



Wild Horse Observers Association
(WHOA)

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& The Placitas Coalition

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Re: Plan submittal for BLM Rio Puerco RMP for the Placitas BLM lands in unit 5. More comments later on the other units.

Please accept this amended plan for the BLM in the event that you are going to allow the use of the word wild horse.

Thank you for this opportunity to provide inputs for this important process which can have a significant impact on the Placitas community, the East Mt. Community as well as the wild life they live with and support.

Results to date show over 1000 signatures in support of a Wildlife **and Wild Horse** Open Space /Park on the Placitas BLM and in opposition to the other 12 options as identified by WHOA's research.

WHOA sent out a survey (**once** accepted by the BLM) to Placitans bulk mail to approximately 2300 homes, and just this week to the East Mt communities of Sandia Pk and Cedar Crest. Ninety Eight Percent (98%) of the 648 survey Placitan respondents stated they wanted a Wild Life Open Space / Park and that conversely, they did not want; Residential Development, Mining, a Highway (Northeast Corridor) or an Energy Corridor, etc. Fifteen percent (15.5%) stated that their no. 2 preference was to give the land back to the Native Americans as a publicly accessible open space. So far, the East Mts are also at 98% for a state park and in opposition to all other options with 52 surveys respondents, we are receiving 15 to 20 per day.

It is important to point out, that this survey when sent out bulk mail, was received and answered by those for and against our preference, and that this survey is unlike a petition, in that it provided the opportunity to vote for any of the 13 options we were aware of, as well as providing a fill in option called; "Other". Placitas Survey respondents who wanted a Loop Rd, Mining, Energy Corridor, ATV Park, shooting Range, Oil and Gas drilling etc. were all less than ½ percent or none. Another small percentage of Placitas residents said that grazing was their 2ed choice.

Another 119 Business and stake holders who live contiguous to the BLM from Placitas including, Developers Realtors, Placitas Chamber of Commerce, Home Owners Associations, Environmental Companies, Democratic Women of Sandoval County, Pueblo Management Company, Cafes, Hair Salons, etc have stated Common Grounds with WHOA as follows;

With this letter we join the Common Grounds Coalition with WHOA and the State of New Mexico (via their support, and their representative's unanimous votes for SM2 in 2006 and SJM08 in 2007) to keep the wild horses on the BLM in Placitas and other surrounding areas of Placitas. As such we would like to keep the 5000 acre BLM property in Placitas as a wildlife/wild horse park.

We would like to clarify that as this BLM is 5000 acres or less, making this a state park would not require an act of Congress and also that under the Public Parks and Purposes Act, this land could be acquired over time by the state without cost for the land, only capital improvements as required.

Additionally the state wide Hispano Round Table and it's 60 member organizations around New Mexico and the American GI Forum of New Mexico have also joined in Common Grounds with WHOA.

Another 164 WHOA surveys from Albuquerque posted on Earth Day at La Montanita Coop show 100% in support of a Wildlife / **Wild Horse Open Space** /Park on the Placitas BLM and in opposition to all the other options listed.

Another 130 New Surveys from the East side of the Mountain were handed in today (June 30) with 125 of them strongly for this project and specifically for making this BLM land into a state park through a land tenure adjustment. This is in addition to the previous 52.

Placitas Public Meetings 1) 4/5/08 Sponsored by WHOA & Placitas Coalition, 2ed) Sponsored by Las Placitas Association (LPA)

Strong support was also shown at two public meetings held in Placitas by WHOA/Placitas Coalition and Las Placitas Assoc.(LPA) with approximately 200 and 150 attendants respectively.

At the second meeting, all but one raised their hand in support of the Wild Life / **Wild Horse** Park and only one raised his hand in support of a Loop Rd or the West –wide Energy Corridor but not in opposition to the wildlife / **Wild Horse park**. The BLM RMP staff witnessed this.

Water for Development (Opposition to Connecting Road which will bring unplanned development and water usage.)

Summary Statement for both East Mountain Communities and Placitas; Development needs to be planned and a North East Corridor to either community may play havoc with the water resources for both humans and wild life/ **Wild Horse park.**

Sandia Mountains; Mountain Lowland Communities By David J. McCraw, Paul W. Bauer, Glen E. Jones, Michiel R. Heynekamp, and Kathryn Glesener - New Mexico Bureau of Mines and Mineral Resources (Excerpt)

In the mountain lowland communities east of the Sandia Mountains and Albuquerque, rapid development of largely upper class subdivisions (complete with approved planned golf courses) has recently caused water demand to exceed the carrying capacity of local aquifers. Landowners in the adjacent Estancia Basin (a closed basin to the east) are currently pumping large volumes of ground water to these East Mountain communities to meet these increasing demands. In April of 1998, county officials placed a moratorium on further subdivision development until ground-water studies of the region can be undertaken.

Not unlike Placitas, the East Mountain area is characterized by complex structural and stratigraphic controls on ground-water flow between mountain recharge areas and adjacent basins and these are poorly understood.

Placitas; It may be a good idea to save the water under the Placitas BLM and not allocating it for development or industrial uses to save it for future use by Placitans some of whom are now mining ancient water.

Placitas Extensive 2002 Peggy Johnson Hydrogeology Report -New Mexico Tech Report OF-469 ;

Characteristics Vary Greatly from Place to Place, Laced with Geological Faults - “Shoobox Aquifers”- Some Sources Disconnected, Others Cover Wide Areas, Some Water in Rock Cracks, Some in Sandy Soils, - Residence Time of Groundwater, Some Ancient / Mined, Some Renewed by Recent Precipitation. Age in Ground Ranges from 6 Months to 35,000 Years, Slow Underground Flows - Generally toward Rio Grande.

Water for Wildlife / Wild Horses:

There are natural springs though out Placitas especially on the east end. Where they have dried up or don't run year round, due to development and/or global warming, many people have put out tanks for the wild life / wildhorses.

Wildlife / Wild Horse Management Fencing

WHOA and Placitans have put up over 4.5 miles of fencing in the last 3 years and maintained another 2 miles. This is to say, that Placitans are active, concerned, and responsible in the area of herbivore and other wild life protection and want these BLM lands under more local control than the BLM can provide as a federal agency. In general and in Placitas, the BLM relies on the permittees for fencing, however, Placitans have provided labor, money, and expertise to put up miles of safety fencing over the past few years.

Range land Heath Criteria/ Ungulates of the Placitas BLM; We recommend that all grazing of Placitas BLM lands should be horses based on public inputs, stake holders (people who live contiguous to the BLM) , based on the BLM data below which shows horses are better for the environment, based on the fact that the permittees for 0971 and 0972 are not grazing cattle anymore and the one permittee for 0971 who still holds a valid permit for 3 cattle does not live contiguous to the BLM (a requirement) but now lives in Albuquerque. Also the other previous permittee for 0972 had not been grazing cattle, and because both these cattle grazing permittees have now applied for gravel mining permits, though public input and experts show that Mining is not compatible with a residential area.

Switch to horse grazing only and/or switch to state park lands /open space lands. There will be minimal financial impact on the permittees. Theirs may likely be a cultural loss. However if Placitans can utilize the land for Cultural Heritage purposes as an Open Space /park, this may help alleviate this loss.

In the EA 2001 for Allotment 971 the following information and statements can be found.

- **Cultural Resources**; Nine archeological sites exist. (FOR DETAILS see pg 11) (Any class 2 sites?)
- Depth of the water table is the most limiting factor to riparian health. (Rather than grazing, but 17 acres have been set aside to not be grazed.)
- The Rio Puerco ES showed that un-grazed pastures had 24% less total vegetative ground cover than the grazed pasture.
- In short grass steppes, Richard Hart (1999) confirms that biodiversity is maximized under some level of grazing other than none.
- “..livestock could be removed from this allotment, realistically, grazing pressure from deer would continue and without competition would increase. No change can be expected in the sagebrush and pinon juniper woodland types without some vegetative treatment.
- No grazing would also have undesirable long term effects in some upland vegetation zones, especially those that evolved under grazing pressure of large native herbivores.
- Research by Collins, et al. (1998) demonstrates that top down (grazing) in grassland ecosystems, diversity in native vegetation can be retained under conditions that would otherwise lead to a decline in species richness. (Horses have top front teeth and cut the grass, cattle pull it out with their tongue as they have no upper front teeth.) (There is currently no grazing and so it minimal impact to lessees.)
- Weed free policy enforcement is waiting on; “the New Mexico Dept of Agriculture’s establishment of a weed free certification program for feeds and supplemental forage.”
- **Visual Resource Management** BLM has assigned this allotment as a class IV Visual Resource Management rating (VRM). It appears that this is based on the vegetation alone and we feel that the tremendous views should be taken into account for a higher rating.

In RANGE UTILIZATION Key Forage Plant Method 12/17/2004 the following information and statement in black below, can be found. Green is my calculation.

- 6 acres/month per cow (=> gives 72 acres/yr required per cow) 1/27/98

In the Qualitative Rangeland Health Assessment for Las Huertas Creek Allotment #972 in Sandoval County, New Mexico the following information and statements can be found.

- No compaction, no evidence of Livestock (Though other reports of #971 stated there were 5 horses year round. There are no barriers between these allotments.)
- Species producing seeds lower than what is expected. (Horses digestive systems unlike that of cattle, don’t kill seeds, but replant the food they eat.)

In the Environmental Assessment for the Grazing Allotment #924 the following information and statements in black below, can be found.

- **3.8 WILDLIFE** This allotment provides habitat for a variety of wildlife and wild horse species. Species, or sign thereof, observed on the Shallow Limey Savanna site include coyotes and rabbits. Other species including prong horn antelope, mule deer, bobcat, and badger probably use the site on occasion. Raptors that could potentially utilize the allotment for foraging include red tailed hawk, ferruginous Hawk, American kestrel, and prairie falcon.
- **Riparian, American Indian Religious concerns, recreation, wildlife and other resources unaffected by the horse grazing on this allotment.**

Grazing Permits on the Placitas BLM +

This table gives a good idea of the AUM's available for ungulates wild and domestic.

0971 Lomos Alto #1 yr round	3 cattle	36 AUMs (permittee does not live in Placitas)	valid 01/01/2003 to 12/31/2012
0971 Lomos Alto #2 inactive	3 cattle	36 AUMs (permittee passed away.)	
00924	09/01 to 01/31	2 horse	10 AUMs (Lives in Placitas) valid 07/01/2000 to 06/30/201
0972	03/01 to 01/10	60 cattle	386 AUMs (Lives in Algodonas) expired 2/28/2007/on hold

+The cattle permittees have also now also applied for gravel mining permits and are not grazing.

Wildlife Corridor: As can be seen by the abundant BLM data, there is plenty of wildlife and less cattle means more wild life per the BLM data referenced in this paper.

Crime Rate: People have concerns that with a Northeast Corridor and the associated development, traffic, water and wildlife issues, there would be increased crime and noise pollution etc. If there were a park, traffic could be mitigated by the land tenure adjustments recommended and/or by the use of docents who would drive one car/van from the Coronado Monument or the Bernalillo Train station with multiple tourists in one vehicle by appointment.

Property Values: A park for wild life would give consistent property values and retain the rural quality of life which people moved here for. Interestingly and tellingly, many of the Placitas Coalition are realtors and developers who understand this very point as well as the fact that the wild life sells homes per their advertisements and pamphlets (even those already built!).

Heritage Tourism/Preserve America Executive Order March 2003

Will be submitting further inputs on the other units of the Rio Puerco BLM lands

1. WHOA Newsletters on fencing progress.
2. Preserve America Executive Order of march 2003
3. Rural Economic Development Presentations by the Rural Economic Development Dept Through Tourism (REDTT), and another by NMSU/BLM/REDTT.
4. State Park Draft (Includes, Wild Horses as a re-introduced Native Specie)
5. WHOA NM Heritage Tourism Plan
6. Oceanic Fossils on the Placitas BLM and Rio Puerco
7. Placitas BLM lands traditional uses (sheep, donkeys, horses)

Northeast Corridor In summary Placitas Fire Chief Bud Brinkerhoff stated for the WHOA/Placitas Coalition Presentation that further ingress or egress is not needed currently for Placitas and that when it is needed 165 can just be widened.

“I/We would like to see the following issues in the Scoping Report as well as continued throughout the revision process and into the final plan”. Please include any other issues identified in the summary letter above.

1- Land Tenure Adjustment

I want To End the possibility of a Connecting Rd through the Placitas BLM from I25 to RT 14.

To accomplish this, the following is needed:

- Land Tenure Adjustments for the Placitas-area BLM lands for disposal as a State Park or Historic State Park or Open Space or Conservancy for quiet recreational and wildlife and **wild horse** habitat as defined by the gaining agency. This would preserve our property values and rural way of life.
- Possible small Land Tenure Adjustment of 500 plus or minus acres for the local Spanish Land Grant San Antonio de las Huertas but not to include/allow a connecting road to I25 or Rt14.
- No Land Tenure Adjustment for development, roads, or public energy easements.
- Land Tenure adjustment of the Al Baca lands or Santa Ana Lands or other private lands for easement to the Frontage Rd (not I25) for the State Pk.
- The Las Huertas Creek Watershed in Unit 5 is a natural system for wildlife migration connecting the Sandias to the Jemez mountains according to the Dave Foreman of the NM Wilderness Alliance. It is an important link to the wildlife habitat preservation work being done in the Ortiz Mountains and Glorieta Mesa and Galesito Basin. This is also of National Significance. It lies in the path of the Continental Mega Linkages called the Spine of the Continent that has been developed over the past 20 years to link areas of wildlife migration together, and utilizes National parks and private lands along the entire stretch of the Rockies linked from Alaska to Mexico.

2 - Mineral and Energy Development; As a state Park, this (minerals and energy development should be off limits (with the exception of renewable energies such as wind or solar compatible with the wild animals and visual resource management as well as state park or local open space or conservancy regulations.)

The New Mexico Environment Department Air Quality Bureau in 2003 recommended that permits for mining that propose locating in areas unsuited for mining be denied. **Mines should not be allowed to operate near Native American “sacred sites,” residential neighborhoods, historic rural communities, or in areas where the resulting “scar” will ruin a scenic view shed.** The BLM lands in Placitas has sacred sites, is a rural quality residential community with beautiful views from most residences.

Also, the Las Huertas Watershed is an aquifer recharging system in our area and wildlife habitat that should not be disturbed for gravel mining and its resultant dust, silica, and airborne pollutants we all have to breathe.

- No Right-of-Ways or Easements through the Placitas-area BLM lands
- No further lands acquired by the BLM in Unit 5
- Placitas public lands should;
 - be excluded from energy and mineral development as an Urban Wildlife interface
 - No travertine development,

- no sand and gravel development,
- no development of landscaping materials,
- no uranium development,
- no oil and gas exploration, and no associated roads.

3 - Recreation and Visitor Services; As a state Park, we do not need many if any services as we can utilize the Coronado State Monument for Visitor Services. No OHV preferably. Hiking, horse riding, Mountain biking OK. No wildlife harassment same as the Albuquerque Open Space Ordinance for Placitas Albuquerque Open Space. The state or Open Space Division would determine if any further parking lots would be needed beyond what is already available. No OHV's.

4 - Visual Resource Management; As a State Park, the abundant visual resources of the Santa Ana Plateaus, the wildlife, the wild horses, the Sandia Mountains, Jemez Mountains, and Placitas ridges and canyons, plant life, big sky, and our night sky should/will be preserved. There should be no residential development in this area.

5 - Special Area Designation; I do not want the BLM to have administration over this land, I want it to be NM State or Albuquerque/Santa Fe Open Space lands or private conservancy so that local citizens have more control over what happens in our back yard. I would like Placitans to be able to speak freely of their desires for this area since Placitans have been disallowed to say what they have clearly showed that they want in surveys and public meetings and BM comment sheets, therefore ACEC cannot serve us under these restrictive circumstances.

6 - Travel and Trails Management As a State Park, this will be managed on a local basis by docents at no cost to the state and for minimal impact on the water shed etc.

- No connecting roads I25 to RT 14.
- ATVs are already welcomed in the far reaches of Rio Rancho, on the land near the airport, and at the track and hill
climbs 20 miles west of Placitas out of earshot of residential areas.

7 - Public Land-Urban Interface; As a State Park, this will be managed on a local basis by docents at no cost to the state and for minimal impact on the water shed etc. A state park will make a great interface and preclude further encroachment on the open spaces and wildlife.

8. Other important questions and issues per the public that don't necessarily fit into the 7 issues as identified by the BLM such as water concerns;

- **Water Usage and Water Mining** is a concern for the Placitas area as well as the East Mt areas and therefore development is a concern as is mining and any other water intensive activity.
- I Support the **Placitas Coalition's** efforts for all the animals currently and or recently on BLM lands.
- I Support the **Pathways Wild life Corridor** efforts to maintain the wildlife corridors north of and around
the Sandia Mt. Area.
- I **reject the proposed West-wide Energy Corridor** and associated easements coming through the Placitas BLM, Placitas residential areas and East Mt. residential areas south of Rt22.
- I **Support Cultural and Historical Rural Economic Development** efforts associated with the **San Antonio de Las Huertas Land Grant.**

- **I Support Cultural and Historical Rural Economic Development** efforts associated with the **Native American Cultures.**
- **I strongly prefer feral, wild, or domestic, horse grazing to cattle grazing in unit 5.** They have front upper teeth, trim the grass rather than pull it out with their tongue versus cattle, replant the food they eat as their stomachs do not kill the seeds, their scat helps the soil retain moisture, they break the ice for other wild animals and dig holes in the snow for them, they do not hang out in one spot but roam miles in one day so as not to over graze an area, they do not hang out and ruin stream banks, they are loved by Americans for their beauty and role in our nations history, they are a re-introduced native Specie as per mitochondrial DNA whereas cattle evolved in Asia. They increase bio-diversity Finally, the state of NM has shown through their representatives votes on many Memorials and bills carried by Senator Komadina for WHOA that they like horses. (Per Craig Downer articles in the Albuquerque Tribune and email to WHOA.) I want a wild horse park on the current BLM lands.
- I feel that to invalidate any public comment due to local vernacular or BLM legal sensitivities especially where the public disagrees with the BLM sensitivities is a taking of our voices and our rights to freedom of speech. **I protest any government agency depriving my right to freedom of speech.**

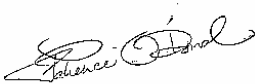
References Include;

1. Placitas Coalition Statements and WHOA Surveys, BLM comment forms filled out.
2. ENVIRONMENTAL ASSESMENT FOR THE LOMOS ALTOS ALLOTMENT (No. 971) GRAZING LEASE RENEWAL (EA NM-010-2000-077)
3. Requirements for Rangeland Health Title 43, Part 4180 of the Code of Federal Regulations
4. Grazing Lease Auth no. 3000939 printed 2/10/2003
5. RANGE UTILIZATION Key Forage Plant Method 12/17/2004
6. Community Structure Analysis (CSA) Method Bud Wilson Range tech 1-24-1998
7. Utilization Studies Report Las Huertas Creek Allotment #972
8. Interpreting Indicators of Rangeland Health Site Documentation Worksheets 7/26/00 Assessment #1 and 2
9. Qualitative Rangeland Health Assessment for Las Huertas Creek Allotment #972 in Sandoval County, New Mexico. Prepared by Envirosystems Management, Inc. Oct 26, 2007
10. Environmental Assessment for the Lease Grazing Alotment #924.
11. Craig Downer to WHOA email Craig C. Downer, Wildlife Ecologist, A.B., M.S., Ph.D. studies P.O. Box 456, Minden, NV 89423
12. Water in the Middle Rio Grande Placitas Issues Section by Bob Wessely 4/5/08
13. Peggy Johnson Hydrology Report 2002 New Mexico Tech Report OF-469 – Available in Placitas Library
14. Mountain Lowland Communities By David J. McCraw, Paul W. Bauer, Glen E. Jones, Michiel R. Heynekamp, and Kathryn Glesener - New Mexico Bureau of Mines and Mineral Resources (Excerpt)
15. BLM Environmental Study of Oct 2007
16. Placitas Fire Chief Bud Brinkerhoff Statements ; 4/4/08

17. Grazing Permits 2007
18. BLM Drought Plan
19. Horses Genetic Testing SignPost
20. Local Wildlife Corridor Map
21. San Felipe Declaration
22. Legal Status Wild Horses- Jason Burnette Attorney at Law
23. WHOA and Placitas Coalition Presentation of 4/5/08
24. Modulation of Diversity by Grazing and Mowing in Native Tallgrass Prairie Scott L. Collins, * Alan K. Knapp, John M. Briggs, John M. Blair, Ernest M. Steinauer
- 25.

- **Restoring Heterogeneity on Rangelands: Ecosystem Management Based on Evolutionary Grazing**
- **Patterns**
- Samuel D. Fuhlendorf and David M. Engle
- *BioScience*, Vol. 51, No. 8 (Aug., 2001), pp. 625-632 (article consists of 8 pages)
- Published by: [American Institute of Biological Sciences](#)

Sincerely,



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