



NATIONAL STONE, SAND  
& GRAVEL ASSOCIATION

December 15, 2023

Subject: NSSGA Comments on BLM's Proposed Mineral Withdrawal in New Mexico  
(BLM\_NM\_FRN\_MO#4500172157; NMNM-145757)

Bureau of Land Management  
Rio Puerco Field Office  
Attn: Placitas Withdrawal  
From: National Stone, Sand & Gravel Association  
Date: December 15, 2023

Re: Comments on Proposed Withdrawal of 4,212.98 Acres in New Mexico

On behalf of the over 400-members of the National Stone, Sand & Gravel Association (NSSGA), I am writing to express our opposition to the proposed Placitas Withdrawal, that would permanently ban future aggregate production in areas of central New Mexico, severely limiting critical resources needed in the construction of infrastructure and public works projects for this growing region. NSSGA represents aggregates producers and those who manufacture equipment and services that support the construction industry. Our members are essential to the work of this country, and we represent more than 90 percent of the crushed stone and 70 percent of the sand and gravel produced annually in the United States. Our members employ more than 100,000 hard- working men and women, who are responsible for the essential raw materials found in every home, building, road, bridge and public works project.

Aggregates, such as sand, gravel, and crushed stone, are the bedrock of our infrastructure, providing the essential components for roads, bridges, wind farms, water treatment facilities, as well as residential and commercial buildings. The current proposal by the Bureau of Land Management (BLM) to withdraw 4,212.98 acres of land in New Mexico from mining and related activities raises significant concerns. This land is not only situated near the Albuquerque market, but it also harbors some of the region's only accessible aggregate supplies.

The implications of this withdrawal are far-reaching, potentially hindering critical infrastructure projects and stifling economic development. It sets a troubling precedent that could severely limit the community's access to vital resources needed for constructing and maintaining public works and



buildings. Schools, hospitals, homes, and businesses all stand to suffer from reduced availability of aggregates.

Moreover, if the withdrawal proceeds, the repercussions would be felt in the economic strain placed on public projects. Importing the necessary stone, sand, and gravel would drive up costs substantially. Conservative estimates suggest that aggregate prices in the Albuquerque metro market could surge by 30-to-40 percent. In a more drastic forecast, costs could potentially escalate by up to 90 percent. Such increases would place a heavy burden on the financial feasibility of infrastructure development and repairs, impacting the quality of life and future growth of the region.

New Mexico's infrastructure, already under strain, will likely face exacerbated challenges due to this withdrawal. The state's bridges, roads, and dams require immediate attention, and the aggregate materials from the proposed withdrawal area are crucial for these projects. According to the American Society of Civil Engineers, New Mexico's infrastructure deficiencies include thousands of structurally deficient bridges, high-hazard potential dams, and significant needs in drinking water and wastewater systems. The elimination of local aggregate sources will hinder efforts to address these deficiencies, impacting public safety and economic growth.

The proposed land withdrawal in New Mexico poses a threat not only to the construction sector but also to the environment and the local economy. The requirement to source aggregates from greater distances due to the withdrawal could inadvertently increase environmental impacts. This shift would lead to escalated transportation emissions, undermining the industry's efforts to reduce its carbon footprint. Such an increase in logistical distance and emissions would be contrary to the overarching goal of enhancing environmental sustainability, particularly as the region looks towards bolstering its renewable energy capabilities and water efficiency projects.

The implications extend to the economic fabric of central New Mexico. Local community budgets and federal funds earmarked for infrastructure advancements would be starkly constrained by the heightened costs of aggregate supply. This financial strain promises to decelerate project execution and inflict damage on the economic vitality of the area. New Mexico already grapples with significant infrastructure challenges as highlighted by the American Society of Civil Engineers: with thousands of bridges deemed structurally deficient, a substantial portion of roads in poor condition, and pressing needs in drinking water and wastewater infrastructure totaling in the billions. Additionally, the state contends with numerous high-hazard potential dams and a significant shortfall in school capital expenditures.

To cut off access to essential construction materials is to hobble New Mexico's capacity to address these pervasive infrastructure issues. Such a measure would not only delay the much-needed enhancements but also impair the state's competitiveness in a global market that increasingly demands swift and sustainable infrastructure development.

Building upon the concerns raised by the proposed withdrawal of land in New Mexico, it's important to note that the proposal at hand bears similarities to the legislation better known as the "Buffalo Tract Protection Act", a piece of legislation which has been repeatedly introduced since the 114th Congress.



Despite its longevity in the legislative process, spanning nearly a decade, the Act has consistently failed to gather the support needed to pass into law. Highlighting that elected officials in both chambers understand that a withdrawal such as the one proposed would have a negative impact on Americans.

The administration's current approach, which appears to favor executive action over legislative consensus, raises concerns within the industry about the precedent such a method sets. It suggests a movement away from democratic deliberation and towards unilateral decision-making, which may not fully take into account the complex balance of economic, environmental, and cultural interests at stake.

New Mexico is actively upgrading its infrastructure network with the aid of the Infrastructure Investment and Jobs Act (IIJA). The 2021 federal infrastructure law has allocated \$2.80 billion to the state, with \$483.86 million designated for fiscal year 2023 to enhance roadways and bridges. By September 30, 2023, New Mexico has committed \$529.56 million of these funds to various projects, supporting 190 new projects in FY 2023, on top of the 347 from FY 2022.. However, New Mexico's infrastructure ambitions face a potential setback. Should the Department of the Interior (DOI) proceed with its proposed withdrawal of land, it would significantly hamper the state's ability to achieve its IIJA-related infrastructure goals, as the withdrawal would restrict access to essential aggregates, crucial for numerous construction projects. This move could create a substantial hurdle in maintaining the momentum of infrastructure development, highlighting the delicate balance between environmental considerations and infrastructural progress.

The NSSGA advocates for a more nuanced policy-making approach. We believe that while it is critical to safeguard precious cultural and environmental assets, it is equally important to ensure that the livelihood and economic stability of New Mexico's communities are not undermined. NSSGA members have a track record of exceeding state, local, and federal environmental regulations, demonstrating their commitment to environmental stewardship and the well-being of local communities. These efforts are integral to their operations as they continue to provide the essential construction materials necessary for infrastructure development.

In light of this, NSSGA's position is clear: policy decisions should strike a careful balance between conservation efforts and the practical needs of infrastructure and economic progress. NSSGA urges policymakers to adopt strategies that do not put New Mexico at a disadvantage but rather support its growth and sustainability for the future.

Sincerely,



Michele Stanley  
VP, Government and Regulatory Affairs  
National Stone, Sand & Gravel Association

