thousands of pounds of smashed, rusting scrap metal was left all over the landscape.

Here is one the targets in the Potrillo Mountains WSA as seen from the Google Earth



The arrow above is pointing at what the photo below is looking at on the ground. We were standing at what is the tip of the arrow looking up the hill. From the ground, it looks like an old fence line road or Jeep trail and you would never know that it is a WWII bombing target.



Two of these targets were even created within what are now wilderness study areas.

Before the New Mexico Wilderness Alliance starting pushing for the national monument, they were promoting wilderness designation for these areas.

They clearly knew these targets were out there and that wilderness is supposed to be lands that retain their primeval character and have substantially been un-impacted by man.

Yet they were still pushing for wilderness designation.

Now, they claim that these scars on the landscape are worthy of national monument protection.

The desert is still recovering from this environmental destruction.

Would they allow these targets to be constructed and used today?

They would have had us loose the war, rather than bulldoze this pristine land.

Now they want to honor that past destruction as an object worthy of national monument protection.

This is the epitome of hypocrisy and another blatant abuse of the Antiquities Act.

Aden Crater

Among the volcanic cones in the Potrillo Mountains is **Aden Crater**, a small shield cone where a lava tube housed the **11,000-year old skeleton of a ground sloth**, one of few ever recovered with skin and hair preserved and a key to understanding the extinction of this and other species.

Yes, the ground sloth was found in 1928, **but it is now gone.**

It is supposed to be on display at the Peabody Museum.

Read a good article here:

<https://www.desertusa.com/animals/shasta-ground-sloth.html>

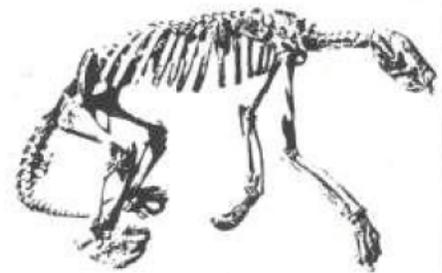


Figure 10. Top, skeleton of *Northrotherium Shastense* (Ground Sloth) and bottom, restoration of the sloth. The sloth measured just less than 6 ft (2 m) in length (from Lull, 1929).

Kilbourne Hole

The volcanic field also contains five maars, or low-relief volcanic craters. Kilbourne Hole, a maar with unique volcanic features that the Secretary of the Interior designated as a National Natural Landmark in 1975, is over a mile wide and over 300 feet deep. **The sparkling yellow and green olivine glass granules found inside rocks blown from the crater attract amateur and professional geologists to this site,** and its resemblance to the lunar landscape provides scientists and visitors with other-worldly experiences, as it did for **the Apollo astronauts who trained there. A slightly smaller maar, Hunt's Hole,** brings visitors and geologists to the southeastern corner of the Potrillo Mountains complex.

Here are the comments NMWA used to promote Kilbourne Hole as an object



KILBOURNE HOLE

Designated as a National Natural Landmark in 1974, Kilbourne Hole is an exceptional globally famous mile-wide volcanic maar crater thought to be 80,000 years old. This rare geologic wonder was also used by the Apollo 12-17 missions to train astronauts for a lunar environment. This site is also near Hunt's Hole, a smaller crater also included in the Organ Mountains-Desert Peaks National Monument proposal.

They make two claims:

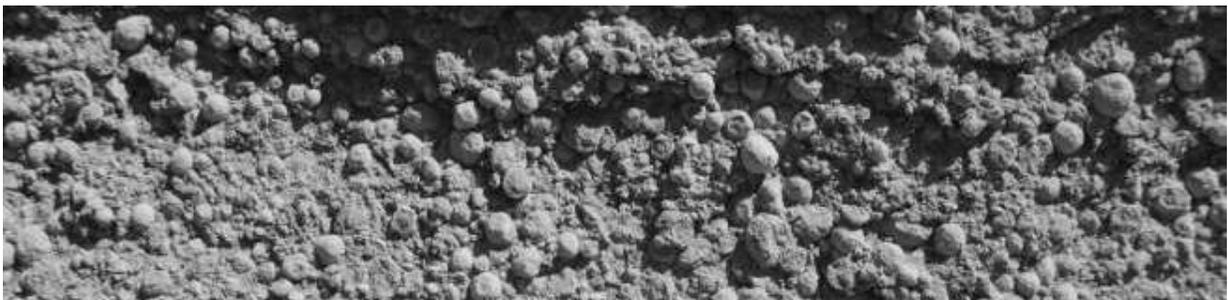
1. It is a rare geologic wonder because it is a maar volcano
2. Was used by the Apollo missions to train astronauts for a lunar environment

Here is what it looks like from Google Earth

Here it is from the ground



These little balls (Lapilli) are the tell-tell sign that it is a maar volcano



The sparkling yellow and green olivine glass granules found inside rocks blown from the crater attract amateur and professional geologists to this site,

The proclamation talks about the Olivine found at Kilbourne Hole: **“The sparkling yellow and green olivine glass granules found inside rocks blown from the crater attract amateur and professional geologists to this site”**. People do not go there to look at the Olivine; they go to collect it.

Warning is hereby given to all unauthorized persons not to appropriate, injure, destroy, or remove any feature of the monument and not to locate or settle upon any of the lands thereof.

Collecting Olivine is now illegal with the national monument designation.



Is **this** maar volcano really a rare geologic wonder?
Here is what [Geology.com](http://geology.com) has to say to this question:

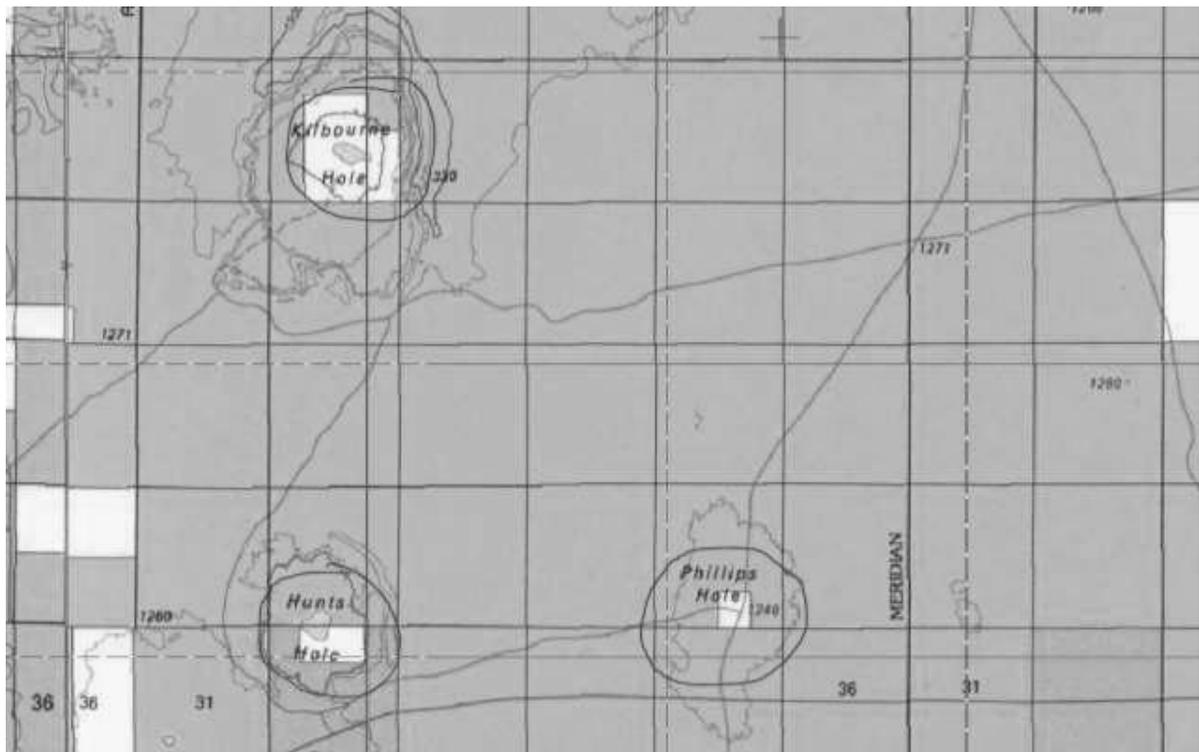
How Common are Maars?

Maars are more numerous than most people realize. After cinder cones, maars are the second most common volcanic landform. [2] If you search the Smithsonian Institution's Global Volcanism Program database, you will be able to find hundreds of maars. [3]

Maars are underrepresented as volcanic landscape features because they are small in size and lack rocky vertical development that would make them resistant to weathering and erosion. Because they are relatively small, shallow depressions, they can be easily filled with sediment and not recognized as volcanic features.

Source: <http://geology.com/stories/13/maar/>

So Kilbourne Hole is **not** a rare geologic wonder, in fact there are several other maar volcanoes in that immediate area.



Pay special attention to the fact that these three holes have a large portion of private or state property (white or blue).

Kilbourne Hole - Apollo Training Site?

NASA acknowledges that it used Kilbourne Hole for geological training of some Apollo astronauts.

The Apollo 15 moon mission Astronauts spent 470 hours studying geology at sixteen different sites around North America and Hawaii.

Geologic Training for Apollo J-Missions: Apollo 15 Example

- **General Scientific Training (includes all science training prior to mission selection and mission-specific training for Apollo 15): ≈375 hours**
- **Apollo 15-Specific Science Training (Apollo-16 and -17 had similar training)**
 - General science lectures - 80 hours
 - Principal investigator briefings - 20 hours
 - Orbital geology training - 80 hours
 - Lunar sample training - 12 hours
 - Geologic field training trips - ≈470 hours

8 hours at Kilbourne Hole out of 470 total geologic training hours = 1.7%

Potential Field Training Locations	
• Orocopia Mountains, Calif. ≈20 hours	• Merriam Crater, Ariz. ≈16 hours
• Mojave Desert, Calif. ≈10 hours	• San Gabriel Mountains, Calif. ≈16 hours
• Meteor Crater, Ariz. ≈16 hours	• Hawaiian volcanoes ≈40 hours
• San Francisco Volcanic Field ≈20 hours	• Kilbourne Hole, N.M. ≈8 hours
• Suffield, Alberta, Canada ≈4 hours	• Ubehebe Craters, Calif. ≈24 hours
• San Juan Mountains, Colo. ≈20 hours	• Taos, N.M. ≈20 hours
• Buell Park, Ariz. ≈16 hours	• Coso Hills, Calif. ≈20 hours
• Ely, Minn. ≈12 hours	• Nevada Test Site, Nev. ≈16 hours

- **Total training hours: ≈1,037 hours for Apollo 15 science operations**

Source: <http://www.lpi.usra.edu/meetings/leagilewg2008/presentations/oct30pm/Eppler4082.pdf>

Notice on these lists, that not one national monument or national park is listed. That is because these places are protected from such destructive activities as a group of astronauts walking around, kicking the dirt, and talking.

They visited the hole four times in 1971 (modern history) and spent a total of eight hours there, so that was just two hours walking around Kilbourne Hole each time.

- Geologic field training trips - ≈470 hours
- Orocopia Mountains, Calif. ≈20 hours
- Mojave Desert, Calif. ≈10 hours
- Meteor Crater, Ariz. ≈16 hours
- San Francisco Volcanic Field ≈20 hours
- Suffield, Alberta, Canada ≈4 hours
- San Juan Mountains, Colo. ≈20 hours
- Buell Park, Ariz. ≈16 hours
- Ely, Minn. ≈12 hours
- Merriam Crater, Ariz. ≈16 hours
- San Gabriel Mountains, Calif. ≈16 hours
- Hawaiian volcanoes ≈40 hours
- Kilbourne Hole, N.M. ≈8 hours
- Ubehebe Craters, Calif. ≈24 hours
- Taos, N.M. ≈20 hours
- Coso Hills, Calif. ≈20 hours
- Nevada Test Site, Nev. ≈16 hours
- **Total training hours: ≈1,037 hours for Apollo 15 science operations**

The core of the lunar training took place at the **USGS Astrogeology Science Center in Flagstaff, AZ.**




The moon's Mare Tranquillitatis is an ancient plain of volcanic rock pocked with craters and coated with fine dust. In the 1960s, engineers and scientists in the U.S. Geological Survey's Astrogeology Branch reproduced a 10-acre swath of Mare Tranquillitatis in Cinder Lake, a volcanic crater field northeast of Flagstaff, Arizona, for use in Apollo astronaut training and lunar vehicle and equipment testing. This video shows how they marked out crater locations, planted explosives, and set them off in three waves, excavating hundreds of craters up to 10 meters wide.

<https://astrogeology.usgs.gov/missions/apollo>

Does Kilbourne Hole really merit national monument protection?

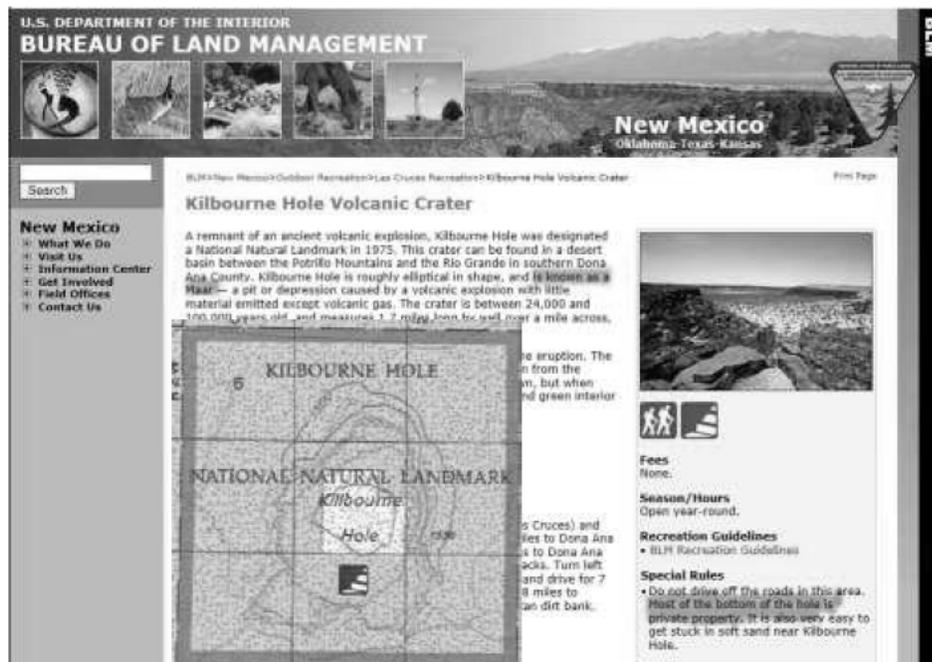
It is definitely NOT a rare geologic wonder, as they claim!

Just because some modern history astronauts in training walked around the site for two hours on four occasions, this does not make it worthy of national monument designation.

Since when do we declare a place as a national monument, just because someone walked around it?

In addition, it was designated a National Natural Landmark in 1975.

Again, notice that the BLM webpage mentions that most of the bottom of hole is private property.

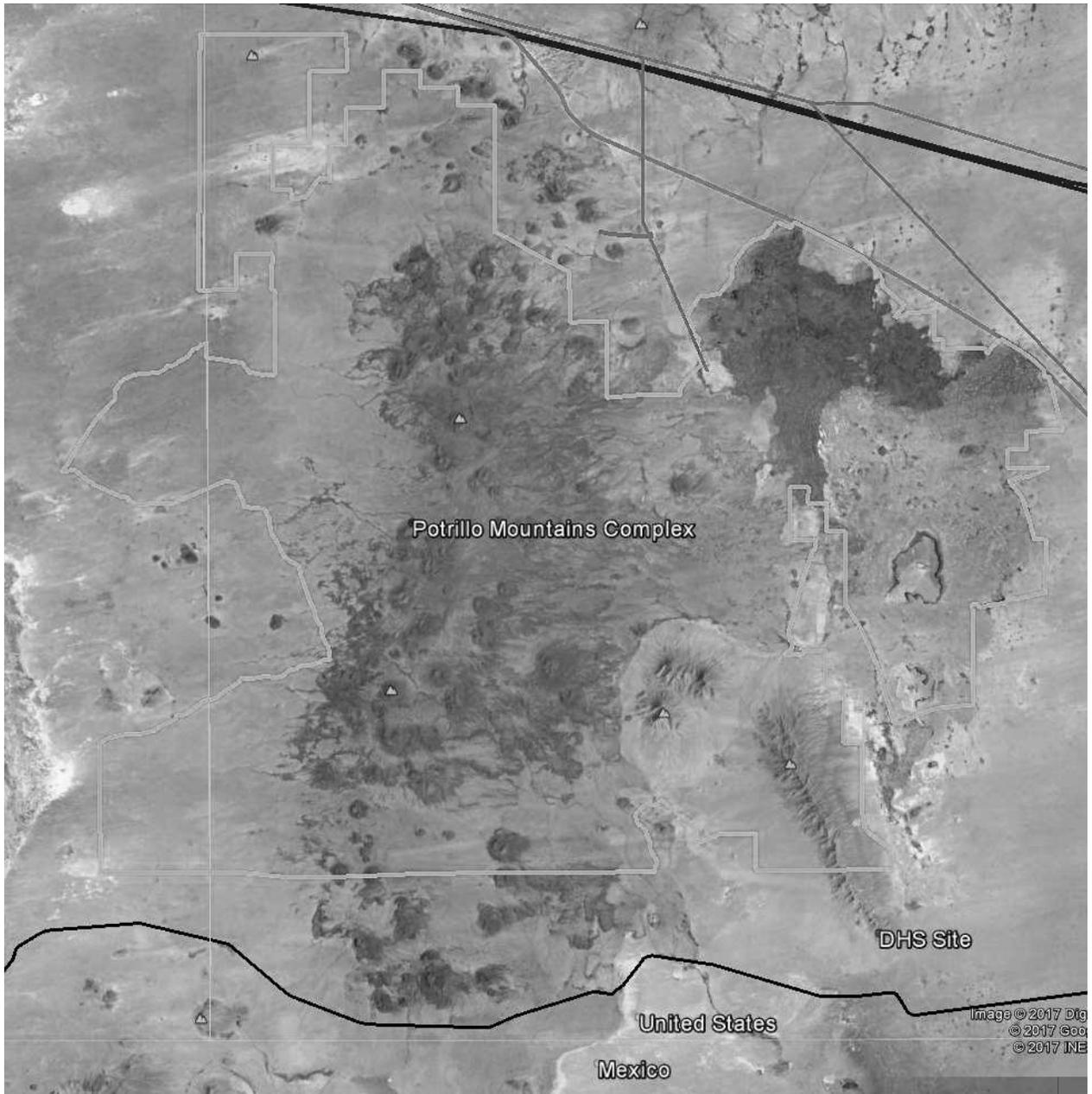


Reference: http://www.blm.gov/nm/st/en/prog/recreation/las_cruces/kilbourne_hole.html

Critical Infrastructure Within or Near Potrillo Mountains Complex

There is no critical infrastructure within the complex

A major railroad and electrical transmission line form the east boundary of the unit



**Effects on Railroad Infrastructure
Prevents Needed Las Cruces Rail Bypass**

On May 28, 2014, Union Pacific had the grand opening of their \$400 million dollar facility in Santa Teresa, NM.

This facility will serve as one of the largest inland ports in the United States and is just 10 miles from the border of the Potrillo Mountains Complex.

The rail line forms the eastern boundary of the Potrillo Mountains Complex.

With the added capacity of the rail yard, a new spur line is needed to connect from Santa Teresa to the existing northbound line.

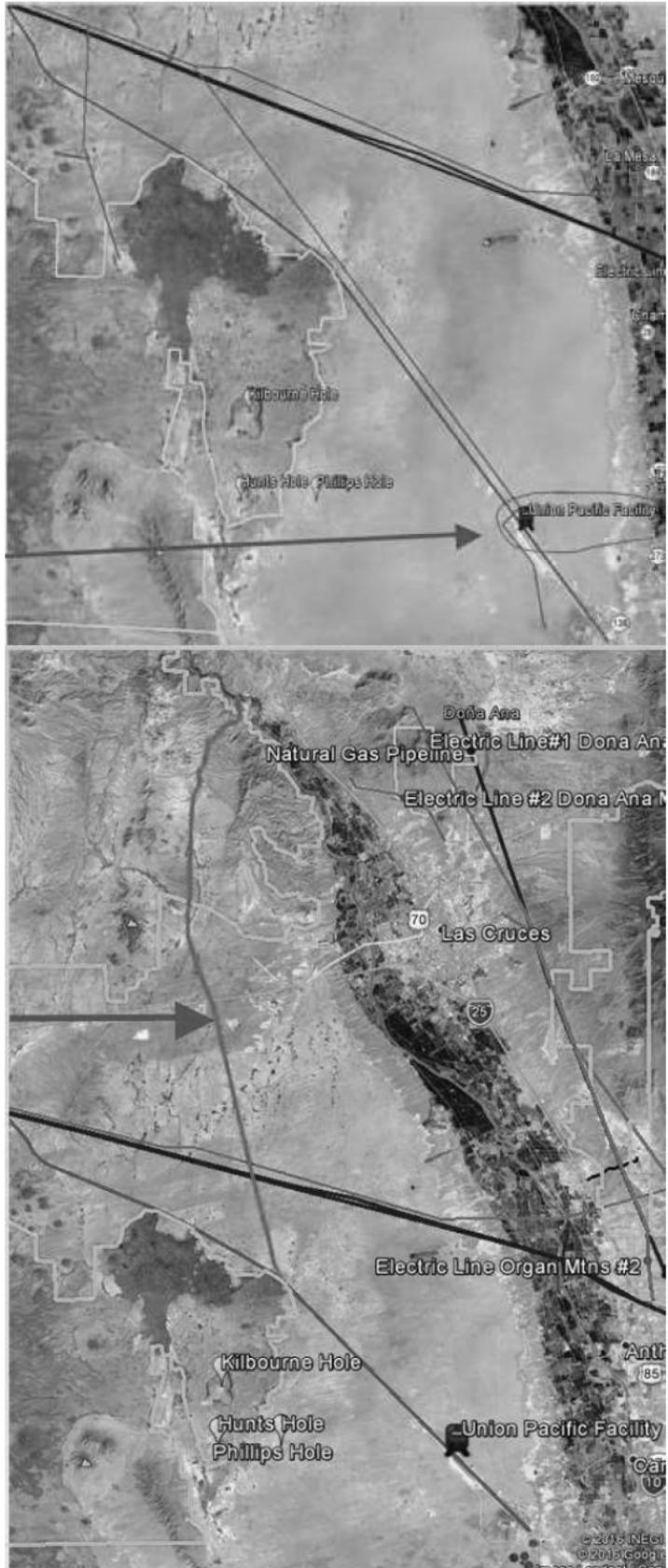
To go straight across the valley from Santa Teresa to the existing line would result in the loss of valuable farmland. This route would also substantially increase rail traffic through Las Cruces as freight is moved north.

Until the monument was designated, the railroad was working on a plan to build a spur (green line) that would use the west mesa to bypass Las Cruces and then use Faulkner Canyon in the Desert Peaks Complex as shown in this image.

They have scrapped that plan for now because of the monument.

This is bad for economic growth and safety as all dangerous cargo is now forced to travel through a highly populated area unnecessarily.

If the Desert Peaks and Potrillo Mountains Complexes were removed,



from monument status this spur line could become a viable possibility again.

Conflicts with Special Management Areas in the Potrillo Mountains Complex

Potrillo Mountains WSA - 151,049 acres

Mt Riley WSA - 8,488 acres

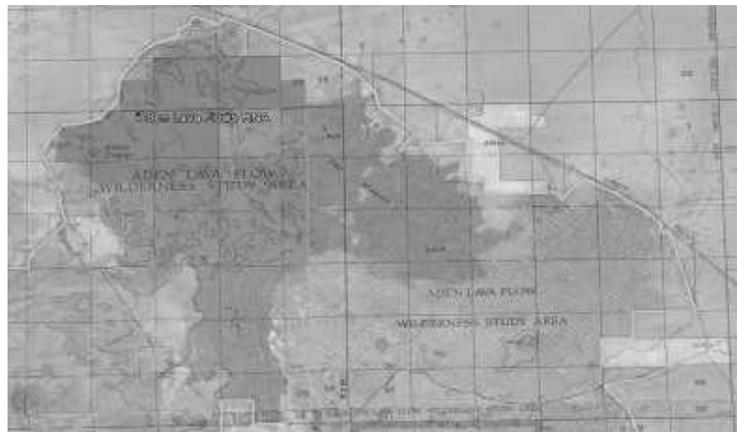
Aden Lava Flow WSA - 25,972 acres

Aden Lava Flow RNA - 4,008 acres

Kilbourne Hole NNL - 5,760 acres

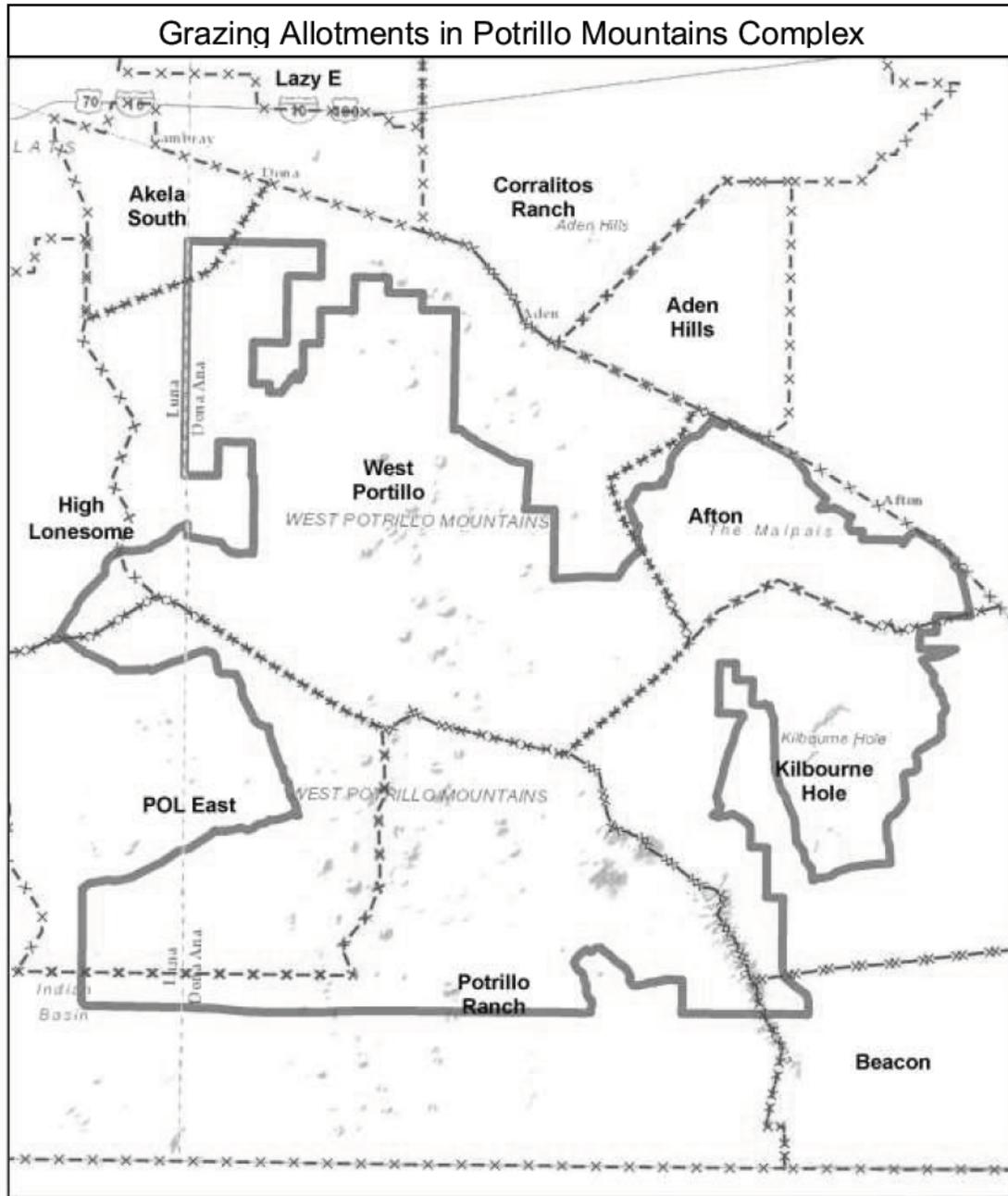


The Aden Lava Flows WSA and RNA overlap each other



Effects on Allotment Management

There are 8 ranches and 27 ranch families affected by the Potrillo Mountains Complex. These ranches provide 100% of the available water for wildlife in the complex. How will the allotments that are partially in and partially out of the actual monument be managed? Most likely those allotments will be managed by the monument management plan, thus increasing the actual monument managed area to well over 600,000 acres.



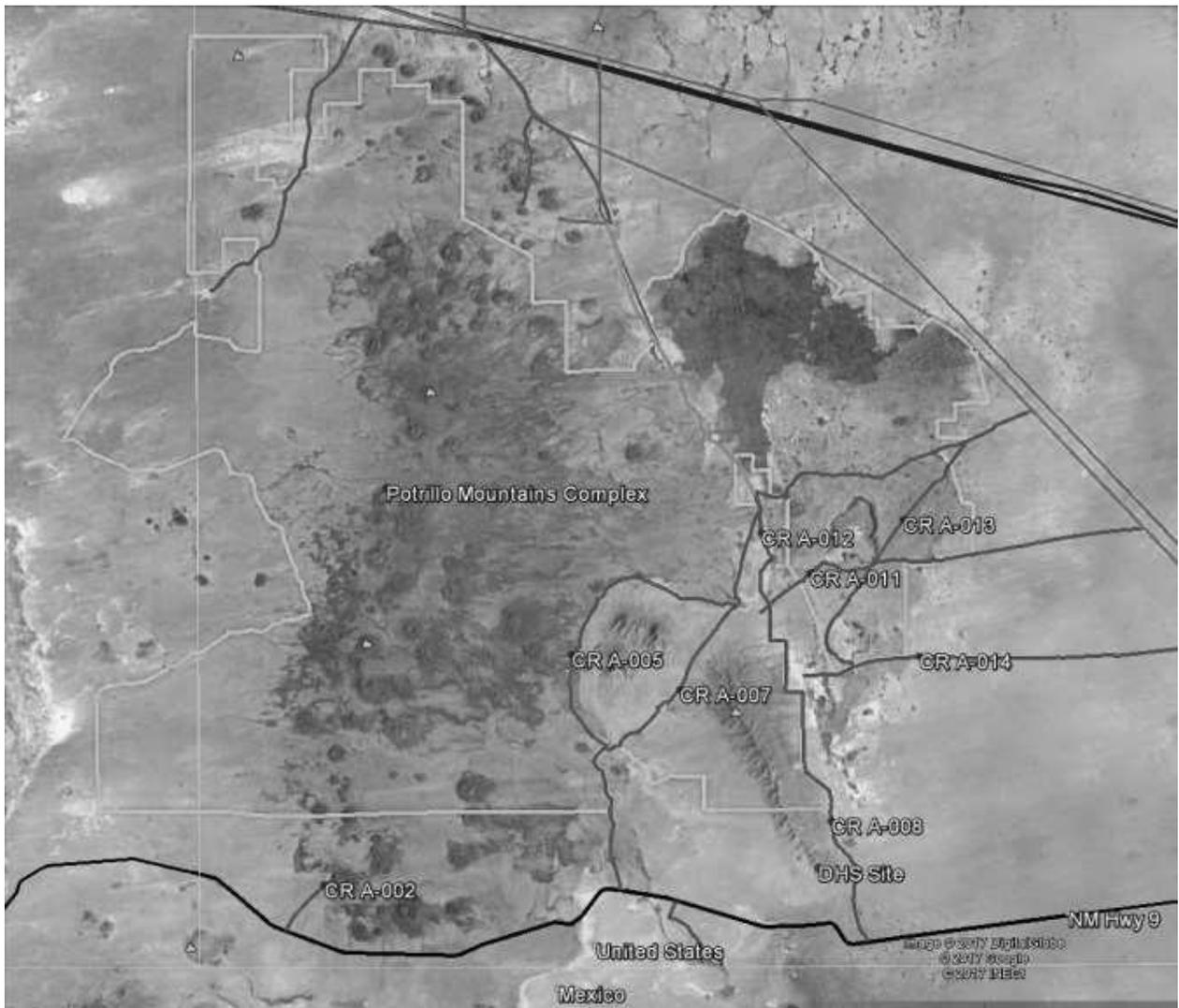
Effects on Border Security

Our main concern about the Potrillo Mountains Complex is the proximity to the US/Mexico border.

The southern boundary is only 4.5 miles from the border. There is a network of roads that lead straight to Interstate 10 and past any Border Patrol checkpoint. It would be very easy to move illegal goods and people through the complex to Interstate 10.

This area is at the outer edge of the patrol zone for the Santa Teresa Border Patrol station to the east and the Deming Border Patrol station to the west.

The slowest Border Patrol response time is right below the complex.



The border barrier in this area is just simple D-day type barriers that do not slow down a person on foot.

The barbwire fence to the left of the D-Day barrier is the actual border fence



These small barriers are very easy to be ramped over with a vehicle

Here are a few examples of some of the methods they use.

They just pull up to the barrier with the ramp vehicle and deploy the ramps and the barrier is little more that a speed bump



The Organ Pipe Cactus National Monument in Arizona is a perfect example of what can happen when a national monument is designated so close to the US/Mexico border. The environmental damage is staggering.



Effects on Future Water Supply in Potrillo Mountains Complex

Water is Life

The Mesilla Groundwater Basin holds estimated 60 million acre-feet of fresh and brackish water (total dissolved solids less than 10,000 parts per million). The Potrillo Mountains Complex has an estimated 10 million acre-feet of the water resource with important recharge properties. Because of recharge properties, the monument has important potential for Aquifer Storage and Recovery (ASR).

The monument effectively sequesters a large portion of available water.

Important brackish water resource is available for desalination. Geothermal resources beneath the monument provide energy for desalination and safe disposal of brines. Monument designation further complicates a complex water planning and management of the resource.

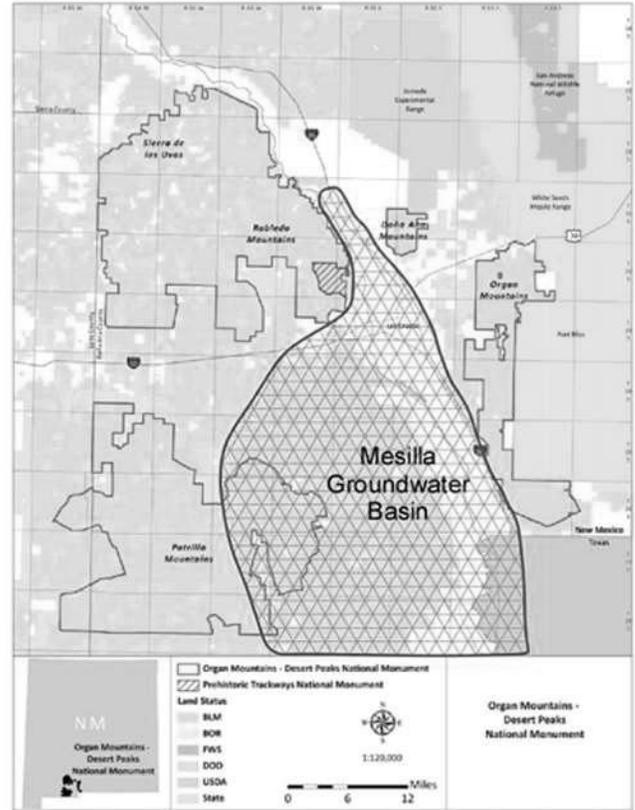
Water for wildlife is in jeopardy with threats to viable ranching.

Flood control options are reduced or eliminated.

Geothermal energy has the smallest environmental footprint of any energy resource.

Base load and cost competitive power and industrial direct-use heat that has much less cost than natural gas.

A substantial geothermal resource potential underlies the Potrillo and Sierra de Las Uvas-Robledo Complexes of the monument.



Desert Peaks Complex

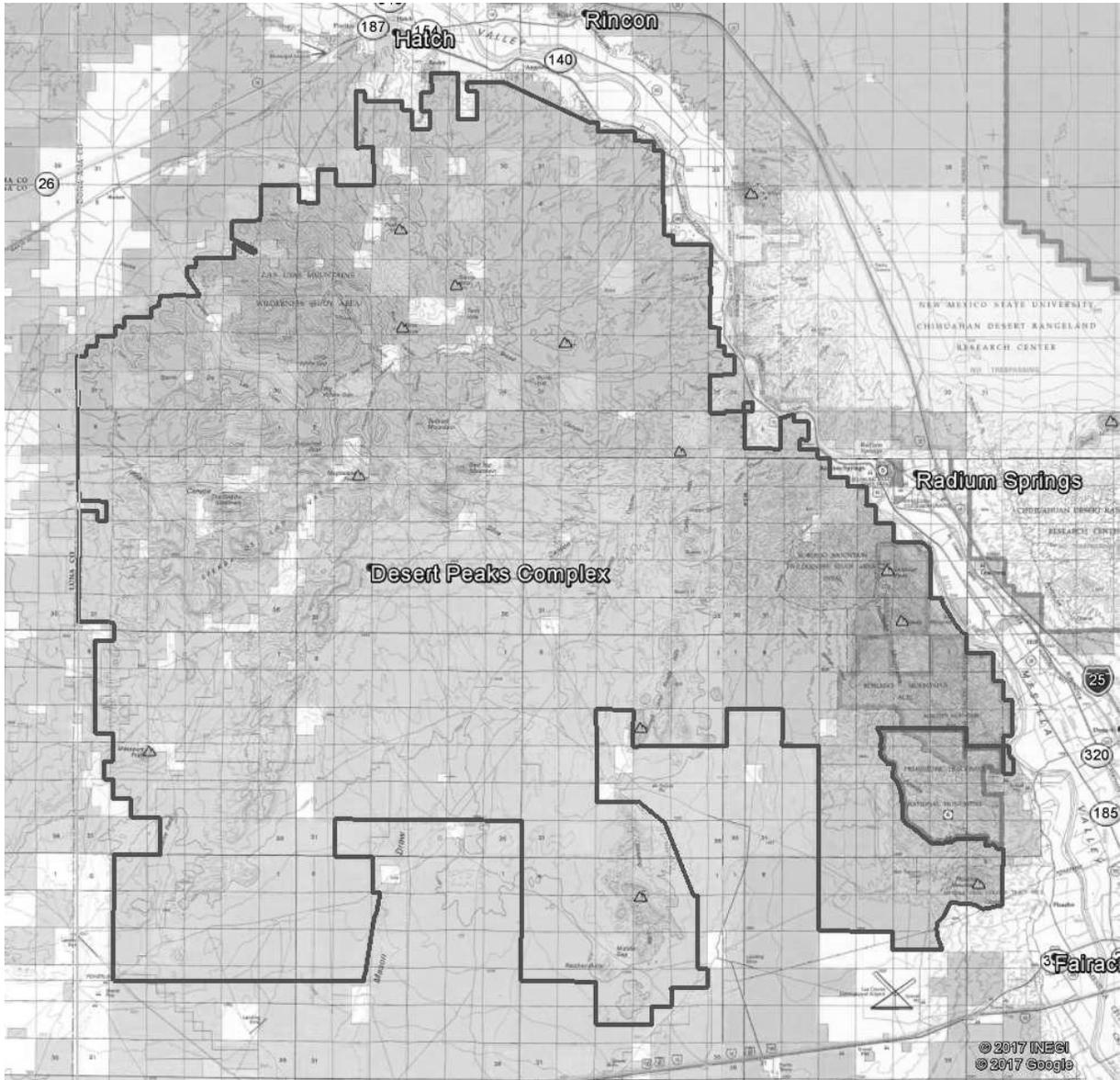
Land Ownership

Public Land - 201,915 acres

State Land - 43,296 acres

Private Land - 7,719 acres

Actual Complex Size - **252,930 acres**



Listed Objects within Desert Peaks Complex

- Rock art areas in the Las Valles Canyon
- Small caves and pit-house villages
- A ten-room pueblo in the Robledo Mountains
- Scattered Paleo Indian artifacts,
- The 1854 Gadsden Purchase
- Butterfield Overland Trail
- Rough & Ready stage stop
- Geronimo's Cave
- Outlaw Rock
- 1880s U.S. military heliograph station
- World War II bombing targets



Archaeological Resources within Desert Peaks Complex

Archaeologically rich, the Organ Mountains-Desert Peaks area features **hundreds of artifacts, rock art, dwellings, and other evidence of the Native peoples of the area. Three of the many rock art areas are in the Las Valles Canyon in the Sierra de las Uvas**, the Providence Cone area in the Potrillo Mountains, and the Doña Ana Mountains. **Scattered Paleo Indian artifacts, including those from the Folsom and Clovis cultures**, represent the first people who lived in southern New Mexico and have been found in the Robledo and Potrillo Mountains as well as **the Las Uvas Valley**. The majority of the cultural items known to be in the Organ Mountains-Desert Peaks area are from the Chihuahuan Archaic period between 8,000 and 2,000 years ago. **Diverse rock art images, along with ceramic fragments**, demonstrate that the area was the scene of many cross-cultural interactions as the region's early occupants transitioned over time from roaming hunters to semi-permanent villagers.

Here are the comments NMWA used to promote objects in the Desert Peaks Complex.



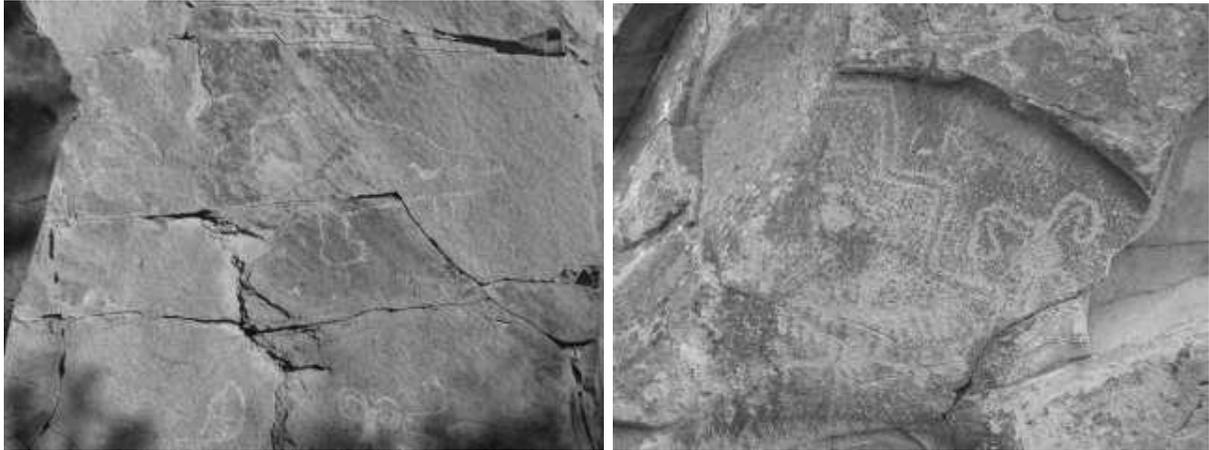
Archaeological and historic resources are also rich in the **Sierra de las Uvas Mountains Complex**. At least 20 historic and prehistoric sites are known to occur within or adjacent to the Robledo Mountains WSA, including some of the earliest known prehistoric habitation sites in southern New Mexico. Also included are **several undisturbed pothouse villages, two Lithic Indian sites** in Horse Canyon, and at least two excellent petroglyph sites in the Sierra de las Uvas. **More prehistoric sites likely exist, but no comprehensive survey has taken place.**

Rock Art and Pit-house Villages in Las Valles Canyon

Valles Canyon is mentioned in the proclamation as one of the three areas with rock art.

Rock art and scattered Paleo Indian artifacts would not "**require permits for the examination of ruins, the excavation of archaeological sites, and the gathering of objects of antiquity**" as specified in Sec 3 of the Act, so should not need the protection of Sec 2.

This rock art is no different from what is found at tens of thousands of sites across the western US.



The Native people of these mountains used natural overhangs for shelter and food storage, and their obsidian points, basket fragments, and food remains are still present. Small caves and **pit-house villages can be found across the landscape**, including **ruins of a ten-room pueblo in the Robledo Mountains**

We have talked to ex-BLM employees and amateur archaeologists that have spent their lives exploring every inch of these mountains chasing down rumors of such sites.

They have found nothing

If these sites would really exist, the BLM is forbidden from disclosing their locations

Section 9 of the Archaeological Resources Protection Act of 1979 forbids disclosure of the nature and location of any archaeological resource, so the BLM is forbidden by a newer law to provide maps or otherwise direct the public to these locations because this would create a **risk of harm** to such resources or to the site at which such resources are located. So these sites cannot be used as tourist attractions.

Here is what Section 9 of the Archaeological Resources Protection Act of 1979 states:

Section 9

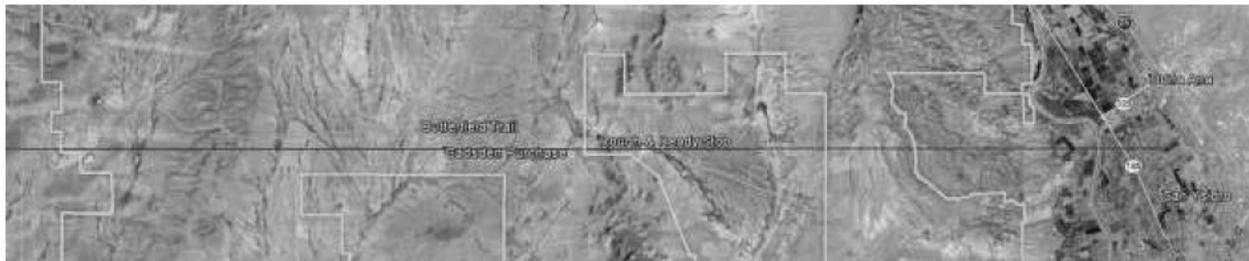
(a) Information concerning the nature and location of any archaeological resource for which the excavation or removal requires a permit or other permission under this Act or under any other provision of Federal law may not be made available to the public under subchapter II of chapter 5 of title 5 [of the United States Code] or under any other provision of law unless the Federal land manager concerned determines that such disclosure would—

- (1) further the purposes of this Act or the Act of June 27, 1960 [the Reservoir Salvage Act, as amended, 16 U.S.C. 469-469c-1] and
- (2) not create a risk of harm to such resources or to the site at which such resources are located.

The 1854 Gadsden Purchase

Historians continue to study the southernmost portion of the area, which was acquired in 1854 as part of the Gadsden Purchase, the final territorial acquisition within the contiguous United States.

The Gadsden Purchase is just a line on a map.



There are a few rock Cairns scattered here and there.

This one is on the hill above the Rough & Ready stage stop.



The photo to the right is at the Gadsden Purchase Carin looking north toward the AT&T communication tower.



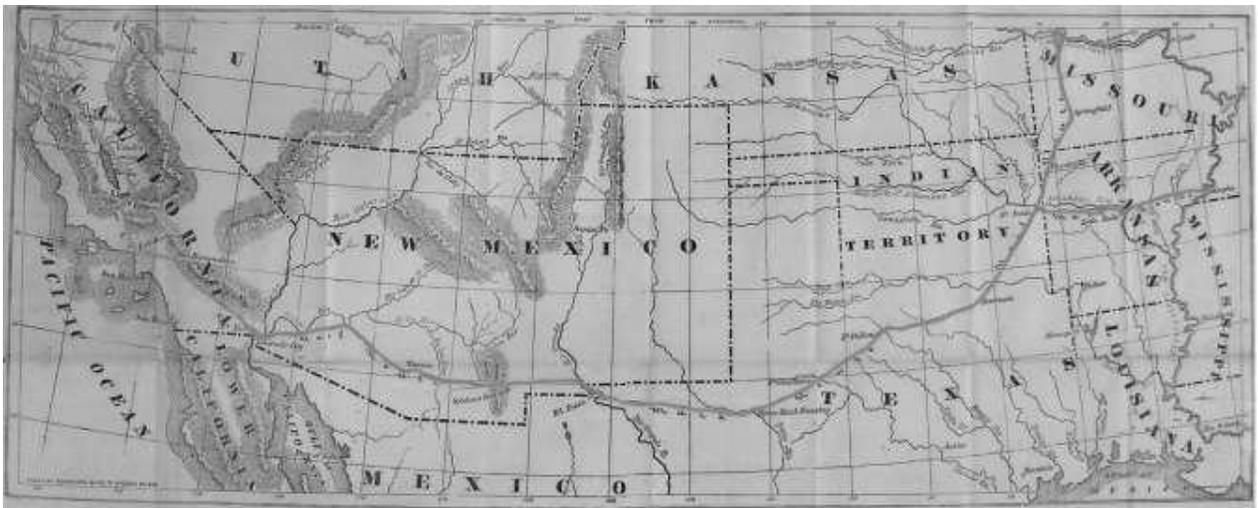
Butterfield Trail

In the late 1850s, John Butterfield developed the **Butterfield Overland Trail**, a mail and passenger stagecoach service from Memphis and St. Louis to San Francisco. Butterfield set upon improving the segments of the Trail in southern New Mexico that had been previously used by Spanish explorers, the Mormon Battalion, and western settlers. **Crossing the Organ Mountain-Desert Peaks area are about 20 miles of the Trail**, along which sit the remains of at least one stage stop.

The Butterfield Overland Mail service ran from 1858 through 1860 when Wells Fargo took over the route.

The Civil War then forced Wells Fargo to quit using the route for a time.

After the Civil War, Wells Fargo once again used the route for mail and stagecoach, transportation until after the transcontinental railroad was completed in 1869.



Clearly, it left a huge mark across the landscape from Missouri to California.

One has to ask; **“If this trail merits national monument designation, would they support construction of something big today across that area?”**

Today it looks either like a washed out arroyo or like an unused two-track Jeep trail

What protection does a national monument really bring to this trail?

Nature is taking its course and either repairing the damage or eroding it into arroyos.



Rough & Ready Stage Stop

Crossing the Organ Mountain-Desert Peaks area are about 20 miles of the Trail, **along which sit the remains of at least one stage stop.**

The “remains of at least one stage stop” that are mentioned is the Rough & Ready stop.



It is not within the monument boundaries and it is on private property - not public.

In case one wonders what these remains look like today, here they are:



Legend of Geronimo's Cave

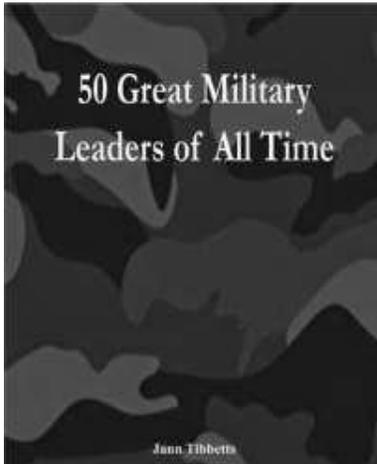
In a Robledo Mountains **legend**, the famed Apache leader Geronimo is said to have entered a cave to avoid U.S. soldiers; while the soldiers stood guard at the only entrance of what is now known as "Geronimo's Cave," the Apache leader mysteriously disappeared without a trace.

This whole object is based on a **legend** and even the proclamation says it is.

All other references to this cave describe the Geronimo connection as a **legend** or myth.

There is not one iota of factual evidence that he ever was in or near this cave.

The book 50 Great Military Leaders of All Time by Jann Tibbetts, talks about Geronimo's expertise at escaping and ties one of those escapes to this cave:



Though outnumbered, Geronimo fought against both Mexican and United States troops and became famous for his daring exploits and numerous escapes from capture from 1858 to 1886. One such escape, as **legend** has it, took place in the Robledo Mountains of southwest New Mexico. The **legend** states that Geronimo and his followers entered a cave, and the U.S. soldiers waited outside the entrance for him, but he never came out. Later, it was heard that Geronimo was spotted outside, nearby. The second entrance through which he escaped has yet to be found and the cave is still called Geronimo's Cave, even though no reference to this event or this cave has been found in the historic or oral record. Moreover, there are many stories of this type with other caves referenced that state that Geronimo or other Apaches entered to escape troops, but were not seen exiting. At the end of his military career, he led a small

Arizona Legend of Geronimo's Cave

There is another, almost identical Geronimo cave **legend** in the Superstition Mountains outside of Phoenix, Arizona.

This one talks about the belief that there is a network of subterranean caves and tunnels beneath the Superstition Mountains and that:

Geronimo was reported seen stepping into rock walls and disappearing without a trace, only to be seen days later in New Mexico.

Source: <http://www.burlingtonnews.net/arizona.html>

Maybe he knew of an inter-dimensional portal between the two caves.

Now that would be worth designating as a national monument for the science aspect.

Using a legend as an object to justify a national monument!

Did the Antiquities Act intend to have national monuments created based on legends?



This is an absolute abuse of the law to justify the creation of this national monument.

Reality of Geronimo's Cave

It is closed. It has been closed by the BLM since January 2011 to combat the spread of White-nose syndrome fungus that is destroying bat populations in unprecedented numbers.

Here is the news release and you will notice that the Las Cruces field office not only closed Geronimo Cave, but also the U-Bar and Lepto Splat caves.

 U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT NEWS RELEASE
Release Date: 01/25/11
Contacts: Donna Hummel, 505.954.2019

CLOSED

White-Nose Syndrome Threat Closes 28 BLM Caves in New Mexico

Santa Fe – The Bureau of Land Management published notice in the Federal Register today closing 28 caves to public visitation for the next two years in an effort to reduce the threat of White-nose Syndrome to bats. The temporary closures affect caves that are known to have significant bat roosts.

The following BLM caves are now closed due to WNS:

Las Cruces Field Office: Geronimo, U-Bar and Lepto Splat

The cave is in a Wilderness Study Area so it already has a higher level of protection than what a national monument offers.

It is also very inaccessible due to being half way up the east face of Robledo Peak and can mainly be reached by crossing the Rio Grande, which has water in it sometimes.



Billy the Kid or “Outlaw Rock”



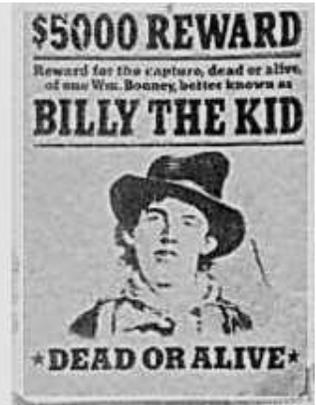
In the late 19th century, the infamous outlaw Billy the Kid (William H. Bonney) repeatedly traversed this area. **While hiding in the Robledo Mountains, "the Kid" inscribed his signature, which is still visible today, on what is now known as "Outlaw Rock."**

Here are the comments NMWA used to promote Outlaw Rock as an object



BILLY THE KID

William H. Bonney, later nicknamed Billy the Kid, is perhaps the most famous outlaw ever to occupy New Mexico. Bonney's time in New Mexico, and specifically in modern day Southeast New Mexico, corresponded with an era of lawless violence often referred to as the Lincoln County War. To some, he was considered a "thieving, murderous, little cowboy-gone-bad." To others, Bonney had an almost heroic status, respecting the native Mexican culture and people while fighting the law. In 1880, he left his mark quite literally in the Organ Mountains-Desert Peaks region when, along with friends Tom O'Folliard, Charles Bowdre, Dave Rudabaugh, and Tom O'Keefe, he holed up in the Robledo Mountains to keep an eye on Fort Seldon below. Bonney famously inscribed his name on the mountain in an area now known as "Outlaw Rock." Bonney's signature is still visible on Outlaw Rock today.



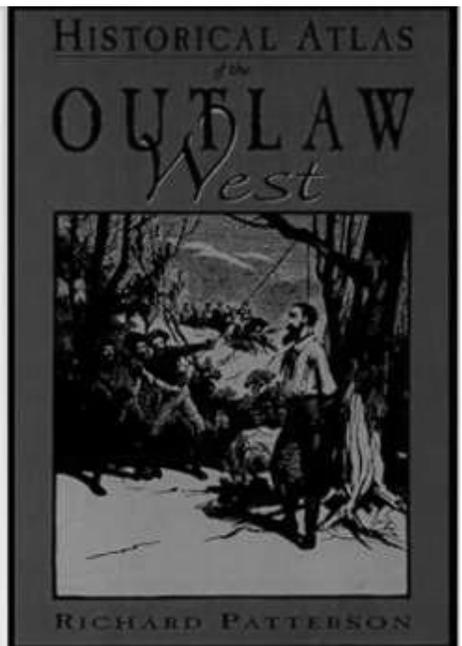
There is no actual proof that Bonney was actually ever there or even was the one that scratched the graffiti on the rocks. The 1984 book *Historical Atlas of the Outlaw West* by Richard Patterson has a more realistic take on the rock:

Notice that the author refers to this as a **legend** and used the word **purported** to identify how the scratches got there.

Outlaw Rock
Dona Ana County

Just off Interstate 25, about four miles west of Fort Seldon State Monument and a half-mile or so north of Radium Springs, can be seen a craggy peak local residents call "Outlaw Rock." The name stems from scratches on the rock purported to be placed there by Billy the Kid and several members of the gang he ran with in the late 1870s and early 1880s. If one climbed to the base of the peak and carefully inspected a spot a short way up a narrow arroyo, one would find the names "Bonney" and "Bowdre," the letters "Off" and the initials "D. R." Legend has it that "Bonney" was scratched there by Billy himself (who at times used the alias William Bonney), and "Bowdre" was written by his outlaw pal Charles Bowdre. The "Off" is presumed to be the nickname of another gang member, Tom O'Folliard, and the initials "D. R." are said to be those of the notorious killer Dave Rudabaugh.

According to the owners of the land on which the peak is located, the site, an ideal hideout spot with a commanding view of the surrounding area (especially Fort Seldon), was once said to include the remains of an adobe hut which was dismantled a few years ago by a Hollywood movie crew for use on a set.



Billy the Kid Rock - Source of the Legend

The legend or myth really sprang to life in 1992 when Joe Ben Sanders, a **controversial historian**, with a particular interest in Billy the Kid was approached by an unnamed person that purportedly walked into his office and told Sanders about the hideout.

In his book, *Forgotten Hideouts of Billy the Kid*, Sanders describes how he came to hear about this hideout on page 4:

Ironically, the next hideout and story of Billy the Kid I ran across caught me sitting on my butt, in the Las Cruces office, analyzing artifacts from a fiber optic line. I was going brain dead counting a bunch of glass sherds" and fragments of cans we had dug up, **when in walks a stranger looking for me**. He was a Butterfield Trail buff and wanted to milk me of information I had acquired through thousands of miles of walking and reading. Being brain dead I **subsequently forgot his name or what he looks like**, but I never forgot the story he told me about the Robledo Mountain Hideout of Billy the Kid and his gang. I paid particular attention to his description on how to get to the site.

It just so happens that this hideout now gave Sanders enough information for another book. He stated:

I eventually had enough information for another book that needed to be told before the outlaws names completely disappear from this rock ledge due to natural environmental conditions. As with most sites of this nature, none of these have ever been documented.

Here is the drawing of the locations of the graffiti that he found:

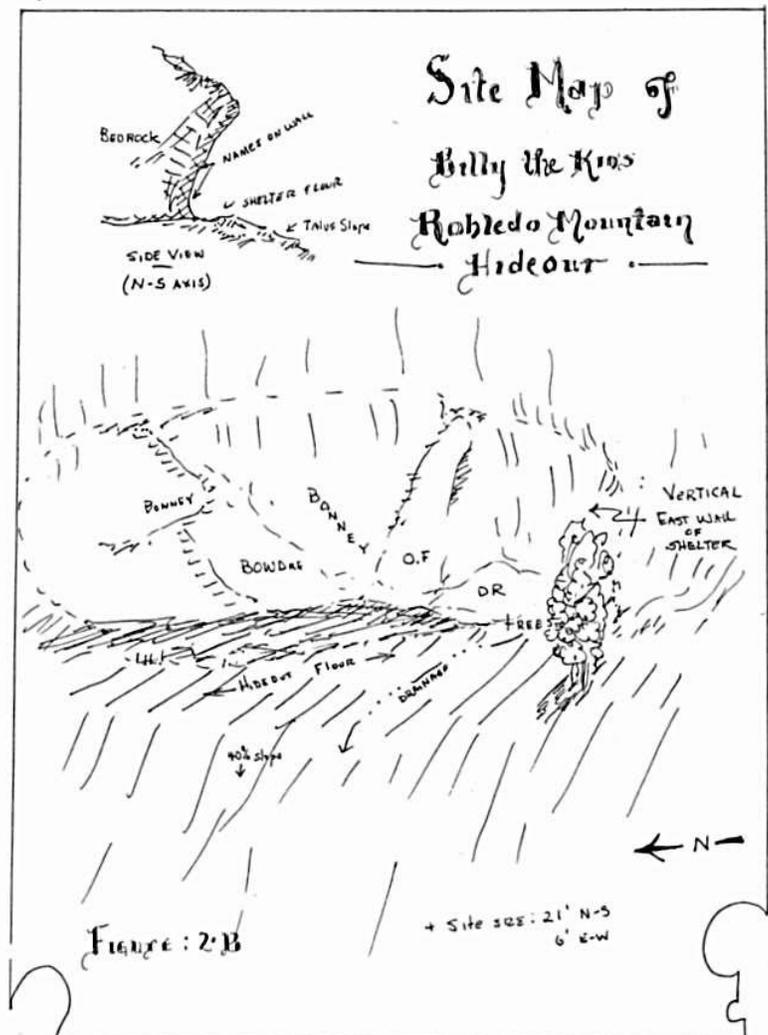
The photos of the site in his book were very poor quality black & white.

He describes that all the names except Bonny's were applied with paint.

Where did outlaws on the run and hiding for their lives come up with paint?

Sanders said Bonny's name was **scratched** into the rock.

Sanders then was able to get an article published in the New Mexico Magazine about his find.



In 2007, a blogger named rayray found the site, most likely after reading about it in New Mexico Magazine, and posted a story on the Internet at:

<http://www.summitpost.org/billy-the-kid-s-black-hill-hideout/366202>

The screenshot shows the SummitPost.org website interface. At the top is the logo and a search bar. Below is a navigation menu with categories like 'Areas & Ranges', 'Mountains & Rocks', 'Routes', 'Images', 'Articles', 'Trip Reports', 'Gear', 'Other', 'People', 'Plans & Partners', 'What's New', and 'Forum'. The main content area features a sidebar on the left with links for 'Images (8)', 'Comments (6)', 'Geography', 'MyTopo Map', 'Nearby Custom Objects', and 'Interactive Map'. The central section is titled 'Billy the Kid's Black Hill Hideout' and includes metadata such as 'Page Type: Custom Object', 'Location: New Mexico, United States, North America', 'Lat/Lon: 33.46662°N / 106.96571°W', 'Object Type: Historic interest', 'Object Title: Billy the Kid's Black Hill Hideout', and 'County: Doña Ana'. It also displays 'Page By: rayray', 'Created/Edited: Dec 16, 2007 / Mar 7, 2008', 'Object ID: 366202', 'Hits: 12272', 'Page Score: 85.36%', and '20 Votes'. Social media sharing buttons for Twitter, Facebook, and a 'Submit' button are visible. A small thumbnail image of the hideout is shown on the right.

In this Internet post, the **legend** had evolved into fact.

Here are some of the photos he posted:

The block contains four black and white photographs arranged in a 2x2 grid, each with a caption below it:

- Top Left:** A close-up view of a rocky cliff face. The caption reads: "A closer view of Billy the Kid's Black Hill Hideout near Radium Springs, New Mexico. Billy and three cohorts left their names and initials on the rock wall in the center, to the left of the tree. Photo taken 12/18/07."
- Top Right:** A wide-angle view of a canyon with a dirt road winding through it. The caption reads: "This is the vantage point near Billy the Kid's Black Hill Hideout near Radium Springs, New Mexico. Looking down on Faulkner Canyon Road, formerly a wagon road linking Silver City and Fort Selden, Billy and his gang likely took advantage of this to monitor the passage of posses and others. Photo taken 12/18/07."
- Bottom Left:** A view of the rocky hideout area with sparse vegetation. The caption reads: "Billy the Kid's Black Hill Hideout near Radium Springs, New Mexico is on a partially covered ledge, right of center in this photo. Photo taken 12/18/07."
- Bottom Right:** A close-up of the rock wall showing faint markings. The caption reads: "Billy the Kid, Tom O'Folliard, Charles Bowdre, and Dave Rudabaugh left their names and initials on the rock wall at their Black Hill Hideout in 1880, near Radium Springs, New Mexico. The markings have been eradicated by the passage of time and are today barely distinguishable. Photo taken 12/18/07."

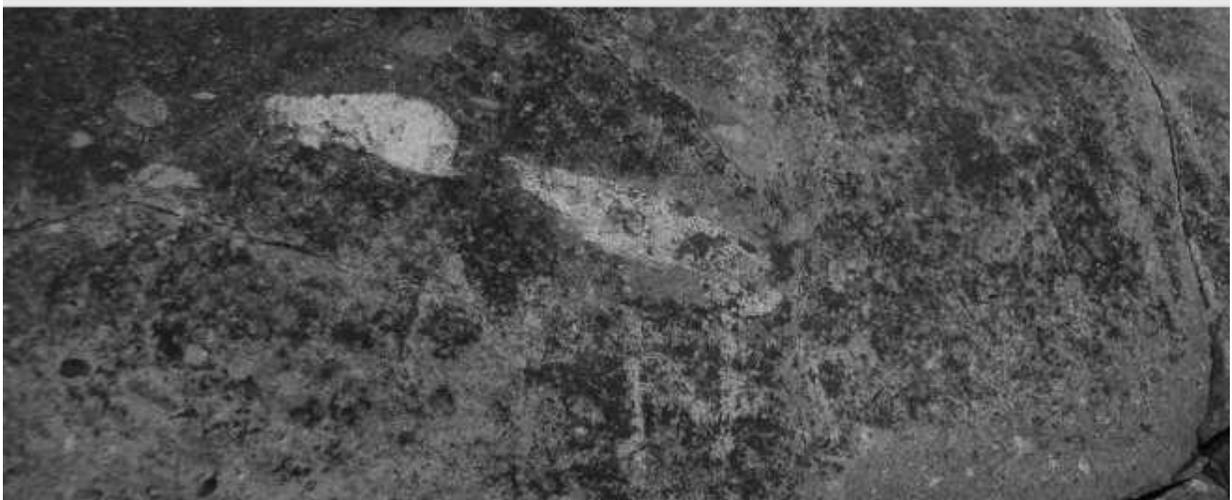
Here are our photos of what the rock looks like:

It is forty to fifty feet up the side of a hill and impossible to find if you do not have a guide.

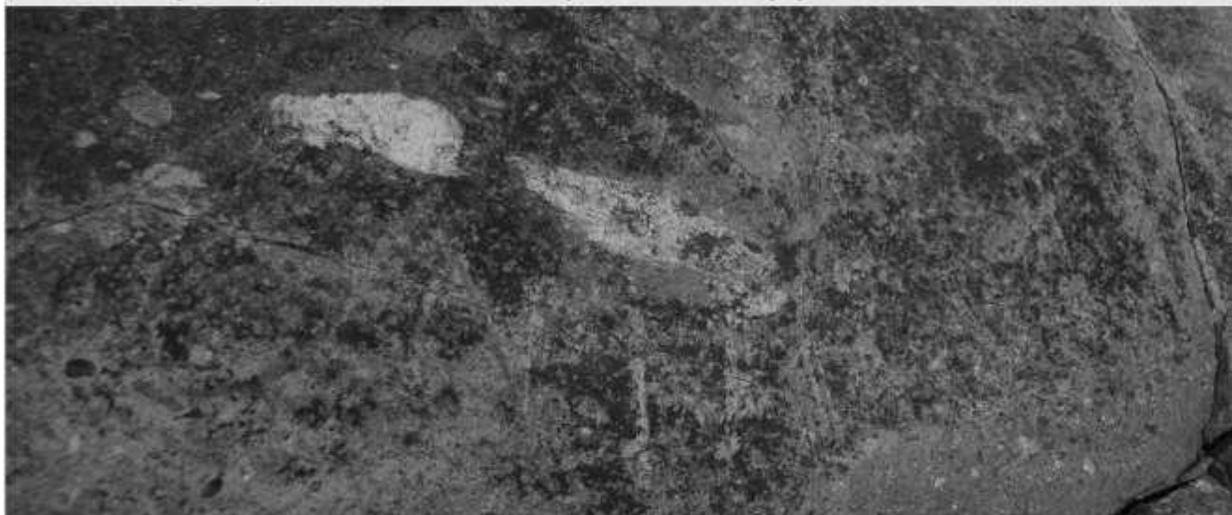




Here, is the rock close up. These are the best of the marks visible.



Here, photo-editing software has been used to try and highlight the scratches.
With imagination, one can make out **ONNEY**.
We never saw any of the painted names, which most likely has weathered away by now.



One other fact that the monument proponents neglected to mention was that this rock is inside a WSA, so it already has a higher level of protection than what national monument protection provides.

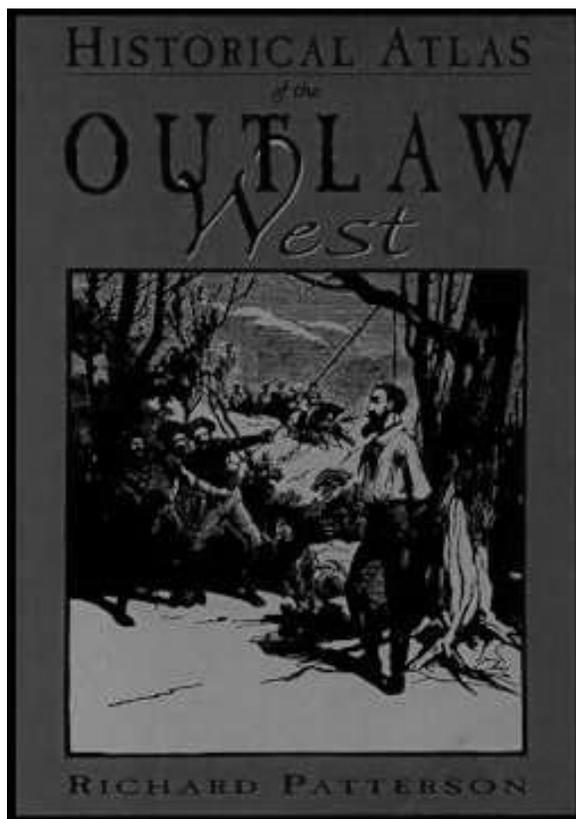
As the Patterson book indicates, there is no factual evidence that Billy the Kid and his gang ever stayed at or near the site and refers to it as a **legend**.

That book is one of very few western history books that even mentions it.

Monument protection for a legend or folklore?

Moreover, a cold-blooded killer on top of that.

Really!



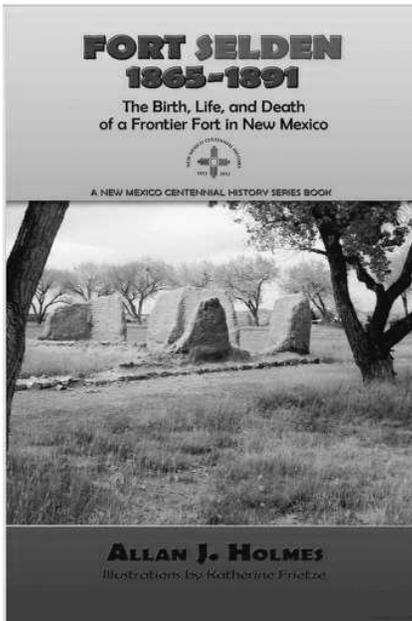
1880's U.S. Military Heliograph Station

An 1880s U.S. military heliograph station, the remains of which still stand at Lookout Peak in the Robledo Mountains, transmitted Morse code messages during the Army's western campaigns.

This heliograph is on the top of Lookout Peak, overlooking Ft. Selden.

According to the book "*Fort Selden 1865-1891*", the heliograph was only used one time in 1888.

That was only 18 years before the Act was passed.



General Nelson Miles, who had relieved Major General George Crook as commander of the Department of Arizona, established heliograph detachments consisting of two or three men on peaks across southern Arizona and New Mexico.

A heliograph was a shuttered mirror on a tripod. Through manipulation of the shutter the operator sent flashes of sunlight in Morse code to the next station. Each post was assigned a heliograph and an "area of observation."⁵⁹ The station at Fort Selden was placed on a peak in the Robledo mountains (now referred to as Signal Peak by the locals, but Lookout Peak by the map makers), which afforded the post communication in several directions; west via Cooke's Peak to Arizona, south with Fort Bliss via Mount Franklin, and east with Fort Stanton direct.⁶⁰ **The only reported use of the heliograph at Fort Selden was in 1888 when Lieutenant James E. Brett reported to the district that he had communicated with his patrol in the San Andres Mountains with the system.**⁶¹

In summary, the communications between Fort Selden and its headquarters and between Fort Selden and its field operations continued to be a problem throughout the post's life. MacArthur's 1886 report showed a vast change in the forms of communication since the

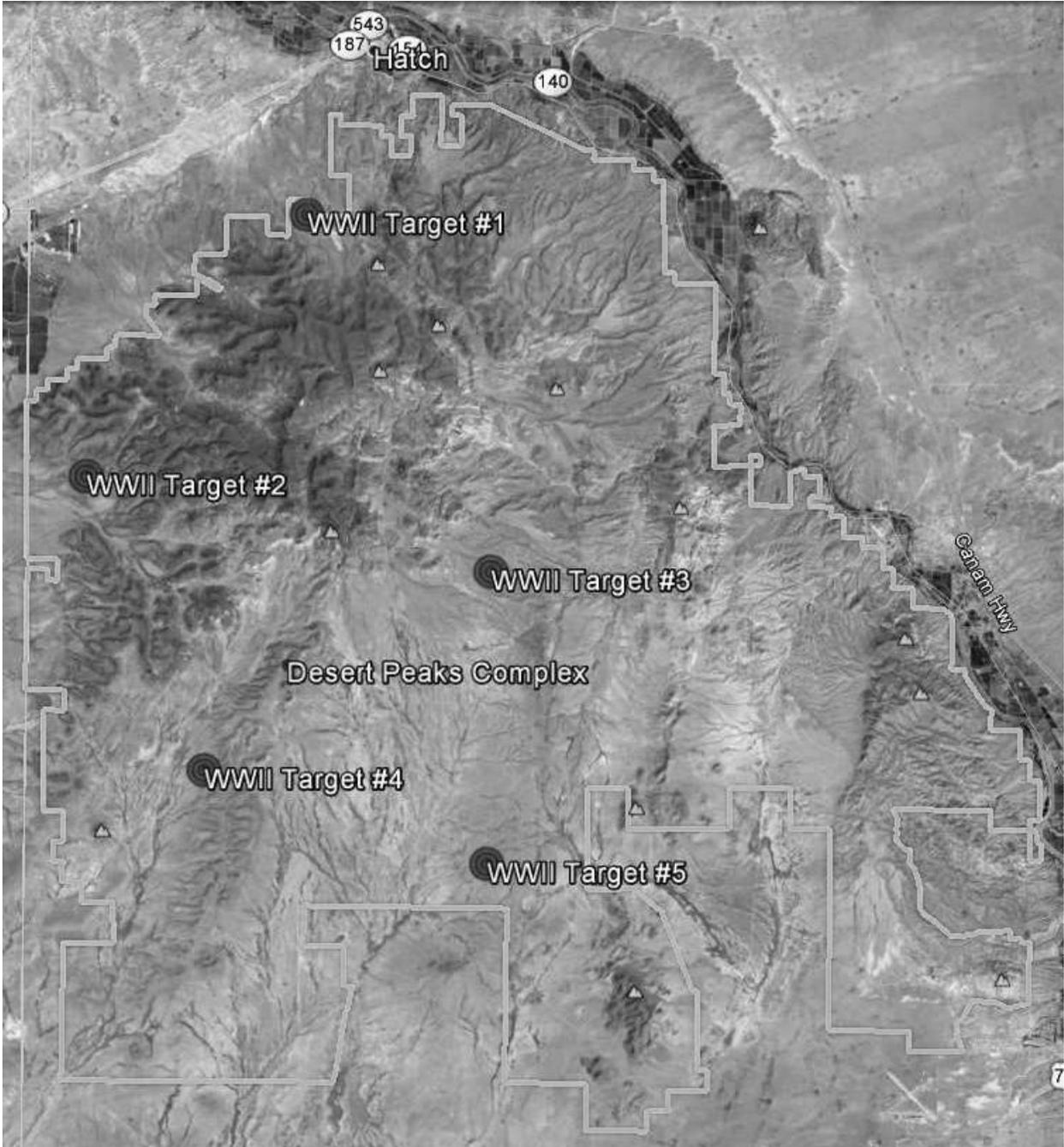
All that is left is a concrete block and some pipes sticking out of the ground.



WWII Bombing Targets in Desert Peaks Complex

During World War II, the Army Corps of Engineers constructed 18-acre bombing targets, the remains of which still dot the landscape.

Nothing about these targets would "require permits for the examination of ruins, the excavation of archaeological sites, and the gathering of objects of antiquity" as specified in Sec 3 of the Act, so should not need the protection of Sec 2.



This is what the target that was constructed across the Butterfield Trail looks like today from Google Earth:
(The orange line is the Butterfield Trail. The red circle is where the previous photos of the Butterfield Trail were taken.)



Critical Infrastructure Within or Near Desert Peaks Complex

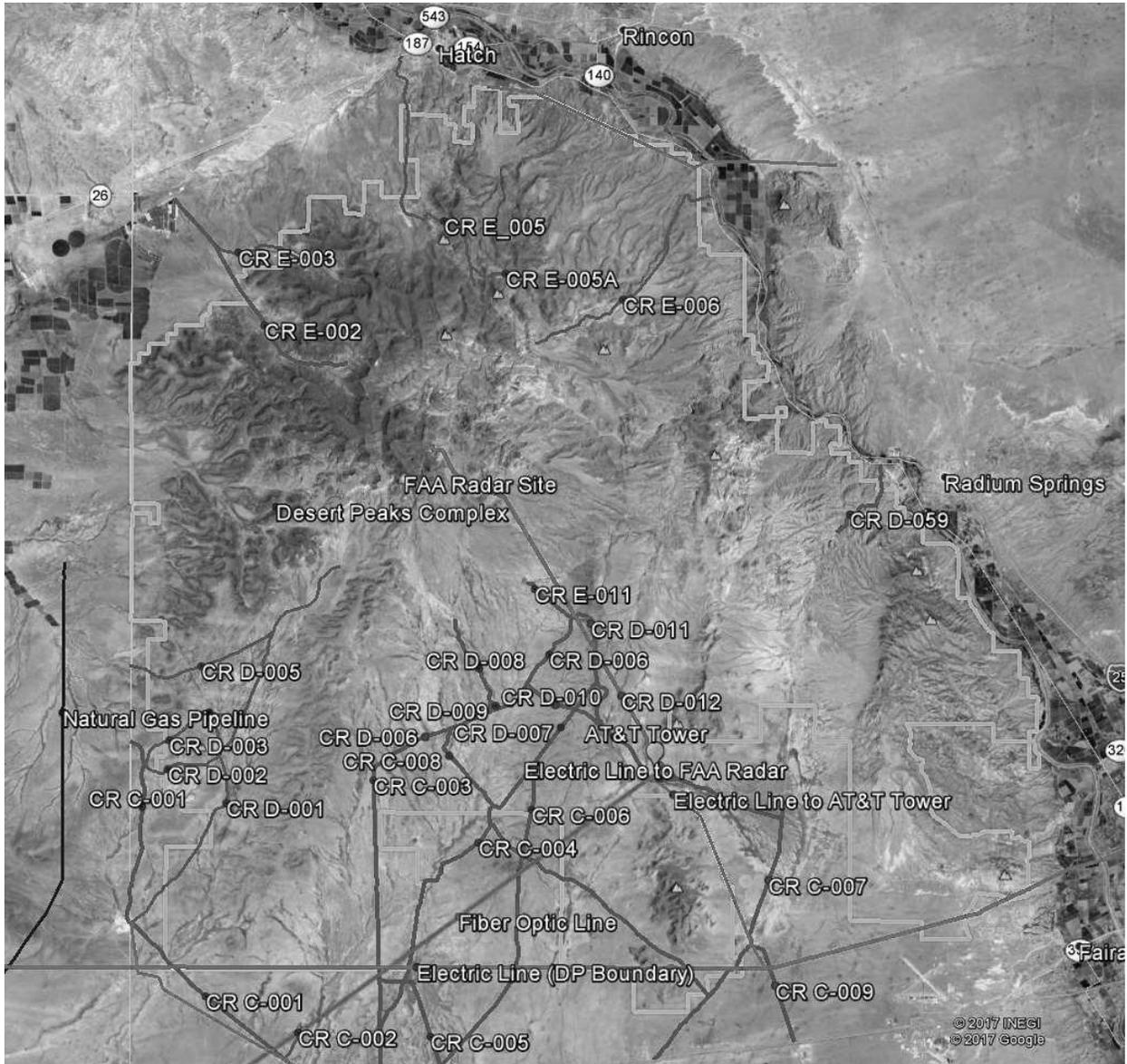
Has electrical transmission line and paved road running through the heart of the complex to the critical FAA radar site

Fiber optic communication line runs from AT&T Tower through lower section of complex

Electrical Transmission lines on north and south boundaries

Laced with county roads

Natural gas pipeline near western boundary



Effects on Critical Infrastructure - FAA Radar Site

Located almost dead center of the complex is the critical FAA radar site that provides radar coverage for the whole El Paso and Southern New Mexico region.

This radar dome is visible from almost any place within the complex.

It is the dominating feature of the landscape.

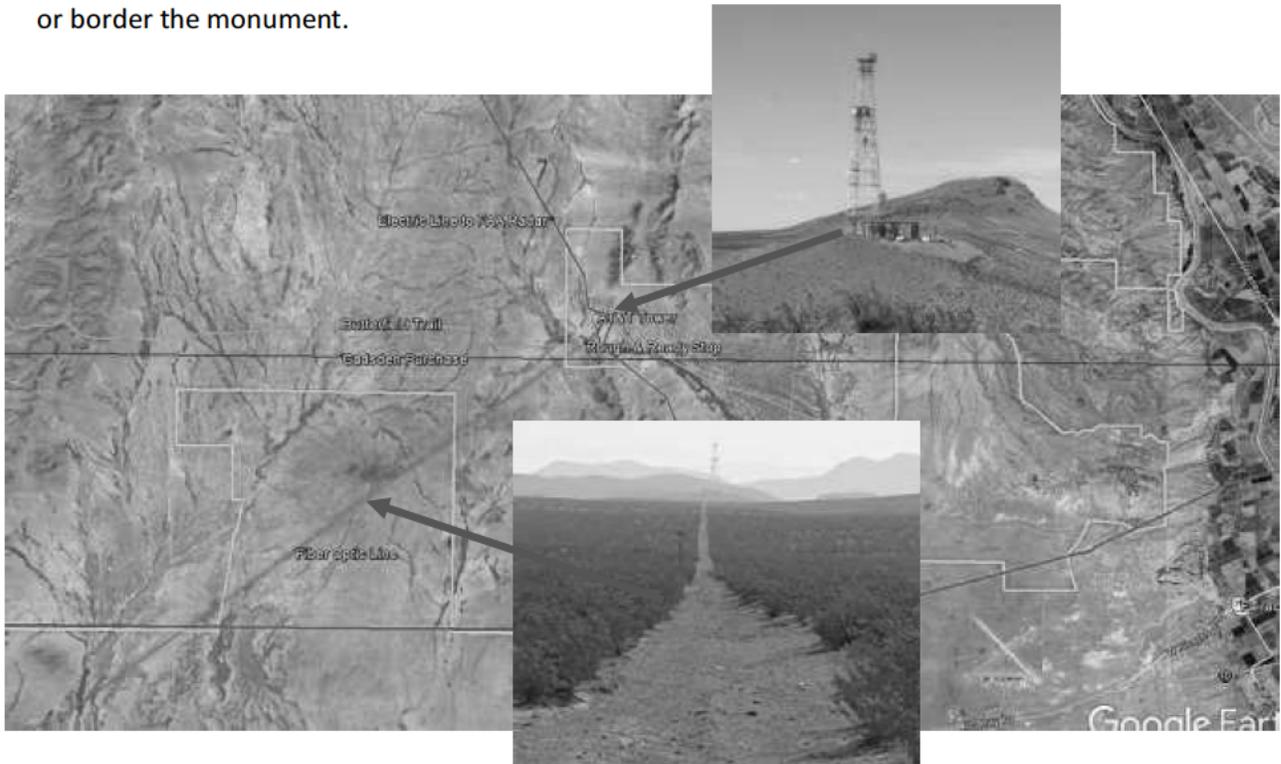
A paved road and electrical line provide critical access and electricity to the site.



Effects on Critical Infrastructure - AT&T Communication Tower

The next most dominating feature of the complex is the AT&T communication tower in the lower center.

Although it is not in the monument, the road, fiber optic line and electric line servicing it cross through or border the monument.

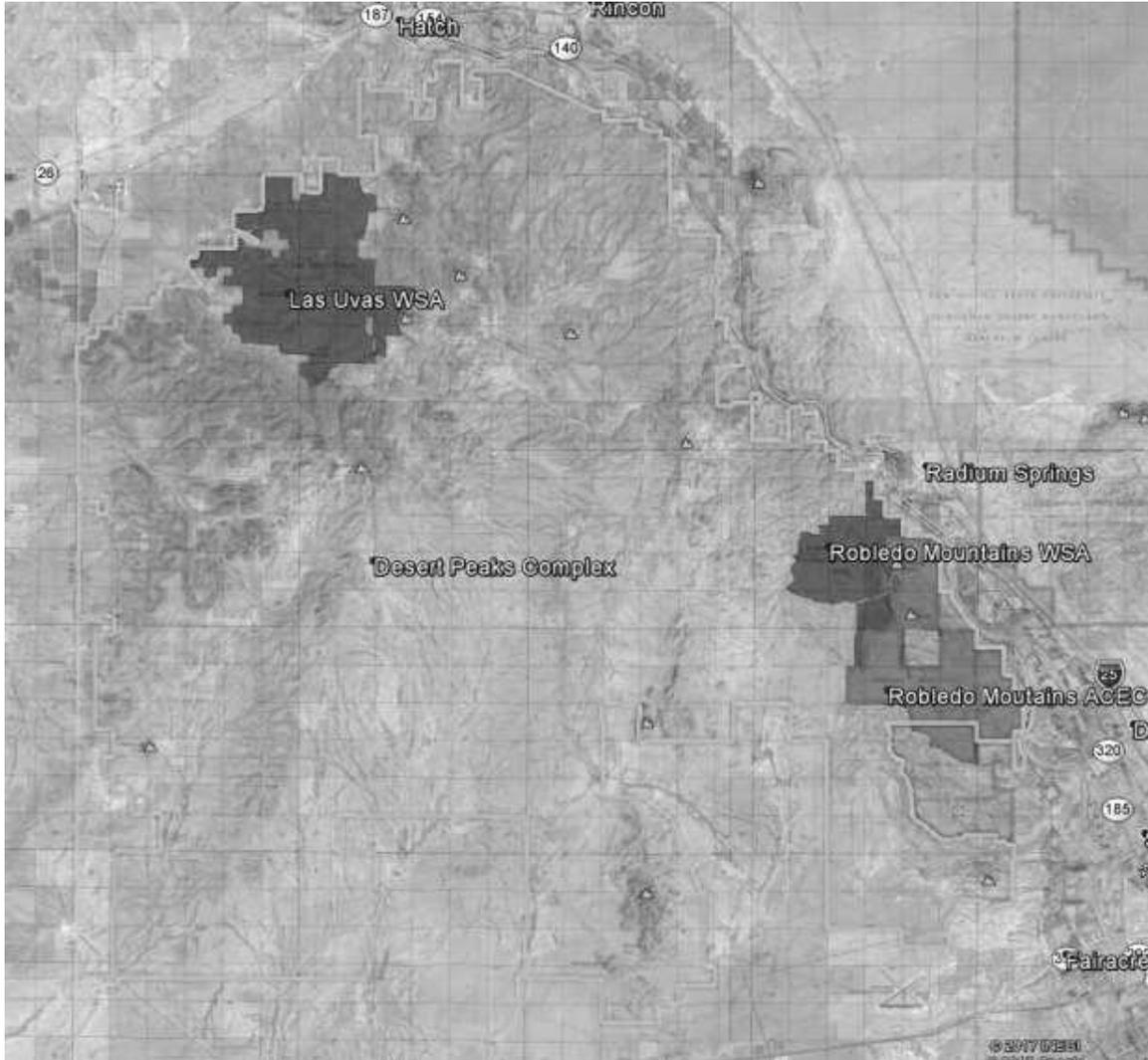


Conflicts with Special Management Areas in Desert Peaks Complex

Las Uvas WSA - 11,067 acres

Robledo Mountains WSA - 13,379 acres

Robledo Mountains ACEC - 7,867 acres



The Robledo Mountains WSA and ACEC overlap each other:



Availability of Federal Resources to Properly Manage

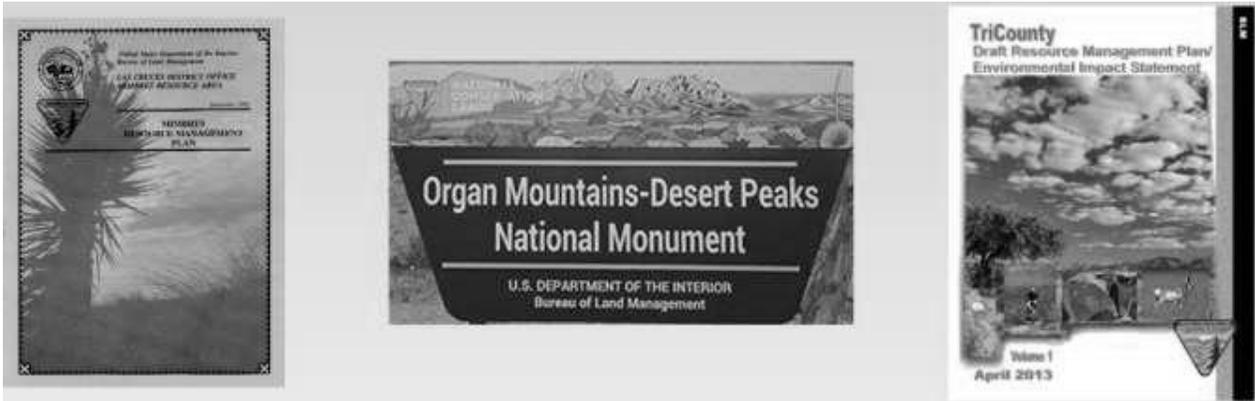
Forty ranches are touched by this massive monument.

Some of them already have to deal with Wilderness Study Areas, ACEC's, and RNA's on parts of their allotments.

Now they will have to deal with the management plan for the national monument.

On top of this, they have to deal with the regular multiple use regional management plans.

Some of these ranches span several BLM districts so they have to deal with one management plan for part of their ranch and another one for another part of their ranch.

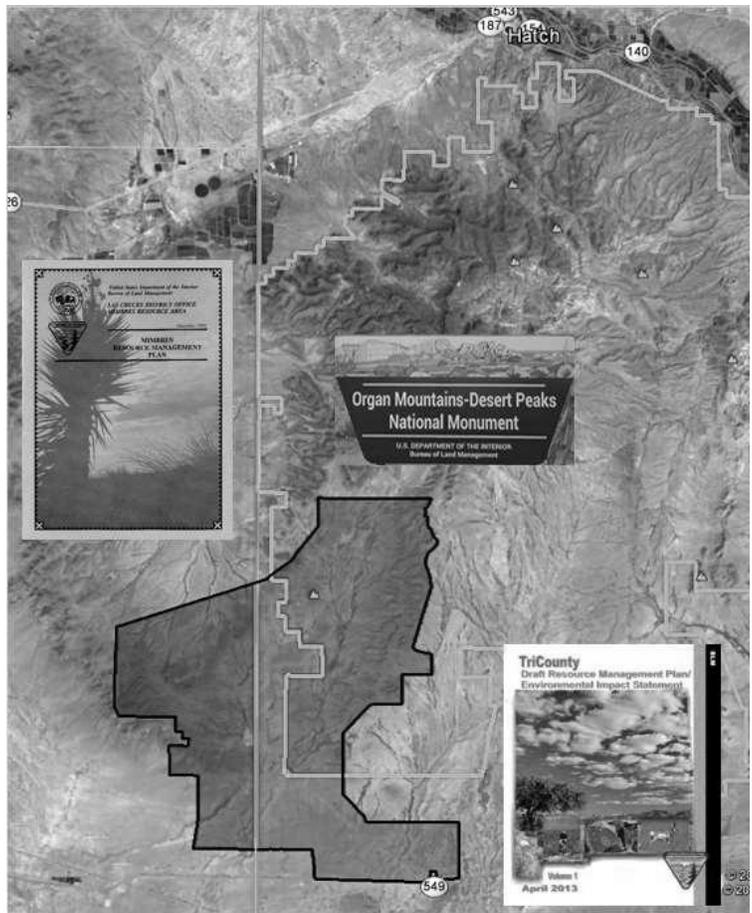


The Butterfield Trail Ranch that was discussed previously is a case in point.

Part of the ranch is in Doña Ana County so that section falls under the new TriCounty Management Plan.

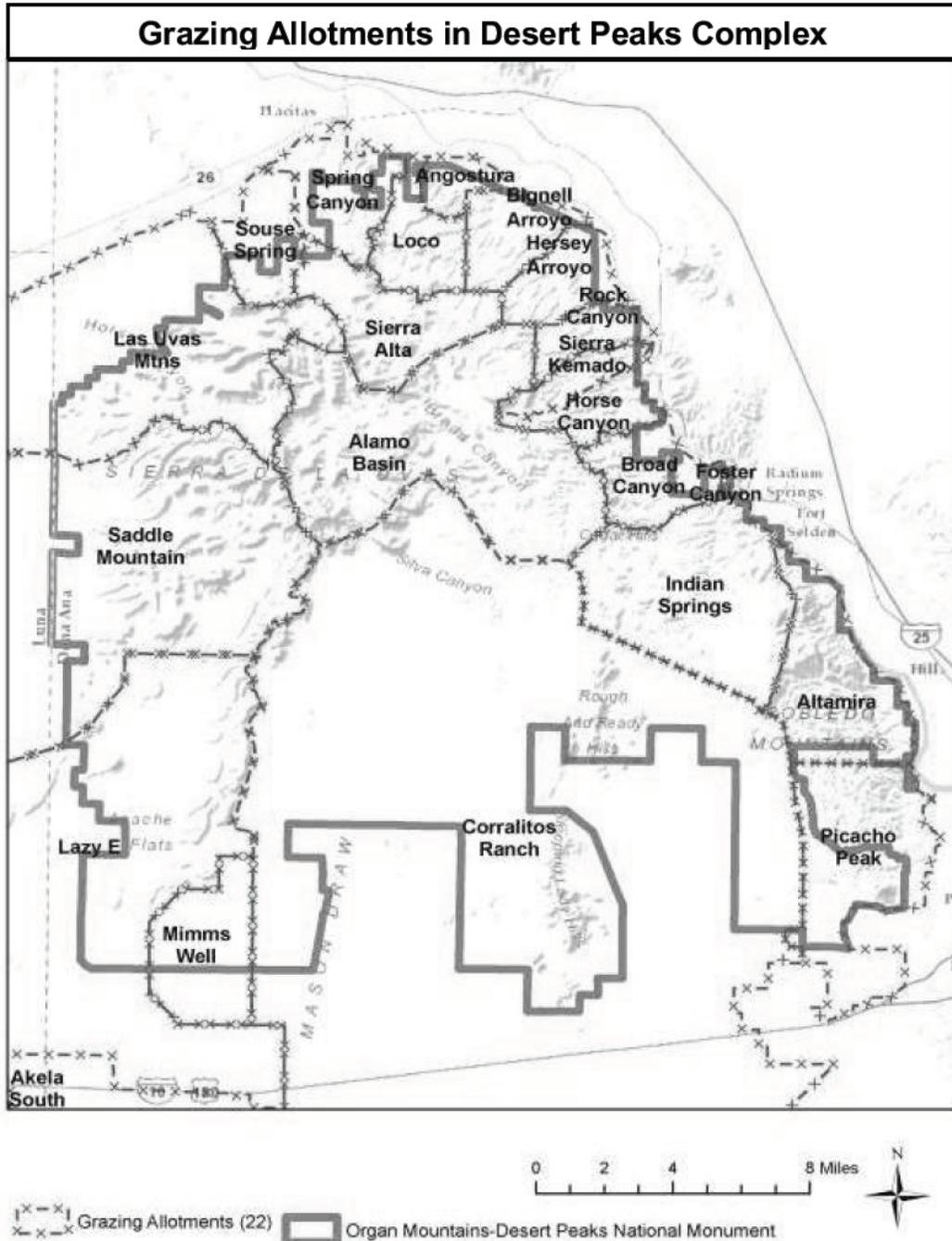
Another part of the ranch is in Luna County so it is managed under the older Mimbres Resource Management Plan.

Finally, a part of the ranch is in the Organ Mountains Desert Peaks National Monument, so it will eventually have another management plan



Effects on Allotment Management

There are 21 ranches and 47 ranch families affected by the Desert Peaks Complex. These ranches provide 97% of the available water for wildlife in the complex. How will the allotments that are partially in and partially out of the actual monument be managed? It will be impossible to manage a portion of an allotment with one management criteria and another portion with different management, so most likely the national monument management plan would be the rule for all of any allotment that it touches, thus increasing the actual monument managed area to well over 600,000 acres. Here is a map showing all of the allotments that touch the Desert Peaks Complex.



Organ Mountains Complex

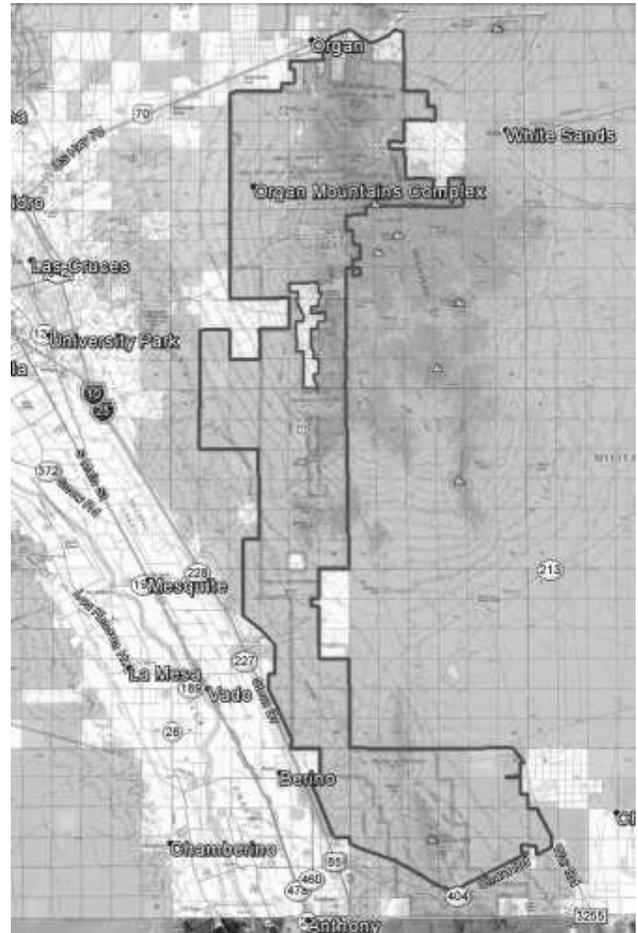
Land Ownership

Public Land - 71,232 acres

State Land - 1,713 acres

Private Land - 1,644 acres

Actual Complex Size - 74,589 acres



Archaeological Resources in Organ Mountains Complex



The deeply creviced peaks of the Organ Mountains, named in 1682 by early European explorers for their resemblance to organ pipes, conceal numerous ancient dwellings, including La Cueva, and other caves where smoke-blackened ceilings evidence long-extinguished campfires.

Here are the comments NMWA used to promote the Organ Mountains as an object



Pre-historic/Archeological Resources

Within the **Organ Mountains**, archaeological sites include the La Cueva rock shelter, which was professionally excavated in the 1970's. This excavation provided a significant number of artifacts and data on prehistoric cultures that have inhabited the cave, some as long ago as 7,000 years. The Peña Blanca rock shelters were professionally excavated in the 1980's and contained what were determined to be the earliest known cultivated corn in the US.

Listed Objects in Organ Mountains Complex

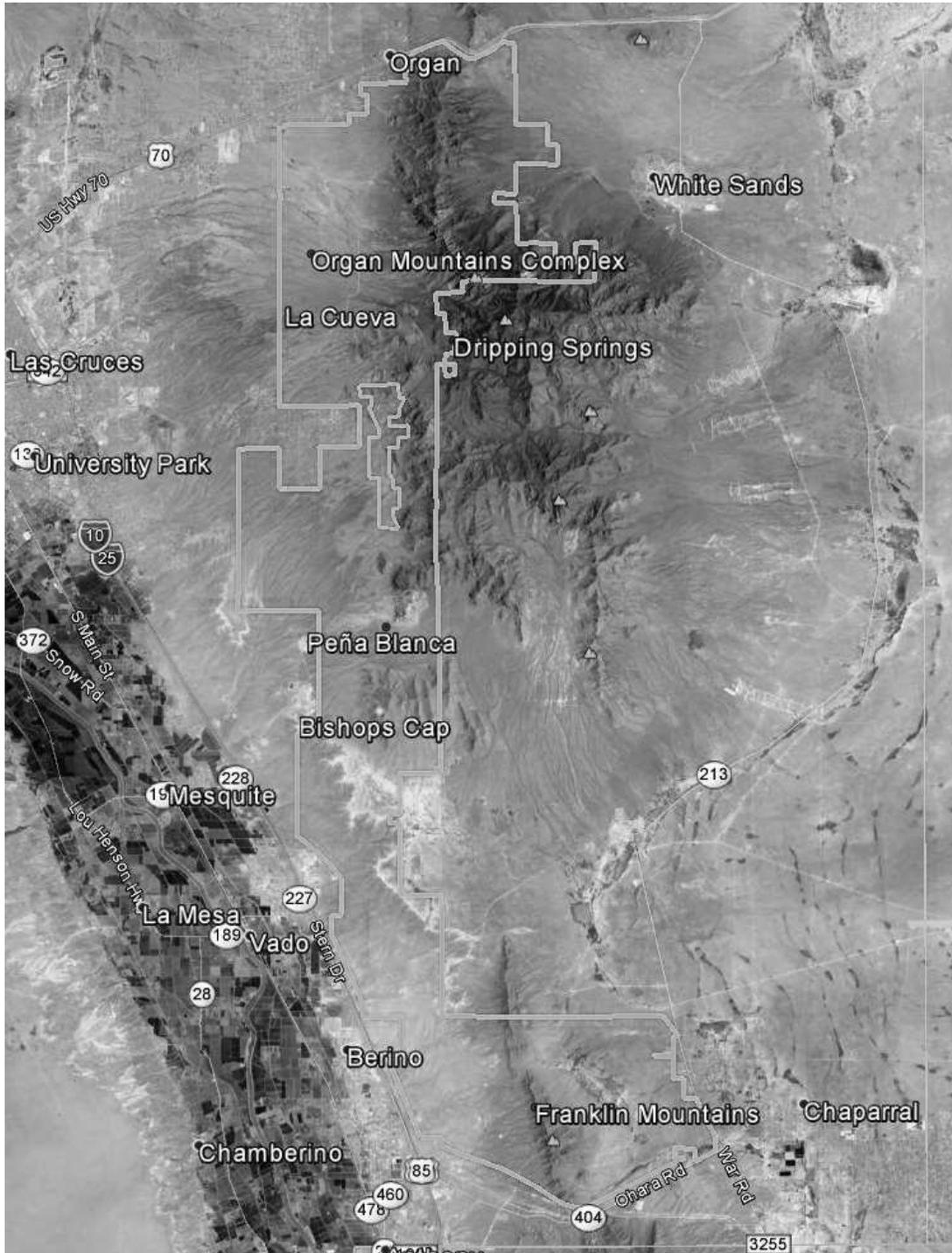
La Cueva

Shelter Cave in the Organ Mountains - Assume Peña Blanca shelter cave

Dripping Springs, resort and concert hall, built in the 1870s

Scattered Paleo Indian artifacts, including those from the Folsom and Clovis cultures. Includes chips, points, and rock art

Organ Mountains



These two sites clearly meet the intent of the Act.



La Cueva or Hermit's Cave

This developed tourist attraction has been the main attraction in the Organ Mountains for years.

It is a well-developed site attracting visitors and requires a parking fee to visit the site.

It fits the criteria of the Act as a prehistoric structure or dwelling.

Before monument designation, it was already a well-developed attraction and has had thousands of visitors per year.



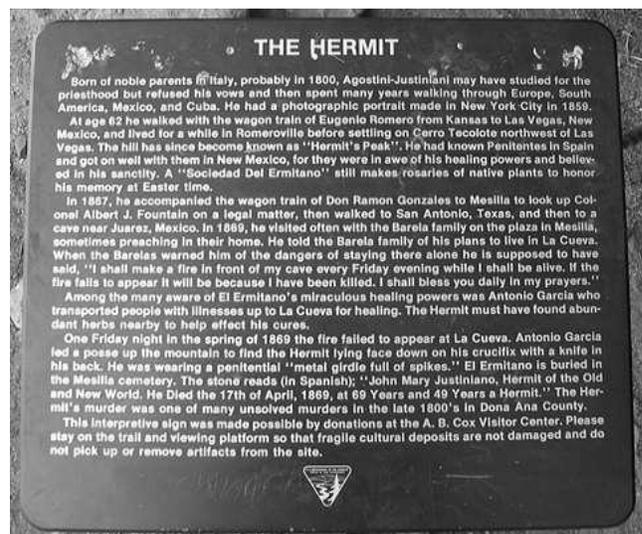
The most famous resident of this cave was not a Native American, but a wandering hermit by the name of Giovanni Maria de Agostini who was born in Italy around 1801.

Some people refer to him a Catholic Priest or Monk, but according to the sign posted at the visitor site, he never took the vows of priesthood.

Agostini arrived in this area around 1867.

In 1869, he was murdered in the cave.

A local priest was accused of the murder, but never tried.



The shelter was occupied from almost 5,000 BC through the historic period that followed the arrival of the Europeans.

In the mid 1970's, approximately 100,000 artifacts were recovered from here by the University of Texas at El Paso. (Where are the reports of this excavation?)

There is no threat of looting, as it has already been extensively studied and looted or excavated.

The only thing left to see now is a low over hang with smoke stains on the roof.

Notice the paved walkways and rope barriers.

They do not allow photographs of this room anymore.



Peña Blanca

Shelter Cave in the Organ Mountains is a well-documented fossil site, including fossil remnants of ancient ground sloths, birds, and voles.

The **Peña Blanca** shelter caves are in a formation of volcanic tuff that eroded in such a way that dozens of natural overhangs and shallow caves have been created.

The areas within the circles have dozens of possible shelters. We visited a few of the shelters in the lower hill recently and those photos are on the next pages.



This is the first shelter we looked at.



Several prehistoric grind holes were seen (red arrow above), indicating previous prehistoric inhabitation.



The smoke stained rock and fire ring are recent additions to this shelter.

We were there with the rancher that has this allotment and he had been to the site several times before the fire ring was there.



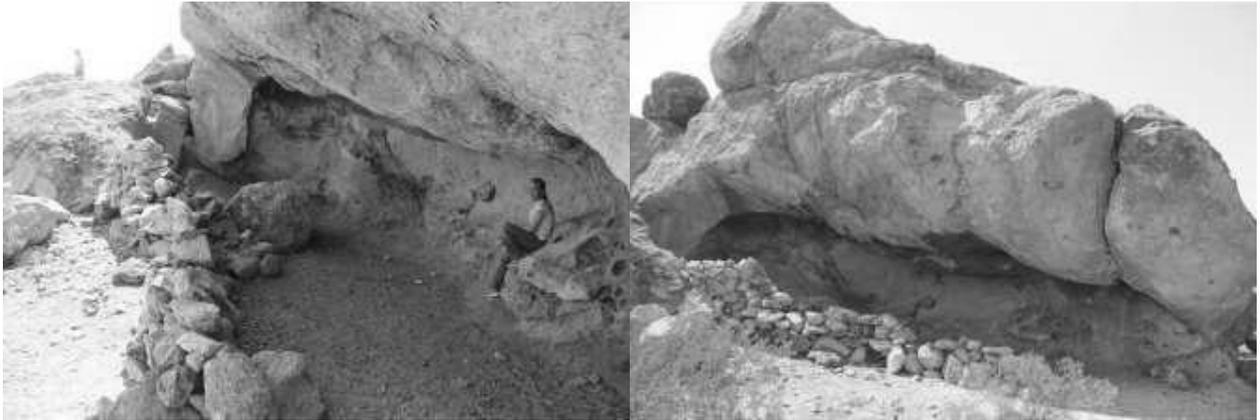
Notice the smooth floor.

The next shelter also sported the addition of a recently built rock wall.

The rancher also verified that this was new construction.

The prehistoric inhabitants would have never been this sloppy in their construction.

Notice the smooth floor



The last one we visited looked like the place where the 1980's excavations occurred.

Notice the floor in this one, there are 4 to 7 foot craters throughout the shelter and debris strewn everywhere.



Dripping Springs

Visitors to the Organ Mountains can still see remnants of Dripping Springs, a once-popular resort and concert hall, built in the 1870s and converted into a sanatorium before its abandonment and decay.

We have to pay to access this area so are just showing a Google Earth image.



Critical Infrastructure Within or Near Organ Mountains Complex

Other rights-of-way shall be authorized **only if they are necessary for the care and management of the objects identified** above.

Six electrical lines are within this complex.

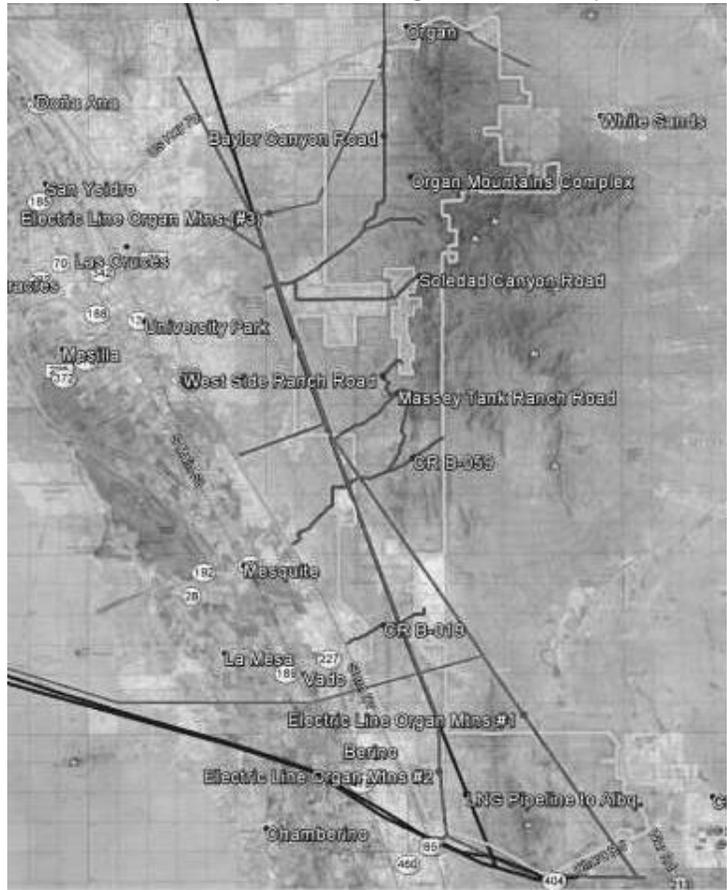
A liquid petroleum pipeline runs through the complex.

This line follows the electric lines so is not real visible at this picture size and goes all the way to Albuquerque, NM.

County Road B-019 is a paved road that leads to the large subdivision of private property over by WSMR.

This subdivision is called Lords Ranch and is now an island within the monument.

The southern boundary of the monument is right in a major utility corridor with several gas lines, electrical lines, and a highway.



If this line running by Bishops Cap that goes to the City of Albuquerque needs to be up graded from 345-kV to a 380-kV voltage or higher then it requires by law that the ROW be increased from 100' to 150'

Therefore, the addition of a new 50' ROW from the BLM cannot happen because it is not “necessary for the care and management of the objects identified”.



Conflicts with Special Management Areas in Organ Mountains Complex

Organ Mountains WSA - 7,211 acres

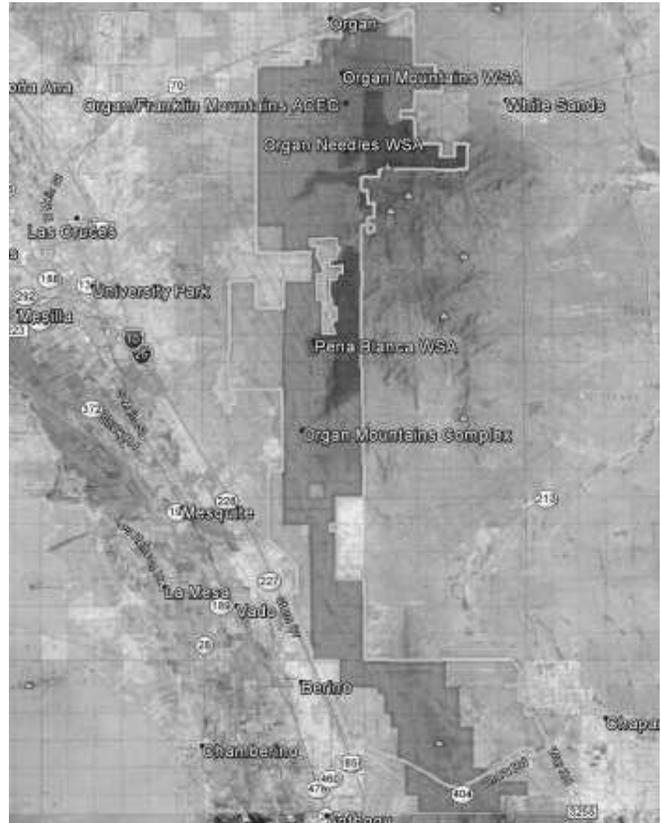
Organ Needles WSA - 5,959 acres

Peña Blanca WSA - 4,780 acres

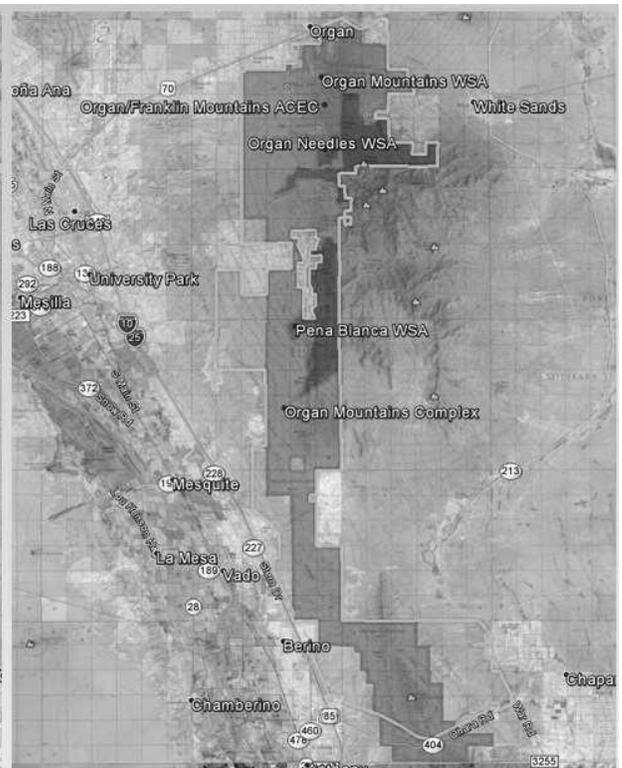
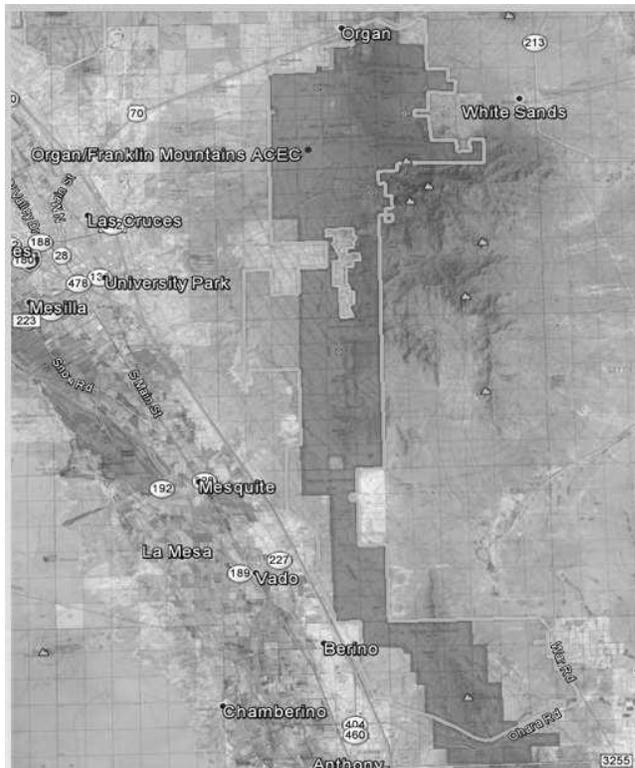
Organ/Franklin Mountains ACEC - 54,842 acres

Organ/Franklin Mountains SRMA - 62,808 acres

SRMA is listed with acres, but could not find good map of it

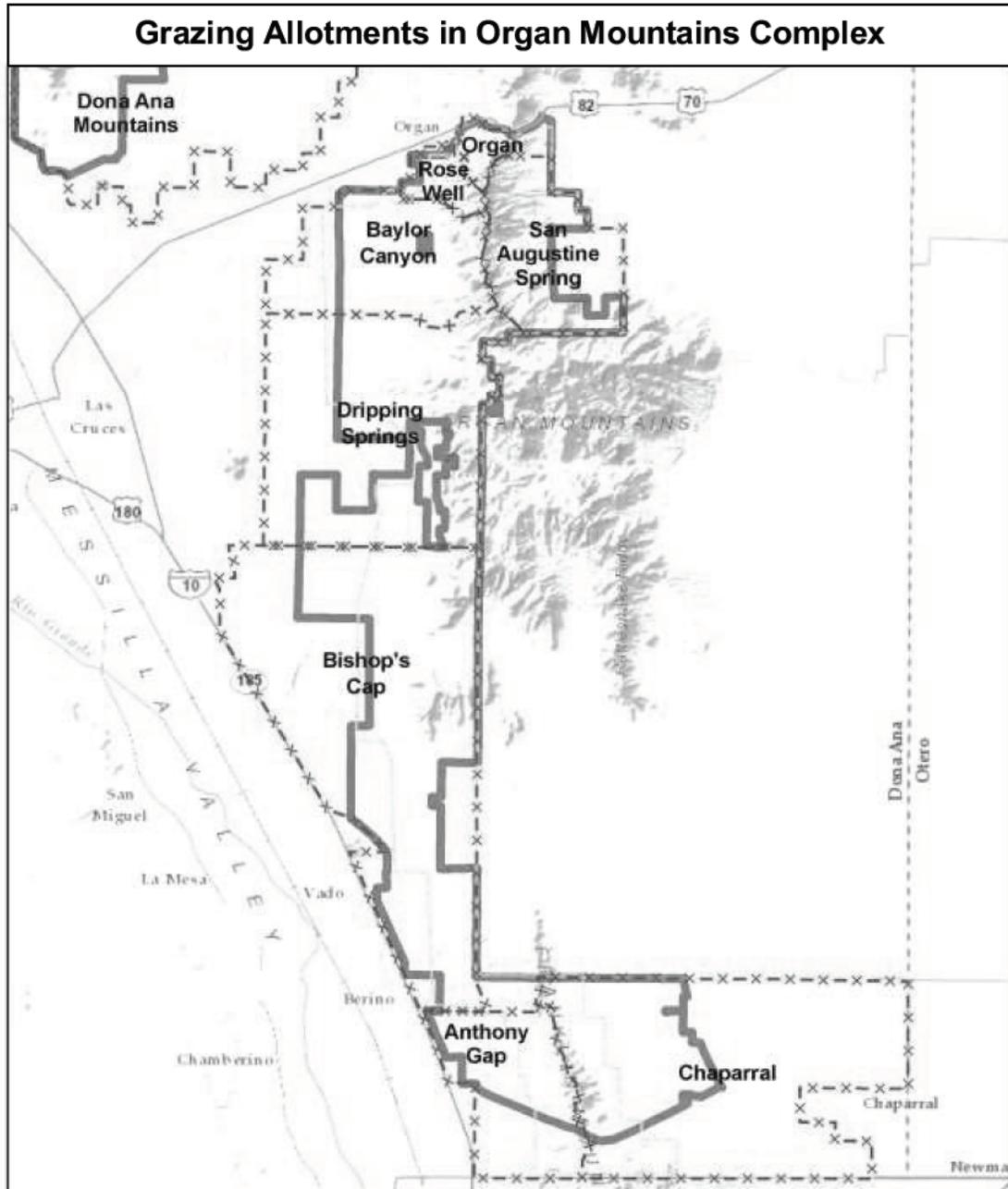


The ACEC overlaps each of the WSA's.



Effects on Allotment Management

There are 8 ranches and 13 ranch families affected by the Organ Mountains Complex. How will the allotments that are partially in and partially out of the actual monument be managed? It will be impossible to manage a portion of an allotment with one management criteria and another portion with different management, so most likely the national monument management plan would be the rule for all of any allotment that it touches, thus increasing the actual monument managed area to well over 600,000 acres.



x-x-x Grazing Allotments (9)
 Organ Mountains-Desert Peaks National Monument

Other Concerns

Access Will Be Lost

Historically, when monument proponents are promoting a new national monument, they are very emphatic that existing access via developed roads and trails will not be restricted.

Then, as soon as the monument is dedicated, the major push is to get existing developed roads and trails closed.

Time and time again, this scenario has played itself out.

Here in Doña Ana County, the same denial on wanting to close developed roads and trails was voiced by proponents as they pushed for the designation of the Paleozoic Trackways National Monument.

This area was where roads and trails had been developed with the cooperation of the local BLM office for the world famous Chile Challenge four-wheel drive event.

However, when the management plan was released, half of the extreme four-wheel drive trails and other trails were closed.

The Chile Challenge was then forced out of the area completely.

Each of the four complexes of the Organ Mountains Desert Peaks National Monument is laced with developed roads and trails that generations of local residents and ranchers have used for decades.

Many of these roads are graded county roads.

Here is an image of most of the graded county roads in the Desert Peaks Complex. Not shown are all the ranch roads that service water and feeding areas.

Many of the recreational opportunities that these trails offer to the local residents will be lost with the development of this monument



Here is what is currently on the New Mexico Wilderness Alliance website about off road vehicles:

<https://www.organmountains.org/the-lands/threats/>

OFF ROAD VEHICLE ABUSE

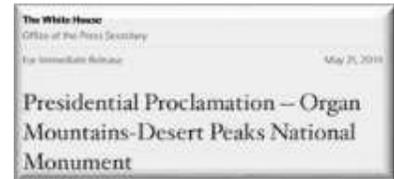
Off Road Vehicle Abuse continues to be the number one threat to public lands in the West, according to recent research. Irresponsible ORV use leads to fragmentation of sensitive lands, incursion of non-native species, degradation of wildlife habitat, property damage caused by cut fences, and a nuisance to other non motorized visitors. With the tremendous growth of Doña Ana and El Paso Counties, we have also seen a proliferation of illegal off road vehicle abuse in some of the regions in the Organ Mountains-Desert Peaks National Monument. Irresponsible ORV use leaves scars that can take generations to heal.



They use this false propaganda to continually get public lands closed to anyone that wants to use vehicles to enjoy the land.

Hunting Could Become Prohibited

The May 21, 2014 presidential proclamation that established the Organ Mountains Desert Peaks National Monument said this about wildlife within the monument:



The area also supports diverse wildlife. Across the Organ Mountains-Desert Peaks landscape, many large mammal species can be found, such as **mountain lions**, **coyotes**, and **mule deer**. The Organ Mountains were also historically home to **desert bighorn sheep**. Raptors such as the golden eagle, red-tailed hawk, and endangered Aplomado falcon soar above the area's grasslands and foothills, where they prey on a variety of mice, rock squirrels, and other rodents, including the Organ Mountains chipmunk. The area's exceptional animal diversity also includes many migratory and grassland song birds and a stunning variety of reptiles, such as black-tailed, western diamondback, and banded rock rattlesnakes; whipsnakes and bullsnakes; and tree, earless, Madrean alligator, and checkered whiptail lizards. Birds such as **Gambel's quail**, black-throated sparrow, ladder-backed woodpecker, verdin, black-tailed gnatcatcher, lesser nighthawk, Scott's oriole, and cactus wren also make their homes here, along with many species of bats. Other mammals, including **black-tailed jackrabbits**, cactus mice, and kangaroo rats, inhabit the area.

The highlighted wildlife is what hunters' target.

In the proclamation statement, this was stated:

NOW, THEREFORE, I, BARACK OBAMA, President of the United States of America, by the authority vested in me by section 2 of the Antiquities Act, **hereby proclaim the objects identified above that are situated upon lands and interests in lands owned or controlled by the Government of the United States to be the Organ Mountains-Desert Peaks National Monument (monument) and, for the purpose of protecting those objects**, reserve as part thereof all lands and interests in lands owned or controlled by the Government of the United States within the boundaries described on the accompanying map, which is attached to and forms a part of this proclamation.

Some species that are hunted are listed in the wildlife section and then the proclamation says that everything listed above is now protected.

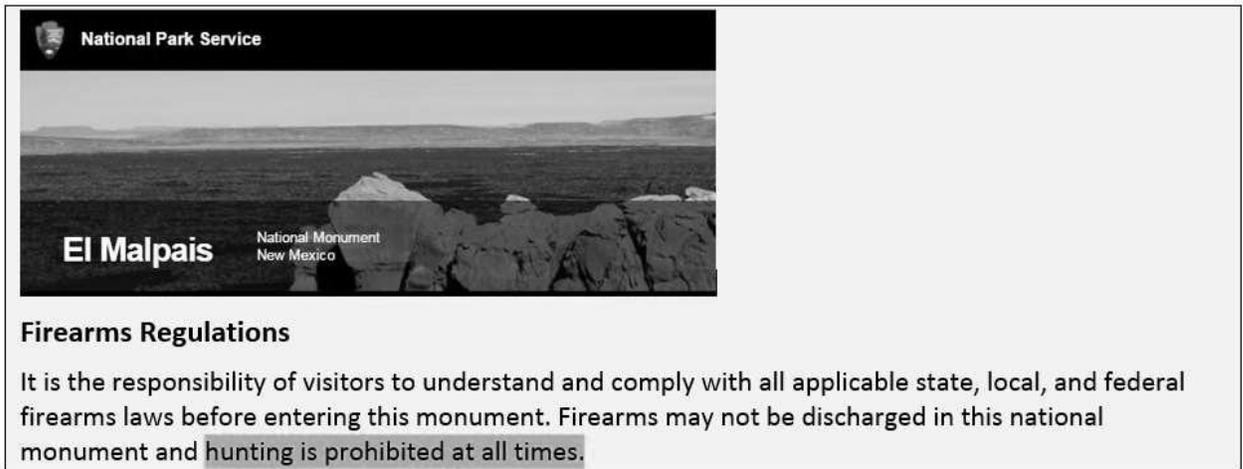
This sounds like hunting was banned by the proclamation.

The Act is supposed to create a national monument to protect prehistoric objects, not wildlife.

That should come from a congressionally designated monument.

As an example, the El Malpais National Monument, here in New Mexico was established by Ronald Reagan in 1987.

Today, here is the status of hunting:



National Park Service

El Malpais National Monument
New Mexico

Firearms Regulations

It is the responsibility of visitors to understand and comply with all applicable state, local, and federal firearms laws before entering this monument. Firearms may not be discharged in this national monument and hunting is prohibited at all times.

We do not know if hunting was banned originally or not, but it is now banned in El Malpais and the same will eventually happen with the Organ Mountains Desert Peaks National Monument.

Recommendation

Protecting this view of these spires has no opposition by most citizens of Las Cruces and Doña Ana County.



It is the other 450,000 acres scattered around the county that most visitors will never see that we are opposed to.

The BLM shares management of the Organ Mountains with White Sands Missile Range (WSMR).

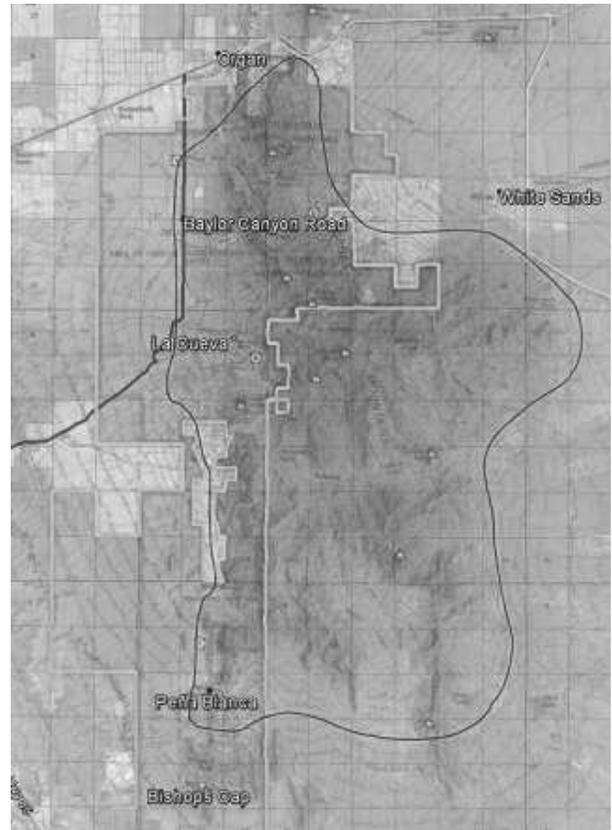
More of the Organ Mountains lie within the WSMR boundary than what the BLM manages

The north end of the Organ Mountains is at San Augustin Pass near the town of Organ.

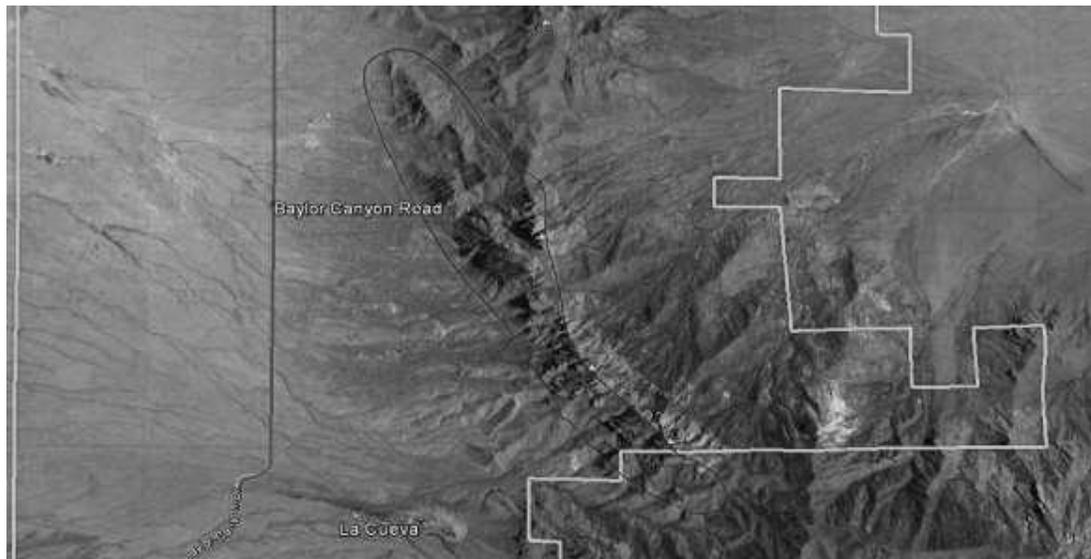
The west face or slope does not extend beyond Baylor Canyon Road.

The south end is Peña Blanca.

A mile south of Peña Blanca is Bishops Cap and south of that is the north end of the Franklin Mountains.



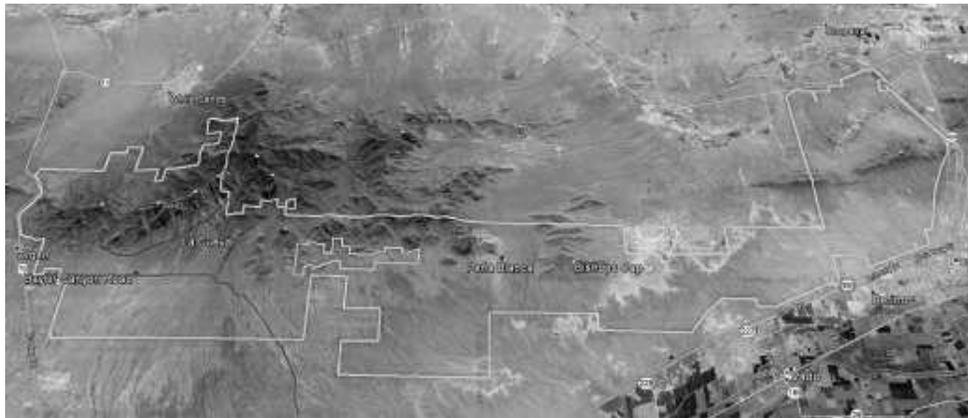
The iconic backdrop that most everyone in Las Cruces can see from the valley is the circled area below.



Here is the view from Las Cruces:



Here is what that viewscape looks like in relation to the 55,000 acre Organ Mountain Complex:



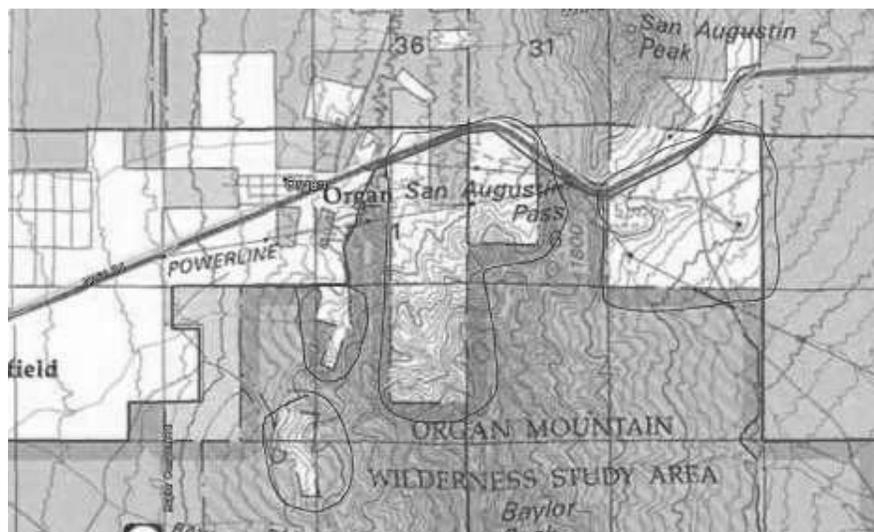
This viewscape is only about 2,600 acres out of 55,000 acres for the whole complex.

So to protect the iconic viewscape of the Organ Mountains for Las Cruces would only require 2,600 acres out of the 55,000 acres that the Organ Mountains Complex currently encompasses.

The only problem is that the intent of the Act was to protect antiquities, not viewscapes.

That should be a congressionally designated national monument.

The northern portion unnecessarily includes about 1,500 acres of private property.

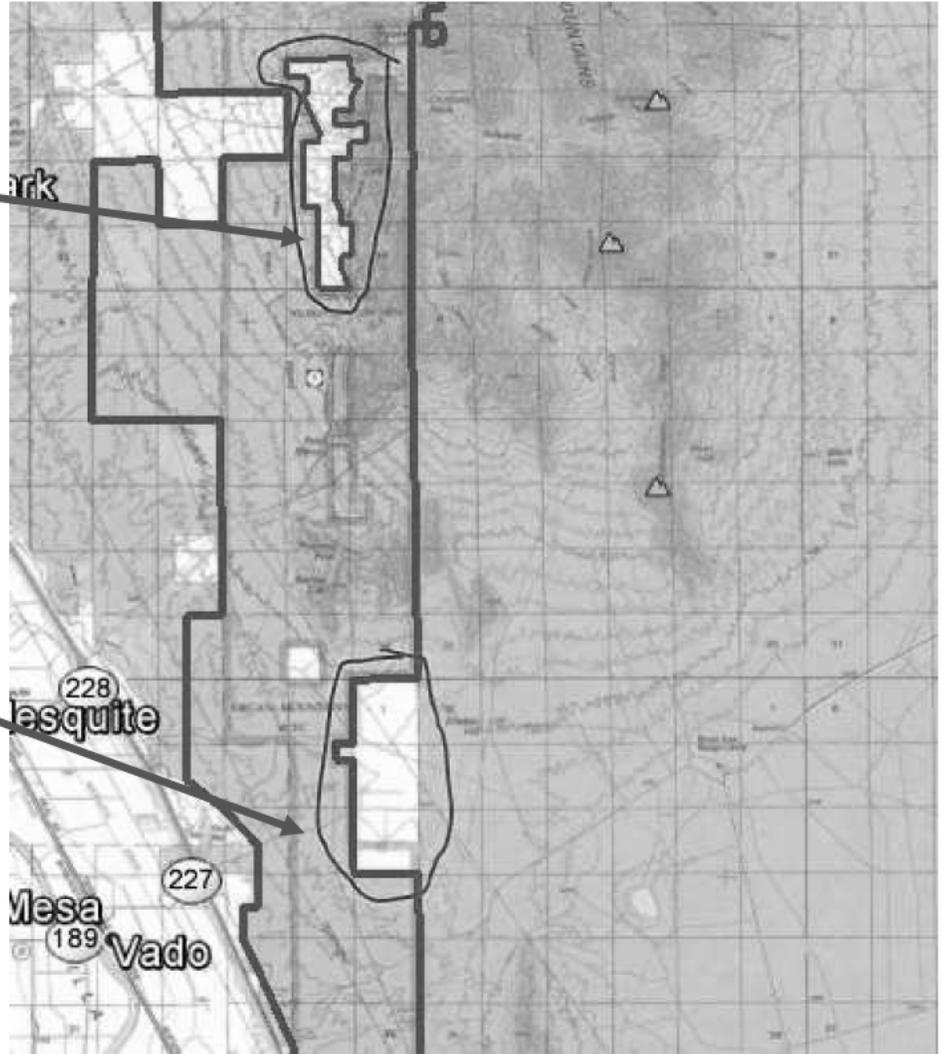


The monument also surrounds two large islands of private property.

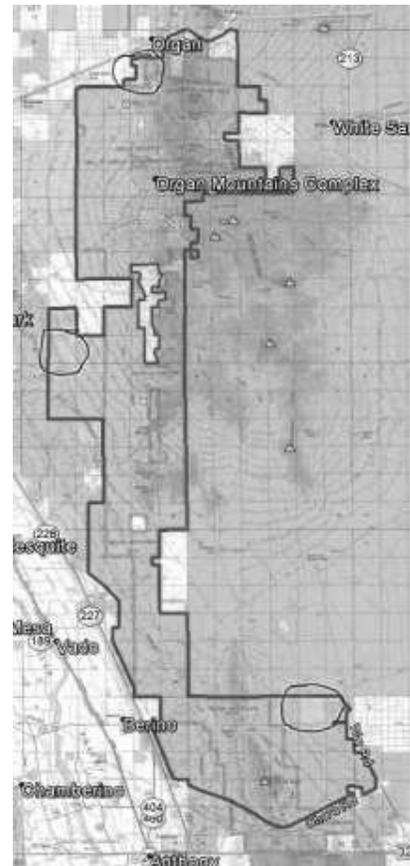
The top Island (Talavera) is about 1,920 acres

The other one, next to WSMR (Lords Ranch) is 1,960 acres

This is 3,880 unnecessary acres surrounded by the monument.



The 1,700 acres of state land on the outer fringes should have been excluded from the beginning

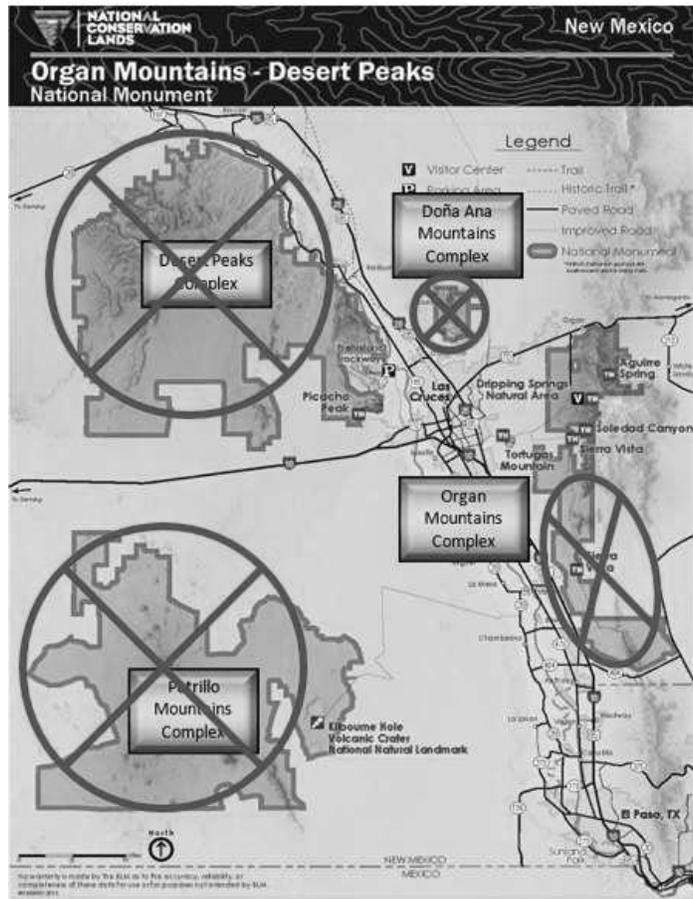


Remove Doña Ana Mountains Complex in entirety

Remove Potrillo Mountains Complex in entirety

Remove Desert Peaks Complex in entirety

Remove areas of Organ Mountains Complex that do not meet the intent of the requirements and original objectives of the Act, including the Act's requirement that reservations of land "...be confined to the smallest area compatible with the proper care and management of the objects to be protected";



The **lower portion** of the Organ Mountains Complex needs to be thrown out because there are no objects of any sort listed in the proclamation in that area and it is crisscrossed with critical infrastructure corridors. (Shaded green)

This is everything south and west of the Peña Blanca WSA (Shaded black)

This includes removing Bishop Cap and the north end of the Franklin Mountains

Everything west of Baylor Canyon Road needs to be removed to exclude the critical infrastructure in that area (Shaded yellow)

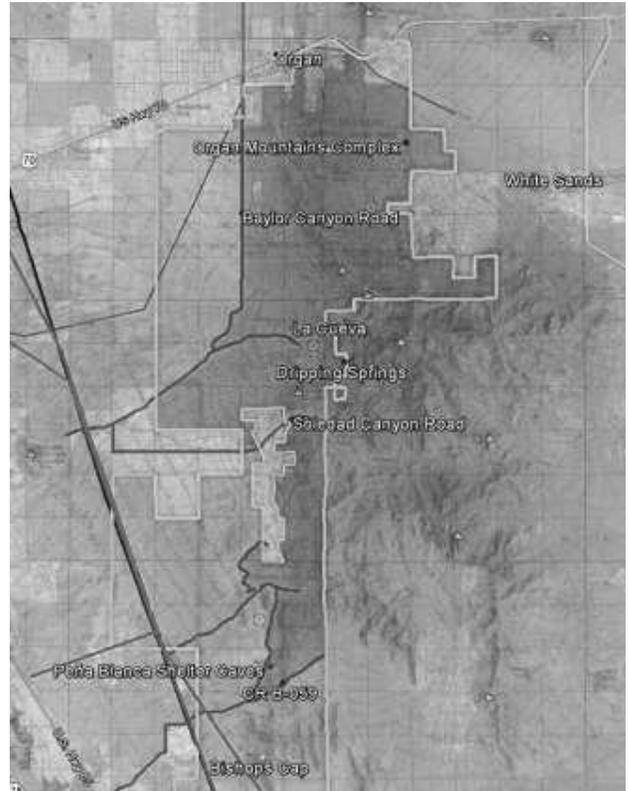
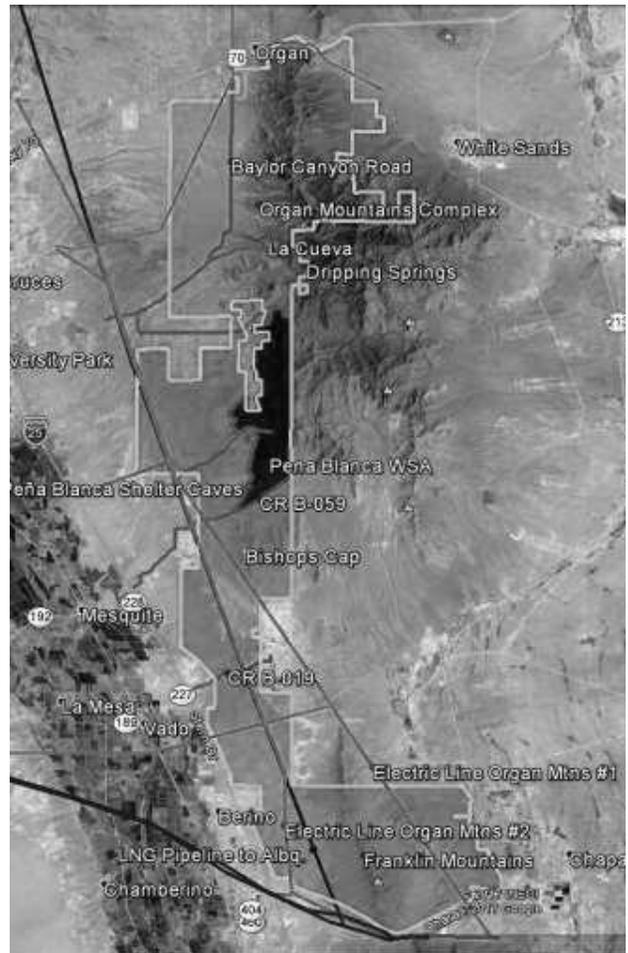
This leaves all of the Organ Mountains (shaded green)

This boundary follows property the Peña Blanca WSA, ownership lines, and existing roads.

The two prehistoric shelter caves that meet the intent of the Act are included in this boundary

All private or state land around the perimeter has been removed

It is in the neighborhood of 24,000 plus acres



This land has been used freely for thousands of years and the rich tapestry of that use provides us with joy and wonder. Now is not the time to close the book on this rich heritage. Release this land from the chains of the monument so history can continue to play out to the enrichment of the current and future inhabitants.

For more information, contact:

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(575)524-7145
fhuff@zianet.com