



The Las Placitas Association

Preserving and Protecting the Quality of Life in the Placitas Area

September 9, 2024



Dear BLM Director,

Las Placitas Association (LPA) and the Eastern Sandoval Citizens Association (ES-CA) jointly submit the following comments and targeted protest on the Final Resource Management Plan (RMP) and Environmental Impact Statement (EIS) dated July 2024.

LPA and ES-CA submitted joint comments to the draft RMP and EIS plan twelve years ago (See attached abstract). Those comments provide the foundation for our September 9, 2024 submission, which is also informed by key Department of the Interior (DOI) Bureau of Land Management (BLM) actions and material changes to the regulatory and policy environment since the July 12 1998 release of the draft RMP/EIS, chiefly: the April 2024 Public Lands Rule including conservation as part of the multiple-use BLM Mandate; and the August 2023 *Bureau of Land Management's Blueprint for the 21st century*.

For your convenience, questions, select comments and protest language appear in bold blue italics.

Introduction and Overarching Comments

LPA and ES-CA thank BLM for respecting and responding to critical community concerns about gravel mining in Placitas on the Buffalo Tract and nearby BLM lands, notably the Crest of Motezuma, that were expressed during the DRMP/EIS scoping process and the DRMP comment period in the 2012 timeframe. Thank you, as well, for including enlarged graphical versions of the Placitas area in several key categories of the final RMP/EIS maps. It improves mapping legibility.

1. April 25, 2024 Secretariat Withdrawal of 4,424.98 acres of BLM administered land near Placitas and PLO 7940

The transmittal letter from BLM to the public states that the Approved RMP and Record of Decision (ROD) will incorporate the April 25, 2024 Secretarial withdrawal of 4,212.98 acres of

BLM administered land near Placitas, New Mexico from location and entry under the U.S. mining laws, from leasing under mineral leasing laws, and from disposal of minerals under the Materials Act of 1947, subject to valid existing rights, for 50 years (Public Land Order 7940). However, there is no indication on what the formulation will look like and whether it will include maps. *LPA and ES-CA ask that BLM advise on these questions as soon as possible.*

The final RMP/EIS does not mention adoption of the BLM Public Land Rule legitimizing conservation as one of the multiple uses. Why not? It is highly germane: this rule has the potential to impact BLM lands in Placitas. *Please comment as soon as possible.*

BLM should also advise how it will incorporate clarification on these and other questions in the RMP planning process.

2. Salable Minerals (Gravel)

LPA ES-CA appreciate that preferred Alternative C for Salable Materials (gravel) in the Placitas area indicates that these areas are closed to salable materials (Vol. 1, Table 2-8 and Vol. 4 Appendix S Maps 2-25 and 2-26). *Thank you, BLM.*

3. Locatable Minerals

Vol. 1 Table 2-9 indicates that “0” acres in the Placitas area are open to locatable mineral entry. However, the corresponding maps for Alternative C in Vol. 4 Appendix S – Map 2-32 for the planning area and Map 2-33 for Placitas show that the area is “recommended for withdrawal from locatable mineral entry” rather than withdrawn from locatable mineral entry. *Why is the area not “withdrawn from locatable mineral entry” if “0” acres are open? Why is it only recommended?*

4. Solid Leasable Minerals (Coal)

Appendix S Map 2-36 shows as “BLM coal decision area”. Elsewhere, however, it is acknowledged there is no coal in the area. *Therefore, can you please explain why the map does not say withdrawn or closed?*

5. Fluid Leasable Mineral Management (Oil, Gas, and Geothermal)

Vol 1. Table 2-10 shows Placitas closed to fluid leasable mineral management. No part of Placitas is open with standard terms, moderate or major constraints. Alternative C in Vol. 4 Appendix S Map 2-41 shows Placitas as closed to fluid leasable minerals. *Thank you. BLM.*

6. Land Use Tenure

Under the current plan (adopted in 1986 and revised in 1992), BLM lands in Placitas are not up for disposal. Vol. 4 Appendix S Map 2-9 Alternative C indicates all land holdings in Placitas as

potentially suitable for disposal or further study. In Vol. 3 parcels include 269 (Buffalo Tract) and 271 (Crest of Montezuma). *Please explain the thought process and policy motivation for making these lands available for disposal. Also, please comment on the process and methods for achieving disposal.*

Furthermore, Vol. 1 Table 2-4 indicates that BLM is considering transferring management authority for the Crest on Montezuma to another federal land management agency. *Please explain BLM's rationale for such a transfer.*

7. Land Use Authorizations (ROWs)

Vol. 4 Map 2-12 depicts Land Use Authorizations and Rights of Way (ROW). LPA and ES-CA urge BLM to be very judicious about implementing preferred Alternative C, which calls for avoidance designation rather than exclusion designation, especially for new land use authorizations. Vol. 1 Table 2-5 and related discussion do not reference the relationship of these areas with locally designated corridors, which are not discussed. *Please comment on the relationship of ROWs in Map 2-12 and locally designated corridors.*

Right Of Ways Vol. 1 2.2.7.3.2 Land Use Authorizations • Existing authorized easements, permits, leases, ROWs – General ROW Authorization Question particular to Rio Puerco assignment of Authority to Farmington Field Office

PROTEST

All RMP alternatives note that ROWs are necessary for authorized uses such as pipelines, roads, and transmission lines. The RMP also recognizes that implementation of ROWs results in substantial amounts of surface disturbance. This is contradictory and unresolved in the document and therefore relevant for a protest because the ROWs for the Rio Puerco District Office are issued from the Farmington District Office.

The Farmington District Office has little in common with our community in the Rio Puerco District. Population density differs dramatically as the BLM holdings here are surrounded by high density populations. The Rio Puerco District's efforts to increase recreational opportunities in the urban interface on the Buffalo Tract, which were undertaken in 2018 by a community committee supported by the BLM Rio Puerco Field Office (RPFO), could be harmed if existing ROWs were to be added by a distant district office with little regard for our hard-fought mining withdrawal and dedication to use of surrounding BLM lands for recreation.

Considering the increased policy emphasis at state and national levels on clean energy production, storage and transmission over the twelve years since publication of the DRMP, our recreation plan is especially vulnerable if our existing ROWs can be increased by a distant district office.

Our 2018 recreation plan precedes but is supported by the 2023 *Bureau of Land Management's Blueprint* for the 21st Century and Public Lands Rule. While neither are included in the final RMP/EIS, they should be, as previously mentioned. *Will the RMP be amended to accommodate the new initiatives?*

8. Wildlife Corridors

The Wildlife Corridors on the Buffalo Tract and the Crest of Montezuma are a critical features of the Placitas environment. The corridor supports wildlife habitat, providing a migration pathway that extends from Alaska to Mexico. LPA and ES-CA appreciate that closing the Placitas Public Lands to Salable and Locatable Mining supports the Wildlife Corridor. *Thank you, BLM.*

9. Section 368 Westwide Energy Corridor

In opposition to designation of a 368 corridor in the Placitas area, LPA and ES-CA participated in the nationally organized processes to identify Section 368 Westwide Energy corridors for the state of the New Mexico and Department of the Interior Region 2 twice over a period of approximately 10 years. We understand that Westwide Energy Corridor 80-373 is not only located outside the Placitas area, but is also not one of seven priority corridors at the national level. Thus, it is less likely to command government and energy industry attention at this time.

10. Renewable Energy (Solar)

In Vol. 1 Table 2-15 Alternative C calls for exclusion of some land categories and avoidance of other land categories with respect to renewable energy (solar). *It is unclear how the Buffalo Tract, Crest of Montezuma and other Placitas public lands are categorized. Appendix S Map – 50 is difficult to interpret. BLM should clarify this situation.*

Solar energy typically has a large footprint on the ground. For other than undefined site specific (off-grid) energy needs, solar energy uses could interfere with sacred and cultural resources, recreation and other activities on Placitas public lands.

11. Renewable Energy (Wind)

In Vol. 1 Table 2-15 Alternative C calls for “exclusion” of some land categories and “avoidance” of other land categories with respect to wind energy. *It is unclear how the Buffalo Tract, Crest of Montezuma and other Placitas public lands are categorized. Appendix S Map – 51 is difficult to interpret. Does it leave the back portion of the Buffalo Tract open to wind energy development?*

12. Visual Resource Management

Alternative C in Vol. 4 Appendix S Map 2-68 appears to characterize the Placitas public lands as VRM Class IV. However, Appendix S 3-22 appears to mix the characterization of public lands in

the Placitas area as Visual Resource Inventory (VRI) Classes 3 and 4. *Can BLM please explain these classifications and their relationship?* It is fair to say that LPA and ES-CA subjectively consider the scenic value of the Placitas public lands to be very high. *In any case, please clarify the classification(s) in VRM and VRI and explain their significance relative to Placitas public lands.*

13. Recreation, Travel Management Designations and Visitor Services Decisions

Vol. 4 Appendix S-64 identifies Travel Management Designations for Alternative C. In Placitas travel management is limited to designated routes for all modes of travel. *BLM, please comment on designated routes in Placitas public lands.*

The final RMP EIS states that travel would be limited to designated routes on completion of the RMP and the Travel Management Plan (TMP). *BLM, please comment on the status of designated routes and TMP.*

For Alternative C, Vol. 1 Table 2-40 states that travel would be limited to designated primitive roads and trails on 601,900 acres throughout the Rio Puerco. *BLM, please comment on the location and extent of the designated primitive roads and trails in Placitas.*

Vol. 4 Appendix S-45 identifies Recreation Management Areas for Alternatives B, C and D. This map and Vol. 1 Table 2-14 identify the Crest of Montezuma as an Extensive Recreation Management Area (ERMA). LPA and ES-CA in particular recognize the importance of the Crest of Montezuma to wildlife and the wildlife corridor – part of the “spine of the nation” that stretches from Alaska to Mexico.

LPA and ES-CA note with appreciation that closing Placitas lands to mineral mining will support regional recreation on public lands in Placitas. In the 2018 timeframe LPA undertook a review of recreation trails on the Buffalo Tract with cross-cutting community participation and BLM support. Hiking has long been a favorite pastime on public lands in Placitas. However, *there is deep and widespread community concern about travel routes and OHVs. LPA and ES-CA also note with interest and approbation that many recreation areas within the Rio Puerco are closed to overnight camping. LPA and ESCA question overnight camping primarily due to fear of campfire carelessness in close proximity to our residential community.*

. Furthermore, *LPA ES-CA are concerned about recreational shooting on the Buffalo Tract given its proximity to the residential community.*

14. Crest of Montezuma PROTEST

Crest of Montezuma P.5.2 Supporting Management Actions and Allowable Use Decisions

The Crest of Montezuma ERMA (Figure P-3) would be managed according to the management actions and allowable use decisions outlined in Section P.1.2.

Table P-1 identifies ERMA and SRMA for each alternative. In such instances where varying levels of management from different resource programs overlap, the stricter management prescriptions would apply.

The preferred management for the Crest of Montezuma is vague and not specific to the terrain and consideration of its role as part of the wildlife corridor. The term "primitive non-motorized travel" does not specify exactly what is permitted and what is excluded, leaving it open to interpretation by future land managers.

The functions of wildlife linkages are to provide dwelling habitat, provide for seasonal movement, provide for dispersal and genetic interchange between core wild areas and allow for range shifts with climate change. The Crest of Montezuma is in an area of federal, state, private and mixed land use and is unique in that it is the only undeveloped passage on the north end of the Sandia Mountain allowing for dispersal of wildlife from one core habitat to another.

The Crest of Montezuma should be left untouched (open only to foot traffic on established undeveloped trails) to facilitate wildlife movement from the Sandias to the Jemez and the Otero Basin. Disrupting wildlife movement through the Crest of Montezuma threatens to isolate the north side of Sandia, eventually making it a "dead" mountain particularly for large mammals like elk, deer and the apex predators.

The response by BLM to this original concern dismissed the importance of this linkage, saying that the area might constitute a connectivity zone for the Sandia and Jemez Mountains, if it were not for the interstate highway (I-25) NM State Highway 550, the town of Bernalillo, the residential community of Placitas, casinos, mining operations, etc. But the inclusion of the I-25/550 corridor as a priority in the NMDOT Wildlife Crossings Project documents the movement of wildlife through this area, despite all its dangers. Current funding to implement the I-25 Wildlife Corridor is underway and should be included in any plan for the Buffalo Tract and Crest lands

Also not considered are the inherent dangers in opening the Crest to mountain biking and off highway vehicles (OHVs). Much of the terrain is vertical and hostile to all but foot traffic. While LPA favors opening our public lands to its owners, the citizens, there are areas where we should tread lightly on the land, leaving it as undisturbed as possible. There are thousands of acres of recreation land in the Placitas area; the Crest should be protected from any kind of development, even for recreation.

Should the Crest be considered for exchange or disposal, it should only be entrusted to an entity that will protect its unique role in the connectivity of core wildlife habitats.

15. Livestock Grazing

Vol 4. Map 2-17 identifies Range Allotments, which include permit 00972 that covers land on the Buffalo Tract in Placitas. There is another allotment in the area permitted as 00971. LPA ES-CA understand that that both permits are in deferment because the subject BLM land is not in good enough condition to support cattle grazing. Vol. 1 Table 2-7 agrees with the understanding that these allotments would be unavailable for livestock grazing. Vol. 4 Appendix S Map 2-20 shows the Buffalo Tract as unavailable to Livestock grazing under Alternative C, while other Placitas Lands remain open to livestock grazing.

Section 2.4.1 deals with the No Grazing Alternative, which has been eliminated from detailed analysis. While Vol 1 addresses variable grazing under Alternative C, the impact on Placitas lands is unclear.

Please comment on the compatibility of livestock grazing and recreation (or other possible uses on the Buffalo Tract, such as sacred ceremonies) on the Buffalo Tract as well as the role of permit holders in the planning process going forward?

16. Fire Management

Vol. 1 p.2-13 discusses Management Common to All Alternatives. Vol. 4 Maps 2-1 and 2-2 address the Fire Regime. Ever a concern for Placitas, the fire regime was recently elevated in the list of LPA ES-CA priorities because the Forest Service has recently informed the community of its intention to undertake a prescribed burn. The State of New Mexico and indeed the entire nation will be grieving and responding to the 2024 tragedy in Ruidoso for a long time to come. Therefore, the community would like to be certain that the final RMP EIS enumerate the most recent references and learning on the topic of fire management.

17. Urban Interface aka Wildlife Urban Interface

Relative to the urban interface, the RMP/EIS legitimately considers the issues of public health and safety, as well as fire management and user conflicts. However, the RMP/EIS does not emphasize enough other benefits presented to the public, Sandoval County and the greater metropolitan Albuquerque area by the BLM public lands in Placitas. In addition to offering opportunities for cultural conservation, wildlife habitat/corridors and recreation, the Urban Interface in essence provides a natural geographic border for the greater metropolitan Albuquerque area, the population center of New Mexico.

In closing, LPA and ES-CA appreciate the opportunity to comment on the RMP/EIS. On behalf of the community, we would again like to thank BLM for closing the Buffalo Tract, Crest of Montezuma and other public lands in Placitas to salable minerals (gravel).

Sincerely,

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