



Wild Horse Observers Association (WHOA)
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Re: DRAFT Placitas Area Plan January 2009

Date: 1/22/09

Dear Sandoval County/Planning and Zoning,

Thank you for this opportunity for input into the Placitas Area Plan.

Executive Summary

The Biggest Threat to Wildlife, the Wildlife Corridor, the Environment/air and water quality and Placitan desires for a rural community, is a Loop Road Connecting I-25 to Route 14. This would complete a loop around Sandia Mountain and call for more development.

The Placitas Area Plan as published by Sandoval County for the 1/22/09 meeting now calls this Loop Rd whose name, purpose, and publicized status, are ever morphing, the Regional Roadway Alternative, and now states that it will not connect with Placitas. Still Placitans are no part of this ever changing process.

Though there is mention of some consensus Placitan concerns such as a wild life corridor, Placitan consensus concerns are not all addressed nor are they addressed in a substantive and meaningful way.

Placitas Area Plan Boundary

The Placitas Area BLM lands as others are arbitrarily selected or deselected for inclusion in the Placitas Area Plan. There is no rationale given. Two of these lands that are selected/included for public comment are; (Tract of Montezuma) and the approx 200 acre tract in Overlook. However the largest BLM tract on the north side of Placitas is not mentioned anywhere except where it is included on the map showing (plenty of) water on pg 23.

There are too many Placitas Area boundary contradictions here to list and be readable, however suffice it to say that when talking about historic boundaries of Placitas, San Felipe Lands are listed as the boundary. The SADLH Land Grant Patent does not include the Placitas BLM on the north, however it appears they are working with the NM state Legislature and federal representatives to regain some of these "ancestral lands" through an act of Congress. This then is, clearly part of the Placitas Area.

Sandoval County is our representative to the BLM Resource Advisory Council (RAC) for the Placitas BLM Resource Management Plan Update (RMP). The most recent 1992 BLM RMP shows clearly that this northern tract of BLM land was considered part of the Placitas Area and as such, was given special consideration.

Sandoval County also has Cooperative Agency Status with this BLM RMP update process and as such on both of these counts should be representing Placitan views to the BLM. Though it was mentioned by John Arango that Sandoval County would do this, there is no statement in this plan regarding the Placitas Area BLM or it's existence on the North end or border of Placitas.

Moreover, these BLM lands are not mentioned in existing conditions as Open Space and none of the hundreds of Placitan inputs regarding this area have been considered or allowed in the process. This includes WHOA's presentation regarding the desired alternative for a Wild Life Corridor and Wild Life/Horse Park on these lands. This presentation was not allowed into the process though WHOA submitted it multiple times soft and hard copy and was told that we would have the opportunity to present it to the public. We were also admonished to not just speak about what we do not want (Loop Rd) but to mention what we do want by John Arango but have never been allowed the opportunity.

If Sandoval County does not consider these BLM lands as part of the Historic Placitas Area contrary to BLM documentation and SADHL Land Grant claims, etc, WHOA contends that the Land Grants standing and justification in obtaining the return of these lands to them could be lessened as well as this whole planning process called into question.

Loop RD "Regional Roadway Alternative"

What is now the current route of the Regional Roadway Alternative? Why are Placitans not privy to it? How can Sandoval County guarantee no connectivity will occur to Placitas in the future? How can there be a wild life corridor? (Witness all the wild life killings due to I 40 and all the back tracking being done now by the DOT.) When will Sandoval County act as per our RAC representative to the BLM?

With Sandoval County Government's stance;

- I. That the North Placitas BLM tract is not part of the Placitas Area and thereby disallowing comment on the Placitas Area BLM,
- II. That the Sandoval County Government is submitting their comments to the BLM regarding these issues as confidential under the Privacy Act,
- III. That the Sandoval County Government has applied to be the Placitan RAC representative to the BLM but is not accepting comments and not submitting comments to the BLM FOR Placitans,
- IV. That the Sandoval County Government has applied to have Cooperative Agency Status for this BLM RMP process but is not accepting comments and not submitting comments to the BLM FOR Placitans.
- V. With the BLM's stance that Placitans cannot talk about the Loop Rd, the wild Horses, a Land tenure adjustment per Appendix D of their Scoping Report,
- VI. With the abrupt and unexplained opening of rights of way across the BLM into the Placitas Area such as those on Indian Flats where the non-existent Highway is now already named N. Mustang Hwy on Google maps,

Placitans have cause for concern. Here again I refer you to the Issues listed at the end of the WHOA presentation to the county with all due respect.

Placitans have shown their willingness to work together with Sandoval County and the BLM. Their inclusive and let live results have proven this. Please bring all government entities and all cooperative agencies' plans into the light regarding the Placitas Area BLM on the North. Please include Placitans in discussions regarding the states and counties desires for a Regional Road to light so that all can be heard and the best option chosen by the people in the sprit of our sunshine laws in this Land of Enchantment.

Please address the open issues as listed by WHOA which I will resend tonight.

For the Open Spaces, the animals that grace them, and the people that preserve them both,

Patience O'Dowd cofounder WHOA