

August 11, 2009

RECEIVED
LAS CRUCES DISTRICT OFFICE

Bill Childress, District Manager
Jim McCormick, Assistant District Manager
Bureau of Land Management
Las Cruces District Office
1800 Marquess
Las Cruces, NM 88005

2009 AUG 28 PM 1:33

LAS CRUCES, NM 88005

RE: 03009 portion of EIS/ Solar zone study

Gentlemen:

We are in receipt of the notification of July 27, 2009 indicating that the Butterfield Trail Ranch allotment known in BLM files as the Lazy E allotment, 03009, has been included in a township for consideration (T023S, R003W) for a potential solar energy project. The section that affects the noted permit, Section 31, is of great concern to us and we ask that this letter be added to the record for the purposes of the EIS process.

As you are aware, the Lazy E allotment with recent year EQIP project help has dramatically improved its water distribution system. The adequate supply of water from this effort will allow the ranch to adhere to its plan of attempting to have more or less 70% of the ranch cattle free during the monsoon season. This approach has and will greatly improve grama grass and other warm season grass production during the important period of time when rainfall and summer temperatures combine to replenish turf.

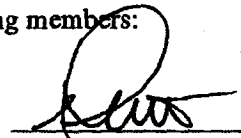
The ranch ownership submits to the BLM that section 31 of the noted Township is arguably one of the best examples of healthy and robust black grama stands in the arid Southwest today. The management approach that the ranch is using in the monsoon season has and will continue to support the vitality of that turf into the future. Because of adequate water supplies, the ability to concentrate cattle on tabosa bottoms elsewhere on the ranch during the monsoons will allow the absence of cattle on this gramma grass in this pasture and in this particular section. This is particularly important during the physiological periods of root extension and or pre-senescence when energy is being used and or translocated in the plants.

Please recognize the importance that we should all place in this approach to grazing and particularly on this area of the turf on the Lazy E allotment. This is an area that is probably as reflective of pristine Chihuahuan grassland of 100 years ago as any example in the Desert Southwest. If it is absolutely necessary to maintain a 36 section footprint for such a study, please look elsewhere where creosote and or mesquite cover dominates the community regime. This section needs to be maintained under this management scheme for the benefit of every aspect of land stewardship.

Sincerely,

Butterfield Trail Ranch LLC owners and managing members:


Thomas S. Cooper


Stephen L. Wilmeth