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2 October 2026

Maille Gray, Permit Lead
Mining Act Reclamation Program
Mining and Minerals Division (MMD)
1220 South St. Francis Drive
Santa Fe, NM 87505

***RE: Revision 26-1, Updated Closure/Closeout Plan, Tijeras Mine and Mill,
Bernalillo
County, New Mexico, Permit No. BE001RE; NMDOW No. NMERT-6306.***

Dear Ms. Gray,

The New Mexico Department of Wildlife (Department) has reviewed the Updated Closure / Closeout Plan (Plan) submitted by GCC Rio Grande, Inc. (GCC). GCC is also requesting partial and final release at some of the reclamation sites, changing the reclamation reference area, and expansion into a new quarry. Staff from the Department, MMD, and GCC conducted a site inspection on 21 September 2026.

The Department does not have any issues with the partial financial release for portions of Quarry 1 where the earthwork, grading, and contouring have been satisfactorily completed. The Department also does not have any issues with the full reclamation release of approximately 74 acres within the mine permit area that have been documented to have met all applicable revegetation and erosion performance standards.

GCC is also proposing to establish a new designated reference area within Quarry 4 to support future reclamation evaluation and comparison, consistent with MMD guidance. Approval for using a portion of a previously reclaimed area that meets MMD reclamation performance standards as a new reference area would set a precedent. The Department considers this a potentially viable proposal that could be justified if at least two consecutive years of vegetation surveys are completed, documenting that the proposed site fully meets MMD vegetation success standards for cover, species diversity, and shrub density.

GCC proposes to incorporate adequately stable, vertical mine highwalls into the post-mining reclamation. The Department supports the incorporation of highwalls into the post-mining reclamation plan. However, in order for the highwalls to provide functional habitat for nesting raptors, ravens (*Corvus* spp.), and other avian species, the Department recommends including the creation of ledges and cavities in the highwall design. The Department also recommends further enhancing the habitat value of the highwalls by creating an undulating or irregular profile and by placing talus material along the toe of each highwall to provide habitat for small mammals and reptiles.

The Department concurs with the reclamation seed mix proposed in Table 5-5 of the Plan. The Department also suggests that GCC consider adding some additional plant species that are beneficial for pollinating insects. A more pollinator-friendly seed mix should include a diversity of flowering plants with different colors and shapes and flowering times that span spring through fall (March-October), rarer plants, perennials, native bunch grasses and thistles, some plants with pithy and woody stems, and high-nutrient or value plants (e.g., goldenrods [*Solidago* spp.], gumweed [*Grindelia* spp.], or sunflowers [*Helianthus* spp.]). Ideally, at least three different species should be flowering at all times between March and October. Consult pollinator-friendly plant species lists provided by the [Xerces Society for Invertebrate Conservation](#) or other appropriate resources, including the [Ecological Revegetation Application](#). No-till drills may be more effective than broadcast seeding for establishing flowering plants and leaving some bare ground (to support nesting insects) may be beneficial. The Department also recommends that the seed mix and mulch be certified weed-free to avoid inadvertently introducing non-native species to the reclamation site and that sterile non-native seed sources not be used. If using mulch, a shallow layer of pebbles or compost, leaf litter, plant debris, or wood are preferred over plastic mulch. Any alternate plant species, used to substitute for primary plant species that are unavailable at the time of reclamation, should also be native. When possible, the Department recommends using seeds that are sourced from the same region and habitat type as the reclamation site and suggests including seeds from a region that represents potential future climatic conditions at the site. Include as much locally appropriate genetic diversity in seed sources as possible.

In Section 3.1, GCC is proposing post-mining land uses that include: industrial/commercial, wildlife habitat, and recreation. The primary post-mining land use will be wildlife habitat, with recreation identified as an associated, compatible use. The stated goal of the Plan is to provide for the re-establishment of a self-sustaining ecosystem on the permit area following closure that is consistent with the surrounding area and post-mining land use. Section 3.2 states: "Once its operations cease and reclamation is successfully completed, GCC is not currently planning on retaining ownership of the permitted area. Future land ownership may include either a private party or a governmental agency. If current trends continue, the property could become desirable for residential use. However, if this occurs at some future date, it will occur after GCC sells the land and the next owner would be responsible for any development and costs associated with the land use revision".

The Department had previously expressed concerns that a future change in land ownership of the mine and mill site from GCC to another private entity may result in a change in land use that would adversely impact a section of the Tijeras Canyon Wildlife Safe Passage Project. Of specific concern is an I-40 underpass with an associated animal detection system that is located near Public School Road. Wildlife fencing is used to direct wildlife into the underpass and to safely across I-40 at the site of the animal detection system, thereby providing important habitat connectivity between the Manzano and Sandia Mountains. Future residential development on the western portion of the mine permit area could significantly impair or prevent wildlife from utilizing the underpass. The Department recommends that any future land sale or transfer pursued by GCC provides for the establishment and protection of an adequate wildlife corridor that maintains connectivity to the I-40 wildlife safe passage underpass. Because the western portion of the mine permit area is bordered by the Cibola National Forest, the Department believes that incorporating a wildlife corridor as an extension of the adjacent National Forest land would be the most effective way to preserve habitat connectivity to this underpass. The Department strongly recommends that GCC continue discussions with the US Forest Service (USFS) regarding a possible land exchange to ensure that critical wildlife habitat connectivity between the Manzano and Sandia Mountains is preserved and protected. The Department appreciates that during the site inspection, GCC did acknowledge that they are still working on a plan with the USFS that would create a permanently protected wildlife corridor that maintains habitat connectivity to the I-40 safe passage underpass and encourages continuation of these efforts.

Thank you for the opportunity to review and comment on the Plan. If you have any questions, please contact Ron Kellermueller, Mining and Energy Habitat Specialist, at (505) 270-6612 or ronald.kellermueller@dgf.nm.gov.

Sincerely,

Virginia
Seamster

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Virginia Seamster, Ph.D.

Assistant Chief for Technical Guidance

Wildlife Management Division, Ecological and Environmental Planning Section

cc: USFWS NMES Field Office