Valles
Caldera
Trust

VOLUME 2: APPENDIX A

Final Public Access and Use Plan

Environmental Impact Statement

October 15, 2012

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A-1	EPA	In general, any demolition, construction, rehabilitation, repair, dredging or filling activities have the potential to emit air pollutants. EPA recommends that best management practices are implemented to minimize the impact of any air pollutants. Furthermore, construction and waste disposal activities should be conducted in accordance with applicable local, state and federal statutes and regulations.	Thank you for taking the time to read the Draft EIS and submitting your comments. The EIS has been revised to include best management practices and additional mitigation measures.
A-2	EPA	EPA encourages the use of clean, lower-emissions equipment and technologies to reduce pollution. EPA's final Highway Diesel and Non-road Diesel Rules mandate the use of lower sulfur fuels in non-road and marine diesel engines beginning in 2007. To further reduce potential air quality impacts related to construction emissions, the VCT should include a Construction Emissions Mitigation Plan and adopt this plan in the Record of Decision (ROD).	The EIS has been revised to state that the Valles Caldera Trust will develop a construction emissions mitigation plan, which will be adopted in the Record of Decision.
A-3	EPA	On page 4-180 of the DEIS, the statement is made that, "Overall, no National Ambient Air Quality Standards exceedances and no measurable impacts to nearby Class I areas are expected from increased motor vehicle use within the preserve". We ask that the FEIS verify if this statement is only intended to describe the winter scenario of no shuttle/personal vehicle access beyond the visitor center into the preserve.	The EIS has been revised to clarify the analysis.
A-4	EPA	Discussion of Alternatives 3B and 4B in the DEIS indicates that development of the Entrada del Valle Visitor Center could result in substantially increased visitation i.e.; almost five times the number of visitors in 2010, and "would represent a measurable regional indirect impact that may influence the amount of greenhouse gases (GHG) and criteria pollutant emissions in the area". The analysis contained in this DEIS characterizes direct/indirect effects of these alternatives at the programmatic level over the long term to be major, and cumulative effects of these alternatives to be major. The FEIS should provide estimates of the extent of GHG and criteria pollutant emission increases related to these and other alternatives.	The impact analysis of GHG emissions and air quality has been revised in the EIS. Both analyses now evaluate impacts at a regional level, which resulted in impacts not being measurable. Therefore, quantitative emissions estimates were not provided. In addition, federal guidance on GHG emissions from the Council on Environmental Quality (CEQ) issued February 18, 2010, states, "An agency may decide that it would be useful to describe GHG emissions in aggregate, as part of a programmatic analysis of agency activities that can be incorporated by reference into subsequent NEPA analyses for individual agency actions. In addition, Federal ... proposals regarding long range energy, transportation, and resource management programs lend themselves to a programmatic approach." As noted in the Draft EIS, the transportation component of the plan falls under the programmatic planning level. Therefore, if needed (i.e., if measurable) estimates of the extent of GHG and criteria pollutant emission increases of the preferred alternative would be addressed in a NEPA document that tiers from the Draft EIS, as directed under the CEQ guidance.
A-5	EPA	According to the DEIS, the design would use existing or constructed wetlands for wastewater treatment and stormwater storage, thereby reducing capital costs. EPA recommends against using existing (natural) wetlands for directly treating waste and stormwater. Using natural wetlands for treating or receiving direct runoff from stormwater and wastewater can be detrimental to the long term health of the wetland by overwhelming their ability to assimilate pollutants and nutrients. EPA would support developing constructed wetlands outside of waters of the U.S. and off channel for such purposes. The intercepting constructed wetlands can then be designed to discharge into natural wetlands to provide beneficial hydrology once pollutants (parking lot runoff) are removed by the treatment wetlands.	The EIS has been revised so that constructed, not existing, wetlands would be used.
A-6	EPA	The FEIS should quantify potential impacts to waters of the U.S., including wetlands. EPA recommends that all efforts to avoid impacts to wetlands be taken and any unavoidable impacts be fully mitigated on-site with the restoration of in-kind resources.	The EIS has been revised to quantify the impacts to waters of the U.S., including wetlands, and mitigation measures were added.
A-7	EPA	The DEIS discussion on Environmental Justice is fairly robust and provides a great deal of socio economic data on both minority groups and ethnicity. The one item EPA suggests improving is to provide more comprehensive discussion on existing stressors impacting communities of minority people. A more detailed discussion of the impacts of poverty and how this proposed action could mitigate the level of poverty through additional job creation would be helpful. EPA suggests and believes recruitment and employment of local residents from the poverty communities at the preserve would be beneficial. EP A asks these concerns be addressed and included in the FEIS.	The EIS has been revised to incorporate more discussions of how the plan could help mitigate poverty levels through job creation, as well as employment of "Cultural Guides" from the American Indian population.

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A-8	EPA	The Consultation and Coordination Chapter of this DEIS mentions public meetings, but it is not clear whether tribal consultation has taken place. EPA asks that the FEIS provide more detail of tribal involvement. This would include copies of letters sent to USDA and copies of response correspondence received from the tribes. EPA recommends that tribes be contacted for input. The DEIS indicates that Pueblo, Navajo, and Ute tribes were present throughout the area's history. The Comanche Nation, Kiowa Tribe, Fort Sill, Mescalero, and Jicarilla Apache Tribes should be included as potential or future invitees for comment and consultation also.	Formal and informal consultation has occurred throughout the planning process. Scoping information and updates were distributed to all interested/affected tribes, including those listed in your letter. The EIS was included in the annual list of projects submitted to tribes. To avoid duplication of efforts, the trust used the NEPA process to achieve National Historic Preservation Act (NHPA) Section 106 public notification and to provide periods for public comment. Therefore, the trust used concurrent notification and comment periods for both NEPA and NHPA and encouraged the public, stakeholders, and tribal communities to ask questions and provide comment on issues related to historic preservation, historic properties, and cultural resources. Based on the selection of any action alternative, formal consultation would continue throughout design, construction, and management. The Final EIS includes this information in chapter 5.
A-9	EPA	The DEIS indicates that "increased access" would also create new jobs for tourist guides that would need to be bi-lingual. EPA suggests employment of "Cultural Guides" from the local American Indian population.	The EIS has been revised to include employment of "Cultural Guides" from the American Indian population.
A-10	EPA	Regarding domesticated livestock grazing leases, EPA suggests leasing be limited. Domesticated livestock bring in foreign plant species via hoofs and feces. The DEIS mentions problems with invasive plant species in the area and this could increase this problem.	The Valles Caldera Trust will continue to conduct its livestock grazing program in accordance with its 2009 *Multiple Use and Sustained Yield of Forage Resources Environmental Assessment* .
A-11	EPA	With regards to having vehicle tours of the preserve, EPA suggests conducting limited vehicle lead tours. We also suggest limited public access roads, trails, etc. near the Santa Clara Indian Reservation due to potentially uninvited access and possible illegal activities, (gathering, hunting, stealing, etc) on sensitive tribal lands. Please address these issues in the FEIS.	Under alternative 2, shuttles and private vehicles would have access only to Level 3 and Level 4 roads (see Figure 2-4 map on page 2-33 and text on page 2-30 of the Draft EIS). Under alternatives 3A/B and 4A/B, shuttle and private vehicle access would be further restricted to only Level 4 roads (see Figure 2-7 map on page 2-42 and text on page 2-46 and 2-54). None of the Level 1 or 2 roads shown on the maps from the Valle Toledo to the Santa Clara Indian Reservation would be open to shuttle or private vehicle use. The EIS has been revised to further address access to sensitive tribal lands, particularly the Santa Clara Indian Reservation.
B-1	NM Dept Game and Fish	The DEIS does not appear to contain a comprehensive or cogent analysis of the potential effects of upgrading roads and allowing spontaneous personal vehicle access for an estimated 120,000 visitors per year, as proposed by alternatives 38 and 48, and to a lesser extent, alternative 2, on elk behavior, particularly during calving periods. Table 2-10 Comparison of Alternatives states "Personal vehicle use would create more frequent, persistent, and widespread disturbance to terrestrial wildlife than a shuttle system". Page 4-76 states "Expanded and widespread human activity within the preserve has not occurred before; wildlife is not habituated to human presence". Page 4-77 states: Increased visitation would increase noise levels along the preserve's roads and at recreational facilities throughout the preserve such as campgrounds, picnic areas, and trailheads. Wildlife can be adversely affected by sounds that intrude on their habitats and would therefore avoid these places, slightly reducing the amount of available habitat. However, sufficient habitat exists in the preserve that adverse physiological and/or behavioral changes to wildlife are not anticipated. However, the next paragraph states: Long-term impacts (mostly related to disturbance) would be minor to moderate and adverse because increases in human visitation could cause measurable changes in habitat use patterns, particularly in sensitive areas such as elk calving areas and riparian zones. Disturbance would be most severe during the summer when visitation is highest and animals such as elk use the preserve as critical summer range. Impact levels would be lower during the winter when visitation is lowest. These two statements are directly contradictory, and with regard to elk and mule deer, we do not concur with the statement" ... sufficient habitat exists in the preserve that adverse physiological and/or behavioral changes to wildlife are not anticipated".	Thank you for taking the time to read the Draft EIS and submitting your comments. The EIS has been revised to include more information about the effects of recreationists on elk.

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B-2	NM Dept Game and Fish	Regarding vehicle noise levels for alternative 38, page 4-81 states: Personal vehicles would also come in a wider variety of engine types, sizes, and noise levels compared to a presumably more similar set of shuttles. Impacts from noise would be similar to those under alternative 3A, with more disturbance from different motor vehicle engines. More unlimited access via personal vehicle -for instance, the use of 4-wheel drive vehicles to access remote locations -could result in potential illegal hunting and further loss of undisturbed areas for elk breeding, calving, and foraging. These differences would result in increased measurable changes to fish and wildlife compared to alternative 3A.	The text, "for instance, the use of 4-wheel drive vehicles to access remote locations," is incorrect and has been removed from the Final EIS. No Level 2 roads, which are the most primitive and would require use of high-clearance vehicles, are being proposed for visitor use. Chapter 2 of the Draft EIS notes that roads connected to the visitor contact station/visitor center would be improved to Level 4, and that “all other roads would remain at their current level” (page 2-18). The EIS has been revised to reflect the effect of noise on elk breeding, calving, and foraging. As described in the Draft EIS, chapter 2 (page 2-4) notes that only programmatic decisions will be made at this time regarding transportation. More detailed planning, including maintenance levels of the public transportation route, will be considered in future, site-specific transportation plans. Programmatically the VCT has assessed potential impacts from the broadest level of preserve-wide access. Alternative 2 proposes less development, less visitation, and freest access with personal vehicles.
B-3	NM Dept Game and Fish	After review of the DEIS, it is not clear to us what the statement" ... for instance, the use of 4-wheel drive vehicles to access remote locations ... " means. Figures S6 and S8 relative to implementation of alternatives 38 and 48, which allow open spontaneous personal vehicle access, state "Personal vehicles follow Level 4 loop route; use other road levels". Will visitors be allowed to use 4-wheel drive vehicles to access remote locations? This was not apparent from reading the DEIS text, but if this will occur, disturbance to elk and mule deer will be exacerbated. A significant predictor of elk and deer distribution is the distance to roads that are open to motor vehicle traffic (Thomas et al. 1979 in Wisdom et al. 2004). Elk in particular have shown disproportionately less use of areas near roads open to motorized traffic (Lyon 1983, Rowland et al. 2000, 2004 in Wisdom et al. 2004a). Depending on the volume of traffic, quality of the road, and density of cover adjacent to the road, elk have been documented to avoid habitat from 0.25 miles to 1.8 miles from the road. Rowland et al. (2000, 2004 in Wisdom et al. 2004a) found that elk strongly preferred habitat farther from roads open to motorized traffic at the Starkey Experimental Forest and Range Station in northeast Oregon. Habitat selection was calculated using more than 100,000 recorded locations of 89 cow elk. Perry and Overly (1977), Rost and Bailey (1979), and Witmer and deCalesta (1985) found less elk use of habitat near primary (higher traffic volumes) rather than secondary or primitive roads (in Wisdom et al. 2004a). At the Starkey Experimental Station, Wisdom et al. (2004) corroborated that high rates of vehicle traffic cause elk to select habitat away from those high use roads.	The text, "for instance, the use of 4-wheel drive vehicles to access remote locations," is incorrect and has been removed from the Final EIS. Alternative 2 proposes the freest access with personal vehicles, which would be allowed on Level 3 and 4 roads. Under alternatives 3B and 4B, personal vehicles would only be allowed on Level 4 roads. No Level 2 roads, which are the most primitive and would require use of high-clearance vehicles, are being proposed for visitor use. Chapter 2 notes that roads connected to the visitor contact station/visitor center would be improved to Level 4, and that “all other roads would remain at their current level” (page 2-18). The EIS has been revised to include more information about the effects of recreationists on elk.
B-4	NM Dept Game and Fish	Non-motorized human recreational activities such as hiking, horseback riding, mountain biking and cross-country skiing can also affect elk distribution and reproductive success (Phillips and Alldredge 2000, Shively et al. 2005, Wisdom et al. 2004b, Cassirer et al. 1992, Shultz and Bailey 1978, Aune 1981). Implementation of alternatives 3B or 4B would allow spontaneous personal vehicle access for an estimated 120,000 visitors a year, using upgraded gravel or paved two-way roads along a loop route starting at the Valle Grande. The greatly increased traffic volume and associated noise and human visual disturbance combined with increased hiker, mountain biker and backpacker access throughout the VCNP associated with implementing alternative 3B or 4B may significantly reduce elk abundance, elk calving success, elk viewing opportunities, and possibly elk hunter success on VCNP. Greatly increased volumes of personal vehicle traffic resulting from alternatives 3B or 4B may have population-level effects on the VCNP elk population. Vehicles stopping to view cow elk with calves hidden in the valle grasslands may cause 1) the cows to delay return to the calves; 2) reduced calf nursing periods and opportunities; 3), increase rates of calf abandonment; and 4) increased calf exposure to predation. Implementation of alternative 2, with spontaneous personal vehicle access for approximately 50,000 visitors a year, may have similar results. Public access primarily by shuttle, however, would reduce the number of vehicles and allow trained shuttle drivers to avoid these situations. Elk may be able to habituate to more predictable shuttle schedules and presence, as compared to higher volume and spontaneous personal vehicle use.	The EIS has been revised to include more information about the effects of recreationists on elk.

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B-5	NM Dept Game and Fish	It is not clear to us why a more rigorous and comprehensive analysis of the direct, indirect,. and cumulative effects of implementing open spontaneous personal vehicle access on elk distribution and reproduction, and potential effects on elk hunting and viewing revenues to the VCNP, was not included in the DEIS. Deferring this level of analysis to future programmatic projects such as road upgrades and picnic area and campground construction would preclude the ability to analyze the potential for irreversible and irretrievable commitments of implementing one of these alternatives as required by the National Environmental Policy Act (NEPA). In fact, the irreversible and irretrievable commitment section of this DEIS analyzes only the potential for irreversible loss of cultural resources; no analysis of wildlife is included. We also believe that an in-depth analysis of the effects of implementing spontaneous and open personal vehicle access to the VCNP on elk and other wildlife is necessary at this stage of planning and decision-making to meet the spirit and intent of the Valles Caldera Preservation Act, which requires protecting and preserving the scientific, scenic, geologic, watershed, fish, wildlife, historic, cultural and recreational values of the VCNP.	The EIS has been revised to include more information about the effects of recreationists on elk. Direct mortality to wildlife, including elk, was added to the discussion on irreversible and irretrievable commitment of resources. This discussion focuses on resources that would receive impacts that could not be mitigated and would constitute a permanent loss.
B-6	NM Dept Game and Fish	Therefore Department does not support implementation of Alternatives 3B or 4B, which would allow both open spontaneous personal vehicle and shuttle traffic simultaneously, therefore greatly increasing the number of vehicles on VCNP at any time. These alternatives would also require that larger parking lots be developed at trailheads, picnic areas and overlooks, to accommodate the use of personal vehicles (p. 2-46). Of the two proposed locations for the development of a large visitor center (10,000 square foot plus 5,000 square foot administrative space), the Entrada del Valle, proposed for the southwest corner of the Valle Grande, would have the most adverse effect on elk calving, which currently occurs near this location. Table 2-10 states "Elk using the area for summer foraging and calving habitat may be disturbed". Also, this location is not on the periphery of the VCNP, as called for in the 2005 VCNP Master Plan for Interpretation (p 2-75). Alternative 2 Banco Bonito Visitor Contact Center The level of development under alternative 2 is expected to accommodate approximately 50,000 visitors annually, or about 330 visitors per day during the summer recreation season. Page 4-55 states that "Programmatic-level actions proposed under alternative 2 would provide visitors access to the majority of the preserve using personal vehicles on Level 3 and Level 4 roads". Figure 2-4 indicates that Level 3 and 4 roads would access most of the major valles, including Valle Grande, Valle Jaramillo, Valle Santa Rosa, Valle Toledo, Valle San Antonio, and Valle Seco. Elk use all of these valles for calving. Increasing vehicle capacity, traffic volume, traffic speeds, and associated vehicle noise and human visual disturbance in and around these valles will cause increasing habitat fragmentation that may adversely affect large game animals such as elk, mule deer and black bears, reducing the potential for successful wildlife viewing and possibly hunting success.	The EIS has been revised to include more information about the effects of recreationists on elk.
B-7	NM Dept Game and Fish	The DEIS appears to make the assumption that visitation will be limited by the size of the visitor center ultimately built. The DEIS states that public access in 2010 was approximately 25,000 visitors. Alternative 2 is anticipated to accommodate approximately 50,000 visitors annually, or about 330 visitors per day during the summer recreation season. We were not able to find a similar visitors per day estimate for alternatives 3A, 3B, 4A and 4B in the DEIS, which are expected to accommodate approximately 120,000 visitors a year. Using a simple ratio, we extrapolate from the DEIS figure of 330 visitors per day for 50,000 visitors per year to approximately 790 visitors a day at 120,000 visitors per year. We also could not find an estimate of how many vehicles per day are currently accessing the VCNP for permitted activities, or how many personal vehicles per day on VCNP that could be expected by implementation of alternatives 2, 3B or 4B. At an average of 2 persons per vehicle, approximately 165 personal vehicles would access the VCNP per day under the alternative 2 scenario during the summer recreation period (Memorial Day through Labor Day), and approximately 395 vehicles per day under alternatives 3B and 4B.	The expected level of visitation determined the suitable size of the visitor center rather than the other way around (see chapter 2, page 2-75). The EIS assesses the maximum footprint the VCT believes is suitable for the expected level of visitation at any site and is sufficient to offer a variety of programs and amenities. Chapter 3 in the Draft EIS describes the current level of visitation (3-3), current transportation system (3-68), current motor vehicle use (mobile combustion sources 3-195). The EIS has been revised to include an estimate of visitors per day for alternatives 3A, 3B, 4A, and 4B. Alternative 2 is expected to have 330 visitors per day on summer weekends and 165 on summer weekdays. Alternatives 3 and 4 are expected to have 790 visitors per day on summer weekends and 395 on weekdays.

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B-8	NM Dept Game and Fish	Elk and mule deer would more easily habituate to relatively lower levels of shuttle traffic with relatively predictable schedules and stops, as compared to higher volumes of personal vehicle traffic with less predictable schedules and stops. Although some elk would likely habituate to either scenario, we expect that allowing open spontaneous personal vehicle access would cause more elk to leave the VCNP to calve where there is less disturbance than implementing a primarily shuttle access scenario. We recognize that under alternatives 3A and 4A, primary access would be provided by shuttle, but more limited personal vehicle access would be allowed by permit for recreational users such as hikers, backpackers, campers, horseback riders and anglers.	The EIS has been revised to include more information about the effects of recreationists on elk and mule deer.
B-9	NM Dept Game and Fish	However, based on the potential adverse effects of open spontaneous personal vehicle access for an estimated 120,000 visitors per year to the elk population on VCNP, the Department supports the development of a visitor contact station at Banco Bonito, and the implementation of a shuttle system that would provide the primary access for most VCNP visitors. During the elk calving period of May 15 to July 1, we recommend that appropriate selective road closures be incorporated as a flexible and adaptable management tool to protect resources in valles where calving is occurring. We believe implementation of this recommendation would minimize adverse impacts on elk during the critical calving period, maintain hunter success and satisfaction, and still provide wildlife viewing opportunities while still achieving the goals of increasing public access and conserving wildlife and wildlife habitat values.	The EIS has been revised to include mitigation measures to protect elk and wildlife in general.
B-10	NM Dept Game and Fish	With regard to implementation of alternatives 4A and 4B and the Vista del Valle visitor center, page xvii states "The Las Conchas fire in 2011 likely burned a substantial amount of designated critical habitat for the Mexican spotted owl, and resulted in direct mortality to most individual Jemez Mountain salamanders. Changes to habitat from the fire would likely inhibit recolonization by the salamander". In fact, the New Mexico Endemic Salamander Team (NMEST) believes that the Las Conchas Fire did not cause direct mortality to JMS, since surface habitat conditions during the fire were extremely dry, and JMS were not likely to be on the surface. However, preferred surface cover objects such as decayed Douglas fir logs were greatly reduced or eliminated in high-severity burned areas, which likely stresses JMS when they do come to the surface during wetter periods. JMS have been found in burned habitats after the Dome, Cerro Grande and Las Conchas Fires. The NMEST is conducting research to determine persistence of JMS after catastrophic wildfires. Surveys for JMS should be conducted and mitigation actions taken if the Vista del Valle location is selected for a visitor center and JMS are found at that location.	As noted on page 4-87 of the Draft EIS, Bandelier National Monument's web site about the effects of the Las Conchas fire states that "Jemez Mountain salamanders and Goat Peak Pika may never be found in the park again." Given the monument's proximity to the preserve, a worst-case scenario was assumed in order to fully assess impacts to the salamander. Text on page 4-87 also states "the fire would have resulted in direct mortality to most" -- not all -- "individuals." It is the trust's hope that Jemez Mountain salamanders will be found in burned habitats within the preserve. The EIS has been revised to include mitigation measures for the salamander.
B-11	NM Dept Game and Fish	Additional changes need to be made to the final EIS relative to JMS. Page 3-98 does not list the JMS as a federal candidate species. Table 3-12 on Page 3-105 does not list JMS as state endangered under the New Mexico Wildlife Conservation Act. The discussion of threats to JMS on page 3-111 does not list fire as the primary threat to the persistence of JMS.	Listing information about the salamander has been revised in chapter 3 of the EIS and additional information about the threat of fire has been added.
C-1	Council of the Incorporated County of Los Alamos	On behalf of the Council of the Incorporated County of Los Alamos, this letter conveys the Council's preference of public access and use option 3A or 3B for the Valles Caldera National Preserve (VCNP). This recommendation is based on input ...Council received 11 e-mail comments from the public. . . . a motion was made to select public access and use option 3A or 3B. The motion was passed 5-0 with 1 recusal.	Thank you for taking the time to read the Draft EIS and submitting your comments.
D-1	NM SHPO	The SHPO agrees that a mitigation plan must be developed to address adverse effects to cultural resources if alternative 2, 3 or 4 is selected. Rather than developing an MOA to address adverse effects on cultural resources at the visitor center location and developing a separate PA to address public access, the VCNP may want to consider developing a PA that addresses all phases of the visitor center development and public access. If the VCNP chooses this route, a separate MOA for the visitor center would not be necessary. Alternatively, the VCNP could develop the MOA for the visitor center and consult with the SHPO on an individual project basis as trails, parking, picnic areas, etc. are developed for public access.	Thank you for your comment. The Valles Caldera Trust will work with the SHPO on an individual project basis to develop appropriate mitigation through the Section 106 process to resolve any adverse effects and mitigate impacts to a less than significant level.
E-1	Pueblo of Laguna	The Pueblo of Laguna has determined that the undertaking WILL NOT have a significant impact at this time. However, in the event that any new archaeological sites are discovered and any new artifacts are removed, we request to be notified to review items. We also request photographs of items.	The Valles Caldera Trust would work with Pueblos and Tribes to minimize impacts to the extent possible. This has been added as mitigation to chapter 2 of the EIS.

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F-1	Jemez Pueblo	This alternative [the No Action Alternative] would have the most beneficial impacts to the resources from the decrease in human presence within the Preserve. The Pueblo would no longer be concerned about additional adverse impacts to their cultural resources or the natural resources in the procurement areas where medicinal plants and herbs as well as other important resources are collected by the Jemez People.	Thank you for taking the time to read the Draft EIS and submitting your comments. The Valles Caldera Trust would work with Pueblos and Tribes to minimize impacts to the extent possible. This has been added as mitigation to chapter 2 of the EIS.
F-2	Jemez Pueblo	Alternatives 2 thru 4 would have the greatest negative impacts on Jemez Traditional Cultural Properties (hereinafter ''TCPs'') in the YCNP. As stated in the above paragraphs, the Jemez Mountains, including the VCNP, are within the Jemez ancestral domain to which Jemez Pueblo holds aboriginal Indian title. The Jemez People's most sacred religious and cultural locations, including former Pueblo sites where hundreds of our ancestors lived together; including field houses where seasonal fanning and hunting was headquartered, shrines where prayers are offered, grave sites, and procurement locations where medicinal and culturally significant plants and minerals are sourced for a variety of personal spiritual and health uses; would all be threatened by ground disturbing activities involved with construction of a new visitor center, parking lots, campgrounds, picnic areas, road improvements and improvements on hiking trails for backpacking and horseback riding.	As noted in chapter 4 of the Draft EIS, major impacts to cultural resources are anticipated under the action alternatives. As stated in the Draft EIS, if adverse effects are identified, appropriate mitigation would be developed through the Section 106 process to resolve adverse effects. The Valles Caldera Trust would work with Pueblos and Tribes to minimize impacts of increased public visitation to the extent possible. This has been added to chapter 4 of the Environmental Justice section of the EIS under the discussion of alternative 2.
F-3	Jemez Pueblo	With the new proposed buildings and facilities in place there will be an increased demand for water. The proposal mentions that water usage to accommodate the increase in demand will increase anywhere from 2 million gallons to 4.4 million gallons a year. We live in the Southwest and the demand for water has greatly increased for the people living in the urban areas and the Jemez Valley below the Caldera. The Valles Caldera is the headwaters for the Jemez watershed. All of the water that Jemez Pueblo uses for their livelihood comes from this sacred area. In our time of drought, what kind of impact will this have on the availability of water for us who depend on this sacred water? The plan also talks about taking the water from the natural springs in the immediate landscape. Once the millions of gallons are pumped what will happen to our sacred springs in the Preserve that we use for our religious ceremonies? We oppose any further development of springs in the Valles Caldera to provide an increased human water supply.	As described on pages 2-23 to 2-24 and page 2-29 of the Draft EIS, the Valles Caldera Trust would strive to implement as many water conservation methods, such as rainwater harvesting, as possible. The Draft EIS notes that, for alternatives 3A and 3B, if springs are not viable, a well would be drilled, although further analysis is required to determine the production volume of the springs or the best location to drill a well. The Draft EIS also notes that alternatives 4A and 4B pose many obstacles to securing a viable water source, and that further analysis would be required to determine the springs' viability and reliability as a water source. These issues will be factored into the trust's selection of the preferred alternative.
F-4	Jemez Pueblo	Under alternative 2, the Trust proposes a small scale Visitor Contact Station in the Banco Bonito area in the southwestern part of the preserve. In addition, it mentions the development of a double lane road at certain locations to provide easier access into the Preserve. The VCT should understand that one of the most sacred pilgrimage trails from the village of Walatowa to Redondo Peak, our most important landmark in the Preserve, passes through the area where this Visitor Contact Station is proposed. In addition, there are important plant procurement areas within Banco Bonito.	Section 105(g)(1) of the Valles Caldera Preservation Act specifically includes provisions regarding Redondo Peak, which the trust would continue to uphold: "For the purposes of preserving the natural, cultural, religious, and historic resources on Redondo Peak within the area of Redondo Peak above 10,000 feet in elevation (A) no roads, structures, or facilities shall be constructed; and (B) no motorized access shall be allowed." Chapter 4 of the Draft EIS notes that Native American groups would still be permitted periodic on-site visits for cultural and religious practices and to hunt and gather natural resources, as under existing conditions, for all action alternatives. As noted in the Draft EIS, the preserve would work with local Tribes to identify methods of protecting these features, as well as tribal access to them.
F-5	Jemez Pueblo	There is also a small pueblo site and many agricultural features and fieldhouses that Jemez is claiming as their ancestral homeland. Research on the archaeological sites in this area has begun and so much more needs to be researched. It would be a travesty to overlook this rich archeological record and build new facilities that will cause an increase in human population in this area. This population will do what human populations do everywhere on public land: trample on, vandalize, loot, litter, and disrespect sacred places.	As noted in the Draft EIS, the preserve would work with local Tribes and Pueblos to identify methods of protecting important cultural features and of sustaining on-site visits for cultural and religious practices without interference from increased public visitation. In addition, the discussion in the Draft EIS of impacts to cultural resources notes, "Additional inventory would be needed and additional site discovery is highly likely. This work would be conducted in compliance with the laws, regulations, agreements, and policies referenced above and would include required consultations. A programmatic agreement with procedures specific to the proposed public access and use actions could be developed. The VCT would seek to avoid, reduce, or minimize adverse effects on historic properties and areas important to Native American communities." The Draft EIS also acknowledges that increased efforts would be required to address increased visitation; VCT staff members would need to assist in managing visitor capacity and influencing on-site behavior, such as reducing user conflicts, and protecting resources. The EIS has been revised to include the following guideline from the VCT's *Framework and Strategic Guidance for Comprehensive Management* (2005): "activities must not conflict with religious and cultural priorities and uses," as well as other relevant mitigation.
F-6	Jemez Pueblo	Alternatives 3A and 3B propose a 10,000 square Entrada del Valle Visitor Center which includes a full service visitor and interpretive center constructed immediately below State Road 4, southeast of South Mountain overlooking the Valle Grande. This area is a very special and sacred procurement area for one of the religious society groups from Jemez. Some of the archaeology found in this area is the result of this particular society group performing their ceremonies for hundreds of years in that very spot.	As noted in the Draft EIS, the trust would work with local Tribes and Pueblos to identify methods of protecting important cultural features. The EIS has been revised to further elaborate on this.

Valles Caldera National Preserve
Public Access and Use Plan / Environmental Impact Statement (EIS)
Agency Comments on Draft EIS

No.	Affiliation	COMMENT	RESPONSE
F-7	Jemez Pueblo	Alternatives 4A and 4B propose a Vista del Valle Visitor Center. This would be a 10,000 square feet building with a full service visitor and interpretive center constructed immediately above State Road 4, below Rabbit Mountain, overlooking the Valle Grande. This area again is a special and sacred procurement area for several religious society groups from Jemez. It has TCP's as well as archaeology that is a result of our society groups performing their ceremonies in this area since time immemorial.	As noted in the Draft EIS, the VCT would work with local Tribes and Pueblos to identify methods of protecting important cultural features. The EIS has been revised to further elaborate on this.
F-8	Jemez Pueblo	Pueblo recommends shuttle service only for access into and out of the Preserve. It is a trend some of the National Parks are following such as Zion, Yosemite, and Glacier National Parks, and it is working. It would have less of an impact on the resources in the Preserve,	Thank you for taking the time to read the Draft EIS and submit your recommendations All comments will be taken into consideration in the selection of the preferred alternative.
F-9	Jemez Pueblo	There is mention in the EIS that if a shuttle transport system is chosen, in the future the VCNP shuttles will be changed from gasoline engines to electric engines. This is what Jemez would recommend as well to cause less of a carbon footprint from vehicle usage. The Pueblo also recommends that the shuttles follow the Level 4 loop route. It is on a road already in existence and would be easier to manage.	Thank you for your insight regarding the use of existing roads and the potential to incorporate electric vehicles using a solar voltaic system.
F-10	Jemez Pueblo	We also recommend eliminating the proposed picnic areas and camp grounds in the Valle de San Antonio, Valle Toledo, and Obsidian Valley. These areas are special procurement areas. The Valle de San Antonio is a refuge area for the Bald Eagle in the winter time according to Terry Johnson, a wildlife biologist working on data collection on the Bald Eagle. There are proposed fishing and hunting access and parking lots at various locations along the creek in the Valle de San Antonio which will also impact Bald Eagle habitat. Controlling access for seasonal impacts would be best in these locations as well.	No decisions have been made yet for locations of picnic areas and campgrounds. Should an action alternative be selected as the preferred alternative, the trust will develop an implementation plan, which will define more specific details about the programmatic components of this EIS, including the siting of such facilities. These decisions will consider impacts to all resources, including the bald eagle. As noted in chapter 3 of the Draft EIS, The VCT has closed areas to vehicle traffic to limit disturbance to bald eagles that visit the preserve during the winter. Realigning the road to avoid sensitive resources and reduce existing impacts may be incorporated into future plans based on the decisions in this EIS. The EIS has been revised to include mitigation measures, including implementing seasonal closures for protection of wildlife when necessary.
F-11	Jemez Pueblo	The Pueblo also recommends compost toilets, rain catchment systems and an efficient water system infrastructure to use less water. We feel the water usage for the proposed Visitor Center and other proposed facilities is unnecessarily high, especially at a time when our global climate is changing to a much hotter and drier climate. We feel that the Preserve could cut down on it's water usage with more efficient, "go green" water systems.	The Valles Caldera Trust agrees that water conservation systems are necessary. As described on pages 2-23 to 2-24 and page 2-29 of the Draft EIS, the trust would strive to implement as many water conservation methods, such as rainwater harvesting, as possible. The analysis included in the Draft EIS represents the worst-case scenario should the water conservation measures desired cannot be implemented.
F-12	Jemez Pueblo	If the alternative is chosen to build a full service visitor and interpretive center, Jemez Pueblo proposes to offer our geographic atlas of the Jemez ancestral domain, oral histories, recorded testimonials of Jemez elders about the Valles Caldera National Preserve, photo archives, and artifacts repatriated from various museums to put on display at the center. As the DEIS stated, people would be coming from all corners of the world to visit and learn about the Valles Caldera National Preserve. What better way to do this than by displaying these items to educate them about the aboriginal inhabitants of this profoundly unique and beautiful area.	The Valles Caldera Trust welcomes the generous offer by the Jemez Pueblo to contribute to the proposed visitor center to enhance visitors' understanding of the area's aboriginal inhabitants.
F-13	Jemez Pueblo	The Valles Caldera National Preserve is a very special place for the Jemez people. There is not a single area in the Preserve that does not include a Jemez Traditional Cultural Property. The entire Caldera is special and we hold it dear to our hearts.	The Valles Caldera Trust appreciates the importance the Jemez people place on the preserve. As noted in the Draft EIS, the trust would work with local Tribes and Pueblos to identify methods of protecting important cultural features.
G-1	Hopi Tribe	The Summary of Impacts demonstrates that these alternatives benefit visitor experience, socioeconomics, and environmental justice, while having moderate to major impacts to cultural and natural resources. Is the purpose and need of the Preserve to preserve natural and cultural resources, or to encourage visitation through infrastructure, facilities, and shuttle buses, adversely affecting natural and cultural resources? The Grand Canyon Preserve declared a century ago has resulted in the South Rim infrastructure today.	Section 102(b) of the Valles Caldera Preservation Act states that the preserve was established to both "protect and preserve for future generations the scientific, scenic, historic, and natural values of the Baca ranch, including rivers and ecosystems and archaeological, geological, and cultural resources" and to "provide opportunities for public recreation." The Valles Caldera Trust intends to uphold the act's directives in all of our undertakings.
G-2	Hopi Tribe	How does the Valles Caldera propose to fund the alternatives? Will fees be imposed at the visitor portal?	The VCT has a variety of fund-raising mechanisms authorized by the Valles Caldera Preservation Act and referenced in the EIS. The VCT *Strategic Management Plan 2012 – 2018* referenced in the EIS includes goals and strategies for financial sustainability. The Valles Caldera Preservation Act authorizes the trust to charge fees and use a lottery system to generate funds. The VCT must announce proposed fees for access and fees assessed for recreation activities and allow a 60-day public comment period. This will occur at a later date following selection of the preferred alternative. Funding sources for the preserve's programs are addressed in the VCT Strategic Management Plan for Fiscal Years 2012 – 2018, which was referenced in the Draft EIS and available at http://www.vallescaldera.gov/about/trust/docs/Valles%20Caldera%20Trust%20SMP%202012-2018.pdf

Valles Caldera National Preserve
Public Access and Use Plan / Environmental Impact Statement (EIS)
Agency Comments on Draft EIS

No.	Affiliation	COMMENT	RESPONSE
G-3	Hopi Tribe	We recommend reconsideration of the alternatives eliminated from detailed analysis, and support the No Action Alternative 1 in the Public Access and Use Plan Draft Environmental Impact Statement for the Valles Caldera National Preserve.	The Valles Caldera Trust believes that we have developed a reasonable range of alternatives based on the extensive process described on pages 2-8 through 2-17 of the Draft EIS. The VCT carefully considered all alternatives eliminated from detailed analysis and based their elimination on rational criteria.
G-4	Hopi Tribe	If any other alternative [than No Action] is implemented, please provide us with copies of the cultural resources surveys of the areas of potential effect and any proposed treatment plans for review and comment.	The VCT would work with local Tribes and Pueblos to identify methods of protecting important cultural features and would provide copies of cultural surveys to affected Tribes and Pueblos.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

A

August 14, 2012

Marie Rodriguez
Director, Natural Resources
Valles Caldera Trust
U.S. Department of Agriculture
18161 State Highway 4
P.O. Box 359
Jemez Springs, NM 87025

Dear Ms. Rodriguez :

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act (NEPA), and the Council on Environmental Quality Regulations (CEQ) for Implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) and Public Use and Access Plan for the Valles Caldera National Preserve. The Valles Caldera Trust (VCT) within the U. S. Department of Agriculture (USDA) is the lead Federal agency responsible for NEPA compliance for this proposed action.

EPA rates the DEIS as **"EC-2,"** i.e., EPA has **"Environmental Concerns and Request Additional Information in the FEIS"**. The EPA's Rating System Criteria can be found here: http://www.epa.gov/oecaerth/nepa/comments/ratings.html. Our enclosed detailed comments are offered to complement and to more fully insure compliance with the requirements of NEPA and the Council on Environmental Quality (CEQ) regulations. EPA's comments are offered on identification of aquatic resources, minimization of impacts, and air quality impacts, environmental justice and tribal consultation. EPA asks that these comments be addressed and responded to in the FEIS.

Our classification will be published on the EPA website, www.epa.gov, according to our responsibility under Section 309 of the Clean Air Act to inform the public of our views on proposed Federal actions. If you have any questions, please contact Mike Jansky of my staff at (214) 665-7451 or by e-mail at jansky.michael@epa.gov for assistance.

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EPA appreciates the opportunity to review the DEIS. Please send our office two copies of the FEIS when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Federal Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 20004. You may now electronically file your EIS using our *e-NEPA Electronic Filing Pilot* by linking to EPA's web site at http://www.epa.gov/compliance/nepa/submiteis/index.html.

Sincerely yours,

Rhonda Smith
Chief, Office of Planning
and Coordination

Enclosure

We promote compliance with Federal environmental regulations in partnership with our States and Tribes
Internet Address (URL) • http://www.epa.gov

DETAILED COMMENTS
ON THE
UNITED STATES DEPARTMENT OF AGRICULTURE (USDA)
VALLES CALDERA TRUST (VCT)
DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS) AND
DRAFT PUBLIC USE AND ACCESS PLAN
FOR THE PROPOSED
VALLES CALDERA NATIONAL PRESERVE
SANDOVAL AND RIO ARRIBA COUNTIES, NEW MEXICO

BACKGROUND

The Valles Caldera Trust (VCT) prepared a Draft Environmental Impact Statement (DEIS) for the proposed Public Access and Use Plan (PAUP) aimed at expanding visitor access to the Valles Caldera National Preserve (preserve) located in Sandoval and Rio Arriba Counties, New Mexico. The plan describes alternatives for the development of facilities and infrastructure on the landscape including sites for a visitor center. The DEIS describes possible effects and environmental impacts each alternative may have on the preserve.

The following comments are offered for your consideration in finalizing the DEIS.

AIR QUALITY

A-1 In general, any demolition, construction, rehabilitation, repair, dredging or filling activities have the potential to emit air pollutants. EPA recommends that best management practices are implemented to minimize the impact of any air pollutants. Furthermore, construction and waste disposal activities should be conducted in accordance with applicable local, state and federal statutes and regulations.

A-2 EPA encourages the use of clean, lower-emissions equipment and technologies to reduce pollution. EPA's final Highway Diesel and Non-road Diesel Rules mandate the use of lower-sulfur fuels in non-road and marine diesel engines beginning in 2007. To further reduce potential air quality impacts related to construction emissions, the VCT should include a Construction Emissions Mitigation Plan and adopt this plan in the Record of Decision (ROD).

A-3 On page 4-180 of the DEIS, the statement is made that, "Overall, no National Ambient Air Quality Standards exceedances and no measurable impacts to nearby Class I areas are expected from increased motor vehicle use within the preserve". We ask that the FEIS verify if this statement is only intended to describe the winter scenario of no shuttle/personal vehicle access beyond the visitor center into the preserve.

A-4 Discussion of Alternatives 3B and 4B in the DEIS indicates that development of the Entrada del Valle Visitor Center could result in substantially increased visitation i.e.; almost five times the number of visitors in 2010, and "would represent a measurable regional indirect impact that may influence the amount of greenhouse gases (GHG) and criteria pollutant emissions in the area". The analysis contained in this DEIS characterizes direct/indirect effects of these

alternatives at the programmatic level over the long term to be major, and cumulative effects of these alternatives to be major. The FEIS should provide estimates of the extent of GHG and criteria pollutant emission increases related to these and other alternatives.

WETLANDS

A-5 According to the DEIS, the design would use existing or constructed wetlands for wastewater treatment and stormwater storage, thereby reducing capital costs. EPA recommends against using existing (natural) wetlands for directly treating waste and stormwater. Using natural wetlands for treating or receiving direct runoff from stormwater and wastewater can be detrimental to the long term health of the wetland by overwhelming their ability to assimilate pollutants and nutrients.

EPA would support developing constructed wetlands outside of waters of the U.S. and off channel for such purposes. The intercepting constructed wetlands can then be designed to discharge into natural wetlands to provide beneficial hydrology once pollutants (parking lot runoff) are removed by the treatment wetlands.

A-6 The FEIS should quantify potential impacts to waters of the U.S. including wetlands. EPA recommends that all efforts to avoid impacts to wetlands be taken and any unavoidable impacts be fully mitigated on-site with the restoration of in-kind resources.

ENVIRONMENTAL JUSTICE AND RECOMMENDATIONS

A-7 The DEIS discussion on Environmental Justice is fairly robust and provides a great deal of socio economic data on both minority groups and ethnicity. The one item EPA suggests improving is to provide more comprehensive discussion on existing stressors impacting communities of minority people. A more detailed discussion of the impacts of poverty and how this proposed action could mitigate the level of poverty through additional job creation would be helpful. EPA suggests and believes recruitment and employment of local residents from the poverty communities at the preserve would be beneficial. EPA asks these concerns be addressed and included in the FEIS.

TRIBAL CONSULTATION AND RECOMMENDATIONS

A-8 The Consultation and Coordination Chapter of this DEIS mentions public meetings, but it is not clear whether tribal consultation has taken place. EPA asks that the FEIS provide more detail of tribal involvement. This would include copies of letters sent to USDA and copies of response correspondence received from the tribes. EPA recommends that tribes be contacted for input. The DEIS indicates that Pueblo, Navajo, and Ute tribes were present throughout the area's history. The Comanche Nation, Kiowa Tribe, Fort Sill, Mescalero, and Jicarilla Apache Tribe's should be included as potential or future invitees for comment and consultation also.

A-9 The DEIS indicates that "increased access" would also create new jobs for tourist guides that would need to be bi-lingual. EPA suggests employment of "Cultural Guides" from the local American Indian population.

A-10 Regarding domesticated livestock grazing leases, EPA suggests leasing be limited. Domesticated livestock bring in foreign plant species via hoofs and feces. The DEIS mentions problems with invasive plant species in the area and this could increase this problem.

A-11 With regards to having vehicle tours of the preserve, EPA suggests conducting limited vehicle lead tours. We also suggest limited public access roads, trails, etc. near the Santa Clara Indian Reservation due to potentially uninvited access and possible illegal activities, (gathering, hunting, stealing, etc) on sensitive tribal lands. Please address these issues in the FEIS.

B

GOVERNOR
Susana Martinez

DIRECTOR AND SECRETARY
TO THE COMMISSION
James S. Lane, Jr.

Daniel E. Brooks, Deputy Director

STATE OF NEW MEXICO
DEPARTMENT OF GAME & FISH

One Wildlife Way
Santa Fe, NM 87507
Post Office Box 25112
Santa Fe, NM 87504
Phone: (505) 476-8008
Fax: (505) 476-8124

Visit our website at www.wildlife.state.nm.us
For information call: (888) 248-6866
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ROBERT ESPINOZA, SR.
Farmington, NM

PAUL M. KIENZLE III
Albuquerque, NM

BILL MONTOYA
Alto, NM

August 9, 2012

Ms. Marie Rodriguez
Director, Natural Resources
Valles Caldera Trust
P.O. Box 359
Jemez Springs, NM 87025

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Valles Caldera National Preserve Public Use and Access Plan Draft EIS
NMDGF Doc. No. 15141

Dear Ms. Rodriguez:

The Department of Game and Fish (Department) has reviewed the Valles Caldera National Preserve Public Use and Access Plan Draft Environmental Impact Statement (DEIS). The DEIS proposes six alternatives for the development of facilities and infrastructure to provide increased access to and within the Valles Caldera National Preserve (VCNP). According to your cover letter, the plan is needed to: provide more access, more spontaneous access, and more freedom to explore the VCNP for visitors; provide facilities and infrastructure that would be adequate to meet public safety standards as required by the Valles Caldera Preservation Act if access were increased; provide adequate infrastructure to protect the natural and cultural resources of the VCNP; provide a portal or physical point of access to the VCNP; manage the VCNP in a sustainable manner; and provide programs, activities, and facilities that promote long-term financially sustainable management of the VCNP at a scale appropriate to public demand and values consistent with other purposes.

The DEIS includes two levels of planning and impact analysis. Shorter-term decisions are analyzed in more detail at an implementation level. The implementation level focuses on developing a portal or physical point of access to the VCNP and a visitor contact station or visitor center and associated facilities. These actions could be implemented without additional National Environmental Policy Act (NEPA) compliance. Long-term management direction is presented at a programmatic level, and will be used as a guide for future decisions. Elements of the plan presented at this level would not be implemented without additional future NEPA documentation.

Alternative 1, the no action alternative, which is compared with the action alternatives, would result in the removal of the existing temporary staging areas and the elimination of the interim recreation program.

The Valles Caldera Trust would phase out current access through these staging areas and phase out interim programs and activities, which have not been reviewed for direct, indirect, or cumulative effects.

Under Alternative 2: Banco Bonito Visitor Contact Station, a small-scale visitor contact station (ca. 2,500 to 5,000 sq. ft. and an estimated 50,000 visitors per year) would be developed at the Banco Bonito area in the southwestern part of the VCNP. Additional development would include day-use facilities, a small parking area, and double-lane roads at specific locations to provide access to the VCNP for personal vehicles and/or shuttles. Facilities and infrastructure developed in the future would include fishing access sites, trailheads, overlooks, campgrounds, and picnic areas.

Alternative 3A: Entrada del Valle Visitor Center – Primary Access via Shuttle System proposes development of a full-service visitor center near the southwest corner of the Valle Grande. Access through the VCNP would be primarily by shuttle; personal vehicles would be allowed for specific activities by permit only. Facilities and infrastructure developed in the future would be similar to those under alternative 2.

Alternative 3B: Entrada del Valle Visitor Center – Primary Access via Personal Vehicle would be the same as alternative 3A, but the primary mode of transportation onto the VCNP would be personal vehicles. Shuttles would only be used for tours and group events or to reduce congestion on high-use days.

Alternative 4A: Vista del Valle Visitor Center – Primary Access via Shuttle System is similar to alternative 3A but would locate the full-service visitor center south of NM Highway 4 below Rabbit Mountain, overlooking the Valle Grande. Alternative 4B: Vista del Valle Visitor Center – Primary Access via Personal Vehicle would be the same as alternative 4A, but the primary mode of transportation onto the preserve would be personal vehicles.

Alternatives 3A, 3B, 4A and 4B would build a full-service visitor center at the respective locations of ca. 10,000 square feet plus 5,000 square feet administrative space. All four of these alternatives plan for an annual visitation of 120,000 visitors a year. VCNP roads open to shuttle or public vehicle use would be upgraded from primarily single-lane, two-way Level 4 gravel or paved roads in alternatives 3A and 4A to primarily double lane, two-way Level 4gravel or paved roads in alternatives 3B and 4B.

The DEIS does not identify a preferred alternative, although page 3-13 states that "The quality of the visitor experience is more important than the quantity. It may be important to limit the number of people so participants can experience the sense of expansiveness and quiet that the preserve can offer", and "Visitor activities must not result in serious or lasting impairment of natural systems".

Elk Management and Conservation on VCNP

Elk (*Cervus elaphus*) hunting and viewing are among the greatest attractions at the VCNP, and elk hunting is one of the largest income generating activities for the VCNP, generating hundreds of thousands of dollars annually (Valles Caldera Trust 2007). Page 3-16 states that in 2007, elk hunts generated $327,055 in revenues and cost approximately $135,000 to market and conduct. Page 3-14 states that VCNP offers some of the best elk hunting in New Mexico, with an average of 80% success rate for bull elk hunts, and consistently high hunter satisfaction.

The DEIS identifies the VCNP as a core breeding ground for elk in the Jemez Mountains, and the entire preserve is classified as critical summer and winter range and calving habitat. Elk were extirpated from the Jemez by 1900. Transplants by the Department in 1947 and 1964 reestablished elk in the Jemez Mountains. As stated on p. 3-95 of the DEIS, elk are now abundant and conspicuous on the VCNP. Department elk management goals are to increase hunting opportunity and quality of hunts on the east

side of the Jemez Mountains in Game Management Unit (GMU) 6C, while maintaining population levels on the west side of the Jemez Mountains (GMU 6A) and on VCNP (GMU 6B).

B-1 The DEIS does not appear to contain a comprehensive or cogent analysis of the potential effects of upgrading roads and allowing spontaneous personal vehicle access for an estimated 120,000 visitors per year, as proposed by alternatives 3B and 4B, and to a lesser extent, alternative 2, on elk behavior, particularly during calving periods. Table 2-10 *Comparison of Alternatives* states "Personal vehicle use would create more frequent, persistent, and widespread disturbance to terrestrial wildlife than a shuttle system". Page 4-76 states "Expanded and widespread human activity within the preserve has not occurred before; wildlife is not habituated to human presence". Page 4-77 states:

> Increased visitation would increase noise levels along the preserve's roads and at recreational facilities throughout the preserve such as campgrounds, picnic areas, and trailheads. Wildlife can be adversely affected by sounds that intrude on their habitats and would therefore avoid these places, slightly reducing the amount of available habitat. However, sufficient habitat exists in the preserve that adverse physiological and/or behavioral changes to wildlife are not anticipated.

However, the next paragraph states:

> Long-term impacts (mostly related to disturbance) would be minor to moderate and adverse because increases in human visitation could cause measurable changes in habitat use patterns, particularly in sensitive areas such as elk calving areas and riparian zones. Disturbance would be most severe during the summer when visitation is highest and animals such as elk use the preserve as critical summer range. Impact levels would be lower during the winter when visitation is lowest.

These two statements are directly contradictory, and with regard to elk and mule deer, we do not concur with the statement "…sufficient habitat exists in the preserve that adverse physiological and/or behavioral changes to wildlife are not anticipated".

B-2 Regarding vehicle noise levels for alternative 3B, page 4-81 states:

> Personal vehicles would also come in a wider variety of engine types, sizes, and noise levels compared to a presumably more similar set of shuttles. Impacts from noise would be similar to those under alternative 3A, with more disturbance from different motor vehicle engines. More unlimited access via personal vehicle – for instance, the use of 4-wheel drive vehicles to access remote locations – could result in potential illegal hunting and further loss of undisturbed areas for elk breeding, calving, and foraging. These differences would result in increased measurable changes to fish and wildlife compared to alternative 3A.

B-3 After review of the DEIS, it is not clear to us what the statement "…for instance, the use of 4-wheel drive vehicles to access remote locations…" means. Figures S6 and S8 relative to implementation of alternatives 3B and 4B, which allow open spontaneous personal vehicle access, state "*Personal vehicles follow Level 4 loop route; use other road levels*". Will visitors be allowed to use 4-wheel drive vehicles to access remote locations? This was not apparent from reading the DEIS text, but if this will occur, disturbance to elk and mule deer will be exacerbated.

A significant predictor of elk and deer distribution is the distance to roads that are open to motor vehicle traffic (Thomas et al. 1979 *in* Wisdom et al. 2004). Elk in particular have shown disproportionately less use of areas near roads open to motorized traffic (Lyon 1983, Rowland et al. 2000, 2004 *in* Wisdom et al. 2004a). Depending on the volume of traffic, quality of the road, and density of cover adjacent to the road, elk have been documented to avoid habitat from 0.25 miles to 1.8 miles from the road. Rowland et al. (2000, 2004 *in* Wisdom et al. 2004a) found that elk strongly preferred habitat farther from roads open

to motorized traffic at the Starkey Experimental Forest and Range Station in northeast Oregon. Habitat selection was calculated using more than 100,000 recorded locations of 89 cow elk. Perry and Overly (1977), Rost and Bailey (1979), and Witmer and deCalesta (1985) found less elk use of habitat near primary (higher traffic volumes) rather than secondary or primitive roads (*in* Wisdom et al. 2004a). At the Starkey Experimental Station, Wisdom et al. (2004) corroborated that high rates of vehicle traffic cause elk to select habitat away from those high use roads.

B-4 Non-motorized human recreational activities such as hiking, horseback riding, mountain biking and cross-country skiing can also affect elk distribution and reproductive success (Phillips and Alldredge 2000, Shively et al. 2005, Wisdom et al. 2004b, Cassirer et al. 1992, Shultz and Bailey 1978, Aune 1981).

Implementation of alternatives 3B or 4B would allow spontaneous personal vehicle access for an estimated 120,000 visitors a year, using upgraded gravel or paved two-way roads along a loop route starting at the Valle Grande. The greatly increased traffic volume and associated noise and human visual disturbance combined with increased hiker, mountain biker and backpacker access throughout the VCNP associated with implementing alternative 3B or 4B may significantly reduce elk abundance, elk calving success, elk viewing opportunities, and possibly elk hunter success on VCNP. Greatly increased volumes of personal vehicle traffic resulting from alternatives 3B or 4B may have population-level effects on the VCNP elk population. Vehicles stopping to view cow elk with calves hidden in the valle grasslands may cause 1) the cows to delay return to the calves; 2) reduced calf nursing periods and opportunities; 3), increase rates of calf abandonment; and 4) increased calf exposure to predation. Implementation of alternative 2, with spontaneous personal vehicle access for approximately 50,000 visitors a year, may have similar results. Public access primarily by shuttle, however, would reduce the number of vehicles and allow trained shuttle drivers to avoid these situations. Elk may be able to habituate to more predictable shuttle schedules and presence, as compared to higher volume and spontaneous personal vehicle use.

B-5 It is not clear to us why a more rigorous and comprehensive analysis of the direct, indirect, and cumulative effects of implementing open spontaneous personal vehicle access on elk distribution and reproduction, and potential effects on elk hunting and viewing revenues to the VCNP, was not included in the DEIS. Deferring this level of analysis to future programmatic projects such as road upgrades and picnic area and campground construction would preclude the ability to analyze the potential for irreversible and irretrievable commitments of implementing one of these alternatives as required by the National Environmental Policy Act (NEPA). In fact, the irreversible and irretrievable commitment section of this DEIS analyzes only the potential for irreversible loss of cultural resources; no analysis of wildlife is included. We also believe that an in-depth analysis of the effects of implementing spontaneous and open personal vehicle access to the VCNP on elk and other wildlife is necessary at this stage of planning and decision-making to meet the spirit and intent of the Valles Caldera Preservation Act, which requires protecting and preserving the scientific, scenic, geologic, watershed, fish, wildlife, historic, cultural and recreational values of the VCNP.

B-6 Therefore Department does not support implementation of Alternatives 3B or 4B, which would allow both open spontaneous personal vehicle and shuttle traffic simultaneously, therefore greatly increasing the number of vehicles on VCNP at any time. These alternatives would also require that larger parking lots be developed at trailheads, picnic areas and overlooks, to accommodate the use of personal vehicles (p. 2-46).

Of the two proposed locations for the development of a large visitor center (10,000 square foot plus 5,000 square foot administrative space), the Entrada del Valle, proposed for the southwest corner of the Valle Grande, would have the most adverse effect on elk calving, which currently occurs near this

location. Table 2-10 states "Elk using the area for summer foraging and calving habitat may be disturbed". Also, this location is not on the periphery of the VCNP, as called for in the 2005 VCNP Master Plan for Interpretation (p 2-75).

Alternative 2 Banco Bonito Visitor Contact Center
The level of development under alternative 2 is expected to accommodate approximately 50,000 visitors annually, or about 330 visitors per day during the summer recreation season. Page 4-55 states that "Programmatic-level actions proposed under alternative 2 would provide visitors access to the majority of the preserve using personal vehicles on Level 3 and Level 4 roads". Figure 2-4 indicates that Level 3 and 4 roads would access most of the major valles, including Valle Grande, Valle Jaramillo, Valle Santa Rosa, Valle Toledo, Valle San Antonio, and Valle Seco. Elk use all of these valles for calving. Increasing vehicle capacity, traffic volume, traffic speeds, and associated vehicle noise and human visual disturbance in and around these valles will cause increasing habitat fragmentation that may adversely affect large game animals such as elk, mule deer and black bears, reducing the potential for successful wildlife viewing and possibly hunting success.

B-7 The DEIS appears to make the assumption that visitation will be limited by the size of the visitor center ultimately built. The DEIS states that public access in 2010 was approximately 25,000 visitors. Alternative 2 is anticipated to accommodate approximately 50,000 visitors annually, or about 330 visitors per day during the summer recreation season. We were not able to find a similar visitors per day estimate for alternatives 3A, 3B, 4A and 4B in the DEIS, which are expected to accommodate approximately 120,000 visitors a year. Using a simple ratio, we extrapolate from the DEIS figure of 330 visitors per day for 50,000 visitors per year to approximately 790 visitors a day at 120,000 visitors per year. We also could not find an estimate of how many vehicles per day are currently accessing the VCNP for permitted activities, or how many personal vehicles per day on VCNP that could be expected by implementation of alternatives 2, 3B or 4B. At an average of 2 persons per vehicle, approximately 165 personal vehicles would access the VCNP per day under the alternative 2 scenario during the summer recreation period (Memorial Day through Labor Day), and approximately 395 vehicles per day under alternatives 3B and 4B.

B-8 Elk and mule deer would more easily habituate to relatively lower levels of shuttle traffic with relatively *predictable schedules and stops*, as compared to higher volumes of personal vehicle traffic with less predictable schedules and stops. Although some elk would likely habituate to either scenario, we expect that allowing open spontaneous personal vehicle access would cause more elk to leave the VCNP to calve where there is less disturbance than implementing a primarily shuttle access scenario. We recognize that under alternatives 3A and 4A, primary access would be provided by shuttle, but more limited personal vehicle access would be allowed by permit for recreational users such as hikers, backpackers, campers, horseback riders and anglers.

With regard to public opinion of shuttle use for most situations, as compared to open and spontaneous personal vehicle access, page 4-18 states "... 80% of survey respondents indicate that recreational access should be limited, and approximately 53% believe that increased access is less important than the possible negative environmental effects associated with it. Shuttle use would support these views".

The DEIS appears to make the assumption that visitation will be limited, or at least influenced by, the size of the visitor center ultimately built. It is not clear to us why annual visitation to VCNP is anticipated to be 50,000 visitors annually with a smaller visitor center at Banco Bonito; whereas the larger visitor centers at Entrada de Valle or Vista del Valle (10,000 sq. ft. plus 5,000 sq. ft. administrative space) are
B-9 expected to attract 120,000 visitors per year. **However, based on the potential adverse effects of open spontaneous personal vehicle access for an estimated 120,000 visitors per year to the elk population on VCNP, the Department supports the development of a visitor contact station at**

Banco Bonito, and the implementation of a shuttle system that would provide the primary access for most VCNP visitors. During the elk calving period of May 15 to July 1, we recommend that appropriate selective road closures be incorporated as a flexible and adaptable management tool to protect resources in valles where calving is occurring. We believe implementation of this recommendation would minimize adverse impacts on elk during the critical calving period, maintain hunter success and satisfaction, and still provide wildlife viewing opportunities while still achieving the goals of increasing public access and conserving wildlife and wildlife habitat values.

Jemez Mountains Salamander

The Jemez Mountains salamander (*Plethodon neomexicanus*)(JMS) is a state endangered and federal candidate species that is endemic to the Jemez Mountains of northern New Mexico. JMS spend approximately 9 months of the year underground, and only come to the surface during monsoon season (generally July through September), when surface habitat conditions are wet enough for JMS to breath cutaneously through their skin. Primary threats to the JMS include habitat fragmentation and loss, and more recently, large catastrophic, high-severity wildfires that destroy surface habitats.

B-10 With regard to implementation of alternatives 4A and 4B and the Vista del Valle visitor center, page xvii states "The Las Conchas fire in 2011 likely burned a substantial amount of designated critical habitat for the Mexican spotted owl, and resulted in direct mortality to most individual Jemez Mountain salamanders. Changes to habitat from the fire would likely inhibit recolonization by the salamander". In fact, the New Mexico Endemic Salamander Team (NMEST) believes that the Las Conchas Fire did not cause direct mortality to JMS, since surface habitat conditions during the fire were extremely dry, and JMS were not likely to be on the surface. However, preferred surface cover objects such as decayed Douglas fir logs were greatly reduced or eliminated in high-severity burned areas, which likely stresses JMS when they do come to the surface during wetter periods. JMS have been found in burned habitats after the Dome, Cerro Grande and Las Conchas Fires. The NMEST is conducting research to determine persistence of JMS after catastrophic wildfires. Surveys for JMS should be conducted and mitigation actions taken if the Vista del Valle location is selected for a visitor center and JMS are found at that location.

B-11 Additional changes need to be made to the final EIS relative to JMS. Page 3-98 does not list the JMS as a federal candidate species. Table 3-12 on Page 3-105 does not list JMS as state endangered under the New Mexico Wildlife Conservation Act. The discussion of threats to JMS on page 3-111 does not list fire as the primary threat to the persistence of JMS.

We appreciate the opportunity to comment on this project. Should you have any questions regarding our comments, please contact Mark Watson, Habitat Specialist, of my staff at (505) 476-8115, or <mark.watson@state.nm.us>.

Sincerely,

Matt Wunder, Ph.D.
Chief, Conservation Services Division

MW/MLW

CC: USFWS NMES Field Office
Jim Lane (Director, NMDGF)
R.J. Kirkpatrick (Assistant Director, NMDGF)
Robert Livingston (Northwest Area Operations Assistant Chief, NMDGF)
Cal Baca (Wildlife Management Division Chief, NMDGF)
Darrel Weybright (Wildlife Management Division Assistant Chief, NMDGF)
Stewart Liley (Elk Program Manager, NMDGF)
Kevin Rodden (Mule Deer Program Manager, NMDGF)
Ellen Heilhecker (Northwest Area Operations Habitat Specialist, NMDGF)
Donald Auer (Wildlife Management Division Habitat Manager, NMDGF)
Bill Taylor (Northwest Area Game Manager, NMDGF)
Charles Painter (Conservation Services Herpetologist, NMDGF)
Mark Watson (Conservation Services Habitat Specialist, NMDGF)

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LOS ALAMOS COUNTY

133 Central Park Square - Los Alamos, NM 87544
Phone (505) 663-1750 Fax (505) 662-8079
Website: www.losalamosnm.us

COUNTY COUNCIL
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C

August 14, 2012

RECEIVED
AUG 15 2012
VALLES CALDERA TRUST

Mr. Dennis Trujillo
Executive Director
Valles Caldera Trust
P.O. Box 359
Jemez Springs, NM 87025

Re: Selection of Public Access and Use Option for the Valles Caldera National Preserve as part of the public participation process for the Draft Environmental Impact Statement (DEIS).

Dear Mr. Trujillo:

C-1 On behalf of the Council of the Incorporated County of Los Alamos, this letter conveys the Council's preference of public access and use option 3A or 3B for the Valles Caldera National Preserve (VCNP).

This recommendation is based on input received following a 12-day public comment period that the County advertised in local media. This notice directed interested citizens to the Valles Caldera National Preserve's Draft Environmental Impact Statement, as well as the options presented as part of the Public Access and Use Plan. Council received 11 e-mail comments from the public. Following a question and answer session with VCNP Natural Resource Coordinator Marie Rodriguez, and Council discussion, a motion was made to select public access and use option 3A or 3B. The motion was passed 5-0 with 1 recusal.

Thank you for the opportunity to comment on this project that will allow expanded access to the Valles Caldera.

Sincerely,

Harry Burgess
County Administrator

MHB:kes

cc: Sharon Stover, Council Chair

STATE OF NEW MEXICO
DEPARTMENT OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

BATAAN MEMORIAL BUILDING
407 GALISTEO STREET, SUITE 236
SANTA FE, NEW MEXICO 87501
PHONE (505) 827-6320 FAX (505) 827-6338

D

August 7, 2012

Dennis Trujillo
Executive Director
Valles Caldera National Trust
18161 State Highway 4
P.O. Box 359
Jemez Springs, NM 87025

Re: Public Access and Use Plan/Draft EIS for the Valles Caldera National Preserve

Dear Mr. Trujillo:

Thank you for providing the New Mexico State Historic Preservation Office (SHPO) with the public access and use plan and draft EIS for the Valles Caldera National Preserve. One behalf of the State Historic Preservation Officer, I have reviewed the information provided and it appears that adverse effects to cultural resources will occur regardless of whether alternative 2, 3, or 4 is selected for development of a visitor center.

D-1 The SHPO agrees that a mitigation plan must be developed to address adverse effects to cultural resources if alternative 2, 3 or 4 is selected. Rather than developing an MOA to address adverse effects on cultural resources at the visitor center location and developing a separate PA to address public access, the VCNP may want to consider developing a PA that addresses all phases of the visitor center development and public access. If the VCNP chooses this route, a separate MOA for the visitor center would not be necessary. Alternatively, the VCNP could develop the MOA for the visitor center and consult with the SHPO on an individual project basis as trails, parking, picnic areas, etc. are developed for public access.

Please do not hesitate to contact me if you have any questions. I can be reached by telephone at (505) 827-4064 or by email at michelle.ensey@state.nm.us.

Sincerely,

Michelle M. Ensey
Archaeologist

Log: 94908
Cc: Norm Nelson, HPD

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AUG 1 0 2012
VALLES CALDERA TRUST

E

PUEBLO OF LAGUNA
P.O. BOX 194
LAGUNA, NEW MEXICO 87026

(505) 552-6598
(505) 552-6654
(505) 552-6655

Office of:
The Governor
The Secretary
The Treasurer

June 19, 2012

Dr. Ana Steffen
Cultural Resources Coordinator
Valles Caldera Trust
18161 State Highway 4
P.O. Box 359
Jemez Springs, New Mexico 87025

Dear Dr. Steffen:

Re: PLAN 2 Six Alternatives for Development

The Pueblo of Laguna appreciates your consideration to comment on the possible interest your project may have on any traditional or cultural properties.

E-1 The Pueblo of Laguna has determined that the undertaking WILL NOT have a a significant impact at this time. However, in the event that any new archaeological sites are discovered and any new artifacts are removed, we request to be notified to review items. We also request photographs of items. According to unpublished migration history, our ancestors journeyed from the north through that area and settled for periods of time before traveling to our present location. Therefore, the possibilities of more findings may exist.

We thank you and your staff for the information provided.

Sincerely,

for Richard B. Luarkie
Governor
Pueblo of Laguna

RECEIVED
JUN 21 2012
VALLES CALDERA TRUST

WALATOWA

PUEBLO of JEMEZ

August 9, 2012

Dennis Trujillo
VCNP Executive Director
Valles Caldera National Preserve
P.O. Box 359
Jemez Springs, NM 87025

RE: Comment on the Draft EIS on Public Access and Use Plan

Dear Mr. Trujillo:

The Jemez people have been living in the Jemez Mountains since time immemorial and have established aboriginal Indian title to most areas within the Jemez Mountains, including the Valles Caldera National Preserve. The Spanish Conquistadors found us living in our homeland in the 1540's and misinterpreting our word "HEMISH" began referring to our ancestral homeland as the "JEMEZ" Mountains. The Jemez people were a strong and well established people numbering in the tens of thousands at the time of Spanish contact. We constructed 62 large villages, constructed hundreds of field houses and summer dwellings, built trails and shrines, and established resource procurement areas throughout the Jemez Mountains. No other people can more rightfully lay claim to the land and resources of the Jemez Mountains than Jemez tribal members whose ancestors built cities, hunted, gathered, were born, lived, died, and were buried in these mountains. Thousands of archeological sites marking the mesas, canyons, and springs in the Jemez Mountains are attributed to the Jemez people. An entire Jemez civilization flourished in these mountains until European contact. The descendants of this civilization, though much reduced in number, live on. The Jemez are adept farmers and hunters, whose food acquisition and storage techniques have sustained them all of these centuries in the same mountain location.

The Jemez people are speakers of the Towa language – a language completely unique in the world. No other people speak this language, except Pecos Pueblo whose tribal members joined the Jemez at Walatowa in 1838. Upwards of eighty percent of the existing 3,000 tribal members found at the village of Walatowa at the base of the Jemez Mountains speak this language fluently. It is our first language; taught in the home to toddlers who then learn English as they enter elementary school.

The Jemez lost their freedom to the Spanish and much of their land to Spanish, American and other European settlers. During the 20th century, large parcels of land that we retained throughout the earlier assaults were lost to Anglo squatters who exploited loopholes in federal law and lax government enforcement of tribal rights. In the first half of the 20th century the American government unlawfully appropriated large areas of

Office of the Governor
4471 Highway 4, Box 100 • Jemez Pueblo • New Mexico • 87024
(505) 834-7359 • Fax (505) 834-7331

Jemez ancestral Indian title lands for inclusion in national forests and Taylor grazing districts. A homeland that once covered at least one million acres now includes only 89,000 acres.

The Public Access and Use Plan proposed by the Valles Caldera Trust (hereinafter "VCT") affects our ties with what is now the Valles Caldera National Preserve (hereinafter "VCNP") and what was central to our ancestral domain. The Draft EIS presents six Alternatives for the development of facilities and infrastructure to provide increased access to and in the Valles Caldera National Preserve. Alternative 1 is the no-action alternative. With this no action plan the Valle Grande and Banco Bonito staging areas would be removed and the current interim recreation program would be eliminated. No facilities or new infrastructure would exist. The current visitor services would not be replaced, although visitors would still be able to hike the trails on Rabbit Mountain without a permit or fee. Spontaneous access to the Preserve would be limited. The VCT would continue to conduct fee-based tours and activities on a scheduled basis. Access for the grazing program would continue, but the VCT would not enter into any new agreements or grants. The
F-1 current tribal access policy would continue. This alternative would have the most beneficial impacts to the resources from the decrease in human presence within the Preserve. The Pueblo would no longer be concerned about additional adverse impacts to their cultural resources or the natural resources in the procurement areas where medicinal plants and herbs as well as other important resources are collected by the Jemez People.

F-2 Alternatives 2 thru 4 would have the greatest negative impacts on Jemez Traditional Cultural Properties (hereinafter "TCPs") in the VCNP. As stated in the above paragraphs, the Jemez Mountains, including the VCNP, are within the Jemez ancestral domain to which Jemez Pueblo holds aboriginal Indian title. The Jemez People's most sacred religious and cultural locations, including former Pueblo sites where hundreds of our ancestors lived together; including field houses where seasonal farming and hunting was headquartered, shrines where prayers are offered, grave sites, and procurement locations where medicinal and culturally significant plants and minerals are sourced for a variety of personal spiritual and health uses; would all be threatened by ground disturbing activities involved with construction of a new visitor center, parking lots, campgrounds, picnic areas, road improvements and improvements on hiking trails for backpacking and horseback riding.

F-3 With the new proposed buildings and facilities in place there will be an increased demand for water. The proposal mentions that water usage to accommodate the increase in demand will increase anywhere from 2 million gallons to 4.4 million gallons a year. We live in the Southwest and the demand for water has greatly increased for the people living in the urban areas and the Jemez Valley below the Caldera. The Valles Caldera is the headwaters for the Jemez watershed. All of the water that Jemez Pueblo uses for their livelihood comes from this sacred area. In our time of drought, what kind of impact will this have on the availability of water for us who depend on this sacred water? The plan also talks about taking the water from the natural springs in the immediate landscape. Once the millions of gallons are pumped what will happen to our sacred springs in the Preserve that we use for our religious ceremonies? We oppose any further development of springs in the Valles Caldera to provide an increased human water supply.

F-4 Under alternative 2, the Trust proposes a small scale Visitor Contact Station in the Banco Bonito area in the southwestern part of the preserve. In addition, it mentions the development of a double lane road at certain locations to provide easier access into the Preserve. The VCT should understand that one of the most sacred pilgrimage trails from the village of Walatowa to Redondo Peak, our most important landmark in the

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(505) 834-7359 • Fax (505) 834-7331

Preserve, passes through the area where this Visitor Contact Station is proposed. In addition, there are important plant procurement areas within Banco Bonito. The trail and procurement areas have been in continual use by the Jemez People for approximately 800 years. This use is 758 years older than the National Environmental Policy Act that gives rise to the DEIS. Dozens of generations of Jemez tribal members have walked that trail and benefitted from the unique plants found in that location. Our tie to that location cannot be overstated.

F-5 There is also a small pueblo site and many agricultural features and fieldhouses that Jemez is claiming as their ancestral homeland. Research on the archaeological sites in this area has begun and so much more needs to be researched. It would be a travesty to overlook this rich archeological record and build new facilities that will cause an increase in human population in this area. This population will do what human populations do everywhere on public land: trample on, vandalize, loot, litter, and disrespect sacred places.

F-6 Alternatives 3A and 3B propose a 10,000 square Entrada del Valle Visitor Center which includes a full service visitor and interpretive center constructed immediately below State Road 4, southeast of South Mountain overlooking the Valle Grande. This area is a very special and sacred procurement area for one of the religious society groups from Jemez. Some of the archaeology found in this area is the result of this particular society group performing their ceremonies for hundreds of years in that very spot.

F-7 Alternatives 4A and 4B propose a Vista del Valle Visitor Center. This would be a 10,000 square feet building with a full service visitor and interpretive center constructed immediately above State Road 4, below Rabbit Mountain, overlooking the Valle Grande. This area again is a special and sacred procurement area for several religious society groups from Jemez. It has TCP's as well as archaeology that is a result of our society groups performing their ceremonies in this area since time immemorial.

Alternatives 2, 3B and 4B propose access into the Preserve via personal vehicles and/or shuttles. The primary mode of transportation would be personal vehicles. Shuttles would only be used for tours and group events or to reduce congestion on high-use days. Alternatives 3A and 4A propose primary access via shuttle system from the proposed full service visitor center near the Valle Grande to provide interpretive and other services to visitors. Access to the Preserve would be primarily by shuttle: personal vehicles would be allowed for specific activities by permit only. As I mentioned earlier, the mere fact of an increase in human presence, up to 120,000 a visitors a year, poses a threat to the ability of the Jemez People to continue to practice their religion in what is now the VNCP. Personal vehicle access for up to 120,000 visitors annually is unimaginable. The place would be a circus. It is hard enough on the wildlife right now with the vehicle flow into and out of the Preserve let alone approximately 300 vehicles a day in the Preserve. That is why the
F-8 Pueblo recommends shuttle service only for access into and out of the Preserve. It is a trend some of the National Parks are following such as Zion, Yosemite, and Glacier National Parks, and it is working. It would have less of an impact on the resources in the Preserve.

F-9 There is mention in the EIS that if a shuttle transport system is chosen, in the future the VCNP shuttles will be changed from gasoline engines to electric engines. This is what Jemez would recommend as well to cause less of a carbon footprint from vehicle usage. The Pueblo also recommends that the shuttles follow the Level 4 loop route. It is on a road already in existence and would be easier to manage.

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F-10 We also recommend eliminating the proposed picnic areas and camp grounds in the Valle de San Antonio, Valle Toledo, and Obsidian Valley. These areas are special procurement areas. The Valle de San Antonio is a refuge area for the Bald Eagle in the winter time according to Terry Johnson, a wildlife biologist working on data collection on the Bald Eagle. There are proposed fishing and hunting access and parking lots at various locations along the creek in the Valle de San Antonio which will also impact Bald Eagle habitat. Controlling access for seasonal impacts would be best in these locations as well.

F-11 The Pueblo also recommends compost toilets, rain catchment systems and an efficient water system infrastructure to use less water. We feel the water usage for the proposed Visitor Center and other proposed facilities is unnecessarily high, especially at a time when our global climate is changing to a much hotter and drier climate. We feel that the Preserve could cut down on it's water usage with more efficient, "go green" water systems.

F-12 If the alternative is chosen to build a full service visitor and interpretive center, Jemez Pueblo proposes to offer our geographic atlas of the Jemez ancestral domain, oral histories, recorded testimonials of Jemez elders about the Valles Caldera National Preserve, photo archives, and artifacts repatriated from various museums to put on display at the center. As the DEIS stated, people would be coming from all corners of the world to visit and learn about the Valles Caldera National Preserve. What better way to do this than by displaying these items to educate them about the aboriginal inhabitants of this profoundly unique and beautiful area.

F-13 The Valles Caldera National Preserve is a very special place for the Jemez people. There is not a single area in the Preserve that does not include a Jemez Traditional Cultural Property. The entire Caldera is special and we hold it dear to our hearts. We strongly advise that our comments be taken into careful consideration when decisions are being made on the proposed alternatives. Any decision made on the proposed action alternatives would change the Preserve as we know it. Let's all be good stewards of the land as our Jemez forefathers were and work together in good faith to protect and enjoy the Jemez homeland. We look forward to your response.

Sincerely,

Joshua Madalena

Joshua Madalena
Governor

Office of the Governor
4471 Highway 4, Box 100 • Jemez Pueblo • New Mexico • 87024
(505) 834-7359 • Fax (505) 834-7331

THE HOPI TRIBE

G

LeRoy N. Shingoitewa
CHAIRMAN

Herman G. Honanie
VICE-CHAIRMAN

June 29, 2012

Dennis Trujillo, Executive Director
Attention: Ana Steffen, Cultural Resources Coordinator
Marie Rodriguez, Director, Natural Resources
Valles Caldera Trust
18161 State Highway 4, P.O. Box 359
Jemez Springs, New Mexico 87025

RECEIVED
JUL 9 2012
VALLES CALDERA TRUST

Dear Mr. Trujillo,

Thank you for your correspondence dated June 11, 2012, regarding the enclosed Public Access and Use Plan/ Draft Environmental Impact Statement for the Valles Caldera National Preserve. The Hopi Tribe claims cultural affiliation to prehistoric cultural groups in New Mexico, and in historic times the Hopi Tewa people traveled from New Mexico to First Mesa. Hopi Cultural Preservation Office supports the identification and avoidance of prehistoric archaeological sites, and we consider the prehistoric archaeological sites of our ancestors to be Traditional Cultural Properties. Therefore, we appreciate the Valle Caldera Trust's solicitation of our input and your efforts to address our concerns.

The Hopi Cultural Preservation Office has previously stated that we are interested in consulting on any proposal that has the potential to adversely affect National Register eligible prehistoric sites on the Valles Caldera National Preserve. We have reviewed the enclosed summary and we understand there would be direct impacts to archaeological sites present on the alternative locations being considered for development. The Plan states:

> Alternative 2: 12 of the 13 archaeological sites on or near the proposed visitor contact station site have been determined to be eligible or recommended as eligible for listing on the National Register of Historic Places (NRHP). These are primarily agricultural features from the early Pueblo peoples.
>
> Alternatives 3A and 3B: 10 of the 11 archaeological sites on or near the proposed visitor center site have been determined to be eligible or recommended as eligible for listing on the NRHP. These sites consist of lithic scatters...
>
> Alternatives 4A and 4B: All of the 11 archeological sites on or near the proposed visitor center site have been determined to be eligible or recommended as eligible for listing on the NRHP. These sites consist of lithic scatters as well as ceramic pottery pieces not usually found at higher locations.

Therefore, these alternatives are likely to adversely affect numerous National Register eligible prehistoric sites.

G-1 In addition, the Summary of Impacts demonstrates that these alternatives benefit visitor experience, socioeconomics, and environmental justice, while having moderate to major impacts to cultural and natural resources. Is the purpose and need of the Preserve to preserve natural and cultural resources, or to encourage visitation through infrastructure, facilities, and shuttle buses, adversely affecting natural and cultural resources? The Grand Canyon Preserve declared a century ago has resulted in the South Rim infrastructure today.

G-2 How does the Valles Caldera proposed to fund the alternatives? Will fees be imposed at the visitor portal?

G-3 We recommend reconsideration of the alternatives eliminated from detailed analysis, and support the No Action Alternative 1 in the Public Access and Use Plan/ Draft Environmental
G-4 Impact Statement for the Valles Caldera National Preserve. If any other alternative is implemented, please provide us with copies of the cultural resources surveys of the areas of potential effect and any proposed treatment plans for review and comment.

If you have any questions or need additional information, please contact Terry Morgart at the Hopi Cultural Preservation Office at 928-734-3619 or tmorgart@hopi.nsn.us. Thank you for your consideration.

Respectfully,

Leigh J. Kuwanwisiwma, **Director**
Hopi **Cultural Preservation Office**

xc: New Mexico State Historic Preservation Office

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No.	COMMENT	RESPONSE
1-W	I support option 3A in the VCNP access plan. I think the planned Visitor Center Site on the North side of NM 4 is the best option. While I find both sites 3 and 4 beautiful locations from which to share the beauty of the caldera, I believe that site 3 is best from a traffic flow prospective. Furthermore, I believe that limiting public vehicle access to permits for those positioning cars for extended excursions or for other special uses are in the best interest of maintaining the natural ambiance of the Preserve.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
2-W similar to 7-W	The Valles Caldera National Preserve is the spiritual heartland of Northern New Mexico. It is of fundamental importance that this multi-cultural region remain a protected wilderness retreat. We have much to learn from its landscape and much to enjoy within its bowl of bounty. The Valles Caldera Trust has begun a creative era of management under the new direction of Executive Director Dennis Trujillo. The plan shows respect for and protection of the unique nature of the Preserve area while seeking expansion of public programs. The options presented in the Draft Public Access and Use Plan EIS with designs for a new visitor center are sensibly conceived and will be an asset to the Preserve for the future. It is vital to lend our voices to the Trust's mission so that the 2015 management deadline can be extended. I believe that careful professional management and further development of educational programs for the public to understand and appreciate the special heritage of the Caldera will ultimately help attain the Trust's goal of financial sustainability that is required for extension into 2020. Low impact to the environment is a priority of the Valles Caldera Trust. I am confident that whatever option is chosen is a result of exhaustive study and sensitive adherence to the land itself. The Valles Caldera is a treasure to Northern New Mexicans and the world. And I believe that it belongs in the hands of the Valles Caldera Trust.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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No.	COMMENT	RESPONSE
3-W	I have read the six plan options and of them, if I had to vote today, I would favor Alternative 2 or Alternative 3B, although I still have some concerns with each. But first, I would like to extend my appreciation for having the opportunity to give input. My biggest fear is reading in the newspaper some day that a decision has already been made on how some governmental bureau is planning to use the Valles going forward. I have come to know the Valles through fishing there the past three years. It is the best overall fishing experience I've ever had. This includes many factors - the quality of fishing, the beauty of the land, the uniqueness of the experience, the organized nature of the fishing program, and respect other anglers have for the waters and land. The fact there is a fee involved - $25-$35 for each visit - I believe is a big part of the successful fishing experience. I am not rich. I live in Santa Fe and work hard for the money I make. As can be afforded, I fish the Valles whenever possible and view the fee as being well worth the cost. I have fished many areas around Northern New Mexico and have tired of the poor fishing, but particularly the disrespect anglers have shown toward the land with trash and evidence of over-fishing. My biggest fear is having the Valles being turned into a money-making operation at the cost of the land's beauty. I worry what the Park Service or Forest Service might do in that regard. We don't need it. There are already plenty of other recreational sites for that. Keep Valles unique. It is a unique treasure. Once we go to a "Park Service" solution, it will be too late to ever go back. The fishing program as it currently exists is brilliant. Limiting a certain maximum of fishermen per tract of land keeps that tract from being over-fished and provides a large area for fishermen to enjoy without encroachment. If I pay for that experience, it's fine. I believe paying for and reserving a day to fish tends to discourage the casual angler/camper/recreationalist who, in time, will fill the Valles in droves without that fee. I understand that with any plan that's eventually approved, revenue is a huge issue, and that there are other recreational/educational/scientific/ programs and priorities to consider. But what I prefer is to keep the fishing program intact as is. That it brings in significant revenue is something that should be considered in the decision-making process of where fishing - and Valles - goes in the future	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
4-W	I strongly support the plan to get the Valles Caldera into the National Park Service as a first priority. There are pros and cons, but I don't think that the Trust has sufficient income to take proper care. In the meantime, I feel it is important to control access to the Caldera to minimize environmental damage. This would severely restrict personal vehicle access in favor of scheduled shuttles run by trained staff (not volunteers) who will supervise visitor access. I hope, in addition to strict environmental impact monitoring, the Longmire production company is paying BIG BUCKS for access. The Caldera Trust can use the income!	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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No.	COMMENT	RESPONSE
5-W	The documents are very easy to read and quite thorough. Good job. A comment on the Valle Vidal versus the VCT. Keep in mind the VV only has 42 miles of roads open while the VCT uses double to triple the miles of roads. The Snowmobile use is light, the ATV is only on 42 miles. I have concerns with alternatives that attempt to exploit the Valle Grande. The Valle Grande is the heart of the VCT. Since the acquisition there are less than 50% of ELK seen in the Valle Grande because of the current use, think what more development will do. None of your alternatives talked about reducing the amount of roads on the VCT or eliminating the main road up the Valle Grande. I didn't see much discussion on the revenue generating or maintenance costs. If you plan to pay for the costs there needs to be revenue. Does the public understand you need to charge entrance fees, user fees, increase hunting fees, logging, grazing to raise revenues or do something similar as the Park Service if you expect to cover costs?	Thank you for taking the time to read the Draft EIS and submit your comments. As noted on page 2-74 of the Draft EIS, specific elements of the Valle Vidal management model, including all-terrain vehicle (ATV) use on all open roads and snowmobile use, were considered inappropriate for the preserve based on the Valles Caldera Preservation Act, not the number of miles of roads within the preserve. Section 108(e)(1) of the act states that the VCT shall consider "appropriate opportunities for public use and recreation that are consistent with the other purposes under section 105(b)." This means that public use and recreation activities allowed on the preserve must not conflict with the purposes for which the preserve was established, specifically "to protect and preserve the scientific, scenic, geologic, watershed, fish, wildlife, historic, cultural, and recreational values of the preserve" as stated in section 105(b). The trust believes that open and unlimited ATV and snowmobile use, as well as off-road use, would conflict with its mandate to protect and preserve the preserve's values. The number of elk on the preserve has decreased since acquisition of the preserve by the federal government, but not due to development. New Mexico Department of Game and Fish (NMDGF) intentionally reduced the elk herd size in the Jemez Mountains during the late 1990s and early 2000s, which happened to coincide with the creation of the preserve, issuing nearly double the number of hunt tags for the Jemez Mountains (Units 6A, 6B, and 6C). This reduced the herd size in the Jemez Mountains from 7,000-9,000 to the current number of 4,000-6,000. In recent years, overall elk numbers have been consistent, and NMDGF estimates that the number of elk on the preserve is 2,000-2,500 animals, or about half of the herd size of the Jemez Mountains. The 2005 Valles Caldera National Preserve Framework and Strategic Guidance for Comprehensive Management notes that the preserve's elk population is far greater than has previously been the case in the long-term natural history of the caldera. This information has been added to the EIS. The list of cumulative actions on page 4-10 of the Draft EIS notes the road decomissioning activities the preserve is undertaking under a separate planning process; therefore, they are not included in the alternatives for this plan. The trust must announce proposed fees for access and fees assessed for recreation activities and allow a 60-day public comment period. This will occur at a later date following selection of the preferred alternative. As described in chapter 2, economic feasibility and cost/benefit ratios were included in the screening criteria used in developing alternatives. chapter 2 also includes performance requirements aimed at reducing and minimizing future operating costs. The VCT has a variety of fund-raising mechanisms authorized by the Valles Caldera Preservation Act and referenced in the Draft EIS. The VCT Strategic Management Plan for Fiscal Years 2012 – 2018 is referenced in the EIS and available at http://www.vallescaldera.gov/about/trust/docs/Valles%20Caldera%20Trust%20SMP%202012-2018.pdf
6-W	In earlier comments to you regarding my preferred location for the visitor center, I supported the Vista del Valle site. After touring the Vista del Valle and Entrada del Valle sites, I want to rescind my support for the Vista site. The arguments for the Entrada site are persuasive, so I now concur with the position Tom Jervis has taken in Caldera Action's formal comments. I would also like to emphasize my support for shuttle service on the Preserve with absolutely minimal vehicular access. Thank you for all your efforts in behalf of wise choices on the Preserve.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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No.	COMMENT	RESPONSE
7-W	The Valles Caldera National Preserve is the spiritual heartland of Northern New Mexico. It is of fundamental importance that this multi-cultural region remain a protected wilderness retreat. We have much to learn from its landscape and much to enjoy within its bowl of bounty. The Valles Caldera Trust has begun a creative era of management under the new direction of Executive Director Dennis Trujillo. The plan shows respect for and protection of the unique nature of the Preserve area while seeking expansion of educational and recreational public programs. The options presented in the Draft Public Access and Use Plan EIS with designs for a new visitor center are sensibly conceived and will be an asset to the Preserve for the future. It is vital to lend our voices to the Trust's mission so that the 2015 management deadline can be extended. I believe that careful professional management and further development of educational programs for the public to understand and appreciate the special heritage of the Caldera will ultimately help attain the Trust's goal of financial sustainability that is required for extension into 2020. Low impact to the environment is a priority of the Valles Caldera Trust. I am confident that whatever option is chosen is a result of exhaustive study and sensitive adherence to the land itself. The Valles Caldera is a treasure to Northern New Mexicans and the world. Under the present direction of the Board, it is best managed by the Valles Caldera Trust.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
8-W	I support Alternative 3A that is in a site where electric power and domestic water are more available than at the Vista del Valle Visitor Center site. Also, more activities would be available directly from this site. Visitors would have a view of Valle Grande from the western end.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
9-W	Government vehicles with paid or volunteer guides should only be allowed access off road. Hunters and fisherman can use walking and or horses for access if shuttles are unavailable.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
10-W similar to 7-W	The Valles Caldera National Preserve is the spiritual heartland of Northern New Mexico. It is of fundamental importance that this multi-cultural region remain a protected wilderness retreat. We have much to learn from its landscape and honor the ancestral stewardship that has left the Caldera one of the most magical and pristine places on the planet earth. Low impact to the environment is a priority of the Valles Caldera Trust. I am confident that whatever option is chosen is a result of exhaustive study and sensitive adherence to the land itself. The Valles Caldera is a treasure to Northern New Mexicans and the world. Under the present direction of the Board, it is best managed by the Valles Caldera Trust. The Valles Caldera Trust has begun a creative era of management under the new direction of Executive Director Dennis Trujillo. The plan shows respect for and protection of the unique nature of the Preserve area while seeking expansion of educational and recreational public programs. The options presented in the Draft Public Access and Use Plan EIS with designs for a new visitor center are sensibly conceived and will be an asset to the Preserve for the future. It is vital to lend our voices to the Trust's mission so that the 2015 management deadline can be extended. I believe that careful professional management and further development of educational programs for the public to understand and appreciate the special heritage of the Caldera will ultimately help attain the Trust's goal of financial sustainability that is required for extension into 2020. My thanks and special thoughts to the many silent voices that don't know how to speak. The Indigenous peoples of the land around the Caldera sometimes lose hope, their silent prayers and stewardship has kept the Valles like it should be, one of the most pristine places in the world. I thank my ancestors and I thank the current management of the Valles, lets keep it this way to preserve its pristine status. We always need to consider the consequences of our actions, not only presently, but for years to come.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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No.	COMMENT	RESPONSE
11-W	I would like to comment on the alternatives: I favor alternative 3A, having a visitor center and shuttles. Unfortunately allowing personal vehicles will lead to degradation of the area; sad but true. I would actually favor a less elaborate visitor center, but that wasn't an alternative. Causing a slight inconvenience to visitors will ensure that only people who really want to go and who are willing to make advance plans will be able to enter. Fortunately, the road has challenging moments (nothing like Chaco, of course). As my group left the Preserve a lightning storm began which progressed into torrential rain. This was soon after the fire, and of course there was flooding and boulders on the road (we did, obviously, get out). The experience showed all too clearly the effect of wildfires. If you will have public access you may consider closing hunting, or people will be bagging tourists by mistake. Your comment website was not all that easy to use--it was very hard to find how to comment. Of course that may have ensured that only those who had something to say would persevere. Evidently there's another problem, now, in that it was cutting off comments. Computers certainly make life easier, don't they? --Thanks for getting back to me on this.	Thank you for taking the time to read the Draft EIS and submit your comments. The trust will continue to manage the timing and location of various programs to reduce conflicts between activities that may not be compatible for any number of reasons, including public safety.
12-W	I support efforts to enhance public access to, and understanding of, the Valles Caldera, which is recognized world-wide as a classic example of a resurgent volcanic caldera. It is unique in its perfectly preserved landforms â€“ this certainly should be recognized as a major reason for preservation and access and in designing educational presentations for the Caldera. Best site for visitor access: #3, Entrada del Valle Visitor Center (phased in, in stages). Reasons: Highly visible and accessible from Highway 4; direct access to hiking/skiing trails not damaged by fire; fabulous view of Valle Grande and its extrusive volcanic domes; possibilities for up-close viewing of wildlife from the center. Phase this in, but with expansion plans, to limit initial cost and allow adjustment in facilities/access as visitors increase and experience grows. Option 3B: This could initially be limited to high-clearance AWD/4WD vehicles and/or to certain roads/areas. This would reduce pressure on shuttle vehicles and would not require immediate upgrading of all roadways. Other considerations: 1. Preserve Banco Bonito as a secondary access point to activities in that area. 2. Geologic education should include information on post-eruption dome growth and lake development and the subsequent draining of the caldera lake by East Fork and San Antonio creeks. 3. Preservation of pristine wilderness: Usage history shows the caldera is far from pristine; it has been grazed, logged, filmed, hunted etc. for over 100 years. Current fish and elk herds are reintroduced. Management should continue. 4. Limitations on future developments: The maps of options D and E in the 2009 Public Scoping Information document go beyond what I envision as desirable. The geology is very durable, but I am also concerned about excessive impact on wildlife and overall environment. B, C, D and E all assume the Coyote Call site for a visitor center, which I do not support. 5. Best skiing is in wooded areas but access to these requires a long hard slog through the slush on warmer days. This needs a solution, perhaps snowmobile access? 6. Instead of making all native American sites off-limits, why not hire several native American guides to take visitors to these sites and explain their significance? 7. When we visited site #3 there was a sign at the entrance road, but logs across the entrance. At the visitor center the staff were unaware of the directives to park by the old movie set . Finally we were given a permit to park at the entrance to the road. The disconnects between what is on the website and what we encounter at the visitor center, suggests a need for better top-down communication. At the same time, the staff have always been very pleasant, and ultimately very helpful. 8. The financing analysis (Public Scoping Information, 2009) indicates that only the maximum development option (E) is 100% supporting! Bases on NPS experience? This should be caref	Thank you for your comments. Under all action alternatives, the proposed visitor contact station or visitor center would include education and ecotourism facilities. The location and scale of the development proposed under alternatives 3 and 4 are especially suitable for interpreting the geology of the preserve. Education is and will continue to be an important focus for the VCT. The VCT currently has a program area dedicated to environmental education, offers a variety of educational and interpretive tours, including a geology tour, and maintains a facility for the purpose of hosting formal education and scientific programs. The VCT also participates in local programs that provide environmental education to students and teachers. Such activities would continue in the future. Wildlife impacts are addressed in chapter 4 of the plan, which has been revised to include greater detail on impacts to elk from increased recreation. Should an action alternative be selected as the preferred alternative, recreational use and facilities, including winter activities, will be defined in more detail during the programmatic phase of planning. However, as the Draft EIS states, nonmotorized access and enjoyment are encouraged in the preserve. In accordance with the 1978 American Indian Religious Freedom Act (42 USC 1996) the EIS states that the preserve would work with local Tribes and Pueblos to identify methods of protecting important landscape features and identifying methods of sustaining on-site visits for cultural and religious practices without interference from increased public visitation. "Without interference" does not necessarily mean the public would be fully excluded from specific areas. The Valles Caldera Trust would seek to achieve an appropriate balance of access and use for all visitors while complying with the act. As mentioned in chapter 4 of the plan, increased visitation under the action alternatives may result in a need to hire additional employees, which would result in a slight beneficial impact on local environmental justice populations, including Native Americans. The EIS has been revised to include employment of "Cultural Guides" from the American Indian population. Again, education is important to the trust, including the preserve's important cultural resources.

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No.	COMMENT	RESPONSE
13-W	My husband and I love the Valles Caldera. Most of our visits have been for snow activities. We would like to do more hiking there, which influenced my choice of visitor center locations. Of those proposed, I would choose 3B. I prefer the ability to enter using my own vehicle. I do not care to 'wait' around for shuttles - personal preference here. I prefer the 3B to the 4B site because I feel the location is better for hiking and backpacking activities. It also still allows a beautiful view of the caldera - although I have to say site 4 probably is a little more picturesque for that. I love the idea of a bike lane as well, as I enjoy that too. Thanks for the opportunity to comment. Hope it goes well!	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
14-W	I would like to see even less public use of the Caldera. N.M. needs to retain these beautiful spots for the future well-being of our State/States. More use means chance of poor usage. Why do we have to use every single acre of green spaces in these United States for public access??!! There is such a thing called "pristine space" but there seems to be less and less. Please use restraint. Ever hear of it??	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
15-W	Alternative 4B appears to give management the greatest flexibility in controlling traffic and, at the same time, providing for the maximum public benefit in recreation and education. A theater, exhibit halls, observation deck, and classroom are critical in allowing creation of an educational program to make Valles Caldera more than just a recreational area for hiking, camping, fishing, etc., important as those functions are. The DEIS is well researched and written and the opportunities for public involvement are exciting and endless. I appreciate the opportunity for public comments.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
16-W	I like Alternative 3A or 3B. We need to be good stewards and find a way to provide for the protection of this area, provide enough money to finance the upkeep and educate people on what this area is and why we need to protect it. It is good to handle this education and protection in a way that will allow you to have the system pay for itself. This also allows more access to people that would not ordinarily visit this area because of the remote access. Please provide Disabled visitors access to this area.	Americans with Disabilities Act (ADA) compliance is noted specifically under the description of components in alternatives 3 and 4 (A and B) but was not specifically noted under alternative 2. chapter 2 of the EIS was further revised to stress that the Valles Caldera Trust would comply with the ADA to provide access to disabled visitors to the fullest extent possible under all alternatives.
17-W	I am still hoping that the National Park Service (NPS) will one day take over management of the Valles Caldera National Preserve (VCNP). I don't plan to use the VCNP, other than the free trails, until either the NPS takes over management or the present VCNP management offers an annual pass.	Thank you for your comment.

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18-W	I support the points in red below as made by Caldera Action (I've clipped most of their original email). To summarize, I support Alternative 4A which would keep the shuttle-only access and would have a visitor center that overlooks the Valle Grande (at Vista del Valle or Entrada del Valle). Shuttle-only access would help maintain the quiet beauty of the Preserve's vast landscapes. The visitor center is best sited where the public can, and I'll directly quote Caldera Action because I can't put it any better, "enjoy the grandeur of the Valle Grande. It also seems reasonable that the Preserve, as part of a "comprehensive management plan for the whole Preserve", do an "environmental analysis of the VCNP's road system". You need to know what's out there and if any of the roads are causing resource damage and should perhaps be decommissioned. The whole point of doing that as part of a "comprehensive management plan for the whole Preserve" is so you can see where the roads fit into the big picture. If you do piecemeal planning for the Preserve, you risk inadvertently damaging what you're supposed to be taking care of for the public. The idea of removing "maintenance activities from the Old Ranch Headquarters" to Banco Bonito seems eminently wise. The old ranch headquarters should showcase the history of the Preserve, not its maintenance activities. Truthfully, I wasn't going to comment at all. I made all sorts of detailed comments on the original website you set up for the public access planning process several years ago and then absolutely nothing happened; then you started the public access planning process all over again. I don't understand why you are engaging in such a painfully protracted planning process for public access. I agree totally with Caldera Action, point number 4 below, that you should work to have a Preserve-wide comprehensive plan and stop this "segmented" planning process which is alienating the public. Subject: Call to Action from Caldera Action 1) Alternative 4A is the best one in terms of long term protection of the Preserve and for providing quality, quiet access for a diverse public. This alternative would place a visitor center overlooking the Valle Grande and continue the shuttle-only access to the Preserve among other things. 2. support the shuttle system and hope it will become permanent do a complete environmental analysis of the VCNP's road system...as part of a comprehensive management plan for the whole Preserve. 3. building the visitor center near Highway 4 at the "Vista del Valle" site or "Entrada del Valle" site at the old movie set. remove all maintenance activities from the Old Ranch Headquarters and establish a new maintenance area at Banco Bonito 4) ask the Trust to bring all of it's planning efforts together as Congress required rather than developing segmented planning that ignores relationships between activities and developments	Thank you for taking the time to read the Draft EIS and submit your comments. The National Environmental Policy Act (NEPA) is a federal law that applies to all actions taken by federal agencies, including the Valles Caldera Trust. An action is defined by NEPA as approving, undertaking, or funding in whole or in part new and continuing activities, and projects or programs funded or conducted by agencies. If the action is expected to significantly affect the quality of the human environment (i.e., the natural and physical environment, as well as interrelated social or economic impacts), the agency must analyze the impacts of the proposed action -- in this case, through an environmental impact statement (EIS). Therefore, taking steps to broaden public access and create a portal for visitor use required compliance with NEPA and development of this EIS. As mentioned in the Draft EIS on page 2-4, a transportation system to support primary access via shuttle or personal vehicle based on the selected alternative would require additional planning and decision-making in compliance with NEPA prior to implementation. This would include an environmental analysis of the proposed road system.
19-W	I have enjoyed hikes and cross country ski trips into the Valles. The experience and views are heightened by the emptiness of the place. Therefore, as much as I would like easier access, I believe overuse will ruin the experience. The Visitor Center should be tucked away from the road; therefore, Alternative 2 appears to be the best option. In many respects, the Valles is not a large area; and the open valleys exaggerate the visual impact of high use. Therefore, guiding principles should be: minimize vehicle traffic in the main caldera, preserve the views, provide vehicle overlooks for the casual visitor, allow low impact activities (hiking, fishing, hunting) and enforce the rules to prevent misuse. Overall, the NEPA document is well written. I recognize the authors had a tough job. All will not be happy with the eventual outcome, but you gave it a good shot.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
20-W	4) ask the Trust to bring all of it's planning efforts together as Congress required rather than developing segmented planning that ignores relationships between activities and developments	Thank you for submitting your comments.

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22-W	I have carefully read the proposed alternatives and have the following concerns and suggestions: It appears that most of the alternatives concentrate on siting of a visitor center and the VCS as a means to maximize the "short-stay experience" of visitors. This is largely how the National Parks and National Forest systems exploits the recreational visitor. Decades of experience has shown this to be a viable, but short-sighted means to generate revenue; site a large, well apportioned visitor center near scenery, just past a fee booth, provide clean restrooms with running water, and certify that visitors will only stay for a few hours by providing barriers to a backcountry experience. This model only serves the casual motor-tourist and does almost nothing for your most critical mission: To protect and preserve for future generations the scientific, scenic, historic, and natural values of the Baca ranch, including rivers and ecosystems and archaeological, geological, and cultural resources (from NEPA Procedures of the Valles Caldera Trust for the Valles Caldera National Preserve July 17, 2003). As environmental changes occur over time, the Valles Caldera, and surrounding Jemez Mountains, will become much more of a "resource island" than it already is. Consistently cool summer and warm winter weather will draw permanent populations of wildlife that may be unable to seasonally migrate out of the area. Add to this, the growing populations of nearby urban areas weary of city life and hungry for wilderness experiences and you have the perfect opportunity for the Valles Caldera to position itself as the paradigm of wilderness preservation through local usage. To that end, I recommend that the "Visitor-Center-Centric Paradigm"; be scrapped and that infrastructure be installed that will: 1) Encourage summer-long educational field camps that concentrate on wilderness management similar to a university program. Provide one-day backcountry tours for local schools during the school year. Promote local concessionaires that provide services for these camps. 2) Encourage backcountry visitation with a tiered access system that encourages frequent visitation that earns elevated access rights over time. 3) Promote organized backcountry experiences and events, i.e. scouting events, hunting/fishing clinics, seasonal wildlife surveys, guided resource "tours", Wilderness First Responder/SAR clinics, etc... 4) Promote low-impact organized backcountry sporting events, i.e. winter cross-country skiing races, fall mountain bike races, biathlons, with emphasis on local concessionaire participation. 5) Restrict the use of motorized vehicles to handicapped access, maintenance/ranching, emergency services, and educational/research activities. Encourage the use of bicycles as primary access on preserve roads. 6) Discourage the individual who will drive 90 minutes to look at a visitor center, go to the bathroom, then, return home.	Thank you for your comments and suggestions. Education has always been, and will continue to be, important to the Valles Caldera Trust. The trust currently conducts educational tours of the preserve, which would continue in the future under the proposed action alternatives. As noted in chapter 2 of the plan, the action alternatives would incorporate low-impact, sustainable practices as much as possible. After the preferred alternative has been identified and the record of decision (ROD) for this plan is signed, the Valles Caldera Trust will undertake programmatic planning level actions, as described in chapter 2 of the EIS. During that time, the trust will consider details about how to best provide expanded recreational use of the preserve, and your suggestions will be taken into consideration.
23-W	In the Draft EIS plan, chapter 2: Alternatives, the only alternative that specifically calls for "open and unlimited access"; for nonmotorized use is Alternative 2. For this reason, Alternative 2 is the only alternative that I support.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative. All action alternatives would provide generally open and unlimited nonmotorized recreational access using the existing trail network at the Banco Bonito location. The EIS has been revised to clarify this. Over time the trust anticipates expanding the trail system preserve-wide. Measures to protect resources similar to those used on other public lands, such as encouraging visitors to stay on designated trails, would also be incorporated into the VCT trail system.
24-W	Please adopt Option 3A..that is the best plan to increase public enjoyment, yet preserve the beauty and protect the environment, including limiting noise pollution. Thank you, Visitor of that great resource 1965-2011	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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25-W	I generally agree with the Public Access and Use proposal. I would insist on semi-paved road access--to decrease dust, etc., day use earlier and later in each day-every day, picnic tables, waste containers or stringent "pack in, pack out" rules-built restrooms--not those awful looking blue things, and wheel chair access where useful. The older or handi-capped public has just as much right to access to these wonderful sites as our more able-bodied younger citizens. Fire pits/grills. Grills better I think so people don't think a pit is an invitation to build a bon-fire. I want the more "common" people like me to have as much access to such a cherished place as more able-bodied or more enabled people. So I hope my wishes can be incorporated in an over-all plan for the taxpayers. And thank you very much, again.	Thank you for taking the time to read the Draft EIS and submit your comments. chapter 2 of the EIS was revised to further stress that the Valles Caldera Trust would comply with the Americans with Disabilities Act (ADA) to provide access to disabled visitors to the fullest extent possible under all action alternatives.
26-W	Due to the fragile and sensitive nature of the Caldera and the wildlife it contains, I feel Alternative 4A best suits the needs of the people and the wildlife. Access via shuttle provides for people to still enjoy the Caldera and its wildlife without doing harm. I have seen what the public has done to some of our state parks and I do not want that to happen to the Caldera. Thanks for your consideration.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
27-W	Thank you for the opportunity to comment. Having visited the area long before the Preserve was created as well as recently with an educational/work project, I am so happy to see this vital area has been protected from private development. It is a treasure that must be kept as pristine as possible for future generations but also allow people to learn about and enjoy quiet recreation. Alternative 4A seem to best meet those criteria. It is unfortunately true that most visitors enjoy public lands from developed vistas and short trails rather than from intimate and extensive involvement and Alt 4A would allow such visitation but provide important educational opportunities. The use of shuttles would not only keep the area from being overrun with motor vehicles but would allow for interior visitation by those who wish that and would provide an educational opportunity by using well-versed shuttle drivers. I do think that ultimate transfer to the National Park Service for management as a preserve rather than as a developed park would best serve the future of the area. I especially wish to see cattle grazing discontinued. Grazing is very damaging to public lands and distasteful for visitation. I would also like to see hunting greatly restricted or eliminated for safety to the public while restoring to the area predators that can more naturally balance the ecosystem.	One of the purposes of the preserve, as defined in the Valles Caldera Preservation Act, is to "provide for domestic livestock grazing" and to "provide for the operation of the Preserve as a working ranch." Grazing is addressed under the trust's 2009 *Multiple Use and Sustained Yield of Forage Resources Environmental Assessment* . The trust will continue to manage the timing and location of various programs to reduce conflicts between activities that may not be compatible for any number of reasons, including public safety.
28-W	I support Alternative 3A, which appears to allow the greatest spontaneous hiking access to the Preserve while limiting the detrimental impacts from private vehicle use. Alternative 4A would be my second choice, though I have concerns about the impacts of the pumping system required to bring water to that site. Thank you for the clear and concise EIS and opportunity to comment.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
29-W	I'd like to add a note to the comments I submitted earlier today. As lead teacher for PEEC's annual weeklong Nature Odyssey in the VCNP, I feel that environmental education is one of the highest uses of the preserve. Over the past several years, I've used all of the proposed sites as outdoor classrooms with the help of many wonderful members of the VCT staff. Based on this experience, I believe 3A is the best site from which to interpret the natural and cultural history of preserve because it combines an excellent vantage point with a feeling of intimacy with Valle Grande. Alternative 2 provides neither. While Alternative 4 provides great views, it has a much greater sense of remove from Valle Grande. Again, thank you for listening and best of luck with the next steps in the process.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
30-W	There are probably several species, but in the quick, one-hour, leaf-through, one species noted in the EIS that wasn't in the EA is golden eagle. A number of years ago there was a pair along NM 4 west of White Rock. An NPS ranger had seen a lot of dust stirred up beside the road and saw that it was an eagle killing and/or dragging a fox. And a couple of winters ago, on a gray Sunday afternoon, I saw what I thought might be one while standing on top of Cerro Grande. It was perhaps a quarter mile west, several hundred feet in the air, and flying/gliding south to north at, I wouldn't be surprised, 40 or 50 miles an hour. Nice to learn that Fettig says they nest on the VCNP.	The affected environment section of the EIS describes the golden eagle's presence on the preserve and protections provided by the Bald and Golden Eagle Protection Act. chapter 4 of the EIS includes mitigation for bald and golden eagles, including conducting nest surveys. The EIS was revised to note impacts to the golden eagle prior to undertaking these mitigation measures.

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31-W	This 550-page Draft EIS is incorrectly titled. It is not a Public Use and Access Plan. It is, much more narrowly, a document that proposes "to develop a portal from which to enter the preserve, construct a visitor center and ancillary facilities, and adopt guidance for future access and development." Any action beyond building a visitor center "would not be implemented without additional future NEPA documentation, including public involvement, at a more detailed level." -- page ii. A title that better fits the document's actual contents is Draft EIS for a Portal Visitor Center. It is stated on page 1-11 that "During public workshops and via written comments in 2007 and 2009, the public expressed a desire for more access, more spontaneous access, more freedom to explore, sustainable management practices, a modest scale of development, and protection of resources and values." At present there are only two trails available for spontaneous access, neither of which course more than 600 meters from State Road 4. Nothing in this Draft EIS proposes to increase opportunities for spontaneous access. Essentially, at "Tier 2" level, all that is being proposed is relocating and increasing the size of the visitor center. The Draft EIS says that the public would like the VCT to "provide facilities and infrastructure that would be adequate to meet public safety standards, as required by the Valles Caldera Preservation Act, if access were increased." This is a misleading statement. The Act authorizes, but does not require, building infrastructure. It requires only that any construction "shall meet public safety standards applicable to units of the National Forest System and the State of New Mexico." -- Public Law 106-248 SEC. 108(e)(1) http://www.gpo.gov/fdsys/pkg/PLAW-106publ248/pdf/PLAW-106publ248.pdf In short, this Draft EIS deals only with providing access to the Preserve by vehicle at one point near the southern boundary of the Preserve. However, most of the approximately 50-mile fenced boundary of the Preserve could be made available for spontaneous free-range access on foot. Short walks from Santa Fe National Forest Roads 36, 144, 289, and 455 could provide free-range hiking on the Preserve side of the boundary fence from where it is already permitted on Santa Fe National Forest and Bandelier National Monument. The Preserve's NEPA procedures allow for authorizing such free-range hiking access with a simple, not complex, NEPA-compliant document. If the Draft EIS were more than just a portal building document and really about general public access and use, it would address this no-cost, minimal impact opportunity for spontaneous access. For further information on this, see Categorical Exclusion 13 of the VCNP's exemplary document, National Environmental Policy Act (NEPA) Procedures of the Valles Caldera Trust for the Valles Caldera National Preserve, Federal Register / Vol. 68, No. 137 / Thursday, July 17, 2003. http://www.vallescaldera.gov/about/trust/docs/trust_NEPAProcedures.pdf page 42471	Thank you for taking the time to read the Draft EIS and providing your comments and suggestions. Most of the recreational activities on the preserve are available by reservation or lottery. In the past few years, the VCT has expanded “spontaneous” opportunities for visiting the preserve. The preserve is open for visitation 7 days/week from late spring to early fall. Most activities can be enjoyed without reservations; however, due to limited capacities, reservations are recommended. All of the action alternatives propose visitor access to the preserve without reservations. People would be able to visit and recreate within the preserve without making prior reservations. The EIS was revised to make this more clear. As stated on page 1-9 of the Draft EIS, the Valles Caldera Preservation Act "authorizes" the Valles Caldera Trust to "construct and operate a visitors’ center in or near the Preserve, subject to the availability of appropriated funds." The quote you mention is in reference to Section 108(4)(e)(1) of the act, which states "Roads, trails, bridges, and recreational facilities constructed within the Preserve shall meet public safety standards..." Thus, the act requires, through the word "shall," compliance with public safety standards if facilities are built. As noted above, the EIS does not state that the act requires construction of infrastructure or facilities, only that such things, if constructed, meet safety requirements. As you note, the Valles Caldera Trust can authorize activities on the preserve through a "simple" NEPA document, such as an environmental assessment or categorical exclusion. As noted on page 2-4 of the Draft EIS, programmatic-level decisions, including decisions about the preserve's trail system, "would require additional planning and decision-making in compliance with NEPA prior to implementation. Future planning and decision-making may require documentation in an environmental assessment or EIS, or may be categorically excluded from further documentation consistent with the VCT procedures for implementing NEPA." Therefore, the trust will engage in the NEPA process to make the programmatic level decisions, such as trail development and use, should one of the action alternatives be selected as the preferred alternative.

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32-W	If a visitor center must be located on the Preserve, the preferable site, of those proposed in the Draft EIS, is Alternative 2, Banco Bonito. 1. Buildings constructed at that location, unlike 3A/B and 4A/B, would not have to be visible from high points on and off the Preserve, thus preserving the values of scenic integrity and scenic attractiveness. 2. The site has been previously disturbed. With much of the Preserve already disturbed, it's difficult to see how disturbing an additional site can be justified when a previously-disturbed site is available. 3. As proposed, Alternative 2 is the least expensive, and therefore most likely to be actually built in a timely manner. It could be designed with possible expansion in mind to make it easy to add on if a larger buildings(s) was needed in the future. 4. It is as good a point for vehicle access as the others, although that should not necessarily be a consideration; the only private vehicles allowed on the Preserve should be those displaying a valid handicap placard and which are transporting one or more handicapped persons. 5. That visitation would range from 50,000 to 120,000, depending on which site is chosen, would seem to be pure speculation. It is similar to what appears on pages 2-82 to 2-84: "The no-action alternative would meet the purpose of NEPA to some degree." "Alternative 2 would meet many of the purposes in NEPA to some degree." "Alternative 3A would meet most of the purposes in NEPA to a moderate degree." "Alternative 3B would meet most of the purposes in NEPA to some degree." "Alternative 4A would meet most of the purposes in NEPA to a moderate degree," "Alternative 4B would meet most of the purposes in NEPA to some degree," While much of the Draft EIS is informative, the above 6 statements are not. If someone from David Evans and Associates, Inc. can say which alternative best satisfies NEPA requirements based on the above, I'll eat their hat. Just joking -- in a document this big, things like this are bound to creep in and not get pulled out.	Thank you for taking the time to read the Draft EIS and submit your detailed comments and suggestions. The method of estimating expected visitation numbers was made available for public input during public scoping for this plan. The numbers were calculated based on the proposed locations of the visitor contact station/visitor center. One factor that was considered in estimating visitation is the casual visitor market in the Jemez corridor, which is estimated to be about 600,000 visitors annually. Visitation for alternatives 3A/B and 4A/B was based on an assumption that the preserve would capture 15-20% of this market. Alternative 2 was designed as a response to public input during public scoping requesting a smaller-scale option. The estimated visitation level at alternatives 3 and 4 are greater simply because their proposed locations in the Valle Grande is expected to attract a greater number of visitors. The EIS assesses the maximum footprint the VCT believes is suitable for the expected level of visitation at any site and is sufficient to offer a variety of programs and amenities. Section 101(b) of the National Environmental Policy Act (NEPA) lists six general objectives federal agencies should meet to provide for enjoyment of a "healthful environment," which are listed on page 2-82 of the EIS. These objectives help define the spirit of the law, as defined in Section 101 of NEPA, and therefore many are subjective, such as "assure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings." Although the various proposed alternatives may or may not meet these general objectives to varying degrees, such determinations alone are not sufficient for basing selection of the preferred alternative. NEPA Section 102, which is the letter of the law, states that federal agencies must consider the impact of their proposed action in decision-making. Section 1500.1(c) of the Council on Environmental Quality Regulations for implementing NEPA states "The NEPA process is intended to help public officials make decisions that are based on understanding of the environmental consequences." Therefore, decision-making is also based on the analysis of environmental consequences, which is provided in chapter 4 and summarized in table 2-11 of chapter 2. Taken together, requirements of both the spirit of the law and the letter of the law provide the basis for selection of the preferred alternative.

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33-W	On page 2-36, it is stated that "Hiking would be expanded to provide short day loops and multi-day backpacking opportunities." Multi-day backpacking implies overnight camping. There is no need to provide for any camping on the Preserve. Formal campgrounds and primitive camping are available outside the Preserve in all directions on the 1.6 million acre Santa Fe National Forest and at Bandelier National Monument. Duplication of camping opportunities on the Preserve would have an environmental impact that cannot be justified and would result in unnecessary expense. If a new visitor center results in greater demand for camping in the area, it can be met by expansion of camping facilities on the Forest and at the Monument and possibly on private land. That should be the case even if the Monument and Preserve someday become a National Park and Preserve. In the event a rim trail is ever established (unlikely in the remaining lifetimes of those who have time to make comments like this), which could provide multi-day backpacking opportunities, its meandering route would be on the Forest and Monument as well as the Preserve, and campsites, primitive or otherwise, for those hiking the trail would not need to be on the Preserve.	Thank you for taking the time to read the Draft EIS and submit your detailed comments and suggestions. Existing camping facilities are not meeting current demand. The Santa Fe National Forest Plan, amended in 2010, states "Developed recreation falls short of meeting projected demand.... However, demand for developed recreation can also be met by private or other public facilities that are off the National Forest." The National Park Service's web site for Bandelier National Monument currently notes that "Camping areas are more limited than before the [Los Conchas] fire" that occurred in 2011. In establishing the preserve, the Valles Caldera Preservation Act states that Congress finds that "the Baca ranch's natural beauty and abundant resources, and its proximity to large municipal populations, could provide numerous recreational opportunities for hiking, fishing, camping, cross-country skiing, and hunting." The act further states, "The Trust is expressly authorized to . . . provide other facilities for activities including, but not limited to camping . . . ." The Valles Caldera Trust believes that camping provides an opportunity for visitors to more fully experience and appreciate the natural environment in a primarily low-impact manner. In addition, providing camping opportunities would help meet the demand being experienced on adjacent public lands, and would support the findings of Congress as described in the Valles Caldera Preservation Act. The development of facilities and infrastructure in support of camping would require additional project level, site-specific analysis. As described in chapter 2 of the Draft EIS, activities such as camping would be analyzed in more detail during the programmatic level of planning. At that time, the purpose and need for any such development would be refined and alternatives that vary in the scale and location of development would be considered.
34-W	The caldera staff has received a number of comments advocating for expanded private vehicle access to the Preserve. It is important that we: strongly encourage the VCNP staff to plan for very limited private vehicle access to the VCNP. The special qualities that much of the public finds attractive at the Preserve are the quiet, the good chance of seeing variety of wildlife, and the sense of wildness that persists in the place despite past uses. All of these qualities can only be maintained by limiting motor noise, and the intrusion of vehicles to the backcountry. The VCNP has a sense of quiet and solitude that is a rare experience for people today. Private vehicle access to the Preserve may be appropriate for hunters for game retrieval (providing they stay on established roads), groups, and for the handicapped who need special provisions. Ranchers tending cattle should have access with carefully considered limits. Otherwise a shuttle system such as the one the VCNP now provides but with flexibility and continuous improvement would serve the public well. These shuttles could be adjusted to protect nesting wildlife, elk habitat or other environmental concerns such as road conditions that could lead to stream pollution or road damage. In the future, electric vehicles could be used to further limit noise and pollution; send comments BEFORE TUESDAY, AUGUST 14TH.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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35-W	Marie, Please find our amended comments on the PAUP DEIS. Note in particular that we have changed our preference from 4-A to 3-A. Beyond this, our additional comments are in addition to those submitted earlier. Sincerely, Tom Jervis, President Caldera Action	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
36-W	Alternative 4a with a simple visitor center would be best. Use funds instead for restoring the Preserve to its natural state for the wildlife and make the areas where wildlife can be seen from the visitor center very attractive to the wildlife. Keep all motorized vehicles out of the Preserve, especially off-road vehicles, snowmobiles, all noisemaking vehicles, etc. Don't allow visitors to bring any noise-making devices into the park. Use electric shuttle buses and electric service vehicles for travel inside the Preserve to minimize noise and pollution. Don't build any more roads inside the park than necessary for park maintenance and limited visitor shuttle tours. Don't allow any mountain bikes or other nonmotorized vehicles that people use for racing or risky and destructive behaviors. The goal should be to view the natural setting and wildlife with as little human impact as possible. People who are looking for thrills, can go to an amusement park. Thank you for the opportunity to contribute to the park planning process.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
37-W	I recommend alternative 2; it provides access and minimizes impact. Thank you for the comprehensive descriptions of the alternatives and the opportunity to comment.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
38-W	We are annual users of the Valles Caldera and favor Alternative 4A as being least intrusive of the caldera itself and reducing car traffic within it. Thanks for allowing/encouraging public comment. We look forward to seeing the place become a more integral part of the National Park System.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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39-W	Dear Valles Caldera Trust, I sincerely appreciate the well-written and illustrated draft Environmental Impact Report on various alternatives for future access and conservation of the natural features of the Preserve's valleys, riparian corridors, and woodlands. I write in three capacities: as a landowner in the Jemez Mountains, as a Biochemistry and Computer Science Professor at Michigan State University, and as leader of a three-county natural area restoration group, the Mid-Michigan Stewardship Initiative. My goal is to retire in the Jemez Mountains in 6 years, and then contribute my experience and energy to the fabulous ongoing restoration work in the Preserve, on which I stay informed as a member of Los Amigos de Valles Caldera. While I am pleased that multiple alternatives have been present, none of the options focus on enhancing low-impact use by hikers and wildlife viewers; instead they focus on visitor center construction and high-impact vehicular access. The alternatives seem to range from "keep as is" (Alternative A), which I favor, given the limited choice, and "pave a lot" or "pave even more". Paved roads act as a corridor for invasive species, both from seeds trapped in tires and from soil and hydrologic disruption during construction. Petroleum from asphalt and vehicle leaks pollute the neighboring soil and water. Furthermore, the massive increase in the number of vehicles and visitors as proposed in Alternatives B - E would ruin the Preserve, by fragmenting and disrupting the plant and wildlife habitats, creating noise, water, and air pollution, and disrupting the spectacular vistas and pure quiet that currently draw repeat visitors like me to the Preserve and neighboring communities. It is my favorite place to hike and observe nature, treating me to calypso orchids, close-up encounters with elk, and the chance to learn first-hand how the forest and grasslands response to wildfire. I love the Valles and know it takes dedication and even courage to keep natural areas like this as wilderness, rather than succumbing to mass tourism. There are many local places where casual visitors can drive through natural parklands, such as Bandelier National Monument and Sandia Mountain. I urge you to conserve the wilderness character of Valles Caldera, which is its most outstanding feature. In addition to Alternative A, it would be worthwhile to consider enhancing the number/length of unpaved foot paths available for hiking and cross-country skiing, preferably by allowing hiking and skiing on two-tracks or cattle trails from the Baca Ranch days. That would increase access to the Preserve without hurting it. Thanks for your work on behalf of the Preserve, and for the opportunity to provide input! Sincerely, Leslie Kuhn, Ph.D.	Thank you for taking the time to read the Draft EIS and submit your detailed comments and suggestions. The Valles Caldera Preservation Act directs the Valles Caldera Trust to develop a program to manage "public use of and access to the Preserve for recreation" and to provide for "the protection and preservation of the scientific, scenic, geologic, watershed, fish, wildlife, historic, cultural and recreational values of the Preserve." The Draft EIS does note that adverse impacts would occur to the preserve from many of the actions you mention under the proposed action alternatives. Managers of public lands must balance the sometimes conflicting needs of public use/ access and resource protection. In developing the alternatives for this plan, the trust sought to offer recreation access alternatives that avoid and minimize impacts as much as possible. Performance requirements, including mitigation measures designed to reduce potential adverse impacts, are included in chapter 2 of the EIS. Based on public comments, we have added new mitigating measures or clarified the resource protection benefits associated with the existing mitigations. If an action alternative is selected as the preferred alternative, the Valles Caldera Trust will undertake programmatic planning level actions, as described in chapter 2 of the Draft EIS. During that time, the trust will consider details about how to best provide expanded recreational use of the preserve and further evaluate potential impacts and mitigation. Your suggestions will be taken into consideration.

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40-W same as 7-W	TO WHOM IT MAY CONCERN: The Valles Caldera National Preserve is the spiritual heartland of Northern New Mexico. It is of fundamental importance that this multi-cultural region remain a protected wilderness retreat. We have much to learn from its landscape and much to enjoy within its bowl of bounty. The Valles Caldera Trust has begun a creative era of management under the new direction of Executive Director Dennis Trujillo. The plan shows respect for and protection of the unique nature of the Preserve area while seeking expansion of educational and recreational public programs. The options presented in the Draft Public Access and Use Plan EIS with designs for a new visitor center are sensibly conceived and will be an asset to the Preserve for the future. It is vital to lend our voices to the Trust's mission so that the 2015 management deadline can be extended. I believe that careful professional management and further development of educational programs for the public to understand and appreciate the special heritage of the Caldera will ultimately help attain the Trust's goal of financial sustainability that is required for extension into 2020. Low impact to the environment is a priority of the Valles Caldera Trust. I am confident that whatever option is chosen is a result of exhaustive study and sensitive adherence to the land itself. The Valles Caldera is a treasure to Northern New Mexicans and the world. Under the present direction of the Board, it is best managed by the Valles Caldera Trust. My thanks,	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
41-W	I firmly believe that there are very few places left in the USA with such natural beauty. I would back hiking trails and wilderness camping area's but no more. If the visiting center needs a location put it close to the border. These things take off and soon they will be more and more. Leave a few places that God intended to be beautiful.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
42-W	Dear Trustees, After reviewing the alternatives proposed in the Draft Public Access and Use Plan - Environmental Impact Statement, I favor Alternative 3B: "Entrada del Valle Visitor Center. Primary Access via Personal Vehicle would be the same as alternative 3A, but the primary mode of transportation onto the preserve would be personal vehicles. Shuttles would only be used for tours and group events or to reduce congestion on high-use days." I think having the visitor center near NM 4 is important for attracting visitors to the Preserve. I think there needs to be restrictions on where personal vehicles can go, but shuttle only is too restrictive. I also think there needs to be a provision for access by bicycle.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative. As noted in chapter 2 of the EIS, alternatives 3A, 3B, 4A, and 4B include a bicycle path that would parallel the loop road as a separate facility or within the road shoulder area. In addition, alternatives 4A and 4B would include an underpass below NM-4 to allow nonmotorized use for a mixture of bicycles and pedestrians for wildlife viewing.
43-W	Attached are the comments from the New Mexico Audubon Council to the Public Use and Access Plan Draft Environmental Impact Statement. Thank you for the opportunity to provide input. Judy Liddell, President New Mexico Audubon Council	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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44-W	Dear Ms. Rodrigues, As a long time resident of New Mexico, and a grandmother who wishes our children and theirs the best possible future, I am writing to urge you to protect the Valles Caldera from any development which might require greater use of vehicles or greater access for vehicles of any kind. It is important that we strongly encourage the VCNP staff to plan for very limited vehicle access to the VCNP. Please move forward with the plan which keeps the shuttle system for visitors and which considers moving the Visitors Center across Highway 4. The VCNP will become, if we are wise, one of the greatest preserves in our country. But we must protect it from even the least of development. And move carefully to restore its wildness.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
45-W	Unable to attend the public meetings so wanted to state my preference. I feel option 3B would benefit the most people who wish to be able to visit this wonderful area. Leaving access as is denying a lot of the population of enjoying the natural beauty of this area. Being in the 60+ demographic I spend a lot of time visiting National parks and monuments and really enjoy the experience of coming and going at my own pace. Being required to board a shuttle is not always possible physically as we	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
46-W	I am disappointed that more choices are not available, but only option 2 limits major construction and character altering crowds. The Caldera exists in it's current state due to limited human access for many years. While I support some increased access with the intention of improved public awareness and enjoyment, I have concerns about too much access and the consequences of human activity that have led to the degradation of many other parts of the Jemez and our national forests in general. The Caldera is a unique and sensitive area that will require careful management if it is to be preserved for future generations. Expecting this wonderful ecosystem to generate a profit is contrary to that goal.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative. Regardless of the alternative that is chosen, the trust would implement avoidance, minimization, and mitigation measures to minimize the level of environmental impact. Performance requirements, including mitigation measures designed to reduce potential adverse impacts, are included in chapter 2 of the EIS. Based on public comments, we have added new mitigating measures or clarified the resource protection benefits associated with the existing mitigations.
47-W	Four generations of my family have responsibly enjoyed the Jemez Mountains. We care deeply for the future of this unique ecosystem, and have concerns regarding increased access, as we have seen over the years just how poorly some people treat their national forests. It is also very sad to me that we expect this amazing place to earn a profit. No mention is made of how many people are currently using the Caldera each year, and no mention is made of how revenue will be generated if option 1 is chosen, though it is clear that option 1 is not favored. If I have to choose, then option 2 seems the best approach, though I wish there were more choices that did not include what seems like an excessive amount of development. Nothing being proposed has the best interest of the place or it's wildlife in mind, just the interests of people, who already have nearly unlimited access to the rest of the Jemez, and who (some) use this access without regard for their impact on archeological or living resources.	Thank you for taking the time to read the Draft EIS and submit your comments. Table 3-1 on page 3-3 of the Draft EIS displays the annual visitation and revenues for the preserve from 2005 to 2010. As noted on page 1-3, the Valles Caldera Trust is proposing to implement this plan for development of facilities and infrastructure to provide increased access onto and within the preserve and to protect natural and cultural resources from the impacts of increased visitation. The National Environmental Policy Act requires inclusion of a no action alternative (alternative 1) as a benchmark for comparing the proposed alternatives. Page 2-74 of the Draft EIS lists alternatives that were considered but eliminated for various reasons, including smaller-scale development at Valle Grande locations. Regardless of the alternative that is chosen, the trust would implement mitigation measures and take actions to minimize the level of environmental impact. Performance requirements, including mitigation measures designed to reduce potential adverse impacts, are included in chapter 2 of the EIS. Based on public comments, we have added new mitigating measures or clarified the resource protection benefits associated with the existing mitigations.
48-W	My preferred option would be #1, however it seems apparent that the alternatives are the likely choice. Choices 3A and 4A would have the least overall effects due to use of shuttles. Private vehicles would cause the greatest overall adverse effects from air pollution, noise, road maintenance, litter, vandalism. Private use of off-road vehicles should never be allowed. Electric shuttles, solar and wind powered facilities are essential. Gray water use, using potable water only for human consumption. In the final analysis I feel 4A, having the visitor center out of the Valle itself, would be the best alternative. Consideration should be made to institute a small user fee to defray costs. Until Congress gets around to adequately funding the DoI the public needs to help with upkeep.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
50-W	I support Alternative 2. Our family appreciates greatly the opportunity to experience the Caldera. We would not like it to be overused as we see in many such venues.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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51-W	I would like to see the Caldera maintain it's current policy of driving most visitors in the caldera. My husband and I enjoy the drive to a trail head without seeing trash or graffiti. We believe the 10$ fee keeps out the less concerned visitors.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
52-W	BUILD A MULTI-USE MOUNTAIN BIKE /HIKE /SKI /RUN /BACKPACK TRAIL NETWORK WITHIN, AROUND AND CIRCLING THE VCNP. Where possible, connect it to the existing Los Alamos trail network, using appropriate access controls as needed, although less is better and none would be preferred. (Fee collection? Could not a low-impact, creative way to collect be devised? Maybe including an "annual subscription"?) If the trail circling the VCNP is not possible due to land ownership disputes or other reasons, BUILD THOSE PORTIONS OF THE MOUNTAIN BIKE (/hike/ski/running/BACKPACKING) TRAIL CIRCLING THE VCNP which CAN be built, including taking the lead in working with other land owners to bring about a comprehensive circle trail, and add connecting trails allowing a circuit of the VCNP, and including a number of shorter circuit trails, so users can choose between short (an hour or 2), medium (1/2 to 1 day) or long (multi-day) MOUNTAIN BIKE (/hike/ski/running/BACKPACKING) ADVENTURES. Look to the much-used trails in nearby Los Alamos as an example of what can be done with low cost, low impact and high recreation / nature awareness / outdoor adventure value. Any visitor center or gathering place or structures or parking lots ought to be positioned so as to be not visible and right on the perimeter of the VCNP - a place like Banco Bonito staging area - and certainly NOT highly visible in the heart of the Valle Grande. This is a great time to establish this as a goal and precedent, before the anticipated VCNP Park Service transfer, even if this multi-use bike/hike/ski/run trail network project is only begun. Everyone understands multi-year project time scales. Pro Outdoors!	Thank you for taking the time to submit your comments. If an action alternative is selected as the preferred alternative, the Valles Caldera Trust will further investigate the trail system on the preserve during the programmatic level of planning, as described in chapter 2 of the EIS. Any decisions about developing a new multi-use trail would be subject to compliance with the National Environmental Policy Act.
53-W	Valles Caldera is an amazing, irreplaceable treasure that must keep its unspoiled feel or we will have committed a huge misdeed that will never be undone. When I stand at the overlook to the Valle and watch hundreds of elk wander the meadows, or watch six different coyotes go about their lives, or watch a bear lumber along behind four big bull elk, I realize ever more the uniqueness of the Valles especially so near to large metropolitan areas. Option #2 will fulfill a need to provide increased access and education opportunities without intruding too much on the wild character of the Valle. We should be very wary of developing large-scale facilities, such as the other options that will ensure a dramatic increase in traffic and impact on the fragile ecosystem. We can always easily further develop these wild places in the future if necessary, but once developed we can never go back to pristine.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
54-W	I like the Alternative 3 proposal for development of a visitor center (though I would hope the center might have flexible use (e.g., for including administrative purposes) in the event that annual visitors do not reach the proposed estimate--the current facility, while cozy, doesn't have the space to allow for educational displays or functions on site. I do strongly feel that public access beyond the designated visitor area of the Preserve should be limited to foot, horseback, or shuttle/jitney	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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55-W	I would like to add my support for Alternative 2. I believe that Valles Caldera is a unique and fragile natural area. At present, negative impacts from visitation appear low and I would support efforts to ensure that this continues to be the case. Alternative 2 projects 50,000 visitors/yr while Alternatives 3 & 4 project 120,000 visitors/yr. Also, Alternatives 3 & 4 create site footprints at least twice that of Alternative 2. While I believe there should be public access to Valles Caldera, I see nothing wrong with making entry a little more challenging, thus keeping visitor numbers lower and the overall visitation experience closer to that of true wilderness. There are other options in the immediate area for those who prefer more amenities. Also, Alternative 2 must surely be cheaper than 3 or 4. Thank you for the opportunity to comment on potential development plans for this valuable wild area. I will look forward to the final decision.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
56-W	Review of the proposed EIS: 1) The proposed no action alternative is not a status quo proposal, continue operating the Caldera as it is currently operated. Suggest the No Action Alternative be revised to indicate that activities will continue as they currently are at the Caldera, as to comply with NEPA. 2) Propose as Alternative 1, the alternative that is currently postulated as the No Action Alternative, basically dissolve management and programs. 3) The new alternative proposed should really be the alternative 1, instead of building a big building, which requires capital investment, as well staff, and resources to maintain and operate it I suggest a smaller scale option: Locate off Hwy 4 a rest area with information boards so people can read and look at photos Manage the area like the Gila National Wilderness Allow for the public to camp and visit as they do the Gila National Wilderness Allow for hunting and fishing and extend the same methods of regulating such activities as done on the Gila and abolish the current hunting and fishing management methods (i.e. drawings, special licenses, etc). No road construction Allow for road maintenance No cattle grazing, especially in and near the water sheds as to allow for the areas to grow naturally Allow for biologist and such to study and have access to trending learning from preservation efforts Establish hiking trails, routes so people can enjoy and understand the significance of the environment Charge for parking and access Allow for mountain biking but only on main roads No motorized vehicles off roads No camping near and around water sheds Change the management via legislation if necessary to be like the management of the Gila.	Thank you for taking the time to read the Draft EIS and submit your comments. Your suggestions will be taken into consideration in the selection of the preferred alternative and at the programmatic level of development. NEPA requires agencies to analyze the consequences of taking no action. In addition, an assessment of taking no action provides a baseline for comparing the consequences of the action alternatives. The Council on Environmental Quality (CEQ) provides two distinct interpretations of "no action," depending on the nature of the proposal being evaluated. Under the first situation "no action" is "no change" from current management direction or level of management intensity. Under the second situation no action means that the proposed activity would not take place. As noted on page 2-17 of the Draft EIS, the second interpretation was used to define the no action alternative for this plan. The interim recreation program and temporary visitor contact stations were established to provide reasonable public access until long-term decisions regarding the location and scale of development were made. Page 2-74 of t he Draft EIS notes that continuing the interim program from current locations (i.e., continuing activities as they currently are at the preserve) was considered but eliminated from detailed analysis, as allowed by NEPA. Because it was eliminated as a valid action alternative, the interim recreation program and temporary visitor contact stations would therefore not continue and the facilities would be removed under the no action alternative. As the no action alternative, removing the existing temporary facilities and phasing out programs from these locations was used as the baseline to compare the effects of the proposed action alternatives. Page 2-74 also describes why a wilderness/roadless management emphasis based on the San Pedro Parks Wilderness Model was considered but dismissed from detailed analysis in the Draft EIS. While technically and economically feasible, a wilderness model alternative would not meet the purpose of and need for action. It would limit access to a narrow demographic as opposed to expanding or broadening access. In addition, this alternative would not meet the spirit of the preserve's enabling legislation, which promotes a multiple-use landscape as opposed to wilderness or roadless management. One of the purposes of the preserve, as defined in the Valles Caldera Preservation Act, is to "provide for domestic livestock grazing" and to "provide for the operation of the Preserve as a working ranch." Grazing is addressed under the trust's 2009 Multiple Use and Sustained Yield of Forage Resources Environmental Assessment.
57-W	I'm glad to have the chance to comment on the alternative set ups at the Valles Caldera. I like 3B (I think that is the correct one). I think there definitely should be a full service visitor center. I feel very strongly about this. I think this will assist in access and understanding. I am glad that the public is allowed so much more use in the last few years and I think this will assist. I prefer the Center be north of NM 4 (but not all that strongly "south of NM at Rabbit Mt would be nice too" but I like the trails leading from the VC if it's located north of 4). I encourage the use of shuttles (or bicycles or other nonmotorized transport) to access trailheads and other points within the park. I think this would assist in enjoyment.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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58-W	Thank you for providing the opportunity to receive comments from the public. My family and I have enjoy the Vallas Caldera area for many years. We are excited that it will now be more accessible to the general public. Looking at the Alternatives, we feel Alternative 3 A/B Entrada del Valle Visitor Center is by far the best of the three options. This places the Visitor Center in a better location farther off the busy state road. Plus the option of having trail heads start at the Visitor Center is great. We look forward to visiting Vallas Caldera and taking advantage of this wonderful park.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
59-W	I am a film producer and have spent many days filming in the Valle - I recommend that the visitor center and all parking lots be built off site to protect the pristine landscape - the potential for profit from film company location rentals is substantial and any film company shooting in the Valle will have a positive economic impact on Los Alamos for hotel rooms and dining.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
60-W	Alternative Choices: Prefer Alternative 4A because a visitor center visible/easily accessible from Highway 4 is more desirable, especially if shuttle alternative is used. Also like the underpass to give access to Valle Grande overlooks and trails. If a lodge was later added, Alt. 4A would provide easier access. Also it's near two short, easy, all-season trailheads. Also, DEIS makes water issues for 4A and B seems more drastic than they necessarily are. Alternative 3a would be desirable for winter sports enthusiasts, in terms of them being able to park and go immediately, without worrying about shuttle. Alternative 2 allows for too few visitors; shortsighted in the long run. May be too far from Bandelier to pull in visitors from that area. Onsite shuttle fuel storage facilities should be installed unless electric shuttles are used. Design of visitor facilities should be impressive and attractive enough that they become a draw to visitors, instead of a detriment to the view; many visitors to national parks come to see the great lodges, as well as the vistas. (Sample sketches of visitor centers do not meet those criteria, although I understand that they are basically placeholders, and not decisions.) Followup plans after visitors center construction is in place: Should be tent camping and picnic sites at hiking trailheads. If these were installed, it makes shuttle service more desirable than individual cars to avoid theft and vandalism while campers might be off hiking. Primitive campsites should be designated to make it easier to avoid fire spreading and trampling and compaction of many areas, instead of just a few. Should be plans for handicapped accessible short, scenic trails within the preserve, including ADA areas for fishing. Prefer use of shuttle for access, rather than cars; shuttles should have racks for biking, hiking, picnicking, camping, backpacking equipment. Shuttles for B options should be frequent and free (unless used for guided tours); shuttles should access San Antonio creek area for hiking, biking. More bike trails needed in farthest outlying areas - San Antonio creek area. Use of shuttle only for the most part could discourage visitors from stealing cultural resources, taking out endangered plants, parking in non-designated areas, etc.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
61-W	I had the privileged of going through the gate with a key from the Jemass NM RD, 2001 during the Lightning fire stand by and patrolled the whole area for smokes and or fire and WOW what a place! I believe that the public as well the Local businesses and U.S. Government could do nothing but benefit sharing this area with WE THE PEOPLE.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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62-W	First I'd like to say I appreciate all the effort put into the idea of sustainable design and maintenance. I hope the ideas of using natural resources and methods are incorporated into the final design. I also like the idea of showcasing these methods to the public as a way to educate people about using this sort of design. Second, I'd like to support the site of 4A as a site for a visitors center and starting point for visitors to the Caldera. I think this location would have the least negative impact on the stunning visuals of the Valles Caldera, while also attracting the most visitors. But, recognizing the challenges of getting water to that area.... I would like to add a suggestion I didn't see in the paperwork, though perhaps it has been considered. Campgrounds are an entirely different beast than visitors centers... so my suggestion is to locate the visitor center at 4A, and put campgrounds at Banco Bonito where there is plenty of water, and there will be the smaller visitor station (relocated as per the plan) that could service the campgrounds. Include a bike/walking path, and occasional shuttle, from the campground to the visitor center so that campers can access the recreation in the same manner as other visitors (or just let campers drive to the visitors center if the use doesn't support a shuttle). This would reduce the visual and utilities impact of the "center"; and still allow for camping on the Valles Caldera. Thank you for all the information and for soliciting input!	Thank you for taking the time to submit your comments. Potential campground locations have not yet been identified. This will occur during the programmatic planning level described in chapter 2 of the Draft EIS if an action alternative is selected as the preferred alternative. Programmatic-level decisions, including campground locations, would be subject to compliance with the National Environmental Policy Act (NEPA) to evaluate and select the best locations based on impacts to preserve resources and public use. Your suggestions will be considered for incorporation at that time.
63-W	Believing that the Preserve can only survive by providing reasonable access to as many people as reasonably possible, I strongly support the two alternatives that are designed for "Primary Access via Personal Vehicle." Of these two, I find Alternative 4B, slightly more desirable given the proposed location of the visitor center which should attract more travelers and lead to more use and resulting revenue for the Preserve. My wife and I have hiked extensively in the Preserve the past few years, but find the shuttle system lacking and inconvenient. We have ended up walking the road for several miles due to limited availability of the vans. Allowing personal vehicle access should help resolve this problem to a large extent.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
64-W	i support the general goals that are being discussed. the preserve needs to be protected but to attain the self sufficiency mandated wise development has to take place. i think people want camping, lodging & other recreational services offered. There is middle ground here. When we took a van tour 2 years ago the driver felt it necessary to give her opinion that grazing had to be reduced from historical numbers & that public use had to be very restricted. that just won't work. contract with entities that provide services like they do in national parks. the deadline is near to move forward.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
65-W	1. ban all hunting and trapping in this area. 2. ban new roads 3. ban new visitor center with intent to bring in more people. there has never been an area developed by this agency that doesn't destroy the animals and birds that live there. keep the area pristine. 4. no prescribed burning. 5. there is not sufficient protection for nature in this plan 6. i oppose increased access. i believe the taxpayers do not want to pay to develop this area. leave it alone 7. i oppose to taxpayers wallet	Potential impacts to natural resources were evaluated during the course of alternatives development. The alternatives designs avoid and minimize impacts to these resources as much as practicable. Unavoidable impacts would be mitigated as appropriate for the resource. The Final EIS has been revised to include additional mitigation efforts to reduce impacts to natural resources.
66-W	I am in favor of a full-service visitor center. Option 4 seems costly, with an underpass, but I believe the view alone would satisfy most of the 120,000 visitors and would not impact the preserve as much as option 3.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
67-W	Please find attached our comments on the Public Access and Use DEIS. I will mail these also for your file.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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68-W	I am glad to see that alternatives for the Valles Caldera access are being considered. In general I would favor 3A. However I have a few comments. This set of choices is given with no mention of cost or future status for the Preserve which are both critical issues. It's apparent from the experience of the last few years that the Preserve cannot support itself and that any expansion of access or services would probably mean a move to National Park status. Is this anything that New Mexico could ev	As described in chapter 2, economic feasibility and cost/benefit ratios were included in the screening criteria used in developing alternatives. chapter 2 also includes performance requirements aimed at reducing and minimizing future operating costs. The VCT has a variety of fund raising mechanisms authorized by the Valles Caldera Preservation Act and referenced in the Draft EIS. The VCT Strategic Management Plan for Fiscal Years 2012 – 2018 referenced in the EIS and available at http://www.vallescaldera.gov/about/trust/docs/Valles%20Caldera%20Trust%20SMP%202012-2018.pdf includes goals and strategies for financial sustainability. Page 2-13 of the Draft EIS addresses the future status of the preserve regarding potential transfer to the National Park Service: Senate Bill 1689, which would have transferred administration of the preserve to the National Park Service, passed committee review in 2010 but did not make it through the Congress. The proposed transfer was again introduced in the Senate in 2011. It is possible that such a transfer could occur in the near future, possibly during this planning and decision-making process. The alternatives are consistent with both the Valles Caldera Preservation Act and the language of the legislation currently being considered. The VCT will continue operating under its existing legislation and will adjust to any changes accordingly.
69-W	Racial discrimination is not appropriate in a national park or national trust. Sacred means "act respectfully". It doesn't mean "keep out". If the native americans have a sacred spot on top of Redondo peak, that is not cause to exclude the public. It is no less sacred for the touch of my feet than it is for a native american, nor should I be discriminated against for the color of my skin or the fact I happen to be born of mostly European descendants or for the fact that my religion is Buddhism, not Native beliefs. Make people get a permit, required reading on treating sacred areas respectfully, sign an agreement on how they will behave on redondo peak, pay an extra fee, etc. But excluding certain races, religions or ethnic origins is inappropriate.	The 1978 American Indian Religious Freedom Act (42 USC 1996) is intended to protect and preserve the traditional religious rights of American Indians, Eskimos, Aleuts, and Native Hawaiians. The act requires federal agencies to consider the effects of their programs on places and practices of religious importance to American Indians, Eskimos, and Native Hawaiians. In addition, Section 107 (d)(5) of the Valles Caldera Preservation Act states "The Trust is authorized and directed to cooperate and consult with Indian tribes and Pueblos on management policies and practices for the Preserve which may affect them. The Trust is authorized to allow the use of lands within the Preserve for religious and cultural uses by Native Americans and, in so doing, may set aside places and times of exclusive use consistent with the American Indian Religious Freedom Act and other applicable statutes." In accordance with both acts, the Draft EIS states that the preserve would work with local Tribes and Pueblos to identify methods of protecting important landscape features and identifying methods of sustaining on-site visits for cultural and religious practices without interference from increased public visitation. "Without interference" does not mean the public would be excluded from the preserve.
70-W	No doubt Valles Calderas must be preserved and managed in the best possible manner for the use and enjoyment of present and future generations. In no way should it be managed as has been the case in the recent past. The recent practice of very limited access smacked of a snobbish attitude that the preserve was for the few elite. Management of the preserve should be entrusted to the best of the best, namely the National Park Service, the Federal Agency that gives our tax payers more than a dollar's value for each dollar appropriated. The mission statement when the National Park Service was created required it to preserve unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of present and future generations. A very tough act to follow, but accomplished quite well even under much pressure from political and other special interest groups.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative. The jurisdiction of the preserve's management is not within the scope of this project.

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72-W	TO WHOM IT MAY CONCERN: The Valles Caldera National Preserve is the spiritual heartland of Northern New Mexico. It is of fundamental importance that this multi-cultural region remain a protected wilderness retreat. We have much to learn from its landscape and much to enjoy within its bowl of bounty. The Valles Caldera Trust has begun a creative era of management under the new direction of Executive Director Dennis Trujillo. The plan shows respect for and protection of the unique nature of the Preserve area while seeking expansion of educational and recreational public programs. The options presented in the Draft Public Access and Use Plan EIS with designs for a new visitor center are sensibly conceived and will be an asset to the Preserve for the future. It is vital to lend our voices to the Trust's mission so that the 2015 management deadline can be extended. I believe that careful professional management and further development of educational programs for the public to understand and appreciate the special heritage of the Caldera will ultimately help attain the Trust's goal of financial sustainability that is required for extension into 2020. Low impact to the environment is a priority of the Valles Caldera Trust. I am confident that whatever option is chosen is a result of exhaustive study and sensitive adherence to the land itself. The Valles Caldera is a treasure to Northern New Mexicans and the world. Under the present direction of the Board, it is best managed by the Valles Caldera Trust. My thanks,	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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73-W	COMMENTS: I attended the June 25th meeting in Jemez Springs concerning the draft VCT Public Access and Use Plan. The staff presentation was very informative. I appreciated the responsiveness to audience comments. I am writing in support of Option 4b Vista del Valle visitor center with personal vehicle access. The VCT staff is to be commended for listening to the public's preference for spontaneous visitation and responding with a plan to facilitate that pattern of public use. A visitor center that is clearly visible from the highway and has interpretative exhibits and audiovisual presentations will enhance public understanding of the need to protect this special area. I gave a lot of thought to options 3a and 4a with primary access via shuttle system. I think that a shuttle system is better for the environment than personal vehicle access, especially given the possibility of solar generated electric vehicles. However, without assurances about how frequently the shuttles would run and what volume of traffic they would be able to carry, I can't support that option at this time. The staff explained that programmic details would be addressed at a later stage in the planning process, but that may be a mistake in this case. The VCT has a big image problem - many New Mexicans view it as inaccessible and elitist. An inadequate shuttle system won't be any better received than the present reservation system. Secondly, the VCT's future funding is uncertain. Personal vehicle access will require less annual funding to maintain than a shuttle system. If the budget is cut, the parking lots will still be there, but the shuttles might be discontinued. Third, access can be converted to a shuttle system at a later time, if that becomes desirable. I have had a good visitor experience in Yosemite NP using the shuttle system there. The draft plan is well prepared. One minor comment concerns Figure S9 Summary of Impacts. The way the chart is formatted gives 4 times more visual space to Negative impacts than to Beneficial ones. Also, the Beneficial impacts are missing from the segment for Option 4B.	Thank you for taking the time to read the Draft EIS and submit your comments and suggestions. Should the Valles Caldera Trust select an alternative that provides public access within the preserve primarily by shuttle bus, the trust would prepare a transportation plan to identify details you mention, such as how often shuttles would run and the volume of traffic they would carry. If the transportation planning process identifies insurmountable or currently unseen obstacles, including prohibitive operating costs, the trust would reevaluate its decision. Although personal vehicle access would require less annual funding than a shuttle system, other costs, such as increased road maintenance and law enforcement, would be incurred under the personal vehicle access alternatives. Page 2-79 of the Draft EIS includes cost estimates for the proposed alternatives. Total capital costs for alternative 3A is estimated at $27,615,260 and includes shuttle access. Total capital costs for alternative 3B is estimated at $25,043,760 and includes personal vehicle access. Total capital cost estimates for Alternative 4A and 4B are similar. As noted in chapters 2 and 4 of the EIS, providing personal vehicle access would include providing parking areas at several locations within the preserve. If the trust later switched to shuttle access, these large parking areas would either remain, creating eyesores and impervious surfaces that would induce runoff and intrude into wildlife habitat, or would be removed, which would require costs of removing the pavement and reclaiming the disturbed land. In addition, changing from one form of access to another would create a more difficult adjustment for visitors compared to keeping with one form only. Figure S9 was revised to help balance the visual emphasis. The error you note has been addressed.
74-W	We support the stewardship action proposed in the Draft Environmental Impact Statement with the exception of allowing motorized access to the preserve. As frequent users of the Valles Caldera, we believe that "preserving its natural and cultural resources" should be the primary goal of the Valles Caldera Trust. Allowing motorized access will increase trash in the preserve, decrease the quality of the air and water, and increase fire danger in the region. We feel it is sufficient to continue to shuttle people to recreation sites that will allow visitors to hike, bike, fish and explore the land while leaving their motor vehicles in the visitor center parking lot. Although we know that providing quality outdoor recreation and interpretive opportunities are essential for generating income, we think that fiscal self-sustainability can be achieved without compromising the safety and beauty of the preserve.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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75-W	Though I may be late in getting to you my comments, I do seriously wish to be a part of Valles Caldera's future, as a private citizen much in behalf of the public, and solidly support the extension of 2015 VC Trust management into 2020 to give the Trust the opportunity of time for financial sustainability. So many National Parks have and are going under, left insecure and frankly, open to privatization - this CANNOT happen with this geologic and sacred wonder. It is the nexus of Northern New Mexico protected wilderness, especially with Los Alamos next door and all the environmental and human dangers LANL provides. It is the site on its four corners of the Caldera of spiritual renewal, retreat, and pilgrimage for the indigenous like the Jemez throughout time, including the present. All of these cultural expressions of art, literature, celebrations, spiritual quest, and education, as well as the physical history and geology of the Caldera itself, can draw and enhance public interest and participation in the profound strength of Valles Caldera - a worthy world site in every aspect. I thank you for consideration of these comments -	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
78-W	I am disappointed in the lack of options. The presented options appear to either favor severely limit access to the general public (with the exception of scientists, hunters, and certain ethnic groups with preferred access) or major high-cost developments. Alternative approaches with less impact such as issuing back-country permits to nonmotorists (hiking and horseback riding) with a Leave No Trace approach or trail system developments in conjunction with adjoining lands (SFNF, Bandelier NM) such as a rim trail are still not considered. The VCNP management has not changed its approach of controlling every step the public takes on this land since its inception and years of public input have not made a difference. Valuable educational opportunities have not been considered for fear of giving up control. Also, trying to make money off this land is a losing proposition mostly appeasing supposedly budget-conscientious politicians. Grazing cattle is as much a token activity as grazing leases on public land with benefits for a few and detrimental impacts on the land, the tax payer, residents and other users. IMHO, this so-called experiment in land management which is dominated by the land use approaches prevalent among many employees of the Forest Service continues to fail. A paradigm shift would be in order, and I continue to hope for a different approach considering the needs of land and wildlife AND the people whose interest in this land must be maintained so they will continue to support this beautiful piece of land.	Thank you for taking the time to read the Draft EIS and submit your comments and suggestions. As shown in chapter 2 of the Draft EIS, the Valles Caldera Trust (VCT) considered a range of alternatives, many of which were eliminated for reasons stated starting on page 2-74. Alternative approaches as you suggest, such as issuing back country permits only, would exclude a large percentage of people from visiting the preserve and would be seasonally limited. Although the development of a specific trail is not part of the scope of this analysis, issuing back country permits and collaborating with neighboring land managers are excellent administrative tools that could be used to implement expanded access that is proposed under the programmatic level planning in the EIS. Over time the VCT would expand the trail system and the supporting access and infrastructure based on the programmatic level planning identified in the EIS. Knowing that the preserve cannot be all things to all people, the Valles Caldera Trust has strived to present alternatives that provide the widest range of recreational opportunity while protecting the preserve's natural and cultural resources. Results of a public survey conducted in 2010 (included on page 3-186 of the Draft EIS) indicate that, while most people are dissatisfied with the level of access provided on the preserve, the majority also believe that increasing access to the preserve is less important than the possible negative environmental problems associated with doing so. Therefore, some level of management control is necessary. The trust also acknowledges the importance of educational programs, which are included under each of the action alternatives proposed.
81-W	I favor the alternative #2, as it seems to be scaled more appropriately; I do not feel there is much need for a big visitor center; what is needed is simple and cheap access by the general public in ways that are not overprotective and are aesthetically in keeping with the nature of this wonderful place. The attention needs to be to allow people in and they can discover how important it is for them to protect the area; not for the caretakers to do it all; this place is self explanatory in its need to be accesses by the general populous and, if anything, try to keep the elitists out of the picture; the forest is for the populous to be involved it, such as helping with thinning and being sure that the thinning is done with an eye as to protecting against such things as: controlled burns (which are hazardous and not necessary if the thinning is done well), introducing non native landscaping stone (a common problem with parks), insisting on landscape friendly and low profile signage at all times (there is a world of need here), making sure that children and young people learn how to "work"; in the forest so they can continue to be able to co-stewart the land, introduce the concept of a Land Ethic and nature's bill of rights, make sure that the hunters are not just rich people treating the park like it was their private game preserve (poor people who need the meat might become a priority more than an elite stage for the rich), roads that are small scale and blend into the landscape rather than the usual gravel or paved road with foreign gravel and excessive signs. This place is a "querencia" and not an elite playground. Thanks for keeping it beautiful!	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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82-W	A bunch of us from the NM cross country ski club have worked on clearing trails on the Valles for numerous years so we're a bit familiar with the area. I go for alternate 4A. Years ago I proposed to Kinber Barber that a visitors center be place on NM4 next to where your new access gate is now. She went "high order". But that's where people passing by would stop and check out the Preserve. And if they had time would venture farther into the preserve. So, let's go for 4A	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
83-W	We support the plan included in the proposed legislation by Senators Bingaman and Udall to transfer the Valles Caldera to the National Park Service, where the Caldera would be run as a Park Preserve.	Thank you for your comment. The jurisdiction of the preserve's management is not within the scope of this project.
84-W	I would like to see the Valles caldera manage as a National Park with a visitors center, some food vendors, trails that you can hike without a permit,infrimation on the history of the caldera, ranch and other information; I have lived since 1979 and have yet been ont the land or did any hiking. I haven't gone recently because I don't think the public to pay to enjoy the caldera expecitily since more or less bought the place. You could limit hiking by leading hiking groups to the more remote areas and offer overnight hikes. We should be able to enjoy this just like we enjoy other places but not free some sort of entrance fee needs to be employed. I hope this gives the committee some food for thought.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
85-W	THE VALLES CALDERA WOULD BE A FANTASTIC PLACE TO HOST A HORSE STABLES, BOTH FOR THE GENERAL PUBLIC, AND PERHAPS FOR SOME NON-PROFIT ORGANIZATIONS THAT WORK WITH DISABLED CHILDREN. THE VALLES CALDERA SHOULD PROHIBIT ANY KIND OF PRIVATE MOTORIZED VEHICLE TRAVEL EXCEPT TO THE VISITOR'S CENTER, THUS PRESERVING IT FOR HIKING, SKIING, SNOWSHOEING, FISHING, AND HORSE-BACK RIDING.....	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
86-W	You put Public Comments out there, but the bottom line is the management will do what-ever you want to do! The Valles Caldera has proven that with our neighborhood, because they are our neighbors and the bottom line is the Valles Caldera is not neighbor friendly period! The new Board and Ex. Director have proven that by doing what they did to me and our neighborhood! The Valles Caldera use to be neighbor friendly, but that is not the case now!	Thank you for your comment.
87-W	The Los Alamos County Council wished to adopt a position regarding the proposed Public Access and Use Plan. As part of their investigation they requested comments regarding the alternatives and DEIS from the citizens of Los Alamos County. Attached are the comments received (personal information has been redacted). Thanks to Los Alamos County Council for encouraging public involvement in this important planning effort!	See comments 18-M through 31 -M.
88-W	I suggest no additional structures due to economy at this time. In five years a visitor center at the first site away from the salamander habitat. My personal work experience with both the National park Service and Forest Service as an interpretive naturalist is that the park Service builds more dynamic interactive centers. Both agencies need alot more planning for budgeted maintenance dollars. Apply current dollars to interpretive activities and direct visitor education and outdoor interpretive activates. Any future structures should be green built with local resources..timber, stone and local crafts people. Structures should compliment and recede into the environment with minimal impact including parking areas and trails. Sincerely, Marty Stribling.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative. chapter 2 of the Draft EIS includes extensive descriptions of the sustainable design principals that would be incorporated into the action alternatives, including those you mention.
89-W	I support Alternative 2. I like to see the Valles Caldera available for the Public's use in a limited manner, but let's all enjoy this beautiful place we have in our state.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
90-W	In 2004 and 2005 the BFRO explored the caldera in search of sasquatch evidence, and one was seen checking out a camper's tent in broad daylight. At the time it was thought it was another camper, but all were accounted for. It ran away when approached. Thousands of dollars could be earned by the trust if it quietly set aside a remote area for 30 or 40 campers to search for the elusive creature during the non-snow months. They are out there. They exist. The U.S. government and tenured scient	Thank you for your comment.
91-W	I recommend Alternative 4A. This would minimize the adverse effects to the preserve. Plus, visitors would continue to be in the best of hands.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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92-W	August 5, 2011 TO WHOM IT MAY CONCERN: The Valles Caldera National Preserve is the spiritual heartland of Northern New Mexico. It is of fundamental importance that this multi-cultural region remain a protected wilderness retreat. We have much to learn from its landscape and much to enjoy within its bowl of bounty. The Valles Caldera Trust has begun a creative era of management under the new direction of Executive Director Dennis Trujillo. The plan shows respect for and protection of the unique nature of the Preserve area while seeking expansion of educational and recreational public programs. The options presented in the Draft Public Access and Use Plan EIS with designs for a new visitor center are sensibly conceived and will be an asset to the Preserve for the future. It is vital to lend our voices to the Trust's mission so that the 2015 management deadline can be extended. I believe that careful professional management and further development of educational programs for the public to understand and appreciate the special heritage of the Caldera will ultimately help attain the Trust's goal of financial sustainability that is required for extension into 2020. Low impact to the environment is a priority of the Valles Caldera Trust. I am confident that whatever option is chosen is a result of exhaustive study and sensitive adherence to the land itself. The Valles Caldera is a treasure to Northern New Mexicans and the world. Under the present direction of the Board, it is best managed by the Valles Caldera Trust.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
93-W	I understand the VC's need to generate revenue and become self-sustaining. However, I believe the Caldera to be an amazing ecosystem and should be protected from too much use. Therefore, I would like to see Alternative 2 implemented. Under no circumstances do I believe allowing unlimited drive thru using personal vehicles would be protective of this amazing resource. I think the elk would be seriously compromised, as well as all the cultural resources. If access to the Caldera was limited (like the existing system), I would also be in favor of Alternate 4A. This alternative could (and should) be modified to offer a more interpretive visitors center (i.e., keep the crowds out of the Caldera) and less travel of visitors thru the Caldera. As is indicated in the alternatives summaries, option 4A would capture more visitors due to the vista offered by it's location. However, I am concerned about 120,000 people trampling the sensitive environment of the Caldera. Additionally, with either option 2 or 4A, additional securities should be in place to ensure that hunting opportunities remain a priority, rather than an afterthought. Also, I do not understand why Alternative 1 (Do Nothing) isn't offered as a "status quo" option. Instead, it appears that opportunities would be reduced from current levels of access. Under NO CIRCUMSTANBCES do I believe that the Caldera should be turned over to the Forest Service or the National Parks systems. Too many of our National treasures have been degraded or destroyed by these agencies.	NEPA requires agencies to analyze the consequences of taking no action. In addition, an assessment of taking no action provides a baseline for comparing the consequences of the action alternatives. The Council on Environmental Quality (CEQ) provides two distinct interpretations of "no action," depending on the nature of the proposal being evaluated. Under the first situation "no action" is "no change" from current management direction or level of management intensity. Under the second situation no-action means that the proposed activity would not take place. As noted on page 2-17 of the Draft EIS, the second interpretation was used to define the no action alternative for this plan. The interim recreation program and temporary visitor contact stations were established to provide reasonable public access until long-term decisions regarding the location and scale of development were made. Page 2-74 notes that continuing the interim program from current locations (i.e., continuing activities as they currently are at the preserve) was considered but eliminated from detailed analysis, as allowed by NEPA. Because it was eliminated as a valid action alternative, the interim recreation program and temporary visitor contact stations would therefore not continue and the facilities would be removed under the no action alternative. As the no action alternative, removing the existing temporary facilities and phasing out programs from these locations was used as the baseline to compare the effects of the proposed action alternatives.
94-W	Based on the information in the ABQ Journal I support Alternative 1. The additional Alternative actions 2-4B are each too drastic. The development should be minimal and as unobtrusive as possible with limited access for visitors. Why was a lesser development plan not included? I'm suspicious of local and State politics if major development begins.	Thank you for taking the time to read the Draft EIS and submit your comments. Page 2-74 of the Draft EIS lists alternatives that were considered but eliminated for various reasons, including smaller-scale development at Valle Grande locations. Page 2-10 discusses how the Valles Caldera Trust addressed development scale during the alternatives development process.
95-W	I like alternative 2. I like the smaller visitor center. The personal vehicle access is important to me as it allows spontaneity in dropping in for a hike. A shuttle service is nice but the hike must be planned around the shuttle schedule.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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96-W	First, I hope the Valles Caldera gets turned over the National Park Service; I believe, from newspaper accounts at the time, that was the intention of the Texas owner, but he died shortly before it was to occur. I Like Alternative 2: In particular: - smaller visitor center; - "personal vehicles" for spontaneous visits, supplemented by shuttles and a large parking area at the visitor center would give one the option of taking the shuttle to a trail head; - parking lots for up to 10 vehicles; - the Interpretive Facilities and Programs, Ecotourism section sounds good.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
97-W	I have visited the Valles Caldera on a couple of occasions and thoroughly enjoyed the facility as it is accessible now. I understand the need for it to be self-supporting and recommend the alternative that allows that to happen and is still the least intrusive. It is an incredible area which needs to be allowed to remain as close to its natural state as possible so the ecological balance is not upset. In my opinion Alt #2 or #3 may be the best choices to achieve that.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
98-W	The "no action alternative" calls for the removal of the Valle Grande (VG) and Banco Bonito staging areas and elimination of the current interim recreation program. This is not a valid "no action alternative." Like the other actions eliminated from evaluation in the VCP EIS (see Executive Summary, p. xii), the "no-action alternative" does "not meet the purpose of and need for action." It is a significant action that ignores not only the Need for Action of providing for more access but also the requirements of the Valles Caldera Preservation Act (VCPA) to provide "opportunities for public recreation." A more reasonable "no action alternative" should be provided.	NEPA requires agencies to analyze the consequences of taking no action. In addition, an assessment of taking no action provides a baseline for comparing the consequences of the action alternatives. The Council on Environmental Quality (CEQ) provides two distinct interpretations of "no action," depending on the nature of the proposal being evaluated. Under the first situation "no action" is "no change" from current management direction or level of management intensity. Under the second situation no-action means that the proposed activity would not take place. As noted on page 2-17 of the Draft EIS, the second interpretation was used to define the no action alternative for this plan. The interim recreation program and temporary visitor contact stations were established to provide reasonable public access until long-term decisions regarding the location and scale of development were made. Page 2-74 notes that continuing the interim program from current locations (i.e., continuing activities as they currently are at the preserve) was considered but eliminated from detailed analysis, as allowed by NEPA. Because it was eliminated as a valid action alternative, the interim recreation program and temporary visitor contact stations would therefore not continue and the facilities would be removed under the no action alternative. As the no action alternative, removing the existing temporary facilities and phasing out programs from these locations was used as the baseline to compare the effects of the proposed action alternatives.
99-W	None of the proposed recreational activities allow much access to the VG area. I have taken one of the shuttle-based hiking tours. The hiking area was wooded and uninteresting. I certainly did not feel that I was exposed to the unique grassland and riparian features of the VG area. Access to the VG area should be expanded for all alternatives. Other publicly-managed grasslands provide access, at least for low-impact activities such as hiking or cross-country skiing, within the grasslands without creating significant impacts.	As noted on the preserve's web site, the Valles Caldera Trust currently offers guided hikes on the Valle Grande. If one of the action alternatives is selected as the preferred alternative, the Valles Caldera Trust will further analyze hiking options on the preserve during the programmatic level of planning. The Valles Grande is the preserve's "signature landscape" and is an important ecological environment. Recreational activities on the Valle Grande would be managed to protect it from impacts of increased recreation.
100-W	Section 2 All Alternatives There is very little discussion of winter activities. According to the VCP EIS (p.2-18): "During winter, visitors would recreate using trails at the visitor contract station or visitor center (figure 2-8 and figure 2-9)." These figures pertain only to Alternatives 3A and 3B and do not specifically address cross-country skiing or snowshoeing. The VCP EIS mentions cross-country skiing in nearby Bandelier properties; however, the Bandelier area does not have the unique visual experience as the VG area. I believe that maintaining cross-country skiing and snowshoeing within the VG area is important. Cross-country skiing in the VG has been a tradition for surrounding residents; one might say it is one of our cultural values. Please provide more information on how winter activities will be accommodated. Can a cost-effective approach be used, such as self-registration/payment near the current VG Staging Area? This should allow winter sports access 7 days a week, instead of the current restricted schedule of weekends/holidays only, meeting the Need for Action of providing more spontaneous access.	Winter activities, including cross-country skiing and snowshoeing, would be provided under all action alternatives. The EIS has been revised to provide more information about this. In addition, if one of the action alternatives is selected as the preferred alternative, the Valles Caldera Trust will further analyze recreational activities, such as cross-country skiing and snowshoeing, on the preserve during the programmatic level of planning.

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101-W	This section references “our agency procedures for implementing NEPA.” I could not locate these procedures on the web. Providing a link for these procedures would be helpful.	The trust's National Environmental Policy Act procedures can be found in the Stewardship Section of the website under “policy” (http://www.vallescaldera.gov/stewardship/vctDevMain.aspx?id=2). The procedures can be viewed in a complete or condensed form. Also, the President’s Council for Environmental Quality (CEQ) provides links to the NEPA procedures for all federal agencies http://ceq.hss.doe.gov/nepa/regs/agency/agencies.cfm
102-W	According to Section 1, part of the Need for Action is to meet the public request to have “more access, more spontaneous access, and more freedom to explore the preserve.” Alternatives 3A and 4A, which rely on a limited shuttle system, do not provide “more spontaneous access and more freedom to explore the preserve.” Section 4 (p. 4—18) describes the successful use of shuttles in other (crowded) National Parks. However, these shuttle systems are not equivalent to those proposed in the VCP EIS. The shuttles in the National Parks are frequent (the VCP EIS cites an example of every 10-15 minutes in Zion National Park) and traverse much of the park. In a number of the parks (e.g., Bryce) private cars may be used in addition to the shuttles. In contrast, the shuttles suggested for the VCP are very infrequent and only for limited activities. I have taken such a shuttle and, once you finished an activity, you face potentially long waits for the return of the shuttle. They do not provide for a “spontaneous” experience of the park. Limiting access to most of the park to a shuttle system should be considered only when visitation warrants a frequent, scheduled service that covers significant terrain . Therefore, Alternatives 3A and 4A do not meet the Need for Action of providing spontaneous access.	Thank you for taking the time to read the Draft EIS and providing your comments. Most of the recreational activities on the preserve are available by reservation or lottery. Currently access without reservations -- what the Valles Caldera Trust considers "spontaneous access" -- is limited to the hiking trails near Rabbit Mountain south of NM-4 (e.g., the Coyote Call trail). All of the action alternatives propose visitor access to the preserve without reservations. People would be able to visit and recreate within the preserve without making prior reservations. The EIS was revised to make this more clear. Similar to shuttle systems used at several national parks, the proposed shuttle system would not require reservations and would therefore provide for spontaneous access, meeting the purpose and need for action. Shuttles would run frequently to avoid long delays and transport people to their desired destinations and quickly and comfortably as possible. The timing of the shuttles has not been determined. Such details will be defined during programmatic planning should one of the action alternatives be selected as the preferred alternative.
103-W	The VCP EIS identifies the VG as the preserve’s “signature landscape.” Since none of the alternatives provides more than token access to the VG area, at least the visitor center should have a view of it. Therefore, a visitor center at Banco Bonito is not acceptable. This area is heavily wooded and does not have views of the VG area.	As noted on the preserve's web site, the Valles Caldera Trust currently offers guided hikes on the Valle Grande. If one of the action alternatives is selected as the preferred alternative, the Valles Caldera Trust will further analyze hiking options on the preserve during the programmatic level of planning. The Valles Grande is the preserve's "signature landscape" and is an important ecological environment. Recreational activities on the Valle Grande would be managed to protect it from impacts of increased recreation.
104-W	The VCP EIS “acknowledges that it may not be able to obtain a single payment to implement the plan in its entirety, and that funding may be acquired over time instead.” According to this section of the VCP EIS, the first step would be to remove the VG staging center. Because funding may not be available for some time to build other facilities, a better alternative would be to keep the current facilities at the VG support center to accommodate special programs on an as-needed basis. At a minimum, restrooms and the parking lot at the VG staging center could be used to support activities such as skiing. I, personally, do not find that the main building or restrooms at the VG Staging Center degrade my visual experience of the VCP. Nor does the VCP EIS provide evidence that it degrades the visual experience of other visitors.	Thank you for taking the time to read the Draft EIS and submit your comments. The document states that the VCT would phase out current access through the Valle Grande and Banco Bonito staging areas, and would phase out the current interim programs and activities, only if the no-action alternative is selected. Page 2-18 in chapter 2 of the Draft EIS states, “The current interim recreation program would continue in the short term as infrastructure and facilities are developed and a transition is made to the selected alternative.”
105-W	Step 2 in the phased approach is to develop a visitor center and Step 3 is to develop a transportation center and other infrastructure. However, some of the Need for Action (e.g., more spontaneous access) could be met before a new infrastructure is built. Because funding for the infrastructure may take some time to obtain, the Trust should plan to begin to provide more access immediately. For example, skiing (and some hiking) could be expanded to 7 days a week using a self-registration/payment system without requiring additional infrastructure.	Thank you for taking the time to read the Draft EIS and submit your comments and suggestions. If one of the action alternatives is selected as the preferred alternative, the Valles Caldera Trust will begin development of an implementation plan, which would identify how and when the elements of the alternative would be implemented. This plan would identify logical steps to take to transition and implement the actions. When identifying phases, the trust will consider public needs while balancing resource protection.

No.	COMMENT	RESPONSE
106-W	Table 2-10 (Comparison of Impacts) appears to show unmitigated impacts. Discussion within the table of the likelihood of the impact being mitigated or an equivalent table showing mitigated impacts would be helpful. For example, on pp. 2-67 and 2-68, the table shows that "major adverse" long-term impacts on cultural resources for all alternatives except the "no-action alternative." However, section 4 states Major adverse permanent impacts possible would be resolved through the Section 106 process (e.g., "data recovery excavations of archeological sites or detailed documentation of structures.") After mitigation, impacts should not be significant. It would be useful to include similar information in Table 2-10. Also, the terms Negligible, Minor, Moderate, and Major, which apply to adverse impacts, are not defined until Section 4. They should be defined in Section 1 or Section 4 should be referenced.	Table 2-10 (Comparison of Impacts) and sections of chapter 4, Environmental Consequences, show mitigated impacts. More mitigation measures have been added to some impact topics. Definitions for the terms negligible, minor, moderate, and major were added Table 2-11 as a note.
107-W	(p. 4-3) The definitions of adverse impacts (negligible, minor, moderate, major) appear very subjective and arbitrary. For example, a change in air quality may be measurable (analytical methods can measure to parts per million (or lower) levels) and slightly alter the composition of air without exceeding any state or federal standards or affecting the environment. Under the VCT criteria, the impact would be a "major adverse" impact. However, the change would not be significant. Better methods should be identified for measuring the significance of adverse impacts (e.g., state and federal standards, results of existing public surveys, etc.). Also, methods for identifying whether adverse impacts are acceptable should be identified. For example, a number of regulatory water quality requirements are identified in Section 4 in the Water subsection. However, the determination of adverse impacts does not evaluate whether standards and other requirements would be exceeded. No decibel requirements or goals are identified or evaluated in the Noise subsection. Etc.	Thank you for taking the time to read the Draft EIS and submit your comments and suggestions. The impacts were predicted using a variety of methods as described under the "Methodology for Analyzing Impacts" included for each resource topic analyzed. Where state and federal standards exist, those standards provided a baseline for measuring significance, which was then tied to the impact levels in the analysis discussion. In some cases, a qualitative analysis was used, as indicated in the methodology. For example, impacts to natural sounds were based on the document *Predicting Impact of Noise on Recreationists* , published by the U.S. Forest Service and Environmental Protection Agency as stated in the methodology. The analysis follows the steps outlined in the methodology to determine the degree of impact based on the thresholds. For example, the analysis for alternative 2 states that noise at the visitor contact station would be detectable to other visitors, frequent and continuous, appropriate for the location, somewhat absorbed by vegetation, etc. As such, these sounds would be measurable but not excessive for the setting and would not jeopardize the natural sound resource and the ability to detect natural sounds would remain, therefore resulting in a minor adverse effect. These characteristics take more into consideration than simple decibel levels, which may provide a description of the measurable degree of change but not its acceptability to visitors or the ability to continue to detect natural sounds. The methodology in chapter 4 for socioeconomics states that the analysis to social impacts addressed public attitudes, beliefs, and values. The analysis is based on a survey conducted by the preserve in 2010 of these attributes (page 3-186 and 3-187), which is then connected to an impact level. As noted in the Draft EIS, the VCT would obtain a construction general permit, under which it would develop a stormwater pollution prevention plan in compliance with the Clean Water Act. The stormwater pollution prevention plan would address pollutants, sediments, chemicals, and stormwater run-off. The goal is for no measurable change to water quality from construction-related activities. The air quality impact you mention would likely result in a minor impact to air quality. The change would be measurable but would not substantially alter the structure, composition, and function of the air quality based on state and federal standards. The word "substantially" was added to the definition of major to further distinguish major impacts. The purpose of the environmental analysis is to state what the likely impacts would be if an activity were implemented. Avoidance and minimization measures are discussed regarding all resources and mitigation included when impacts are unavoidable. The "acceptability" of any outcome is addressed in several ways: • Goals, objectives, and monitored outcomes (chapter 1, page 1-13). • Performance requirements (including laws or regulations and mitigating measures) that guide or constrain any action or outcome to an acceptable level. • Public comment indicating a degree of acceptability for any potential outcome. • Record of Decision (ROD) where the responsible official decides on an alternative based in part on a review of the potential impacts, and accepts the degree of impacts expected to result from the alternative selected.

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108-W	(p.4-180) For alternative 3B, the VCP EIS states that: "GHG emissions would increase from personal vehicle use in the preserve. It is anticipated that 120,000 people would visit the preserve annually, almost five times the number of visitors in 2010. It is estimated that GHG emissions from transportation of visitors within the preserve is currently 33 tons of CO2 per year. This would potentially increase to approximately 165 tons of CO2 annually based on current travel patterns within the preserve, representing a substantial increase over the preserve's existing carbon footprint and resulting in a major adverse long-term impact." However, the VCP EIS does not identify that any air quality standards will be exceeded due to vehicle-related emissions. Nor would this amount of carbon dioxide be significant compared to regional or global levels. The impact on global warming would be miniscule. Therefore, the conclusion that the increase in the carbon footprint would have a "major adverse" effect on programmatic and cumulative impacts is not supported.	Thank you for taking the time to read the Draft EIS and submit your comments. The analysis regarding the carbon footprint was made in context of the preserve rather than regionally. Compared to the amount of greenhouses gases the preserve currently emits, the changes resulting from increased visitation and services would be major (measureable and extensive in context). Impacts to air quality were assessed at a regional level. This is why the greenhouse gas (GHG) emissions conclusion was major whereas the air quality was not. You are correct; at a regional level, GHG emissions resulting from the proposed alternatives would be very small. The EIS has been revised so that both GHG emissions and air quality are discussed at the regional level.
109-W	(p.4-188 and 4-189) These pages enumerate the needs for additional VCT staffing, such as law enforcement, interpretive services, staff for visitor programs, maintenance, infrastructure, etc. The VCP EIS concludes that the impacts to the VCT's maintenance and operations staff and funds would be "major and adverse." This appears simply to be a funding issue and not the subject of an adverse environmental impact determination. This comment also applies to the same programmatic adverse determination made for some of the other alternatives.	NEPA applies to any major federal action significantly affecting the quality of the human environment. The term "human environment" includes the natural and physical environment. An action that has only economic or social effects does not trigger NEPA. However, when an action has impacts to the physical or natural environment AND interrelated social or economic impacts, all impacts must be addressed in NEPA documents. Therefore, the Public Access and Use Plan/EIS addresses both impacts to the natural environment as well as economic (funding) and social (staffing) impacts.
111-W	I prefer Alternative 3 Entrada del Valle, but I think that you also should pursue, Alternative 2 Banco Bonito, perhaps later on. I DO NOT FAVOR Alternative 1 (no public access) or Alternative 4 Vista del Valle.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
112-W	Hotel: I'm sure a lot of people oppose the idea, but I really think you need to put a hotel near the visitor center or where the old ranch buildings were, similar to the Old Faithful Hotel in Yellowstone. It's a long drive out there to the Valle, and especially for your night/winter/New Year's Fire & Ice events, it's a pain and somewhat unsafe to be driving back down the mountain on icy roads and w/large elk/deer/wildlife roaming around the road in the dark. You need a restaurant and a bar also. This would greatly increase visitor business and would be booked months in advance. Again, the impact would not be huge as that road is currently used plus the ranch buildings used to be there.	Thank you for submitting your comments and suggestions. As noted on page 2-11 of the Draft EIS, limited lodging is currently available on the preserve. Expanding full-service lodging could be a major attraction and could lead to an increase in visitation to the preserve year-round, potentially contributing to economic sustainability. However, public comments received during scoping were overwhelmingly against such development. In addition, the development of lodging on the preserve could compete with existing lodging in Jemez Springs, La Cueva, Los Alamos, and White Rock, and thus conflict with the goal of the Valles Caldera Preservation Act of benefiting local communities and small businesses. The goal of this EIS is to address public access to and use of the preserve, and a lack of lodging is not currently limiting public access. In addition, the viability of sources to fund the expansion of lodging is uncertain, and specific economic analyses are needed to determine whether available funding would be sufficient. Therefore, this issue is not ripe for a decision. Consideration of new lodging will be deferred for future analysis.
113-W	Alternative 3 Entrada del Valle: This would provide a large visitor center w/lots of trail access visible and accessible directly from the highway. This is similar to Bandelier, where headquarters provides a museum, visitor info and gift shop, plus trail access. Much friendlier than the current limited or no trail access. Environmental impact minimal because people already access the staging area via that dirt road plus the old ranch buildings were located in this area also. I'm a little unclear how far down the road the center would be, but you need the visitor center visible and accessible from the highway for disabled & elderly visitors. The current situation is very confusing to people driving by unless they have examined your website, which a lot of folks out for a casual tour of the Jemez would not have done.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
114-W	Alternative 2 Banco Bonito: The smaller visitor contact center, even a version scaled-down from the current proposal, is a very good idea because it is so far away from the Alt. 3 location, basically on the other side of the caldera. A lot of people turn around and go back to Albuquerque before they even hit the Valle Grande (I have friends from school who have lived in Alb for over 30 years and have never seen the Valle!). Banco Bonito would be a great place to snag those folks and generate more interest, plus it would be GREAT to have some free open trailheads here. I am assuming that the info/education center for the Valle will remain in Jemez Springs to attract interest from folks who originally were only visiting Jemez Springs?	Thank you for taking the time to read the Draft EIS and submit your comments. Yes, the existing education center in Jemez Springs will remain in place. No changes are proposed to that facility in the Draft EIS.

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115-W	Alternative 4 Vista del Valle: Having hiked the Coyote Call/Rabbit Ridge Trails many times, I totally oppose putting structures in this beautiful area. I agree that the views are spectacular, but PLEASE leave the elegant sweeping meadow that opens those trials untouched by buildings and signs. The parking would be very congested or would require further paving, ruining the gorgeous meadow, plus it is all quite slanted so a lot of awful leveling would be required. If safety concerns favor putting in an underpass so folks could go under the road from the main Valle area in order to hike Coyote Call, the underpass would be ok (would animals use it at night I wonder?). At most, a sign area showing the trail and its communication with Bandelier could go here just at the trailhead.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
116-W	Dear Ms. Rodriguez, Years ago my family was friends of the Dunigan family, and we enjoyed several stays at what is now the Valles Caldera National Preserve. Most recently, as the executive director of Great Old Broads for Wilderness, I had the pleasure of participating in a volunteer fence removal project with our Rio Grande Valley Broadband. My memories of the gorgeous valle proved correct. I, and the members of my organization, believe that this is a landscape that truly deserves protection from the noise, destruction and clamor of modern motorized traffic. The shuttle system provided by the management was entirely adequate for our needs. Private vehicle access to the Preserve may be appropriate for hunters for game retrieval (providing they stay on established roads), groups, and for the handicapped who need special provisions. Ranchers tending cattle should have access with carefully considered limits. Otherwise a shuttle system such as the one the VCNP now provides but with flexibility and continuous improvement serves the public well. These shuttles could be adjusted to protect nesting wildlife, elk habitat or other environmental concerns such as road conditions that could lead to stream pollution or road damage. In the future, electric vehicles could be used to further limit noise and pollution. The hundreds of New Mexico ad Colorado members of Great Old Broads for Wilderness support the exclusion, with seasonal exceptions, of private motor vehicle access. Those wishing to enjoy the public lands on ATVs, dirt bikes and other oRVs have ample opportunities elsewhere. Please keep the Valles Caldera off-limits to ATVs, etc. for the sake of the other visitors, the wildlife and the rare silence and solitude the Valles Caldera provides. Thank you for the opportunity to comment. Sincerely,	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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117-W	TO WHOM IT MAY CONCERN: The Valles Caldera National Preserve is the spiritual heartland of Northern New Mexico. It is of fundamental importance that this multi-cultural region remain a protected wilderness retreat. We have much to learn from its landscape and much to enjoy within its bowl of bounty. The Valles Caldera Trust has begun a creative era of management under the new direction of Executive Director Dennis Trujillo. The plan shows respect for and protection of the unique nature of the Preserve area while seeking expansion of educational and recreational public programs. The options presented in the Draft Public Access and Use Plan EIS with designs for a new visitor center are sensibly conceived and will be an asset to the Preserve for the future. I support Alternative 4A as the one which will best provide a quality visiting experience to the public while protecting the unique environmental and historical assets of the preserve. It is vital to lend our voices to the Trust's mission so that the 2015 management deadline can be extended. I believe that careful professional management and further development of educational programs for the public to understand and appreciate the special heritage of the Caldera will ultimately help attain the Trust's goal of financial sustainability that is required for extension into 2020. Low impact to the environment is a priority of the Valles Caldera Trust. I am confident that whatever option is chosen is a result of exhaustive study and sensitive adherence to the land itself. The Valles Caldera is a treasure to Northern New Mexicans and the world. Under the present direction of the Board, it is best managed by the Valles Caldera Trust. My thanks,	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
118-W	I urge you to select the alternative that will offer the most protection of the VCNP by preventing private motorized vehicle access. I support the alternative that is the least intrusive of the environment of the VCNP. The shuttle system, continuously improving, is a great asset to the VCNP and one I hope the National Park Service will adopt when/if they manage the VCNP in the future. I therefore tentatively support Alternative 4A: Vista del Valle Visitor Center - Primary Access via Shuttle System. I also support the idea of keeping the visitors center on the south side of NM4. This would keep the center from becoming an eyesore and would keep traffic into the preserve to a minimum. Thank you for considering my comments	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
119-W	I thought the EIS was thoughtfully written, but I have a serious concern on the matter of access or private vehicles to the preserve. Such access should be given only under strict controls. Drivers must stay on the roads, with there being _severe_ consequences if caught off-road. ATVs should be prohibited unless in small authorized groups and only if all ATVs are quiet--no loud ones ever. Insist that there be a _very_ good reason for not using the shuttle service. Only people with business in the preserve (hunters with permits, ranchers with livestock on the preserve, fishermen with permits) should be normally be considered for unescorted private vehicle use.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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120-W	I have been to the Valles Caldera over the years and though the shuttle service still has a ways to go to be great, it is much better then a two lane road through the VC for endless private cars. I must say I agree with the VC Action group about vehicles in the Caldera and I quote it below: Private vehicle access to the Preserve may be appropriate for hunters for game retrieval (providing they stay on established roads), groups, and for the handicapped who need special provisions. Ranchers tending cattle should have access with carefully considered limits. Otherwise a shuttle system such as the one the VCNP now provides but with flexibility and continuous improvement serves the public well. These shuttles could be adjusted to protect nesting wildlife, elk habitat or other environmental concerns such as road conditions that could lead to stream pollution or road damage. In the future, electric vehicles could be used to further limit noise and pollution. So, please limit public vehicles in the Valles Caldera.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
121-W	VCNP Public Use and Access Comments Dorothy Hoard August 2012 Thank you for the opportunity to comment on the Valles Caldera National Preserve Public Use and Access Environmental Impact Statement. It appears that the only decisions involved with this document are where to put a visitor center and the use of van shuttle transportation. I feel that Alternative 3, Entrada del Valle, is the best choice because it has the least impact on traffic on State Road 4. I feel that the national park model has worked well for the use of shuttles during the peak seasons, allowing exceptions for handicapped, special use, and for people whose activity will last beyond scheduled shuttle hours. Allow private vehicles in the off-season when traffic is low. I am deeply disappointed in this Environmental Impact Statement allegedly concerning Public Use and Access. I am a long-time advocate of public access to public land and for less restrictive access to the Preserve. We have been continually told that access cannot be provided without proper management planning documents approved by the Board of Trustees. For six years I looked forward to seeing this process finally being resolved, only to find that this EIS codifies what we have been hearing for 12 years: the Preserve is so precious that it must be protected from the very owners who purchased it and pay for its upkeep. chapter One has the definitive comment: Page 1-11: The public would like the VCT to do the following. Provide more access, more spontaneous access, and more freedom to explore the preserve. The remainder of the document is a long litany, both explicit and implied, citing reasons why and how these public preferences will continue to be denied. It assigns public access to a few acres for a visitor center, followed with vague comments on adding picnic tables and pullouts and overlooks once a visitor center is in place to control access. In electronic searches of the various chapters, I could not find mention of any plans for free-roaming or freedom to explore the preserve. The Board of Trustees has a history of disdain for public opinions on management of the preserve, treating this public land much like a private fiefdom accessible to a favored few. I found this EIS to be a reflection of that disdain. I am truly sorry. I feel the American public deserves better.	Thank you for taking the time to read the Draft EIS and providing your comments and suggestions. In the past few years, the VCT has expanded “spontaneous” opportunities for visiting the preserve. The preserve is open for visitation 7 days/week from late spring to early fall. Most activities can be enjoyed without reservations; however, due to limited capacities, reservations are recommended. All of the action alternatives propose visitor access to the preserve without reservations. People would be able to visit and recreate within the preserve without making prior reservations. Visitors would have the freedom to explore the preserve along established trails and roadways and within designated camping areas, similar to units of the National Park Service, in order to protect the preserve's resources while allowing for a variety of recreation. The EIS was revised to more accurately describe current access and make this more clear.
122-W	To Marie Rodriquez and Valles Caldera National Preserve Please include the following comment in your records. I strongly urge you to protect the VCNP from private motorized vehicle access. The shuttle system that is now in use is a great model for careful preservation of the preserve for visitors, wildlife and plant life and for the environment as a whole. New Mexico is so fortunate to have the VCNP in a natural state. Let's not squander this jewel by allowing private motorized vehicle access into the Preserve.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

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123-W	Thank you for inviting public comment regarding the next step for the Valles Caldera. I prefer Alternative 3A. Above all, it is important to restrict vehicular access to the beautiful meadows. The shuttle system is definitely preferable. I believe the visitor center will be very popular and, located on the edge of the park, will serve many people without cluttering the landscape. I live in Los Alamos and spend many hours every week hiking or x-country skiing in this area.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
124-W	I believe that public access and use at VCNP should enhance the visitor experience while preserving ecological, scenic, and historical values. Therefore, I support Alternative 4A because it allows for public access while protecting the backcountry from development. I strongly support the use of a shuttle system that will enable VCNP to ultimately close excess roads and rehabilitate those areas to their natural condition. Controlled access to the backcountry will protect wildlife and will also reduce pollution, noise, and other human impacts on the preserve. I also support Alternative 4A because the proposal to develop a day-use area that would focus on views of the Valle Grande, geological interpretation, and proximity to Bandelier National Monument could encourage visitors to become more interested in the value of the preserve. Emphasizing proximity to Bandelier National Monument could also encourage people to visit both areas and learn more about the region as a whole in terms of geology, archaeology, wildlife, plants, and history. The full-service visitor and interpretive center should be located close to Highway 4, such as at the Vista del Valle site or the Entrada del Valle site to provide easy access to the preserve and its shuttle system, thus encouraging more people to take the time to learn about and enjoy this unique preserve.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
125-W	I feel that alternative 3 represents the best location for an expanded visitor center in terms of access. I do worry somewhat about the impact of the center on the elk herd, but feel that the level of access that this location provides gives the richest experience in the Preserve.	Thank you for taking the time to read the Draft EIS and submit your comments. The EIS has been revised to include more information about the effects of recreationists on elk.
1-M	The members of the New Mexico Horse Council support the adoption of Alternative # 2, which maintains existing equestrian facilities and programs based from the horse barn, with trail access provided to Valle Grande, Rincon de los Soldados, the Posos, and Cerro del Medio. Many of our members have described trail riding in this beautiful area, and Alternative 2 is the only one that appears to protect current equestrian access.	Thank you for taking the time to read the Draft EIS and submit your comments. The description of alternative 3A/B on page 2-41 of the Draft EIS states, " The temporary visitor contact station currently located at the Valle Grande Staging Area would be relocated to the Banco Bonito Staging Area. The Banco Bonito Staging Area would continue to provide access for horseback riding and staging for special events." This is also true for alternative 4A/B (p. 2-51). Equestrian programs and facilities would continue under all action alternatives.
2-M	Caldera Action has consistently raised concerns about the absence of comprehensive planning on the Preserve. The Preserve in its documents consistently refers to the Strategic Guidance for Comprehensive Management (SGCM) of 2010 as though this is the comprehensive program referred to in the legislation that led to federal purchase of the VCNP for the public and established the Trust as manager (Public Law 106-248). The legislation stated specifically (Section 108 (d)) that the Trust was to complete a Comprehensive Management Program (CMP) “within two years.” Caldera Action asserts that the SGCM is not a comprehensive program or plan. . . . The Preserve’s approach is disjointed and arbitrary and difficult to justify in either scientific or land management terms. This haphazard system of planning is bad in terms of resource protection and public process, and risks unforeseen conflicts between programs at the VCNP that could cause expense for taxpayers.	Thank you for taking the time to read the Draft EIS and submit your comments. The Strategic Guidance for Comprehensive Management is outside the scope of this project.
3-M	Transportation planning is the key that will unlock public access to the Preserve. Although the Preserve has established a system of roads, this system has never been analyzed for its impact on the environment. The present PAUP-DEIS, takes this road system as a given and proposes to make use of it in some way (private vehicles or shuttles) to provide access. There is no analysis, environmental, economic, social, or otherwise of this system.	Thank you for taking the time to read the Draft EIS and submit your comments. As mentioned in the Draft EIS on page 2-4, a transportation system to support primary access via shuttle or personal vehicle based on the selected alternative would require additional planning and decision-making in compliance with NEPA prior to implementation. Such planning could take the form of an environmental assessment or EIS, or may be categorically excluded from further documentation consistent with the VCT procedures for implementing NEPA. That NEPA process would further evaluate in more detail the impacts of the selected transportation system on the environment.

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4-M	We note that it is anticipated that provision for operations and maintenance facilities is incorporated into all the alternatives for visitor facilities (PAUP-DEIS p 4-18). We applaud the removal of these activities from the historic district—Baca Ranch headquarters. However, we suggested in our Scoping Comments that co-location of these activities with the visitor center was inappropriate and that the need for solar and van-charging facilities would best be met by a separate facility out of public view. We note that there is no analysis or mention of this or any other option for these facilities in the PAUP-DEIS. We continue to believe that operations/logistical/maintenance facilities should be out of public view and that the historic district should be open to interpretation of the history of the Baca Ranch.	Thank you for taking the time to read the Draft EIS and submit your comments. Page 2-18 of the Draft EIS states that space for maintenance activities would not likely be larger than 300 square feet. The decision was made to incorporate the maintenance area into the visitor center footprint because its small size could be readily accommodated within the proposed visitor contact station or visitor center, and because the Valles Caldera Trust wanted to avoid disturbing land in another location. Consolidating facilities minimizes impacts to natural and cultural resources and minimizes distance traveled between sites, reducing wear and tear on vehicles, saving fuel and time, and minimizing the carbon footprint. The maintenance area would be designed to be as visually unobtrusive as possible, in adherence with the sustainable design principles described in chapter 2.
5-M	In general we strongly support continuation of shuttle services for visitors to the areas of the VCNP beyond the current visitor center in the Valle Grande. We oppose use of private vehicles in the Preserve except for permitted uses such as hunting, fishing, handicapped access and for the livestock industry. Private vehicles will be damaging to wildlife, watersheds, air quality and visitor experience.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
6-M	We note that your correctly acknowledge in chapter 4 that increased visitation will necessitate increased law enforcement capabilities on the Preserve. We strongly suggest that a memorandum of understanding (MOU) be signed with the National Park Service at Bandelier National Monument for NPS rangers to supplement USFS law enforcement officers. (A similar arrangement is in place for fire services with Bandelier Fire.)	Thank you for taking the time to read the Draft EIS and submit your comments and suggestions. If one of the action alternatives is selected as the preferred alternative, the Valles Caldera Trust will begin development of an implementation plan, which would identify how and when the elements of the alternative would be implemented. This plan would identify how management and operations of the preserve, including law enforcement activities, would be conducted in more detail.
7-M	We continue to believe that Alternative 2, the Banco Bonito minimal development, is not adequate for the public's access and use of the Preserve. Further, we believe that improvements necessary to use VC07 for access into the Preserve would be cost prohibitive.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
8-M	We continue to urge you to consult with the National Park Service (Harper's Ferry) in your considerations of location, sizing, and facilities for the Visitor Center. Harper's Ferry is the acknowledged worldwide leader in the design of interpretive facilities and content. We strongly urge you to use the statutory relationship with the Park Service to make use of this high-quality resource.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
9-M	We are pleased to see the attention paid to renewable energy sources to provide power to the visitor facilities and shuttles and acknowledge the difficulties in siting that this entails. Our proposal to separate the visitor center and logistical/maintenance activities is a recognition of those difficulties.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
10-M	We agree with the premise that the view of the Valle Grande should not be encumbered by visible facilities and that dust from traffic on the Preserve roads is a further encumbrance on the viewscape.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
11-M	We believe that of the alternatives presented Alternative 4-A, the Vista del Valle visitor center with shuttle-only access to the preserve, should be the Preferred Alternative. However, we would like to modify this alternative with separation of visitor center and logistical/maintenance activities and the inclusion of a full analysis of transportation needs on the Preserve which we believe would lead to a greatly reduced road system more in line with USFS guidelines.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
12-M	We further believe that a truly comprehensive management program/plan should precede further action on this and other initiatives.	Thank you for taking the time to read the Draft EIS and submit your comments.
13-M	Specifically, I would like to speak in favor of Alternative 3B. In terms of the location of the proposed future Visitor Center, I believe it is important for this Center to be in the Valle Grande and on the north side of NM 4, near the current entry road, as proposed in Alternative 3B. For visitors who are just passing through, this would provide a better, more intimate impression of the Valle. For visitors who are entering the Preserve for hiking, skiing, or other activities, this location would provide better access. Alternative 3B allows access by private vehicles in addition to shuttles. This is very helpful for activities such as longer hikes, winter cross-country skiing, snowshoeing, backpacking, or camping. A shuttle system is still a good idea for many short-term uses. But access by shuttle only would make it difficult to do longer hikes within the limited hours of operation, and would make it very difficult for ski tourers to access the central or back areas of the preserve in winter. I believe strongly that the Valles Caldera Trust should facilitate low-impact access to the Valle for many uses, but not including motorized sports. Alternative 3B includes paved or gravel 2-lane roads that provide such access.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

Valles Caldera National Preserve
Public Access and Use Plan / Environmental Impact Statement (EIS)
Public Comments on Draft EIS

No.	COMMENT	RESPONSE
14-M	I would prefer to see Alternative 3B modified so that private vehicles were limited to that portion of the proposed roads that lie within or near the Valle Grande. Roads that go all the way into the Valle San Antonio should be accessible by shuttle only. The back valles are naturally isolated from the Valle Grande by Redondo Peak and its outlying hills. These areas should be managed for hiking, camping, fishing, skiing, and other quiet, low-impact activities.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
15-M	Between the route through the town of Jemez springs, and the route through Los Alamos, there can exist a visitor's center on the rim where the view of the big valley just comes into view. From the rim, a bicycle trail that encircles the calderas can begin and end at the visitor's center, hiking trails can start where they do now. In addition, the travel into the ranch headquarters should be limited to buses, one in the morning and one in the evening.	Thank you for taking the time to read the Draft EIS and submit your comments. A visitor center situated on a rim would present substantial obstacles in obtaining utilities (e.g., water and electricity) as well as construction of an access road to reach the facilities. The Valles Caldera Trust considered alternatives that would be the most feasible to construct and would result in the least amount of disturbance to the land. Therefore, situating a visitor center on the caldera rim was not considered. If one of the action alternatives is selected as the preferred alternative, the trust will undertake development of an implementation plan, which will further define recreational activities and facilities in the preserve, and a transportation plan, which will further define details about transportation within the preserve.
16-M	I have no reason to oppose this regulated hunt . I do, however oppose trophy hunting because nature would choose the fittest. Elk with less than a royal 12 rack should be taken.	Thank you for taking the time to read the Draft EIS and submit your comments.
18-M	I support the recommendations contained in the National Parks Service Analysis that recommended that the reserve be integrated into the National Parks Service. . . . Why is LAC council responding at all?	Thank you for taking the time to read the Draft EIS and submit your comments. The jurisdiction of the preserve's management is not within the scope of this project.
19-M	The Sunday Monitor (July 29) presents four alternatives for public access to the Valles Caldera. I favor the option that gives the most access to the public without prior reservation. What I think should be added to considerations for access to the Valles Caldera is an aerial tram that would start in the center of Los Alamos) stop at the ski hill and hiking trail (also for cross-country skiing) and go over the rim all the way to the visitors' center. This is a great way to attract people to stay in Los Alamos while visiting the Valles Caldera. Many places in Switzerland have such amenities. The community could really benefit from such a tram.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
22-M	Let's make the VCNP a trail-rich, outdoor adventure place -leaving the motorized vehicles back at parking lot(s) concealed somewhere near or on the perimeter.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
25-M	I am deeply concerned that ATV and or UTV traffic on the trail/road systems will be detrimental to the terrain. . . . I have seen the destruction 4 wheelers, A TV, and UTV's have created and it is not a pretty site!! I therefore would like you to consider not allowing such vehicles on that property unless it is group organized with supervision.	Thank you for taking the time to read the Draft EIS and submit your comments. As noted on page 2-18 of the Draft EIS, "No motorized, off-road access for hunting or for any type of visitor use is being proposed; current prohibitions against such use would continue. The VCT would provide game carts to hunters and would allow pack horses to travel in designated areas."
26-M	Because the Preserve has been mismanaged virtually from its inception, I have zero confidence that the Preserve's management can do anything correctly. Consequently, my preference is that the National Park Service take over management of the Preserve. I suppose that I could vote for Option 1 -Do Nothing, which is basically what management has been doing, but I'm afraid that my voting for one of their offered Options might be interpreted as a vote of confidence of some sort in current management's ability to do anything.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
27-M	I support Alternative 3B for the Valles Caldera Development. The shuttle-based alternatives have decreased visitor's access and high operational and maintenance costs and will be cost-prohibitive.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
28-M	No major infrastructure improvements, and no new visitor center at the Valles Caldera --at any location. The Trust's plan is not needed for improved public access. They seriously need to work on improving public access. Put any major improvements on hold until the Department of the Interior takes over management of the Preserve. Interior knows how to design and build superior visitor centers and how to manage natural preserves while allowing public access.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
29-M	I favor the alternative #3 full visitor center north of hiway #4. I am a frequent visitor and hiker in the area. Hopefully, further options for private vehicles will be forthcoming.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
30-M	I support options 3a or 4a.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

Valles Caldera National Preserve
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Public Comments on Draft EIS

No.	COMMENT	RESPONSE
31-M	I would also like to offer comments on the graphic (Figure S9) that communicates the benefits and costs of the various alternatives. The costs visually get greater weight because there are 4 magnitudes of costs but only 1 class of benefit. Also the circle presentation gives a smaller wedge to factors closer to center. Unless the intent is to visually skew the weightings then I suggest that a block design might be a better presentation.	Thank you for taking the time to read the Draft EIS and submit your comments. In addition to figure S9, table 2-13 in chapter 2 presents a summary of the environmental consequences for all alternatives in comparative form. Figure S9 is designed to show beneficial impacts and the various degrees of adverse impact (i.e., negligible, minor, moderate, or major). Because no degrees exist for beneficial impacts, the result is, as you note, more visual emphasis on adverse impacts. The figure was changed to help more balance the visual emphasis. The error you note has been addressed. The Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act state that "impacts shall be discussed [in an EIS] in proportion to their significance" (Sec. 1502.2). In addition to showing impact levels, the wedge design was also intended to help portray that proportion based on the plan's purpose and need for action. Table 2-13 shows the resource impacts without proportions.
36-M	. . . We do want to rescind our preference for the VdV site—Option 4-A—and, based on our site visit, to designate the Entrada site—Option 3-A—as our preferred alternative. • change preference to the Entrada site in light of access, hiking possibilities, solar aspect, visual impact on rest of the Preserve, and the more intimate feel of the site, with trees and large rock outcrops. This site also supports greater opportunities for pedestrian access to the Preserve directly from the site; • suggest minimizing access road impact, perhaps using a one-way loop for access to parking; • agree with lightning safety concerns expressed by the VCNP staff with respect to trails to the East Fork originating at the VdV site.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
37-M	strongly encourage the VCNP staff to plan for very limited private vehicle access to the VCNP. . . . .a shuttle system such as the one the VCNP now provides but with flexibility and continuous improvement would serve the public well. These shuttles could be adjusted to protect nesting wildlife, elk habitat or other environmental concerns such as road conditions that could lead to stream pollution or road damage. In the future, electric vehicles could be used to further limit noise and pollution;	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
38-M	The PAUP-DEIS states that provision for operations and maintenance facilities is incorporated into all the alternatives for visitor facilities (PAUP-DEIS p 4-18). We applaud the removal of these activities from the historic district—Baca Ranch headquarters. However, we believe that co-location of these activities with the visitor center is inappropriate and that the need for solar and van-charging facilities would best be met by a separate facility out of public view. We note that there is no analysis or mention of this or any other option for these facilities in the PAUP-DEIS.	Page 2-18 of the Draft EIS states that space for maintenance activities would not likely be larger than 300 square feet. The decision was made to incorporate the maintenance area into the visitor center footprint because its small size could be readily accommodated within the proposed visitor contact station or visitor center, and because the Valles Caldera Trust wanted to avoid disturbing land in another location. Consolidating facilities minimizes impacts to natural and cultural resources and minimizes distance traveled between sites, reducing wear and tear on vehicles, saving fuel and time, and minimizing the carbon footprint. The maintenance area would be designed to be as visually unobtrusive as possible, in adherence with the sustainable design principles described in chapter 2.
39-M	In light of access, hiking possibilities, solar aspect, visual impact on rest of the Preserve, with trees and large rock outcrops, we believe that alternative 3-A, the Entrada site with minimal private vehicle access to the interior of the Preserve should be the preferred alternative. This site also supports greater opportunities for pedestrian access to the Preserve directly from the site;	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
40-M	We believe that Alternative 2, the Banco Bonito minimal development, is not adequate for the public's access and use of the Preserve. Further, we believe that improvements necessary to use VC07 for access into the Preserve would be cost prohibitive and would unnecessarily impact the solitude and character of the Preserve.	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.

Valles Caldera National Preserve
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No.	COMMENT	RESPONSE
41-M	We agree with the premise that the view of the Valle Grande should not be encumbered by visible facilities and that dust from traffic on the Preserve roads, particularly from private vehicles, is a further encumbrance on the viewscape. • We strongly encourage the VCNP staff to plan for very limited private vehicle access to the VCNP. The special qualities that much of the public finds attractive at the Preserve are the quiet, the good chance of seeing variety of wildlife, and the sense of wildness that persists in the place despite past uses. All of these qualities can only be maintained by limiting motor noise, and the intrusion of vehicles to the interior of the Preserve. The VCNP has a sense of quiet and solitude that is a rare experience for people today. Private vehicle access to the Preserve may be appropriate for hunters for game retrieval (providing they stay on established roads), groups, and for the handicapped who need special provisions. Ranchers tending cattle should have access only with carefully considered limits. Otherwise a shuttle system expanded on what the VCNP now provides would serve the public well. These shuttles could be adjusted to protect nesting wildlife, elk habitat or other environmental concerns such as road conditions that could lead to stream pollution or road damage. In the future, electric vehicles could be used to further limit noise and pollution;	Thank you for taking the time to read the Draft EIS and submit your comments. All comments will be taken into consideration in the selection of the preferred alternative.
42-M	The “no action alternative” calls for the removal of the Valle Grande (VG) and Banco Bonito staging areas and elimination of the current interim recreation program. This is not a valid “no action alternative.” Like the other actions eliminated from evaluation in the VCP EIS (see Executive Summary, p. xii), the “no-action alternative” does “not meet the purpose of and need for action.” It is a significant action that ignores not only the Need for Action of providing for more access but also the requirements of the Valles Caldera Preservation Act (VCPA) to provide “opportunities for public recreation.” A more reasonable “no action alternative” should be provided.	NEPA requires agencies to analyze the consequences of taking no action. In addition, an assessment of taking no action provides a baseline for comparing the consequences of the action alternatives. The Council on Environmental Quality (CEQ) provides two distinct interpretations of "no action," depending on the nature of the proposal being evaluated. Under the first situation "no action" is "no change" from current management direction or level of management intensity. Under the second situation no-action means that the proposed activity would not take place. As noted on page 2-17 of the Draft EIS, the second interpretation was used to define the no action alternative for this plan. The interim recreation program and temporary visitor contact stations were established to provide reasonable public access until long-term decisions regarding the location and scale of development were made. Page 2-74 notes that continuing the interim program from current locations (i.e., continuing activities as they currently are at the preserve) was considered but eliminated from detailed analysis, as allowed by NEPA. Because it is not a valid action alternative, the interim recreation program and temporary visitor contact stations would therefore not continue and the facilities would be removed under the no action alternative. As the no action alternative, removing the existing temporary facilities and phasing out programs from these locations was used as the baseline to compare the effects of the proposed action alternatives.

New Mexico Horse Council, Inc.

Established 1970

P. O. Box 10206
Albuquerque, New Mexico
87184-0206

(505) 345-8959 *www.nmhorsecouncil.org*

August 13, 2012

Valles Caldera Trust
P.O. Box 359
Jemez Springs, NM 87025

Subject: Valles Caldera Draft Environmental Assessment Alternatives

1-M The members of the New Mexico Horse Council support the adoption of **Alternative # 2, which maintains existing equestrian facilities and programs based from the horse barn, with trail access provided to Valle Grande, Rincon de los Soldados, the Posos, and Cerro del Medio.**

Many of our members have described trail riding in this beautiful area, and Alternative 2 is the only one that appears to protect current equestrian access.

The New Mexico Horse Council membership is composed of individuals, businesses and clubs (including several chapters of Back Country Horsemen of New Mexico). In our most recent survey of our membership, more than 60% indicated their main interest was pleasure or trail riding, and preservation of trails and trail access was a major concern.

Valerie Cole
Board of Directors
New Mexico Horse Council

Caldera Action

Protecting a unique natural and cultural landscape

July 16, 2012

Marie Rodriguez
Valles Caldera National Preserve
P. O. Box 359
Jemez Springs, NM 87594

Dear Ms Rodriguez,

Caldera Action is a 501(c)3, citizens group dedicated to the long-term conservation of the Valles Caldera National Preserve (VCNP, the Preserve) and appropriate public access to the VCNP. We have around 100 members in 7 states and the District of Columbia and another 100 subscribers.

We submit the following comments as part of the official record on the Trust's current Public Use and Access Plan Draft Environmental Impact Statement (PAUP-DEIS). We begin with comments related to the planning process at the VCNP and then make comments related to the specific alternatives posed by the VCNP in their scoping process.

Caldera Action's board of Directors has reviewed the PAUP-DEIS and has a number of comments. We are disappointed that a number of the issues and suggestions raised in our scoping letter of March 2011 (Scoping Comments) appear nowhere in the document.

We have also encouraged our members to comment on the Plan and on planning in general on the Preserve.

Comprehensive Planning

2-M Caldera Action has consistently raised concerns about the absence of comprehensive planning on the Preserve. The Preserve in its documents consistently refers to the *Strategic Guidance for Comprehensive Management* (SGCM) of 2010 as though this is the comprehensive program referred to in the legislation that led to federal purchase of the VCNP for the public and established the Trust as manager (Public Law 106-248). The legislation stated specifically (Section 108 (d)) that the Trust was to complete a Comprehensive Management Program (CMP) "within two years." Caldera Action asserts that the SGCM is not a comprehensive program or plan. It is ***guidance for*** comprehensive management and that is very different. One example of this lack of comprehensiveness is illustrated in our Scoping Comments and again below with respect to transportation management and maintenance facilities.

The Preserve's approach is disjointed and arbitrary and difficult to justify in either scientific or land management terms. This haphazard system of planning is bad in terms of resource protection and public process, and risks unforeseen conflicts between programs at the VCNP that could cause expense for taxpayers.

Transportation Planning

3-M Transportation planning is the key that will unlock public access to the Preserve. Although the Preserve has established a system of roads, this system has never been analyzed for its impact on the environment. The present PAUP-DEIS, takes this road system as a given and proposes to make use of it in some way (private vehicles or shuttles) to provide access. There is no analysis, environmental, economic, social, or otherwise of this system. In the absence of analysis, new information or changing conditions could dramatically change the conclusions of the PAUP-DEIS, and renders the validity of the document suspect.

We continue to believe that a full environmental analysis of transportation facilities should be conducted as an integral part of this proposal.

4-M We note that it is anticipated that provision for operations and maintenance facilities is incorporated into all the alternatives for visitor facilities (PAUP-DEIS p 4-18). We applaud the removal of these activities from the historic district—Baca Ranch headquarters.

However, we suggested in our Scoping Comments that co-location of these activities with the visitor center was inappropriate and that the need for solar and van-charging facilities would best be met by a separate facility out of public view. We note that there is no analysis or mention of this or any other option for these facilities in the PAUP-DEIS.

We continue to believe that operations/logistical/maintenance facilities should be out of public view and that the historic district should be open to interpretation of the history of the Baca Ranch.

5-M In general we strongly support continuation of shuttle services for visitors to the areas of the VCNP beyond the current visitor center in the Valle Grande. We oppose use of private vehicles in the Preserve except for permitted uses such as hunting, fishing, handicapped access and for the livestock industry. Private vehicles will be damaging to wildlife, watersheds, air quality and visitor experience.

Law Enforcement

6-M We note that your correctly acknowledge in Chapter 4 that increased visitation will necessitate increased law enforcement capabilities on the Preserve. We strongly suggest that a memorandum of understanding (MOU) be signed with the National Park Service at Bandelier National Monument for NPS rangers to supplement USFS law enforcement officers. (A similar arrangement is in place for fire services with Bandelier Fire.) Bandelier has a relatively robust law enforcement staff and they currently patrol to the boundary of the Preserve. They could provide EMT and Search and Rescue services as well for special events like night skiing.

Comments specific to the Visitor Center proposals:

7-M
- We continue to believe that Alternative 2, the Banco Bonito minimal development, is not adequate for the public's access and use of the Preserve. Further, we believe that improvements necessary to use VC07 for access into the Preserve would be cost prohibitive.

8-M • We continue to urge you to consult with the National Park Service (Harper's Ferry) in your considerations of location, sizing, and facilities for the Visitor Center. Harper's Ferry is the acknowledged worldwide leader in the design of interpretive facilities and content. We strongly urge you to use the statutory relationship with the Park Service to make use of this high-quality resource.

9-M • We are pleased to see the attention paid to renewable energy sources to provide power to the visitor facilities and shuttles and acknowledge the difficulties in siting that this entails. Our proposal to separate the visitor center and logistical/maintenance activities is a recognition of those difficulties.

10-M • We agree with the premise that the view of the Valle Grande should not be encumbered by visible facilities and that dust from traffic on the Preserve roads is a further encumbrance on the viewscape.

11-M **We believe that of the alternatives presented Alternative 4-A, the Vista del Valle visitor center with shuttle-only access to the preserve, should be the Preferred Alternative. However, we would like to modify this alternative with separation of visitor center and logistical/maintenance activities and the inclusion of a full analysis of transportation needs on the Preserve which we believe would lead to a greatly reduced road system more in line with USFS guidelines.**

12-M **We further believe that a truly comprehensive management program/plan should precede further action on this and other initiatives.**

We thank you for the opportunity to comment on the proposed PAUP-DEIS. We reiterate our commendations for the progress that has been made since the initial scoping process in 2009.

Sincerely,

Thomas Jervis, Ph.D. President
Caldera Action
PO Box 31151
Santa Fe, NM 87594
Jervidae@cybermesa.com

cc: Valles Caldera Trustees
Office of Senator Jeff Bingaman
Office of Senator Tom Udall
Office of Representative Ben Ray Lujan
Office of Representative Martin Heinrich

Norbert Ensslin
3097 Woodland
Los Alamos, NM 87544

July 26, 2012

Valles Caldera Trust
P. O. Box 359
Jemez Springs, NM 87025

Dear Sir:

13-M This letter provides some comments on the public use alternatives proposed in your Environmental Impact Statement. Specifically, I would like to speak in favor of Alternative 3B.

In terms of the location of the proposed future Visitor Center, I believe it is important for this Center to be in the Valle Grande and on the north side of NM 4, near the current entry road, as proposed in Alternative 3B. For visitors who are just passing through, this would provide a better, more intimate impression of the Valle. For visitors who are entering the Preserve for hiking, skiing, or other activities, this location would provide better access.

Alternative 3B allows access by private vehicles in addition to shuttles. This is very helpful for activities such as longer hikes, winter cross-country skiing, snowshoeing, backpacking, or camping. A shuttle system is still a good idea for many short-term uses. But access by shuttle only would make it difficult to do longer hikes within the limited hours of operation, and would make it very difficult for ski tourers to access the central or back areas of the preserve in winter. I believe strongly that the Valles Caldera Trust should facilitate low-impact access to the Valle for many uses, but not including motorized sports. Alternative 3B includes paved or gravel 2-lane roads that provide such access.

14-M However, in order to mitigate the impact of such roads, I would prefer to see Alternative 3B modified so that private vehicles were limited to that portion of the proposed roads that lie within or near the Valle Grande. Roads that go all the way into the Valle San Antonio should be accessible by shuttle only. The back valles are naturally isolated from the Valle Grande by Redondo Peak and its outlying hills. These areas should be managed for hiking, camping, fishing, skiing, and other quiet, low-impact activities. This modification would provide a good balance between better access for low-impact uses and continued preservation of the outlying areas in their current condition.

Thank you for the opportunity to comment on the EIS. Sincerely Yours,

Norbert Ensslin

Norbert Ensslin

RECEIVED
JUL 27 2012
VALLES CALDERA TRUST

Linda Goforth
845 Rim Rd
Los Alamos,NM 87544

Bandelier National Monument
Superintendent of:
Bandelier, New Mexico (Hand delivered)

Long have I regretted that the visitors center was in the middle of the valley, and that it took the defacing of La Jara to do it. This is so unthinkable, but it happened. My deepest hopes based upon my entire life in the Jemez back to a time when my family had a horse ranch on the Rio de la Vacas, and a concession for the Game and Fish Dept. at Fenton Lake, and knowing the Fentons personally, is that this sort of thing will be better in the future planning and consideration of the beauty of the Valles Caldera. When the lake concession contributed to the overuse of area eventually, we supported its end.

15-M The natural outlet of the tremedous lake in the Valles Caldera is Jemez Springs. Santa Clara is not available for the traffic. Between the route through the town of Jemez Springs, and the route through Los Alamos, there can exist a visitor's center on the rim where the view of the big valley just comes into view.

From the rim, a bicycle trail that encircles the calderas can begin and end at the visitor's center, hiking trails can start where they do now. In addition, the travel into the ranch headquarters should be limited to buses, one in the morning and one in the evening. I have seen a huge male cougar, and birds that need protecting, and herds of elk that need to remain mostly undisturbed. There are timber rattlers that used to grow to over 6 ft. long. I do not know if ranchers have largely changed the area beyond the diminishing of the blue grouse along the creeks.

Limited fishing could certainly be allowed on the creeks according to that which is needed to maintain what bears, eagles, and minnow eaters need. We have seen eagles during wet years, when the creeks are bigger. We still see the ones that eat rodents. Cattle of course should no longer figure. As a ranch preserve only the history of it is appropriate now. Cows I know from life on the ranch we owned, only increase the prevalence of ticks.

16-M Elk hunts were allowed. I have no reason to oppose this regulated hunt. I do, however oppose trophy hunting because nature would choose the fittest. Elk with less than a royal 12 rack should be taken. This would also be an encouragement for those hunters who eat the meat. Less waste.
Winter activities should allow for cross-country skiing on trails and mostly on the trail of the perimeter. I think that the horse led carriage is great.

I think that study hikes and ski trips are great. The snow covered valley os is magnificent when pristine, and unlike most areas other than those in a wilderness.

My blessings to this wonderous area, and prayers for its sensible care.

Linda Goforth

Linda Goforth

PUBLIC COMMENT REPORT (July 26-August 7 2012)
Valles Caldera National Preserve
Draft Environmental Impact Statement/Public Access and Use Plan
To Los Alamos County Council

11 Commentors/12 Preferences												
Comment Subject	**TOTALS**	**1**	**2**	**3**	**4**	**5**	**6**	**7**	**8**	**9**	**10**	**11**
National Park Service Mgmt (vs. mgmt by Valles Caldera Trust)	3	X			X				X			
Most Access Possible	1		X									
No ATVs	1			X								
Option 3A (limit vehicle access)	3					X					X	X
Option 4A	1											X
Option 3B (shuttles too restrictive)	2						X	X				
Multi-Use Mountain Biking Trail	1									X		
TOTAL # COMMENTS:	12											

1

From: Bob Walsh [mailto:walsh100@comcast.net]
Sent: Saturday, July 28, 2012 10:27 AM
To: Stewart, Kelly
Subject: Valle Caldera Plan

18-M I support the recommendations contained in the National Parks Service Analysis that recommended that the reserve be integrated into the National Parks Service. Senator Bingaman has a bill pending in the senate to support this tax saving action that I believe would also result in increased revenue to LA county businesses. Why is LAC council responding at all? I thought they already voted to support Sen. Bingaman and his bill. County actions should support savings to taxpayers and increased access to ALL county residents, not just those with higher incomes.
Sincerely,
Robert Walsh
1165 41 Street

2

From: Amsden [mailto:amsden@losalamos.com]
Sent: Monday, July 30, 2012 3:29 PM
To: Stewart, Kelly
Subject: Valles Caldera Preserve -- suggestion

To: Kelly Stewart

Dear Kelly,

19-M The Sunday Monitor (July 29) presents four alternatives for public access to the Valles Caldera. I favor the option that gives the most access to the public without prior reservation.

What I think should be added to considerations for access to the Valles Caldera is an aerial tram that would start in the center of Los Alamos, stop at the ski hill and hiking trail (also for cross-country skiing) and go over the rim all the way to the visitors' center. This is a great way to attract people to stay in Los Alamos while visiting the Valles Caldera. Many places in Switzerland have such amenities. The community could really benefit from such a tram.

Sincerely,
Dorothy Amsden
520 Rim Road
662-6398

3

From: Shawn McWhorter [mailto:shawnmcwho@gmail.com]
Sent: Tuesday, July 31, 2012 9:56 AM
To: Stewart, Kelly
Subject: comments regarding use of Valle Caldera

25-M I am deeply concerned that ATV and or UTV traffic on the trail/road systems will be detrimental to the terrain. I ride enduro motorcycle and mountain bike. The single-track trails in the Jemez used only by motorcycle/mountain bike are, and have been, maintained by such groups as Blackfeathers and mountain biker volunteers. These trails do little more damage than a trail made by cattle or wildlife. More than a few of the single-track trails were destroyed by the Las Conchas fire but I did manage to find a few...they were well underway to restoration as the trails were very tough to find...I have seen the trails carved out by such atv/utv vehicles and it is clear that the restoration process is not as progressive as single-track trails....single-track trails do little to the environment compared to the destruction that atv/utv's create!! I have seen the destruction 4 wheelers, ATV, and UTV's have created and it is not a pretty site!! I therefore would like you to consider not allowing such vehicles on that property unless it is group organized with supervision.
Thank You!

4

From: Mario Schillaci [mailto:schillaci2@gmail.com]
Sent: Thursday, August 02, 2012 8:32 PM
To: Stewart, Kelly
Subject: vcnp

Greetings:

Here is my response to the Valle Caldera National Preserve Public Access and Use Plan:

26-M Because the Preserve has been mismanaged virtually from its inception, I have zero confidence that the Preserve's management can do anything correctly. Consequently, my preference is that the National Park Service take over management of the Preserve. I suppose that I could vote for Option 1 - Do Nothing, which is basically what management has been doing, but I'm afraid that my voting for one of their offered Options might be interpreted as a vote of confidence of some sort in current management's ability to do anything.

Mario Schillaci
497 Quartz Street
Los Alamos NM 87544

5

From: Michael Altherr [mailto:mraltherr1@gmail.com]
Sent: Friday, August 03, 2012 1:38 PM
To: Stewart, Kelly
Subject: Valles Caldera comment

Dear Ms. Stewart:

1-W I wish to let you know that I support option 3A in the VCNP access plan. I think the planned Visitor Center Site on the North side of NM
4 is the best option. Furthermore, I believe that limiting public vehicle access to permits for those positioning cars for extended excursions or for other special uses are in the best interest of maintaining the natural ambiance of the Preserve.

I hope that you find these comments of some value.

Respectfully,

Michael R. Altherr, Ph.D.

6

From: Ross Lemons [mailto:lemonsra@gmail.com]
Sent: Friday, August 03, 2012 3:10 PM
To: Stewart, Kelly
Subject: Valles Caldera EIS Public Comment

Kelly,

42-W Please communicate to the Council that I favor Alternative 3B: Entrada del Valle Visitor Center—Primary Access via Personal Vehicle would be the same as alternative 3A, but the primary mode of transportation onto the preserve would be personal vehicles. Shuttles would only be used for tours and group events or to reduce congestion on high-use days.

I think there needs to be restrictions on where personal vehicles can go, but shuttle only is too restrictive. I also think there needs to be a provision for access by bicycle.

Ross Lemons
143 Piedra Loop
Los Alamos, NM 87544
505-672-1586

Resident in Los Alamos since 1949

7

From: Dave Thomson [mailto:d.w.thomson@earthlink.net]
Sent: Monday, August 06, 2012 7:14 AM
To: Stewart, Kelly
Subject: Valles Caldera Planning

27-M I support Alternative 3B for the Valles Caldera Development. The shuttle-based alternatives have decreased visitor's access and high operational and maintenance costs and will be cost-prohibitive.

David Thomson
499 Grand Canyon Drive
Los Alamos 87544

8

From: Marie Caldwell [mailto:marie.caldwell@gmail.com]
Sent: Monday, August 06, 2012 10:58 AM
To: Stewart, Kelly
Subject: Valles Caldera "Public Access & Use" Plan

Dear Ms. Kelly,

In a quick read of the Executive Summary and a review of the Valles Caldera Trust's Public Access & Use document, I am dismayed at the Trust's approach and ideas for improvements.

As I understand the Summary, the Trust either gets its way with a new visitor center and other infrastructure improvements or it will severely reduce, or eliminate completely, the already limited public access. That sounds like a threat to me!

My strong opinion is this:

28-M No major infrastructure improvements, and no new visitor center at the Valles Caldera – at any location.

The Trust's plan is not needed for improved public access. They seriously need to work on improving public access.

Put any major improvements on hold until the Department of the Interior takes over management of the Preserve. Interior knows how to design and build superior visitor centers and how to manage natural preserves while allowing public access.

Normally I always support infrastructure improvements, especially for the environment. I am a huge fan of the proposed Nature Center in Los Alamos. But I am against the Trust's plan in its entirety.

Thank you for the opportunity to express my opinion.

Marie Caldwell CFM
PO Box 830, Los Alamos, NM 87544
505.661.3131
marie.caldwell@gmail.com

9

From: George Jennings Jr. [mailto:george.jennings.jr@gmail.com]
Sent: Monday, August 06, 2012 9:12 AM
To: Stewart, Kelly
Cc: Martin, Craig; contacts@triatomics.org; r.mccrady@comcast.net; mccrady@lanl.gov
Subject: VCNP Feedback (comments due to county council by noon tomorrow, 8/7/2012)

Hi, Kelly Monday 8/6/2012

22-M Let's make the VCNP a trail-rich, outdoor adventure place - leaving the motorized vehicles back at parking lot(s) concealed somewhere near or on the perimeter. Overweight, out-of-touch and out-of-shape America needs a place they can go to, play in, and get back in touch with wild America. And the VCNP is perfect - but needs a MULTI-USE TRAIL NETWORK.

My feedback:

BUILD A MULTI-USE MOUNTAIN BIKE /HIKE /SKI /RUN /BACKPACK TRAIL NETWORK WITHIN, AROUND AND CIRCLING THE VCNP.

Where possible, connect it to the existing Los Alamos trail network, using appropriate access controls as needed, although less is better and none would be preferred.
(Fee collection? Could not a low-impact, creative way to collect be devised? Maybe including an "annual subscription"?)

If the trail circling the VCNP is not possible due to land ownership disputes or other reasons, BUILD THOSE PORTIONS OF THE MOUNTAIN BIKE (/hike/ski/running/BACKPACKING) TRAIL CIRCLING THE VCNP which CAN be built, including taking the lead in working with other land owners to bring about a comprehensive circle trail, and add connecting trails allowing a circuit of the VCNP, and including a number of shorter circuit trails, so users can choose between short (an hour or 2), medium (1/2 to 1 day) or long (multi-day) MOUNTAIN BIKE (/hike/ski/running/BACKPACKING) ADVENTURES.

Look to the much-used trails in nearby Los Alamos as an example of what can be done with low cost, low impact and high recreation / nature awareness / outdoor adventure value.

Any visitor center or gathering place or structures or parking lots ought to be positioned so as to be not visible and right on the perimeter of the VCNP - a place like Banco Bonito staging area - and certainly NOT highly visible in the heart of the Valle Grande.

This is a great time to establish this as a goal and precedent, before the anticipated VCNP Park Service transfer, even if this multi-use bike/hike/ski/run trail network project is only begun. Everyone understands multi-year project time scales.

Pro Outdoors!

10

From: Mpetven@aol.com [mailto:Mpetven@aol.com]
Sent: Monday, August 06, 2012 12:52 PM
To: Stewart, Kelly
Subject: Caldera

29-M I favor the alternative #3 full visitor center north of hiway #4. I am a frequent visitor and hiker in the area. Hopefully, further options for private vehicles will be forthcoming.
I was a volunteer on hiway 4 for 2 seasons and interacted with hundreds of tourists. Let's get them to stay awhile.
Thanks Mary Pettitt Venable

11

From: Randall Ryti [mailto:rryti@mac.com]
Sent: Tuesday, August 07, 2012 9:36 AM
To: Stewart, Kelly
Subject: Valles Caldera EIS Public Comment

Dear Ms Stewart

30-M I appreciate the opportunity to provide public comment on the Valles Caldera EIS. I support options 3a or 4a. The Valles Caldera is not a wilderness but instead has having been a working ranch with parts of the ranch heavily logged. While not pristine it has some unique biota and environmental settings. Having a developed visitor center with shuttles seems to offer access to the broadest segment of the population. A center also supports continued economic development.

31-M I would also like to offer comments on the graphic (Figure S9) that communicates the benefits and costs of the various alternatives. The costs visually get greater weight because there are 4 magnitudes of costs but only 1 class of benefit. Also the circle presentation gives a smaller wedge to factors closer to center. Unless the intent is to visually skew the weightings then I suggest that a block design might be a better presentation.

Sincerely
Randall Ryti
1874 Camino Manzana
Los Alamos, NM

Caldera Action

Protecting a unique natural and cultural landscape

August 13, 2012

Marie Rodriguez
Valles Caldera National Preserve
P. O. Box 359
Jemez Springs, NM 87594

Dear Ms Rodriguez,

We submit the following amendments to our comments of July 16, 2012 as part of the official record on the Trust's current Public Use and Access Plan Draft Environmental Impact Statement (PAUP-DEIS). These comments come as a result of our Board field trip to the Caldera. We want to thank you and Bob for the time you took with us in visiting and talking about the Vista del Valle (VdV) and Entrada sites.

Caldera Action is a 501(c)3, citizens group dedicated to the long-term conservation of the Valles Caldera National Preserve (VCNP, the Preserve) and appropriate public access to the VCNP. We have around 100 members in 7 states and the District of Columbia and another 100 subscribers.

36-M **These comments are intended primarily to expand on our earlier comments. However, we do want to rescind our preference for the VdV site—Option 4-A—and, based on our site visit, to designate the Entrada site—Option 3-A—as our preferred alternative.**

In addition to our previous comments, we:

37-M
- strongly encourage the VCNP staff to plan for very limited private vehicle access to the VCNP. The special qualities that much of the public finds attractive at the Preserve are the quiet, the good chance of seeing variety of wildlife, and the sense of wildness that persists in the place despite past uses. All of these qualities can only be maintained by limiting motor noise, and the intrusion of vehicles to the backcountry. The VCNP has a sense of quiet and solitude that is a rare experience for people today.

  Private vehicle access to the Preserve may be appropriate for hunters for game retrieval (providing they stay on established roads), groups, and for persons with disabilities who need special provisions. Ranchers tending cattle should have access with carefully considered limits. Otherwise a shuttle system such as the one the VCNP now provides but with flexibility and continuous improvement would serve the public well. These shuttles could be adjusted to protect nesting wildlife, elk habitat or other environmental concerns such as road conditions that could lead to stream pollution or road damage. In the future, electric vehicles could be used to further limit noise and pollution;

37-M

- agree with the use of planning visitor projections of about 120,000/year. This may be optimistic given that the Harbinger analysis performed for CA, NPCA, and NMWF projected 64,000 visitors/year, but is in the same ballpark and a reasonable planning horizon;

36-M
- change preference to the Entrada site in light of access, hiking possibilities, solar aspect, visual impact on rest of the Preserve, and the more intimate feel of the site, with trees and large rock outcrops. This site also supports greater opportunities for pedestrian access to the Preserve directly from the site;

36-M
- suggest minimizing access road impact, perhaps using a one-way loop for access to parking;

36-M
- agree with lightning safety concerns expressed by the VCNP staff with respect to trails to the East Fork originating at the VdV site.

We thank you for the opportunity for further comment on the proposed PAUP-DEIS. We reiterate our commendations for the progress that has been made since the initial scoping process in 2009.

Sincerely,

Thomas Jervis, Ph.D. President
Caldera Action
PO Box 31151
Santa Fe, NM 87594
Jervidae@cybermesa.com

cc: Valles Caldera Trustees
Office of Senator Jeff Bingaman
Office of Senator Tom Udall
Office of Representative Ben Ray Lujan
Office of Representative Martin Heinrich

New Mexico Audubon Council

Representing Four Local Chapters of the National Audubon Society in New Mexico
Conserving and restoring natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity

August 13, 2012

Marie Rodriguez
Valles Caldera National Preserve
P. O. Box 359
Jemez Springs, NM 87594

Email to Marie Rodriguez <mrodriguez@vallescaldera.gov>

Dear Ms Rodriguez:

The New Mexico Audubon Council is a 501(c)(3) volunteer organization representing the four chapters of the National Audubon Society in New Mexico. We are dedicated to the long-term conservation of birds and other wildlife and the habitat they depend on. We represent over 4,000 members in New Mexico. Our members recreate and watch birds at the VCNP and have an abiding interest in the management, protection, and access to the Preserve.

The Valles Caldera National Preserve (VCNP) has been designated as an Important Bird Area (IBA) by Birdlife International after nomination by Audubon New Mexico for its unique mix of high elevation grasslands, forests, and riparian areas. Breeding and resident bird populations at the VCNP IBA include birds on Audubon's WatchList such as Lewis's Woodpecker, Flammulated Owl, Williamson's Sapsucker, Olive-sided Flycatcher, Virginia's Warbler, and Grace's Warbler.

We have reviewed the Public Use and Access Plan Draft Environmental Impact Statement and <u>submit the following comments as part of the official record on the Trust's current Public Use and Access Plan Draft Environmental Impact Statement (PAUP-DEIS)</u>.

38-M The PAUP-DEIS states that provision for operations and maintenance facilities is incorporated into all the alternatives for visitor facilities (PAUP-DEIS p 4-18). We applaud the removal of these activities from the historic district—Baca Ranch headquarters. However, we believe that co-location of these activities with the visitor center is inappropriate and that the need for solar and van-charging facilities would best be met by a separate facility out of public view. We note that there is no analysis or mention of this or any other option for these facilities in the PAUP-DEIS.

40-M
- We believe that Alternative 2, the Banco Bonito minimal development, is not adequate for the public's access and use of the Preserve. Further, we believe that improvements necessary to use

VC07 for access into the Preserve would be cost prohibitive and would unnecessarily impact the solitude and character of the Preserve.

- We are pleased to see the attention paid to renewable energy sources to provide power to the visitor facilities and shuttles and acknowledge the difficulties in siting that this entails. Our proposal to separate the visitor center and logistical/maintenance activities is a recognition of those difficulties.

41-M

- We agree with the premise that the view of the Valle Grande should not be encumbered by visible facilities and that dust from traffic on the Preserve roads, particularly from private vehicles, is a further encumbrance on the viewscape.

- We strongly encourage the VCNP staff to plan for very limited private vehicle access to the VCNP. The special qualities that much of the public finds attractive at the Preserve are the quiet, the good chance of seeing variety of wildlife, and the sense of wildness that persists in the place despite past uses. All of these qualities can only be maintained by limiting motor noise, and the intrusion of vehicles to the interior of the Preserve. The VCNP has a sense of quiet and solitude that is a rare experience for people today.

  Private vehicle access to the Preserve may be appropriate for hunters for game retrieval (providing they stay on established roads), groups, and for the handicapped who need special provisions. Ranchers tending cattle should have access only with carefully considered limits. Otherwise a shuttle system expanded on what the VCNP now provides would serve the public well. These shuttles could be adjusted to protect nesting wildlife, elk habitat or other environmental concerns such as road conditions that could lead to stream pollution or road damage. In the future, electric vehicles could be used to further limit noise and pollution;

- We agree with the use of planning visitor projections of about 120,000/ year. This seems like an appropriate level of visitation given visitation at Bandelier and the more remote location of the Preserve.

39-M

- In light of access, hiking possibilities, solar aspect, visual impact on rest of the Preserve, with trees and large rock outcrops, we believe that alternative 3-A, the Entrada site with minimal private vehicle access to the interior of the Preserve should be the preferred alternative. This site also supports greater opportunities for pedestrian access to the Preserve directly from the site;

We thank you for the opportunity to comment on this EIS and hope that our comments will be helpful as you move forward with greater public access to the VCNP.

Sincerely,

Judy Liddell, President
9943 Osuna Rd NE
Albuquerque, NM 87111

Comments on the Draft Valles Calderas Trust Public Access and Use Plan Environmental Impact Statement

The following comments are private citizen comments provided on the Draft Valles Calderas Trust Public Access and Use Plan Environmental Impact Statement (VCP EIS). The comments provided may be general, referring to more than one section of the VCP EIS or may be organized by section, page and/or subsection.

	Section	Comment
42-M	General	The "no action alternative" calls for the removal of the Valle Grande (VG) and Banco Bonito staging areas and elimination of the current interim recreation program. This is not a valid "no action alternative." Like the other actions eliminated from evaluation in the VCP EIS (see Executive Summary, p. xii), the "no-action alternative" does "not meet the purpose of and need for action." It is a significant action that ignores not only the Need for Action of providing for more access but also the requirements of the Valles Caldera Preservation Act (VCPA) to provide "opportunities for public recreation." A more reasonable "no action alternative" should be provided.
99-W	General	None of the proposed recreational activities allow much access to the VG area. I have taken one of the shuttle-based hiking tours. The hiking area was wooded and uninteresting. I certainly did not feel that I was exposed to the unique grassland and riparian features of the VG area. Access to the VG area should be expanded for all alternatives. Other publicly-managed grasslands provide access, at least for low-impact activities such as hiking or cross-country skiing, within the grasslands without creating significant impacts.
100-W	Section 2 All Alternatives	There is very little discussion of winter activities. According to the VCP EIS (p.2-18): "During winter, visitors would recreate using trails at the visitor contract station or visitor center (figure 2-8 and figure 2-9)." These figures pertain only to Alternatives 3A and 3B and do not specifically address cross-country skiing or snowshoeing. The VCP EIS mentions cross-country skiing in nearby Bandelier properties; however, the Bandelier area does not have the unique visual experience as the VG area. I believe that maintaining cross-country skiing and snowshoeing within the VG area is important. Cross-country skiing in the VG has been a tradition for surrounding residents; one might say it is one of our cultural values. Please provide more information on how winter activities will be accommodated. Can a cost-effective approach be used, such as self-registration/payment near the current VG Staging Area? This should allow winter sports access 7 days a week, instead of the current restricted schedule of weekends/holidays only, meeting the Need for Action of providing more spontaneous access.
101-W	Summary (p. ii)	This section references "our agency procedures for implementing NEPA." I could not locate these procedures on the web. Providing a link for these procedures would be helpful.
102-W	Section 1. Need (p. 1-11)	According to Section 1, part of the Need for Action is to meet the public request to have "more access, more spontaneous access, and more freedom to explore the preserve." Alternatives 3A and 4A, which rely on a limited

	Section	Comment
		shuttle system, do not provide "more spontaneous access and more freedom to explore the preserve." Section 4 (p. 4—18) describes the successful use of shuttles in other (crowded) National Parks. However, these shuttle systems are not equivalent to those proposed in the VCP EIS. The shuttles in the National Parks are frequent (the VCP EIS cites an example of every 10-15 minutes in Zion National Park) and traverse much of the park. In a number of the parks (e.g., Bryce) private cars may be used in addition to the shuttles. In contrast, the shuttles suggested for the VCP are very infrequent and only for limited activities. I have taken such a shuttle and, once you finished an activity, you face potentially long waits for the return of the shuttle. They do not provide for a "spontaneous" experience of the park. Limiting access to most of the park to a shuttle system should be considered only when visitation warrants a frequent, scheduled service that covers significant terrain . Therefore, Alternatives 3A and 4A do not meet the Need for Action of providing spontaneous access.
103-W	Section 2, Alternative 1	The VCP EIS identifies the VG as the preserve's "signature landscape." Since none of the alternatives provides more than token access to the VG area, at least the visitor center should have a view of it. Therefore, a visitor center at Banco Bonito is not acceptable. This area is heavily wooded and does not have views of the VG area.
104-W	Section 2 (p. 2-76)	The VCP EIS "acknowledges that it may not be able to obtain a single payment to implement the plan in its entirety, and that funding may be acquired over time instead." According to this section of the VCP EIS, the first step would be to remove the VG staging center. Because funding may not be available for some time to build other facilities, a better alternative would be to keep the current facilities at the VG support center to accommodate special programs on an as-needed basis. At a minimum, restrooms and the parking lot at the VG staging center could be used to support activities such as skiing. I, personally, do not find that the main building or restrooms at the VG Staging Center degrade my visual experience of the VCP. Nor does the VCP EIS provide evidence that it degrades the visual experience of other visitors.
105-W	Section 2 (p. 2-77)	Step 2 in the phased approach is to develop a visitor center and Step 3 is to develop a transportation center and other infrastructure. However, some of the Need for Action (e.g., more spontaneous access) could be met before a new infrastructure is built. Because funding for the infrastructure may take some time to obtain, the Trust should plan to begin to provide more access immediately. For example, skiing (and some hiking) could be expanded to 7 days a week using a self-registration/payment system without requiring additional infrastructure.

	Section	Comment
106-W	Section 2 Table 2-10	Table 2-10 (Comparison of Impacts) appears to show unmitigated impacts. Discussion within the table of the likelihood of the impact being mitigated or an equivalent table showing mitigated impacts would be helpful. For example, on pp. 2-67 and 2-68, the table shows that "major adverse" long-term impacts on cultural resources for all alternatives except the "no-action alternative." However, section 4 states Major adverse permanent impacts possible would be resolved through the Section 106 process (e.g., "data recovery excavations of archeological sites or detailed documentation of structures.") After mitigation, impacts should not be significant. It would be useful to include similar information in Table 2-10. Also, the terms Negligible, Minor, Moderate, and Major, which apply to adverse impacts, are not defined until Section 4. They should be defined in Section 1 or Section 4 should be referenced.
107-W	Section 4 (p. 4-3)	The definitions of adverse impacts (negligible, minor, moderate, major) appear very subjective and arbitrary. For example, a change in air quality may be measurable (analytical methods can measure to parts per million (or lower) levels) and slightly alter the composition of air without exceeding any state or federal standards or affecting the environment. Under the VCT criteria, the impact would be a "major adverse" impact. However, the change would not be significant. Better methods should be identified for measuring the significance of adverse impacts (e.g., state and federal standards, results of existing public surveys, etc.). Also, methods for identifying whether adverse impacts are acceptable should be identified. For example, a number of regulatory water quality requirements are identified in Section 4 in the Water subsection. However, the determination of adverse impacts does not evaluate whether standards and other requirements would be exceeded. No decibel requirements or goals are identified or evaluated in the Noise subsection. Etc.
108-W	Section 4 (p. 4-180)	For alternative 3B, the VCP EIS states that: "GHG emissions would increase from personal vehicle use in the preserve. It is anticipated that 120,000 people would visit the preserve annually, almost five times the number of visitors in 2010. It is estimated that GHG emissions from transportation of visitors within the preserve is currently 33 tons of CO2 per year. This would potentially increase to approximately 165 tons of CO2 annually based on current travel patterns within the preserve, representing a substantial increase over the preserve's existing carbon footprint and resulting in a major adverse long-term impact." However, the VCP EIS does not identify that any air quality standards will be exceeded due to vehicle-related emissions. Nor would this amount of carbon dioxide be significant compared to regional or global levels. The impact on global warming would be miniscule. Therefore, the conclusion that the increase in the carbon footprint would have a "major adverse" effect on programmatic and cumulative impacts is not supported.

109-W

Section	Comment
Section 4 (p. 4-188 and 4-189)	These pages enumerate the needs for additional VCT staffing, such as law enforcement, interpretive services, staff for visitor programs, maintenance, infrastructure, etc. The VCP EIS concludes that the impacts to the VCT's maintenance and operations staff and funds would be "major and adverse." This appears simply to be a funding issue and not the subject of an adverse environmental impact determination. This comment also applies to the same programmatic adverse determination made for some of the other alternatives.