

September 30, 2024

Dear Governor Lujan Grisham:

We commend your commitment to protect New Mexico's lands, watersheds, wildlife and natural heritage as part of President Biden's pledge to put America on the path of protecting at least 30 percent of our land and oceans by 2030 (30x30).¹ In addition, we support your promise to designate an additional 20% of New Mexico as climate stabilization areas and recognition of the pressing need to protect migratory wildlife habitat.

However, we are concerned that the agencies tasked with achieving these ambitious goals are not following internationally agreed upon scientific standards for conservation of protected areas and have not adequately acknowledged New Mexico's glaring shortage of protected lands.

Despite New Mexico's abundance of lands rich in biodiversity, we lag behind other states in protecting our unique heritage. New Mexico's percentage of protected lands currently managed primarily for biodiversity is only 6.1% (4.8 million acres) compared to 12.5% nationally.² This percentage of protected areas is even smaller than that achieved by the small, densely populated state of Rhode Island.³ Vast areas of the state—including New Mexico's portion of the Colorado Plateau, Southwestern Tablelands and High Plains ecoregions—are less than 1% protected.⁴

In addition, only 2 percent of New Mexico is protected at the highest level of federally designated wilderness—the smallest amount in any western state—with a backlog of 5.2 million acres of sensitive roadless lands awaiting wilderness

¹ 30x30 is an important stepping stone on the way of reaching the achievable goal of protecting 50% of each of the earth's 846 terrestrial ecoregions by 2050. Large, connected and well managed protected networks distributed across diverse habitats are needed to address the global loss of biodiversity. See Dinerstein, E.; Olson, D.; Joshi, A.; Vynne, C.; Burgess, N.D.; Wikramanayake, E.; Hahn, N.; Palminteri, S.; Hedao, P.; Noss, R.; et al. An Ecoregion-Based Approach to Protecting Half the Terrestrial Realm. *BioScience* 2017, 67, 534–545.

² Dreiss LM, Malcom JW. Identifying key federal, state, and private lands strategies for achieving 30 × 30 in the United States. *Conservation Letters*. 2022;15:e12849. <https://doi.org/10.1111/conl.12849>. p. 6

³ *op. cit.* p. 5

⁴ Hilberg, LE. 2022. New Mexico public lands and their significance to climate change adaptation and mitigation: Identifying priorities for conservation and stewardship. *EcoAdapt*, Bainbridge Island, WA. p. 9. Available at <https://www.nmwild.org/ecoadapt/>. Accessed Sept. 5, 2024

protection.⁵ Ironically, New Mexico is home to the world's first designated wilderness, the Gila Wilderness, which was created a century ago this year at the urging of famed conservationist Aldo Leopold, who in his early career was also a prominent citizen of New Mexico.

The United States Geological Survey's (USGS) Protected Areas Database of the United States (PAD-US) is the nation's official inventory of public open space and private protected areas.⁶ USGS divides lands into four different levels of protection ("Gap Analysis Project" or "GAP" categories). GAP 1 and GAP 2 are the only areas managed in ways consistent with protected lands as agreed on in the 2022 [Kunming-Montreal Global Biodiversity Framework](#). These standards are globally recognized for the implementation of the 2022 Framework by the International Union for the Conservation of Nature (IUCN), the U.N. Environmental Program (UNEP), and the World Conservation Monitoring Center.

GAP 3 protections are inadequate for meeting 30x30 conservation goals because they allow for resource extraction such as logging, mining, fossil fuel development and off-road vehicle recreation that often result in ecosystem degradation and loss of biodiversity. GAP 4 are mostly unprotected private lands.

The state agencies implementing New Mexico's 30x30 regrettably define protected areas as including GAP 3 and GAP 4 lands (in climate stabilization areas). Labeling these "conserved lands"—which are open to resource extraction—as protected areas is inconsistent with the best available science and the relevant international agreements. New Mexico should explicitly restrict claims of protection to GAP 1 and GAP 2 lands like some other states.⁷

Since only 4.8 million acres of federal, state, and private lands in New Mexico are protected at the highest level (GAP 1 or 2) an additional 18.6 million acres must be

⁵ Priorities include portions of the Guadalupe Escarpment Wilderness Study Area and the Tucson Mountains, Madre Mountain, and Carrizo Mountain Roadless Areas. *op. cit.* Hilberg, LE. 2022 p. 30

⁶ <https://www.usgs.gov/programs/gap-analysis-project/science/protected-areas>. This database is largely dependent on land management agencies in making its GAP determinations. In New England and perhaps elsewhere GAP 1 and 2 lands maybe overestimated. For more on this issue see <https://wildlandsandwoodlands.org/progress/dashboard/>. Accessed Sept. 16, 2024

⁷ California is one state that uses GAP 1 and 2 to define its 30x30 conservation areas but regrettably allows some manipulation; for example managed burning in GAP 1 and suppression of wildfire and insect outbreaks in GAP 2.

added to achieve statewide 30x30 goals in the next six years.⁸ As challenging as this task may appear, it could be expeditiously realized through *enhanced protection* of the 19.8 million acres of undeveloped federal and state lands that are currently managed under multiple-use GAP 3 status.⁹

Transformative possibilities for enhanced protection of GAP 3 lands include: 1) designating new and expanding existing wilderness areas,¹⁰ national parks, national monuments,¹¹ wildlife refuges, wild and scenic rivers, riparian corridors and state parks; 2) strengthening national forest protection for inventoried roadless areas and mature and old growth forests; 3) expanding ‘areas of critical environmental concern’ to protect biodiversity on Bureau of Land Management administered lands; 4) incorporating Endangered Species Act planning requirements to conserve imperiled biodiversity and leverage existing practices and processes of the Act; and 5) passing legislation enabling voluntary grazing permit retirement on national forests.

However, enhanced protection of GAP 3 public lands still leaves 80% of the most diverse areas in New Mexico unprotected because they fall on GAP 4 or otherwise unprotected private lands. Also, nearly two-thirds of the top carbon-rich areas fall in GAP 4 areas. Fortunately, the New Mexico Land Conservation Incentives Act (NMAC 3.13.20) is able to permanently protect natural areas by accepting charitable donations of land and conservation easements from private parties in exchange for becoming eligible for a state tax credit. Over 400,000 acres have been put under conservation easement since 2020 using this authority.¹²

It is not known, however, if these conservation easements protect biological “hotspots” or, if they do, whether natural conditions are monitored and maintained.

⁸ USGS GAP, “Protected Areas Database of the United States (PAD-US) 3.0: Spatial Analysis and Statistics” (U.S. Geological Survey data release, U.S. Geological Survey (USGS) Gap Analysis Project (GAP), 2022), (available at <https://doi.org/10.5066/P9KLBB5D>).

⁹ This includes New Mexico’s national forests, national parks and monuments, wildlife refuges, state parks etc.

¹⁰ Wilderness areas serve the dual purpose of preserving biological diversity and ensuring that greenhouse gasses from the possibility of fossil fuel extraction are permanently sequestered underground.

¹¹ Protection would need to be strengthened to prevent the loss or downgrading of Monuments as occurred in 2017 when a review ordered by the Trump Administration threatened New Mexico’s Organ Mountains Desert Peaks and Rio Grande del Norte National Monuments. See C. Hardy Vincent, L. A. Hanson, Executive Order for Review of National Monuments: Background and Data (R44988, Congressional Research Service, Washington, DC, 2017).

¹² See the 30x30 New Mexico 2023 Annual Report, p. 10. Available at <https://www.emnrd.nm.gov/wp-content/uploads/30x30-NM-Report-2023.pdf>

Additional financial incentives may be needed to preserve these irreplaceable hotspots and ensure their long-term protection.¹³

The carbon rich and biologically diverse montane forests of northcentral New Mexico present both opportunities and challenges. The region is vital because it has New Mexico's largest store of sequestered carbon.¹⁴ But this trailing edge of the Southern Rockies Ecoregion may be especially vulnerable to climate disruption because species assemblages and climatic conditions are at their margins.¹⁵

If inventoried roadless areas on national forests in New Mexico's portion of the Southern Rockies Ecoregion were protected at the same enhanced level as neighboring Colorado, 27% of this region would meet the international standards for protected areas. However, this protection would be concentrated in upper elevation areas where existing wilderness already safeguards much of its subalpine forests. Only 5.1% of the low–mid-elevation ponderosa pine forests and 5.7% of the pinyon-juniper woodlands have GAP 1 or 2 status. Most importantly, only 13.1% of the biologically productive riparian ecosystems would be protected at the highest level even with enhanced roadless area protection.¹⁶

The challenges ahead clearly will require audacity and skill, not a rehashing of past policies that have failed the state's ecosystems.¹⁷ It maybe the last chance we get to squarely face the urgency of the biodiversity and climate calamities. As James Baldwin put it, "Not everything that is faced can be changed, but nothing can be changed until it is faced."

¹³ See <https://www.sciencedirect.com/science/article/abs/pii/S0006320718311984>

¹⁴ The carbon stored in these dense montane forests averages 87 metric tons per acre. The highest projected carbon stocks are found in the Canjilon Mountain Roadless Area which has up to 49,710 metric tons per acre. see Hilberg, L.E. 2022, *op. cit.* pp. 5 and 26

¹⁵ DellaSala, D.A.; Africanis, K.; Baker, B.C.; Koopman, M. An Ecoregional Conservation Assessment for the Southern Rocky Mountains Ecoregion and Santa Fe Subregion, Wyoming to New Mexico, USA. Land 2024,13,1432. <https://doi.org/10.3390/land13091432>. p. 2

¹⁶ *op. cit.* p. 10-12

¹⁷ With an estimated three percent of the earth's land ecosystems still ecologically intact, these failures are global. See Joëlle Gergis. 2024. A climate scientist's take on hope, In: *Not too late*, Rebecca Solnit and Thelma Young Lutunatabua, editors. Haymarket Books, Ill. p. 39

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