



Society of Vertebrate Paleontology

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April 17, 2024

Mr. Scott Cooke, District Manager
Las Cruces District Office
U.S. Bureau of Land Management
1800 Marquess Street
Las Cruces, NM 88005
E-mail: BLM_NM_LCDO_Mail@blm.gov

Subject: Requesting additional clarifications concerning BLM’s “Community Pit #1” near Las Cruces, New Mexico

Dear Mr. Scott Cooke,

On behalf of the approximately 2,000 members of the Society of Vertebrate Paleontology (SVP: <http://vertpaleo.org>), thank you very much for taking the time to write us a detailed response letter regarding the remediation efforts at BLM’s “Community Pit #1” near Las Cruces, New Mexico, that was addressed to Dr. Kenshu Shimada (Chair of SVP’s Government Affairs Committee) on March 26, 2024. We are delighted and encouraged by the fact that your office is carefully monitoring the progress with both safety and paleontological resources in mind, by also involving the BLM paleontology staff. However, your letter seems to have illuminated one issue possibly overlooked by BLM, and we would like to seek clarification.

Our critical question is, do BLM’s monitoring efforts also include finding ways, and potentially implementing them, to safely preserve the fossil-bearing stratigraphic horizon? Your letter seems to imply that the monitoring efforts include only documentation and inventory of paleontological resources. As BLM’s final Environmental Assessment of Community Pit No. 1 Safety Project (DOI-BLM-NM-L000-2023-0028-EA) published in July 2023 clearly outlines, your agency (including your response letter) is already aware of the fact that multiple rock units at Community Pit No. 1 are fossiliferous. In particular, the Robledo Mountain Formation has the highest possible Potential Fossil Yield Classification (PFYC) rating of “5”, indicating that the formation is exceptionally important scientifically (see pages 26–30 of the EA). We would like to point out that simply documenting and inventorying fossils as the remediation process progresses would not be sufficient actions to meet the expectations of the Paleontological Resources Preservation Act (PRPA) of 2009. SVP requests BLM that the monitoring efforts must also include exploring options to find ways to balance the preservation of paleontological sources (including the entire fossil site) and safety.

Paleontological resources are nonrenewable and irreplaceable once destroyed. Therefore, as we discussed in our letter dated February 21, 2024, to which you responded, we would also like to continue to encourage BLM to consider converting “Community Pit #1” showcasing traces of fossil marine organisms to something similar to, and complement well with, BLM’s Prehistoric Trackways National Monument (<https://www.blm.gov/visit/ptnm>) that preserves primarily traces of terrestrial organisms. BLM has done a terrific job documenting the significance of paleontological resources at Community Pit No. 1 in its final Environmental Assessment (DOI-BLM-NM-L000-2023-0028-EA). However, your response letter fell short in describing BLM’s efforts to explore ways to preserve the fossil site as a significant natural heritage not only for people in New Mexico but also for people in the entire United States.

As we noted in our previous letter, SVP has always enthusiastically partnered with BLM and other agencies to offer professional assistance on matters relating to our mutual goals of preserving and protecting paleontological resources on federal lands, and we look forward to continuing to do so. We would appreciate it if you could again respond to our question, where you can again address your letter to Dr. Kenshu Shimada or any one of us at svp@vertpaleo.org. Thank you in advance for this time-sensitive request and consideration.

Yours sincerely,

Margaret E. Lewis, Ph.D.

Stuart S. Sumida, Ph.D.

Jessica M. Theodor, Ph.D.



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