



November 14, 2022

Via Email

Sidney Hill
Public Information Officer, EMNRD
Sidney.hill@emnrd.nm.gov

Re: Request for Information #2– Public Input Requested on New Mexico Conservation Definitions

Dear Sidney Hill,

New Mexico Wild is a nonprofit 501(c)(3) grassroots organization dedicated to the protection, restoration, and continued enjoyment of New Mexico’s wildlands and wilderness areas. On November 14, 2022, New Mexico Wild submitted responses to the New Mexico 30 by 30 Advisory Committee’s second Request for Information (RFI #2), in which the committee requested public input on proposed definitions for “conserved lands” and “climate stabilization areas.” We were unable to provide full responses due to the 1000-character limit for the text boxes in the survey. We have provided our full responses below and respectfully request that this letter be forwarded to the Advisory Committee for consideration.

1. Question: **The above definition [of Conserved Lands] is:**

Answer: Bad

2. Question: **How would you improve the above definition of Conserved Lands?**

Answer:

New Mexico Wild offers the following suggestions for improving the draft definition of “conserved lands” that was presented for public input. First, we are concerned that the proposed definition of “conserved lands” fails to focus on the primary objectives of New Mexico 30 by 30, which are to mitigate the catastrophic effects of climate change and to prevent the loss of biodiversity. Rather than providing metrics for evaluating the type and level of land and water protection needed to accomplish these objectives, the proposed definition focuses on the values and benefits that New Mexicans will enjoy as a result of conservation activities. Although these

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values and benefits are important, we suggest removing the values and benefits from the definition of “conserved lands.” The definition of “conserved lands” must provide measurable criteria to determine whether lands, and their watersheds and aquifers, have adequate permanent protection and long-term resiliency. Good definitions will help New Mexico to measure existing contributions toward conservation goals and to evaluate whether proposed conservation projects will meet the desired outcomes. Once good definitions have been adopted, the ecosystem services, cultural values, and other benefits important to New Mexicans should guide New Mexico’s implementation of conservation projects that meet the definition.

Second, in drafting a definition of “conserved lands,” we recommend that New Mexico consider the classification system developed by the United States Geological Survey (USGS) for use in the existing national inventory of protected areas. “The USGS Protected Areas Database of the United States (PAD-US) is the nation's inventory of protected areas, including public open space and voluntarily provided, private protected areas.”¹ The PAD-US database uses categories called “GAP Status Codes” to measure the level of protection afforded to different types of protected lands.

New Mexico’s definition of “conserved lands” should be drafted to encompass geographical areas that meet the USGS categories of “GAP Status 1” and “GAP Status 2.” GAP Status 1 means “[a]n area having permanent protection from conversion of natural land cover and a mandated management plan in operation to maintain a natural state within which disturbance events (of natural type, frequency, intensity, and legacy) are allowed to proceed without interference or are mimicked through management.” Examples of GAP Status 1 include National Parks and Wilderness Areas. GAP Status 2 means “[a]n area having permanent protection from conversion of natural land cover and a mandated management plan in operation to maintain a primarily natural state, but which may receive uses or management practices that degrade the quality of existing natural communities, including suppression of natural disturbance.” Examples of GAP Status 2 include National Wildlife Refuges, some State Parks, and The Nature Conservancy Preserves.

Third, New Mexico Wild believes several important components are missing from the draft definition of conserved lands and should be incorporated, as follows:

- The proposed definition fails to incorporate surface waters (i.e., source water areas), which are a focus of both the Governor Lujan Grisham’s Executive Order #2021-052 and President Biden’s Executive Order #14008. The hydrological efficiency and resiliency of our watersheds, riparian areas, aquifers, water tables and wetlands must be prioritized to

¹ <https://www.usgs.gov/programs/gap-analysis-project/science/pad-us-data-overview>



effectively mitigate climate impacts and to prevent further loss of biodiversity. A focus on water will also help New Mexico address the water quality and water quantity challenges we will inevitably face as our state enters a hotter, drier future and will promote important values and ecosystem services such as drinking water, food supplies, water rights, cultural traditions, and recreational activities.

- The proposed definition fails to emphasize the importance of wildlife habitat and corridors. To protect and enhance biodiversity, the definition of “conserved lands” and the evaluation of conservation projects must prioritize areas that will provide the most value in terms of wildlife habitat, especially for imperiled species and species of conservation concern, and the lands and waterways that provide critical corridors for wildlife movement.
- The proposed definition fails to incorporate the importance of maintaining natural vegetative and soil cover. Natural vegetation and soils enhance climate resiliency by providing natural carbon sequestration. Activities that denude vegetation and soils contribute to climate change by releasing carbon dioxide into the atmosphere, contribute to erosion and water quality degradation, and reduce the amount of habitat and food available to wildlife. Healthy native vegetation and soils also retain precipitation.
- The proposed definition fails to incorporate restoration and monitoring requirements, which will be necessary to ensure that conserved lands are meeting New Mexico’s conservation goals.

Based on our suggestions above, New Mexico Wild recommends that the New Mexico 30 by 30 Advisory Committee adopt the following definition for “Conserved Lands”:

“Conserved lands” are clearly defined geographical areas of lands and surface waters in a primarily natural condition that have permanent protection from the loss of natural vegetative and soil cover, and are managed, restored, and monitored to promote carbon sequestration, climate resiliency, hydrological integrity, biodiversity, and wildlife habitat and corridors. Conserved lands are mostly free from climate and biodiversity stressors such as road building, logging, and mining. Conserved lands have a mandated management plan in place to maintain a natural state.

3. **Question: Are there other land management designations you would identify as fitting within the draft definition of conserved lands? Please include your rationale for including these designations.**

Answer:

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As the content of the RFI #2 survey reflects, there are many different land management designations that could potentially qualify as “conserved lands,” depending on the definition adopted by New Mexico. As set forth above, New Mexico Wild recommends crafting a definition of “conserved lands” that will meet the overarching purposes of 30 by 30: mitigate climate change and protect biodiversity. Once a sufficient definition is in place, New Mexico must evaluate individual geographical areas of lands and surface waters to determine whether each area meets the definition. The same conservation definition and metrics should be applied to each area, regardless of whether land is owned and managed by the federal government, the State of New Mexico, a private landowner, or a sovereign Tribal nation that has chosen to include its lands in New Mexico’s 30 by 30 program.

Since New Mexico Wild focuses on the protection of public lands, and primarily federal public lands, a full analysis of state, private, and Tribal land designations falls outside the scope of our comments. We wish to emphasize, however, that a case-by-case evaluation of each geographical area is critical because some of the land management designations listed in the RFI may or may not meet the definition of conserved lands, depending on the permanency of the protection and the applicable management prescriptions. For example, private lands that are enrolled in the USDA Conservation Reserve Program or that are governed by voluntary conservation easements may lack permanent protection, adequate management prescriptions, or both, as must therefore be evaluated individually to determine whether they constitute “conserved lands” for purposes of 30 by 30.

Regarding public lands, in addition to the long list of land management designations included in the RFI #2, we provide the following suggestions for additional designations that may meet the definition of “conserved lands”:

- Wild and Scenic Rivers (multiple ownerships);
- Outstanding National Resource Waters (multiple ownerships);
- National Parks, National Preserves, National Recreation Areas (National Park Service); and
- National Conservation Lands, including National Conservation Areas, Cooperative Management and Protection Areas, Outstanding Natural Areas, Forest Reserves, and National Scenic Areas (Bureau of Land Management).

4. Question: **The above definition [of Climate Stabilization Areas] is:**

Answer: Very bad

5. Question: **How would you improve the above definition of Climate Stabilization Areas?**

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Answer:

The draft definition of “climate stabilization areas” is meaningless and does not further the conservation objectives of 30 by 30 because it does not require durable protection or management prescriptions to ensure that lands and surface water areas will mitigate climate change. There are many lands and waters in a semi-natural state that provide cultural values, such as neighborhood playgrounds, landscaped roadway medians and parking lots, water treatment facilities, lands used solely for intensive mineral extraction or clear-cut logging, or public and private lands that have been overgrazed by livestock to the point where the natural vegetative and soil cover is lost, water quality is degraded, and wildlife are unable to find forage or shelter. While these semi-natural areas provide some benefits and values to New Mexicans, these benefits do not equate to climate stabilization. The definition of “climate stabilization areas” should be revised to ensure that lands and surface waters in this category can contribute in a meaningful way to stabilizing the climate.

In revising the draft definition, we suggest that the 30 by 30 Advisory Committee consider the USGS definition for GAP Status 3 lands: “An area having permanent protection from conversion of natural land cover for the majority of the area, but subject to extractive uses of either a broad, low-intensity type (e.g., logging, Off Highway Vehicle recreation) or localized intense type (e.g., mining). It also confers protection to federally listed endangered and threatened species throughout the area.”² Examples of GAP Status 3 include National Forests, BLM Lands, State Forests, and some State Parks. We also suggest incorporating the importance of water, wildlife habitat and corridors, and natural soil and vegetative cover into the definition.

Based on our suggestions above, New Mexico Wild recommends that the New Mexico 30 by 30 Advisory Committee adopt the following definition for “climate stabilization areas”:

“Climate Stabilization Areas (CSAs)” are clearly defined geographical areas of lands and surface waters in a natural or semi-natural condition that have durable protection from the loss of natural vegetative or soil cover for most of the area. CSAs may be open to some extractive uses but are managed primarily to promote carbon sequestration, climate resiliency, hydrological integrity, biodiversity, and wildlife habitat and corridors.

6. **Question: What types of land management activities do you think would be good candidates for recognition as CSAs? Please include your rationale for including these activities.**

² <https://www.usgs.gov/programs/gap-analysis-project/science/pad-us-data-overview>



Answer:

New Mexico Wild recommends that New Mexico adopt a good definition for “climate stabilization areas” and then conduct an individual assessment of each area proposed for this category to determine whether it meets the definition. As described above, we are concerned that a single land management designation could encompass both areas that meet the definition and areas that do not meet the definition. Case-by-case evaluation will be needed to determine whether an individual area should be included in New Mexico’s inventory of climate stabilization areas. Given the importance of meeting our climate objectives, New Mexico must ensure that meaningful definitions are adopted to guide the implementation of New Mexico 30 by 30.

Conclusion

Thank you for the opportunity to provide these comments to the New Mexico 30x30 Advisory Committee. New Mexico Wild looks forward to further opportunities to provide public input on this important initiative.

Sincerely,

Sally Paez
Staff Attorney
New Mexico Wilderness Alliance
P.O. Box 25464
Albuquerque, NM 87125
sally@nmwild.org