



& The Placitas Coalition

Wild Horse Observers Association (WHOA)  
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<http://whoanm.org/LoopRd/LoopRd.htm>

March 4, 2009

**Re: Your Loop Rd (I25 to RT 14) comment urgently needed for Crest of Montezuma and Sandia Mt. wildlife, as well as for our rural communities, water, and clean air.**

**After disallowing input on the Placitas BLM for many months, Sandoval County changed their rules, without notice, to allow comment on the last night for public input, for one night only!**

**Dear Open Space and Wildlife Advocate,**

Thank Sandoval County for allowing public comment, at the final hour literally, on the Northern Placitas BLM in the Placitas Area Planning process. This is the BLM parcel which Sandoval County Director of Development Mike Springfield, submitted to the BLM a request for right of way for the "Loop Rd", on 4/25/2008. See web page above for documentation.

Sandoval County named this Loop Rd the Northwest Corridor in their 2007 Annual Development Report, but as of Jan 09, have renamed it "The Regional Roadway Alternate", once they could not deny that the local community was united in opposition to it. As a "regional" road, the state would have to weigh in on it

The 2001 DOT Corridor study I25 to RT14 has called for a four lane highway with 21,000 vehicles per day, through Placitas with 300 to 400 acres of eminent domain takings estimated.

This on going progress on the Loop Rd has been a "covert" process. Sandoval County's Development Director Mike Springfield stated the Loop Rd is "under property acquisition" a phrase regarding closed meetings found in the Open Meetings Act. The BLM is holding Sandoval County inputs on the Loop Rd. to the BLM as confidential under the Privacy Act. Sandoval County has refused to allow public comments on this BLM in the Placitas Area planning process, and the BLM has set well over 1000 comments aside as "out of scope" of their Resource Management Plan (RMP) update.

Make your voices heard. To date there has been no help from our federal or local representatives. Please see/utilize/modify the DRAFT letter below. (Be sure to include your name and address.)

Please contact WHOA with any questions and/or review our Loop Rd Webpage for documentation and chain of events. <http://whoanm.org/LoopRd/LoopRd.htm> This Alert is also there.

**DRAFT LETTER below**

**For the Open Spaces the wild life that grace them and the people who love them,**  
Patience O'Dowd co-founder WHOA, co-founder The Placitas Coalition

To David Mathews Sandoval County NM Attorney [dmathews@sandovalcounty.com](mailto:dmathews@sandovalcounty.com)  
Cc Representative Martin Heinrich [writemartin@mail.house.gov](mailto:writemartin@mail.house.gov)  
Cc Senator Tom Udall [tomudall.senate.gov/contact/contact.cfm](http://tomudall.senate.gov/contact/contact.cfm)  
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Cc Tom Gow BLM [tom\\_gow@nm.blm.gov](mailto:tom_gow@nm.blm.gov)

**Dear Mr. Mathews**

Thank you for understanding that Placitas and area residents must be allowed to comment on the Northern Placitas BLM as on the other public lands in Placitas as part of the Placitas Area Plan and as part of Sandoval Counties legal responsibilities to represent us to the BLM in their Resource Management Plan (RMP) update process.

Please then accept these comments regarding the Northern BLM in Placitas as part of the Placitas Area Plan planning process, and consider them for your final document for consideration by the Sandoval County Commissioners;

**I. WHOA Comprehensive Area Surveys;**

Please include and consider all of the comprehensive surveys and survey results of which WHOA has forwarded to you and will gladly do so again, as needed, regarding the desires of the people for the Northern Placitas BLM. Please also include all and any other comments received regarding this BLM.

**II. Openly represent the citizens of Sandoval County to the BLM as per the Sandoval County legal responsibilities,;**

1. Per the Sandoval County Comprehensive Plan.
2. Per the requirements of Sandoval County as our BLM Resource Advisory Council (RAC) representative to the BLM for this BLM RMP process.
3. Per the requirements for Sandoval County as our cooperative agency in this BLM RMP and as such we believe should be requesting our inputs for this BLM RMP and our RAC representative should be attending all or most of the Placitas Area Planning process rather than being disallowed by legal staff represent us in these meetings and learn our concerns real time.
4. As per our NM State constitution.
5. All Inspection of Public Records requests should be answered in full.
6. All open meetings rules should be adhered to.

**III. End the option of a Loop Rd through the Placitas BLM and Placitas permanently for the following reasons not necessarily in this order, see especially – Water - items 10 and 12;**

**Wild Life Corridor**

1. With a 4 lane highway all the way around the Mt as is called for by the flawed 2001 DOT corridor study, the wildlife of Crest of Montezuma and Sandia Mt. will become genetically in viable as will the Placitas wild Horses. Sandia Mt. will essentially be a dead Mt. as will the Wild Life Corridor from Canada to Mexico, supported by the Western Governors Assoc. This long ranging and vital corridor has already suffered extensively through deaths on I40.
2. To wait for further mapping of the wild life corridor when it is already impacted, is unnecessary and even defeatist as one needs only to look at the science as to; What wildlife exists or used to exist on Sandia and the surrounding mountains. What population size is needed for genetic viability and what is the resultant

territory required. Actual traffic accident and other wild life tracking data are currently available and have been submitted by Pathways Wild Life Corridors of New Mexico to you. The wild life of Sandia Mt and the Crest of Montezuma already can only migrate to the North due to I40 currently to maintain genetic viability in any significant or safe way as it is.

3. It is my/WHOA's contention that one cannot in good conscience make a political point in setting aside the Crest Of Montezuma as a Wilderness Area through a Land Tenure Adjustment from BLM lands to Forest Service Lands, and still support the option for a Loop Rd, now or in the future. Not only would this deem its wild life genetically in viable, but development pressure caused by this would most certainly bring a further decrease in habitat, and pathways, and substantially increase mortality by traffic.
4. New Mexico cannot maintain its Title as the Land of Enchantment without its wild life along with its Big Clear Skies, both of which would be significantly impacted with irresponsible development as projected and supported in the DOT corridor study call to keep this Loop road option open through this BLM permanently.

### **Rural Communities**

5. The Communities both sides of the Mt have proven now, as in the past, that they want to remain as rural communities and that they are united in strong opposition to the Loop Rd. This was re proven in 2007 and 2008 through the WHOA survey as well as through the Placitas Area Planning process, and undoubtedly through the BLM's Rio Puerco Resource Management Plan update process. However, the BLM has arrogantly and set aside over 1000 comments as "out of the scope" while stating that Sandoval County can ask for a Loop Rd at any time as per the BLM's Tom Gow.
6. Leaving the option for a Loop Rd open ended, means that area residents will permanently loose their ability to have their desires met or make any other moves forward to protect these vital wild life corridors.
7. I want a land tenure adjustment/land disposal by the BLM to the state of NM under the Public Parks and Purposes Act which will be free (\$0.0) to the state of NM for conservation of this BLM land as a wild life corridor/park. Importantly, this does not require an Act of Congress as there is less than 5000 acres.
8. I support the horses remaining there for Eco-Tourism/Heritage Tourism purposes with an entrance from I25 established right of way (ROW) if at all possible so as to maintain the rural atmosphere of Placitas. I support immuno-contraception for the horses as needed, though they have never populated beyond the number of grazing permits given out by the BLM for cattle. (There are no active cattle permits currently outside a permit for two domestic horses in the winter.) The BLM's environmental study of Oct 2007 show no ill affect from the horses which do improve bio diversity as top down grazers unlike other non-native species.
9. I support utilization of the Coronado State Monument across I25 in Bernalillo to handle the camping and supplies for this tourism along with scheduled tours to reduce traffic as well as harassment of the wildlife.

### **Water**

- 10. The Middle Rio Grand Water Assembly data shows an ongoing Deficit Spending of Water – 15-20% Last Quarter of the 20th Century, at a Deficit 55,000 af/yr.**
11. Sources of Brine water for development are finite as well as unknown capacity and as well as expensive. Brine water is appropriate for industrial use only, not as a call for unsustainable development.
- 12. To cause the impetus for over development in an area where Sandoval County is selling the same drop of water over and over, is a radical and reckless position. Also, as per Mr. Bob Wessley, of the Water Assembly during a Planning and Zoning meeting in 2008, this can only be termed "fraudulent".**
13. To wit, the lawsuits won by Sandia Knolls regarding water as well as East Mt communities already pumping from Estancia to support current development.
14. The Las Huertas Creek is a major recharge corridor for the Albuquerque basin and could have negative impacts on an already large water deficit again of Water – 15-20% in the Last Quarter of the 20th Century, at a Deficit 55,000 af/yr.

## **Air**

15. This Loop Rd will decrease driving distances by some and therefore reduce pollution by some, but this gain will be most certainly over powered by the development pressure it will most certainly cause.
16. As a Loop Rd which will most certainly increase development as is portrayed in the flawed 2001 Corridor Study it then will not reduce air pollution and ozone. This will be contrary to EPA planned future directives

## **Open Government**

17. I do not support Sandoval County or the BLM or any political subdivision of the state opening and establishing right of ways across the BLM without the input and specific knowledge of the people, especially during a BLM Resource Management Plan Update where everything else, grazing permits etc. is on hold. This has happened as of Dec 5<sup>th</sup> 2008, seen no. 22 below.
18. I do not support the Loop Rd being under “property acquisition” without notice to the public of the closed meetings where this and other Loop Rd name changes and route designations have been carried out.
19. I do not support Sandoval County submitting information to the BLM as stated by the BLM as confidential under the Privacy Act.
20. I would like all Inspection of Public Records requests answered according to the law and according to the spirit of the latest Presidential executive order on this issue.
21. I do not support any political subdivision taking this public process out of our hands to Washington which will then be used as an excuse by those politicians for rampant development by developers while having the appearance only of helping out the Land Grants. The Sep 30<sup>th</sup> 2008 request to the BLM by the NM Senate Interim Committee on Land Grants not necessary or was it fair play on the basis that WHOA and many others through WHOA notification have already strongly supported the SADLH land grant’s bid for a permanent 500 acres of the BLM lands in Placitas. This was based on an understanding of the errors and abuses made under the Treaty of Gaudalupe Hidalgo. Most all but the president of this local Land Grant were and may still be unaware of this attempted snatch of our local voices.
22. Likewise, government entities should not engage in planning process’ such as those that have already named and renamed this Loop Rd and even prematurely mapped most of it on Google maps without any notification of the residents whose properties it runs through. This shows the degree of arrogance toward the people they are supposed to serve by these government entities.
23. Likewise, please do not take this issue out of the local residents hands by re-naming this “Northwest Corridor” as a “The Regional Roadway Alternate” as was done in the Placitas Area Draft Plan in Jan 09.
24. I feel it is disappointing and enlightening that our federal representatives are not working for the people on this matter, especially those that said they supported the use of RT22 as the alternative during their campaign and those that campaigned on stopping the West wide energy corridor through the same BLM lands and through Placitas to the East Mts., but are now stone silent on this similar, however more life and environmentally impacting issue. Rather these representatives appeared to be more engaged with this issue primarily in the spirit of oppositional research.

Sincerely,

Address