

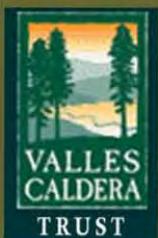
**V a l l e s
C a l d e r a
T r u s t**



**VOLUME 2:
APPENDICES**

**Final
Public Access
and Use Plan**

**Environmental
Impact
Statement**



October 15, 2012

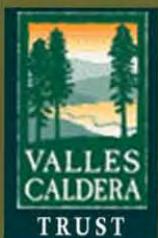
**V a l l e s
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**VOLUME 2:
APPENDIX A**

**Final
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October 15, 2012

Index of Agency Comments/Responses

Agency	Comment No.	Page No.
U.S. Environmental Protection Agency Rhonda Smith, Chief, Office of Planning and Coordination	A-1	1
U.S. Environmental Protection Agency Rhonda Smith, Chief, Office of Planning and Coordination	A-2	1
U.S. Environmental Protection Agency Rhonda Smith, Chief, Office of Planning and Coordination	A-3	1
U.S. Environmental Protection Agency Rhonda Smith, Chief, Office of Planning and Coordination	A-4	1
U.S. Environmental Protection Agency Rhonda Smith, Chief, Office of Planning and Coordination	A-5	1
U.S. Environmental Protection Agency Rhonda Smith, Chief, Office of Planning and Coordination	A-6	1
U.S. Environmental Protection Agency Rhonda Smith, Chief, Office of Planning and Coordination	A-7	1
U.S. Environmental Protection Agency Rhonda Smith, Chief, Office of Planning and Coordination	A-8	2
U.S. Environmental Protection Agency Rhonda Smith, Chief, Office of Planning and Coordination	A-9	2
U.S. Environmental Protection Agency Rhonda Smith, Chief, Office of Planning and Coordination	A-10	2
U.S. Environmental Protection Agency Rhonda Smith, Chief, Office of Planning and Coordination	A-11	2
State of New Mexico Department of Game & Fish Matt Wunder, Ph.D., Chief, Conservation Services Division	B-1	2
State of New Mexico Department of Game & Fish Matt Wunder, Ph.D., Chief, Conservation Services Division	B-2	3
State of New Mexico Department of Game & Fish Matt Wunder, Ph.D., Chief, Conservation Services Division	B-3	3
State of New Mexico Department of Game & Fish Matt Wunder, Ph.D., Chief, Conservation Services Division	B-4	3
State of New Mexico Department of Game & Fish Matt Wunder, Ph.D., Chief, Conservation Services Division	B-5	4
State of New Mexico Department of Game & Fish Matt Wunder, Ph.D., Chief, Conservation Services Division	B-6	4
State of New Mexico Department of Game & Fish Matt Wunder, Ph.D., Chief, Conservation Services Division	B-7	4
State of New Mexico Department of Game & Fish Matt Wunder, Ph.D., Chief, Conservation Services Division	B-8	5

Agency	Comment No.	Page No.
State of New Mexico Department of Game & Fish Matt Wunder, Ph.D., Chief, Conservation Services Division	B-9	5
State of New Mexico Department of Game & Fish Matt Wunder, Ph.D., Chief, Conservation Services Division	B-10	5
State of New Mexico Department of Game & Fish Matt Wunder, Ph.D., Chief, Conservation Services Division	B-11	5
Council of the Incorporated County of Los Alamos Harry Burgess, County Administrator	C-1	5
State of New Mexico Department of Cultural Affairs Historic Preservation Division Michelle M. Ensey, Archaeologist	D-1	5
Pueblo of Laguna Richard B. Luarkie, Governor	E-1	5
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-1	6
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-2	6
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-3	6
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-4	6
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-5	6
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-6	6
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-7	7
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-8	7
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-9	7
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-10	7
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-11	7
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-12	7
Walatowa Pueblo of Jemez Joshua Madalena, Governor	F-13	7
The Hopi Tribe Leigh J. Kuwanwisiwma, Director, Hopi Cultural Preservation Office	G-1	7

Agency	Comment No.	Page No.
The Hopi Tribe Leigh J. Kuwanwisiwma, Director, Hopi Cultural Preservation Office	G-2	7
The Hopi Tribe Leigh J. Kuwanwisiwma, Director, Hopi Cultural Preservation Office	G-3	8
The Hopi Tribe Leigh J. Kuwanwisiwma, Director, Hopi Cultural Preservation Office	G-4	8

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

No.	Affiliation	COMMENT	RESPONSE
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.

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

No.	Affiliation	COMMENT	RESPONSE
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 <i>Multiple Use and Sustained Yield of Forage Resources Environmental Assessment</i> .
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.

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

No.	Affiliation	COMMENT	RESPONSE
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.	<p>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.</p> <p>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.</p>
B-3	NM Dept Game and Fish	<p>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.</p> <p>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.</p>	<p>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).</p> <p>The EIS has been revised to include more information about the effects of recreationists on elk.</p>
B-4	NM Dept Game and Fish	<p>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).</p> <p>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.</p>	<p>The EIS has been revised to include more information about the effects of recreationists on elk.</p>

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

No.	Affiliation	COMMENT	RESPONSE
B-5	NM Dept Game and Fish	<p>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.</p>	<p>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.</p>
B-6	NM Dept Game and Fish	<p>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).</p> <p>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).</p> <p>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.</p>	<p>The EIS has been revised to include more information about the effects of recreationists on elk.</p>
B-7	NM Dept Game and Fish	<p>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.</p>	<p>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.</p> <p>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.</p>

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

No.	Affiliation	COMMENT	RESPONSE
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.

**Valles Caldera National Preserve
Public Access and Use Plan / Environmental Impact Statement (EIS)
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No.	Affiliation	COMMENT	RESPONSE
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 <i>Framework and Strategic Guidance for Comprehensive Management</i> (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 <i>Strategic Management Plan 2012 – 2018</i> 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.

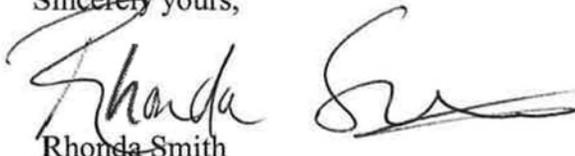
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EPA appreciates the opportunity to review the DEIS. Please send our office two copies of the FEIS when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Federal Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 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,

A handwritten signature in black ink, appearing to read "Rhonda Smith", written over a horizontal line.

Rhonda Smith
Chief, Office of Planning
and Coordination

Enclosure

**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.

GOVERNOR
Susana Martinez



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

Daniel E. Brooks, Deputy Director

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August 9, 2012

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

*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.

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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 4 gravel 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".

B-9 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 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 valleys 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 breathe 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

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COUNTY COUNCIL
Council Chair
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Geoff Rodgers
Michael E. Whemer
COUNTY ADMINISTRATOR
Harry Burgess

August 14, 2012

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

RECEIVED
AUG 16 2012
VALLES CALDERA TRUST

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**

D

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

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. On 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

RECEIVED

AUG 10 2012

VALLES CALDERA TRUST



PUEBLO OF LAGUNA

P.O. BOX 194
LAGUNA, NEW MEXICO 87026



E

Office of:

The Governor
The Secretary
The Treasurer

(505) 552-6598
(505) 552-6854
(505) 552-6856

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:

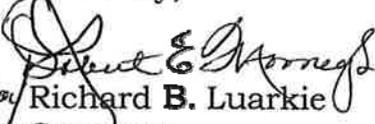
Re: PLAN 2 Six Alternatives for Development

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 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,


Gov Richard B. Luarkie
Governor
Pueblo of Laguna

RECEIVED

JUN 21 2012

VALLES CALDERA TRUST



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

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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 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-1

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

Office of the Governor

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.

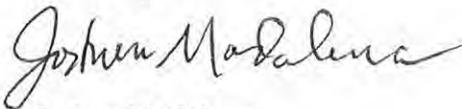
Alternatives 2, 3B and 4B propose access into the Preserve via personal vehicles and/or shuttles. The primary mode of transportation would be personal vehicles. Shuttles would only be used for tours and group events or to reduce congestion on high-use days. Alternatives 3A and 4A propose primary access 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.

Office of the Governor

- 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,

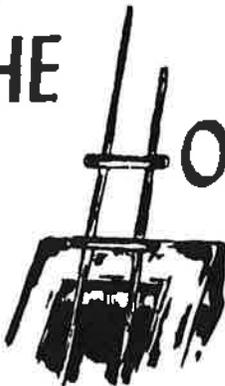


Joshua Madalena
Governor

Office of the Governor

4471 Highway 4, Box 100 • Jemez Pueblo • New Mexico • 87024
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THE HOPI TRIBE



G

LeRoy N. Shingoktewa
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.

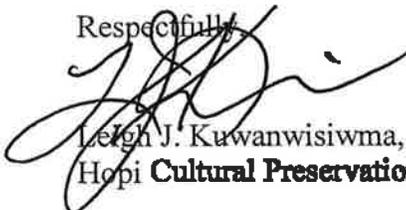
G-2 How does the Valles Caldera proposed to fund the alternatives? Will fees be imposed at the visitor portal?

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

Index of Public Comments/Responses

Name	Comment No.	Page No.
Altherr, Michael	1-W	1
Altshuler, Jean	2-W	1
Amsden, Dorothy	19-M	36
Andberg, Mike	3-W	2
Anonymous	42-M	38
Armstrong, Patty	4-W	2
Atencio, Leonard	5-W	3
Barnett, Betsy	6-W	3
Bartzel, Kristine	7-W	4
Beard, Sam	8-W	4
Brink, Keith	9-W	4
Brosnahan, Lynne	10-W	4
Broxon, Mildred	11-W	5
Bryan, Wilfred	12-W	5
Burris, Virginia	122-W	33
Caldwell, Amba	117-W	32
Caldwell, Marie	28-M	36
Calef, Barbara	123-W	34
Chandler, Colston	119-W	32
Chappell, Laurice	13-W	6
Cole, Valerie	1-M	34
Collins, G.	14-W	6
Condie, Carol	15-W	6
Day, David	16-W	6
Delamater, Yvonne	17-W	6
Delamater, Yvonne	18-W	7
Delamater, Yvonne	20-W	7
DiBello, Ed	19-W	7
Dillon, Christopher	125-W	34
Egan, Veronica	116-W	31
Ensslin, Norbert	13-M	35
Ensslin, Norbert	14-M	36
Fagioli, Richard	22-W	8

Name	Comment No.	Page No.
Feller, Kenny	23-W	8
Fessenden, Peter	24-W	8
Gallowa, Joy	25-W	9
Givens, R. LeRoy	26-W	9
Goforth, Linda	15-M	36
Goforth, Linda	16-M	36
Gunckel, Sue	27-W	9
Gustafson, Sarah	28-W	9
Gustafson, Sarah	29-W	9
Hoard, Dorothy	121-W	33
Huntley, Helen	124-W	34
Jacobson, Ed	30-W	9
Jacobson, Ed	31-W	10
Jacobson, Ed	32-W	11
Jacobson, Ed	33-W	12
Jennings, Jr., George	52-W	17
Jennings, Jr., George	22-M	36
Jervis, Tom	34-W	12
Jervis, Tom	35-W	13
Jervis, Tom	2-M	34
Jervis, Tom	3-M	34
Jervis, Tom	4-M	35
Jervis, Tom	5-M	35
Jervis, Tom	6-M	35
Jervis, Tom	7-M	35
Jervis, Tom	8-M	35
Jervis, Tom	9-M	35
Jervis, Tom	10-M	35
Jervis, Tom	11-M	35
Jervis, Tom	12-M	35
Jervis, Tom	36-M	37
Jervis, Tom	37-M	37
Kasaoka, Laurel	36-W	13
Koenigsberg, Nancy	37-W	13
Kresge, Rob and Julie	38-W	13

Name	Comment No.	Page No.
Kuhn, Leslie	39-W	14
Kutz, Julie	118-W	32
Lapatina, Deborah	40-W	15
Laskowski, Daniel	41-W	15
Lemons, Ross	42-W	15
Liddell, Judy	43-W	15
Liddell, Judy	38-M	37
Liddell, Judy	39-M	37
Liddell, Judy	40-M	37
Liddell, Judy	41-M	38
Linnel, Susan	44-W	16
Lundy, Dorothy	45-W	16
Machemehl, Brian	47-W	16
Machemehl, Craig	46-W	16
Mackey, Moe	48-W	16
Marr, Carol	50-W	16
McKenna, Rosemary	51-W	17
McWhorter, Shawn	25-M	36
Meyer, Kim	52-W	17
Mierzwa, John	53-W	17
Morris, Kathryn	54-W	17
Mulhouse, John	55-W	18
Naverez, Richard	56-W	18
Nichols, Brian	57-W	18
Nihlen, Ann	120-W	33
Nunez, Lorraine	58-W	19
O'Dowd, Charlie	59-W	19
Ostlie, Susan	60-W	19
Parque, Gary	61-W	19
Pettitt Venable, Mary	29-M	36
Phillips, Janet	62-W	20
Pisel, Terry	63-W	20
Poling, Mac	64-W	20
Public, Jean	65-W	20
R., P.	66-W	20

Name	Comment No.	Page No.
Ribe, Tom	67-W	20
Robinson, Pat	68-W	21
Ross, Sean	69-W	21
Ryti, Randall	30-M	36
Ryti, Randall	31-M	37
Sahd, Jay	70-W	21
Schillaci, Mario	26-M	36
Scranton, Coral	72-W	22
Seiser, Virginia	73-W	23
Shaw, Terry and Signe	74-W	23
Sherif, Elizabeth	75-W	24
Sherrard, Ann	98-W	27
Sherrard, Ann	99-W	27
Sherrard, Ann	100-W	27
Sherrard, Ann	101-W	28
Sherrard, Ann	102-W	28
Sherrard, Ann	103-W	28
Sherrard, Ann	104-W	28
Sherrard, Ann	105-W	28
Sherrard, Ann	106-W	29
Sherrard, Ann	107-W	29
Sherrard, Ann	108-W	30
Sherrard, Ann	109-W	30
Shurter, Sabine	78-W	24
Sibbets, Tina	111-W	30
Sibbets, Tina	112-W	30
Sibbets, Tina	113-W	30
Sibbets, Tina	114-W	30
Sibbets, Tina	115-W	31
Sigstedt, Thor	81-W	24
Smith, Carl	82-W	25
Soifer, Lea and David	83-W	25
Solomon, Anna Marie	84-W	25
Squires, Virginia	85-W	25
Stanhope, Cathy	86-W	25

Name	Comment No.	Page No.
Stewart, Kelly	87-W	25
Stribling, Marty	88-W	25
Thomson, Dave	27-M	36
Thorman, Carol	89-W	25
Thound, Al	90-W	25
Torney, David	91-W	25
Trolan, Therese	92-W	26
Turner, Ed	93-W	26
Visor, Suzanne	94-W	26
Walsh, Bob	18-M	36
Walthers, Charles	95-W	26
Walthers, Dianne	96-W	27
Wood, Nancy	97-W	27

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

No.	COMMENT	RESPONSE
1-W	<p>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.</p>	<p>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.</p>
2-W similar to 7-W	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
3-W	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>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.</p>
4-W	<p>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!</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
5-W	<p>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?</p>	<p>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.</p> <p>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.</p> <p>The list of cumulative actions on page 4-10 of the Draft EIS notes the road decommissioning activities the preserve is undertaking under a separate planning process; therefore, they are not included in the alternatives for this plan.</p> <p>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</p>
6-W	<p>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.</p>	<p>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.</p>

**Valles Caldera National Preserve
Public Access and Use Plan / Environmental Impact Statement (EIS)
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No.	COMMENT	RESPONSE
7-W	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p>
8-W	<p>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.</p>	<p>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.</p>
9-W	<p>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.</p>	<p>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.</p>
10-W similar to 7-W	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p>

**Valles Caldera National Preserve
Public Access and Use Plan / Environmental Impact Statement (EIS)
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No.	COMMENT	RESPONSE
11-W	<p>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.</p> <p>If you will have public access you may consider closing hunting, or people will be bagging tourists by mistake.</p> <p>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?</p> <p>--Thanks for getting back to me on this.</p>	<p>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.</p>
12-W	<p>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 "this certainly should be recognized as a major reason for preservation and access and in designing educational presentations for the Caldera.</p> <p>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.</p> <p>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.</p> <p>Other considerations:</p> <ol style="list-style-type: none"> 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 careful 	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

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

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.

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

No.	COMMENT	RESPONSE
18-W	<p>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.</p> <p>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.</p> <p>Subject: Call to Action from Caldera Action</p> <p>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.</p> <p>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.</p> <p>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</p> <p>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</p>	<p>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.</p> <p>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.</p>
19-W	<p>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.☐</p> <p>☐</p> <p>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.</p>	<p>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.</p>
20-W	<p>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</p>	<p>Thank you for submitting your comments.</p>

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

No.	COMMENT	RESPONSE
22-W	<p>I have carefully read the proposed alternatives and have the following concerns and suggestions:</p> <p>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:</p> <p>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).</p> <p>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:</p> <ol style="list-style-type: none"> 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. 	<p>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.</p>
23-W	<p>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.</p>	<p>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.</p>
24-W	<p>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,</p> <p>Visitor of that great resource 1965-2011</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
25-W	<p>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.</p> <p>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.</p>	<p>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.</p>
26-W	<p>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.</p>	<p>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.</p>
27-W	<p>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.</p> <p>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.</p>	<p>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 <i>Multiple Use and Sustained Yield of Forage Resources Environmental Assessment</i>. 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.</p>
28-W	<p>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.</p> <p>Thank you for the clear and concise EIS and opportunity to comment.</p>	<p>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.</p>
29-W	<p>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.</p>	<p>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.</p>
30-W	<p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
31-W	<p>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.</p> <p>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."</p> <p>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.</p> <p>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</p> <p>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</p>	<p>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.</p> <p>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.</p> <p>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.</p>

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

No.	COMMENT	RESPONSE
32-W	<p>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.</p> <ol style="list-style-type: none"> 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: <p>"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,"</p> <p>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.</p>	<p>Thank you for taking the time to read the Draft EIS and submit your detailed comments and suggestions.</p> <p>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.</p> <p>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.</p>

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

No.	COMMENT	RESPONSE
33-W	<p>On page 2-36, it is stated that "Hiking would be expanded to provide short day loops and multi-day backpacking opportunities."</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>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 . . ."</p> <p>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.</p> <p>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.</p>
34-W	<p>The caldera staff has received a number of comments advocating for expanded private vehicle access to the Preserve. It is important that we:</p> <p>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.</p> <p>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;</p> <p>send comments BEFORE TUESDAY, AUGUST 14TH.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
35-W	<p>Marie,</p> <p>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.</p> <p>Sincerely,</p> <p>Tom Jervis, President Caldera Action</p>	<p>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.</p>
36-W	<p>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.</p>	<p>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.</p>
37-W	<p>I recommend alternative 2; it provides access and minimizes impact. Thank you for the comprehensive descriptions of the alternatives and the opportunity to comment.</p>	<p>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.</p>
38-W	<p>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.</p> <p>Thanks for allowing/encouraging public comment. We look forward to seeing the place become a more integral part of the National Park System.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
39-W	<p>Dear Valles Caldera Trust,</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Thanks for your work on behalf of the Preserve, and for the opportunity to provide input!</p> <p>Sincerely, Leslie Kuhn, Ph.D.</p>	<p>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.</p> <p>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.</p>

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

No.	COMMENT	RESPONSE
40-W same as 7-W	<p>TO WHOM IT MAY CONCERN:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>My thanks,</p>	<p>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.</p>
41-W	<p>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.</p>	<p>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.</p>
42-W	<p>Dear Trustees,</p> <p>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."</p> <p>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.</p>	<p>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.</p>
43-W	<p>Attached are the comments from the New Mexico Audubon Council to the Public Use and Access Plan Draft Environmental Impact Statement.</p> <p>Thank you for the opportunity to provide input.</p> <p>Judy Liddell, President New Mexico Audubon Council</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
44-W	<p>Dear Ms. Rodrigues,</p> <p>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.</p> <p>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.</p>	<p>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.</p>
45-W	<p>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</p>	<p>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.</p>
46-W	<p>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.</p>	<p>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.</p>
47-W	<p>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.</p>	<p>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.</p>
48-W	<p>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.</p> <p>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.</p>	<p>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.</p>
50-W	<p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
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	<p>BUILD A MULTI-USE MOUNTAIN BIKE /HIKE /SKI /RUN /BACKPACK TRAIL NETWORK WITHIN, AROUND AND CIRCLING THE VCNP.</p> <p>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"?)</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Pro Outdoors!</p>	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	<p>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.</p> <p>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.</p>	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.

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

No.	COMMENT	RESPONSE
55-W	<p>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.</p> <p>Thank you for the opportunity to comment on potential development plans for this valuable wild area. I will look forward to the final decision.</p>	<p>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.</p>
56-W	<p>Review of the proposed EIS:</p> <ol style="list-style-type: none"> 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: <p>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.</p>	<p>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.</p> <p>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 the 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.</p> <p>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.</p> <p>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.</p>
57-W	<p>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.</p> <p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
58-W	<p>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.</p>	<p>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.</p>
59-W	<p>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.</p>	<p>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.</p>
60-W	<p>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.)</p> <p>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.</p>	<p>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.</p>
61-W	<p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
62-W	<p>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.</p> <p>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....</p> <p>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.</p> <p>Thank you for all the information and for soliciting input!</p>	<p>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.</p>
63-W	<p>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.</p>	<p>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.</p>
64-W	<p>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.</p>	<p>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.</p>
65-W	<ol style="list-style-type: none"> 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 	<p>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.</p>
66-W	<p>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.</p>	<p>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.</p>
67-W	<p>Please find attached our comments on the Public Access and Use DEIS.</p> <p>I will mail these also for your file.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
68-W	<p>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</p>	<p>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.</p> <p>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.</p>
69-W	<p>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.</p> <p>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.</p>	<p>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."</p> <p>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.</p>
70-W	<p>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.</p> <p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
72-W	<p>TO WHOM IT MAY CONCERN:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>My thanks,</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
73-W	<p>COMMENTS:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p> <p>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.</p> <p>Figure S9 was revised to help balance the visual emphasis. The error you note has been addressed.</p>
74-W	<p>We support the stewardship action proposed in the Draft Environmental Impact Statement with the exception of allowing motorized access to the preserve.</p> <p>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.</p> <p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
75-W	<p>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.</p> <p>I thank you for consideration of these comments -</p>	<p>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.</p>
78-W	<p>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-conscious 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.</p>	<p>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.</p> <p>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.</p>
81-W	<p>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 accessed 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 in, 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-steward 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!</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
82-W	<p>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.</p> <p>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</p>	<p>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.</p>
83-W	<p>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.</p>	<p>Thank you for your comment. The jurisdiction of the preserve's management is not within the scope of this project.</p>
84-W	<p>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, information on the history of the caldera, ranch and other information; I have lived since 1979 and have yet been on 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.</p>	<p>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.</p>
85-W	<p>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.....</p>	<p>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.</p>
86-W	<p>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!</p>	<p>Thank you for your comment.</p>
87-W	<p>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!</p>	<p>See comments 18-M through 31 -M.</p>
88-W	<p>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.</p>	<p>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.</p>
89-W	<p>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.</p>	<p>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.</p>
90-W	<p>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</p>	<p>Thank you for your comment.</p>
91-W	<p>I recommend Alternative 4A. This would minimize the adverse effects to the preserve. Plus, visitors would continue to be in the best of hands.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
92-W	<p>August 5, 2011</p> <p>TO WHOM IT MAY CONCERN:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p>
93-W	<p>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.</p>	<p>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.</p> <p>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.</p>
94-W	<p>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.</p>	<p>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.</p>
95-W	<p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
96-W	<p>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.</p> <p>I Like Alternative 2: In particular:</p> <ul style="list-style-type: none"> - 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. 	<p>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.</p>
97-W	<p>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.</p>	<p>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.</p>
98-W	<p>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.</p>	<p>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.</p> <p>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.</p>
99-W	<p>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.</p>	<p>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 Valle 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.</p>
100-W	<p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
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 Valle 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.

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

No.	COMMENT	RESPONSE
106-W	<p>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.</p>	<p>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.</p>
107-W	<p>(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.</p>	<p>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 <i>Predicting Impact of Noise on Recreationists</i>, 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 socioeconomic 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.</p> <p>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:</p> <ul style="list-style-type: none"> • 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.

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

No.	COMMENT	RESPONSE
108-W	<p>(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.</p>	<p>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.</p>
109-W	<p>(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.</p>	<p>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.</p>
111-W	<p>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.</p>	<p>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.</p>
112-W	<p>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.</p>	<p>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.</p> <p>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.</p>
113-W	<p>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.</p>	<p>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.</p>
114-W	<p>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?</p>	<p>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.</p>

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

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115-W	<p>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 trails 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.</p>	<p>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.</p>
116-W	<p>Dear Ms. Rodriguez,</p> <p>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.</p> <p>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.</p> <p>The hundreds of New Mexico and 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.</p> <p>Thank you for the opportunity to comment.</p> <p>Sincerely,</p>	<p>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.</p>

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

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117-W	<p>TO WHOM IT MAY CONCERN:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>My thanks,</p>	<p>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.</p>
118-W	<p>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.</p> <p>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.</p> <p>Thank you for considering my comments</p>	<p>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.</p>
119-W	<p>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.</p> <p>ATVs should be prohibited unless in small authorized groups and only if all ATVs are quiet--no loud ones ever.</p> <p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
120-W	<p>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 than a two lane road through the VC for endless private cars.</p> <p>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.</p> <p>So, please limit public vehicles in the Valles Caldera.</p>	<p>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.</p>
121-W	<p>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.</p>	<p>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.</p>
122-W	<p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
123-W	<p>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.</p> <p>I live in Los Alamos and spend many hours every week hiking or x-country skiing in this area.</p>	<p>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.</p>
124-W	<p>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.</p> <p>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.</p> <p>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.</p>	<p>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.</p>
125-W	<p>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.</p>	<p>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.</p>
1-M	<p>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.</p> <p>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.</p>	<p>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.</p>
2-M	<p>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.</p>	<p>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.</p>
3-M	<p>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.</p>	<p>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.</p>

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

No.	COMMENT	RESPONSE
4-M	<p>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.</p> <p>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.</p>	<p>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.</p>
5-M	<p>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.</p>	<p>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.</p>
6-M	<p>We note that you 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.)</p>	<p>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.</p>
7-M	<p>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.</p>	<p>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.</p>
8-M	<p>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.</p>	<p>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.</p>
9-M	<p>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.</p>	<p>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.</p>
10-M	<p>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.</p>	<p>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.</p>
11-M	<p>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.</p>	<p>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.</p>
12-M	<p>We further believe that a truly comprehensive management program/plan should precede further action on this and other initiatives.</p>	<p>Thank you for taking the time to read the Draft EIS and submit your comments.</p>
13-M	<p>Specifically, I would like to speak in favor of Alternative 3B.</p> <p>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.</p> <p>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.</p>	<p>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.</p>

**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 valleys 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
Public Access and Use Plan / Environmental Impact Statement (EIS)
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.	<p>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.</p> <p>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.</p>
36-M	<p>. . . 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;</p> <ul style="list-style-type: none"> • 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
Public Access and Use Plan / Environmental Impact Statement (EIS)
Public Comments on Draft EIS**

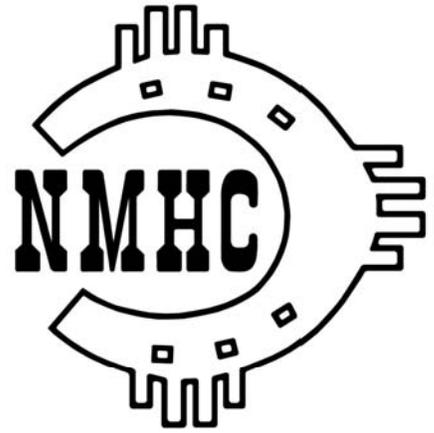
No.	COMMENT	RESPONSE
41-M	<p>We agree with the premise that the view of the Valle Grande should not be encumbered by visible facilities and that dust from traffic on the Preserve roads, particularly from private vehicles, is a further encumbrance on the viewscape.</p> <ul style="list-style-type: none"> 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. <p>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;</p>	<p>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.</p>
42-M	<p>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.</p>	<p>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.</p> <p>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.</p>

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

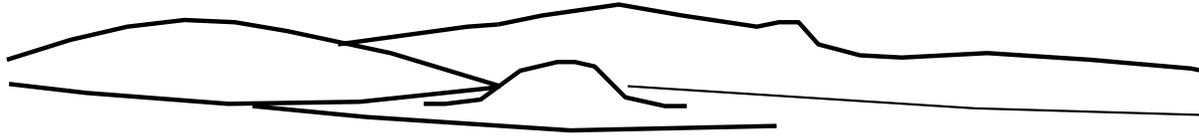
Subject: Valles Caldera Draft Environmental Assessment Alternatives

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 you 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 valleys 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

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 tremendous 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.

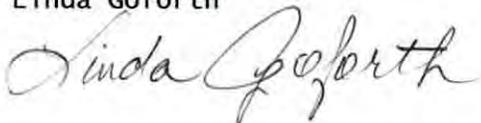
16-M

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 is magnificent when pristine, and unlike most areas other than those in a wilderness.

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

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

August 7, 2012

2012 Aug 7_VCNP Public Comment Report to Co.Council

Page 1 of 6

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

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

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

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
505-872-1588

Resident in Los Alamos since 1949

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

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

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

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@triatomix.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!

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

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.

37-M 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;

- 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 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).

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
	<p>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.</p>
103-W	<p>Section 2, Alternative 1</p> <p>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.</p>
104-W	<p>Section 2 (p. 2-76)</p> <p>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.</p>
105-W	<p>Section 2 (p. 2-77)</p> <p>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.</p>

106-W

Section	Comment
Section 2 Table 2-10	<p>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.</p> <p>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.</p>
107-W Section 4 (p. 4-3)	<p>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.</p>
108-W Section 4 (p. 4-180)	<p>For alternative 3B, the VCP EIS states that:</p> <p>“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.”</p> <p>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.</p>

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.

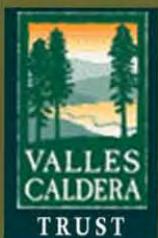
**V a l l e s
C a l d e r a
T r u s t**



**VOLUME 2:
APPENDIX B**

**Final
Public Access
and Use Plan**

**Environmental
Impact
Statement**



October 15, 2012

Errata Sheet

Revisions, Corrections, and Clarifications to the Valles Caldera Public Access and Use Plan Draft Environmental Impact Statement

In June 2012, the Valles Caldera National Preserve released the *Draft Public Access and Use Plan/Environmental Impact Statement* (EIS) for public and agency review. This errata sheet indicates changes that were made to the Final EIS as a result of comments received on the Draft EIS by the Valles Caldera Trust (VCT).

The pages that follow describe minor changes made to the Draft EIS text. In some instances, changes were made to whole sections of chapters. Those sections are being released in their entirety as separate files in order to preserve the context of those sections for the reader and are not included in this errata sheet. Those sections include:

- Summary
- New mitigation in chapter 2
- New text identifying the agency preferred and the environmentally preferred alternatives in chapter 2
- Updated information and analysis for:
 - Fish and Wildlife (elk and mule deer), chapters 3 and 4
 - Environmental Justice, chapter 4
 - Carbon Footprint and Air Quality, chapter 4
- Chapter 5 (updates to public involvement)

Revisions are shown in red in the text that follows. Additions are underlined and deleted text is crossed out.

Chapter 2: Alternatives

Page 2-1: Revise first sentence as follows: This “Alternatives” chapter describes the alternatives considered for the plan, including the recommended preferred alternative, the environmentally preferred alternative, and those eliminated from further analysis in this EIS.

Page 2-7: Under **Alternative 2: Banco Bonito Visitor Contact Station** replace the third sentence as follows:

~~Nonmotorized access from the visitor contact station would be generally open and unlimited. There is an existing network of trails leading from this location, and visitors could generally enjoy open and unlimited nonmotorized use of these trails. Ancillary infrastructure such as restrooms and picnic areas would also be developed in the area surrounding the visitor contact station. Over time, an interior route would be developed to expand access throughout the preserve.~~

Page 2-20: Revise Table 2-3, second column, sixth sentence to include the word “constructed”: Incorporate natural remediation, such as constructed wetlands.

Page 2-26: Under “Use of Wetlands,” revise first sentence by deleting “existing or” as follows: The design would use ~~existing or~~ constructed wetlands for wastewater treatment....

Page 2-30, Table 2-5: Summary of Alternative 2 Components: Second column, insert new text as follows for “Day-use recreation amenities”: Minimal development; nonmotorized recreational access from visitor contact station (e.g., hiking, biking, horseback riding) would be generally open and unlimited on the existing trail network in the vicinity (except for site-specific or seasonal restrictions for resource protection).

Also, second column, insert new text as follows for “Recreational amenities”: From the visitor contact station: Americans with Disabilities Act (ADA)-compliant day-use area, including fishing access, . . .

Page 2-35: Insert new text to the end of fifth sentence, first paragraph: This level of development is expected to accommodate approximately 50,000 visitors annually, or about 330 visitors per day during the summer recreation season on weekends and 165 per day on weekdays.

Page 2-36: Replace first sentence of third full paragraph as for page 2-7.

Page 2-39, Table 2-6: Summary of Alternative 3A Components: Add the following text to the end of the third bullet: visitors could generally have open and unlimited nonmotorized use of the existing network of trails at this location

Page 2-39, second paragraph: Insert the following text after the second sentence: Approximately 790 visitors are expected each day on weekends, and 395 on weekdays.

Page 2-41, last paragraph: Insert new text at the end of the second sentence as for page 2-38, Table 2-6.

Page 2-49, first full paragraph: Insert new text after the third sentence: Approximately 790 visitors are expected each day on weekends, and 395 on weekdays.

Page 2-63, Table 2-11: Summary of Environmental Consequences, Fish and Wildlife: Change long-term implementation level impacts for Alternative 2 from moderate to minor. Change programmatic level short-term impacts for Fish and Wildlife for Alternative 3B from moderate to minor to moderate.

Page 2-66, Table 2-11: Summary of Environmental Consequences, Water: Change Alternative 3A, Summary of Impacts, first sentence as follows: ~~Between 0.5 and 1 acre of wet meadows could~~Up to 7.8 acres of wetlands would be directly affected by the construction of new access road and facilities. Up to 1,379 feet at two stream crossings could be affected by the construction of the access road and facilities.

Also change Alternative 4A, Summary of Impacts, first sentence as follows: ~~Construction of visitor center and facilities could affect wet meadows.~~Up to 1.8 acres of wetlands would be directly affected by the construction of the access road and facilities. Up to 504 feet at one stream crossing could be affected by the construction of the access road and facilities.

Page 2-67, Table 2-11: Summary of Environmental Consequences, Cultural Resources: Change all long-term impacts from major adverse to localized, major adverse.

Page 2-70, Table 2-11: Summary of Environmental Consequences, Carbon Footprint/Air Quality: Delete “**adverse**” under Alternative I, Programmatic, both short and long term and change cumulative from moderate to **minor**. For all remaining alternatives, change all long term impacts to **negligible** and all cumulative impacts to **minor**.

Page 2-72, Table 2-11: Summary of Environmental Consequences: Add the following note to the end of the table: **Negligible: The magnitude of change would not be measurable. Minor: Changes would be measurable but would not alter the structure, composition, or function of the resource and would be limited in context. Moderate: Changes would be measurable and may influence the structure, composition, or function of the resource but would be limited in context. Major: Changes would be measurable, would substantially alter the structure, composition, or function of the resource, and may be extensive in context.**

Chapter 3: Affected Environment

Page 3-11: Insert new text after second sentence of first paragraph: **Elk hunting and viewing are among the greatest attractions at the preserve (VCT 2005i).**

Page 3-98: Lead-in sentence to last set of bullets, change **Three** to **Four** and add **Jemez Mountains salamander (*Plethodon neomexicanus*)** to the bulleted list.

Page 311-312: Move Jemez Mountains Salamander discussion to page 3-104 following New Mexico Meadow Jumping Mouse—Federal Candidate to list the salamander as a Federal Candidate.

Page 3-105, Table 3-12: State Threatened and Endangered Animal Species Documented as Present in Sandoval and Rio Arriba Counties: Add **Jemez Mountains salamander, *Plethodon neomexicanus*, Endangered** to the list of amphibians.

Page 3-108: Last sentence above Table 3-13, insert **Jemez Mountains salamander** following spotted bat.

Page 3-191: Insert new text and table above Limited English Proficiency:

Table 3-35 shows the percentages of minority populations living below the poverty level in 2010 based on U.S. Census data.

Table 3-35: Minority Populations below Poverty Level 2010

Jurisdiction	Native American	Hispanic	Black
Sandoval County	23.0%	13.5%	6.7%
Rio Arriba County	17.7%	20.4%	ND
Los Alamos County	ND	1.5%	ND
New Mexico	31.5%	23.1%	23.6%

Source: U.S. Census Bureau n.d.

ND = no data available.

Page 3-192, Carbon Footprint and Air Quality: After the first sentence, insert new text: **Rising temperatures may, in turn, produce changes in weather, sea levels, and land use patterns, commonly referred to as “climate change.”**

Chapter 4

Page 4-3: Insert the word “substantially” into the definition of Major: Changes would be measurable, would substantially alter the structure, composition, or function of the resource, and may be extensive in context.

Page 4-6, Table 4-1: Cumulative Actions: Insert new row following NMDOT:

NMDGF / Past (late 1990s- early 2000s) / NMDGF reduced elk herd size in Jemez Mountains; this reduced the herd size in the Jemez Mountains from 7,000-9,000 to the current number of 4,000-6,000. / Regional, Preserve / Fish and Wildlife

Page 4-7, Table 4-1: Cumulative Actions, last row (N/A), move text to third column from page 3-95, fourth paragraph: The recent Los Conchas fire likely expanded favorable habitat by restoring meadow habitats on the forested domes on the eastern third of the preserve, although it is too recent to quantify this supposition.

Page 4-14: Revise first paragraph, third sentence as follows: Nonmotorized access from the visitor contact station to the existing network of trails in the area would be generally open and unlimited.

Page 4-14: Insert new paragraph after paragraph four:

As noted in chapter 3, the lack of adequate infrastructure continues to be the biggest challenge for winter recreation. The visitor contact station would provide a location for winter recreationists to assemble for guided winter activities provided by the trust. Winter recreationists would also be able to snowshoe and ski on the trails in proximity to the visitor contact station.

Page 4-15: Insert new paragraph before last one:

Hikers and winter recreationists would continue to use Valle Grande and Coyote Call trails accessible from NM-4. Details at the programmatic level would be refined in future planning, which would more fully address winter recreational activities at the preserve that have proven to be popular. At that time, the trust would consider expanding winter recreational opportunities, such as snowshoeing and cross-country skiing.

Page 4-17: Last paragraph before Programmatic Level, insert new text and revise last sentence:

The visitor center would provide a location for winter recreationists to assemble for guided winter activities provided by the trust, and would provide access to snowshoe and cross-country ski trails directly from the building. The result would be ~~,-resulting in a long-term~~ beneficial impact on visitor experience.

Page 4-17: Second paragraph under Programmatic Level, add new text to end of second sentence: Visitors would be able to bike into the preserve along a dedicated bike path, and drive personal vehicles to the Banco Bonito Staging Area for horseback riding and special events on the existing network of trails in the area.

Also add the following text to the end of the same paragraph: Winter recreationists would continue to use Valle Grande and Coyote Call trails accessible from NM-4. Details at the programmatic level would be refined in future planning, which would more fully address winter recreational activities at the preserve that have proven to be popular. At that time, the trust

would consider expanding winter recreational opportunities, such as snowshoeing and cross-country skiing.

Page 4-19: Insert new paragraph above first full paragraph:

An assessment of visitor satisfaction with public transportation services at Denali National Park and Preserve, where visitor access to the park's interior is controlled, found that the majority of visitors (71 percent) found the shuttles a "good" or "excellent" place for viewing wildlife. Eighty-seven percent said that wildlife observations from the bus was a factor that contributed to satisfaction regarding the transportation system. Seventy-two percent agreed that the bus provided freedom to view the park instead of focusing on driving, which also contributed to visitor satisfaction. Overall, 79 percent agreed or strongly agreed that the transportation service buses enhanced their visit to the park, and 88 percent rated the bus service good to excellent. Authors of the assessment concluded that "the transportation system in Denali not only allows visitors to experience the wild beauty of the park and its wildlife, but also affords a high degree of resource protection and visitor safety" (Miller and Wright 1999).

Page 4-22: First paragraph, insert new text after the second sentence: The visitor center would provide a location for winter recreationists to assemble for guided winter activities provided by the trust, and would provide access to snowshoe and cross-country ski trails directly from the building.

Page 4-26: Last paragraph, revise the last sentence as follows: Nonmotorized access from the visitor contact station to the existing network of trails in the area would be generally open and unlimited.

Page 4-42: First paragraph, delete the last part of the fourth sentence: Vehicles would be concentrated at parking areas near high-use recreation sites, but would also be visible in small quantities in the preserve's more primitive areas ~~where access would be limited primarily by a vehicle's compatibility with road levels (e.g., 4 wheel drive vehicles on Level 2 roads).~~

Page 4-46: First paragraph, first sentence, insert new text in the parenthesis: (e.g., constructed wetlands)

Page 4-88: Insert the following paragraph after the first paragraph for Jemez Mountains Salamander:

Landscape restoration treatments proposed under the 2010 Southwest Jemez Mountains Collaborative Forest Landscape Restoration "will maintain or improve habitat for Jemez Mountain salamander in selected locations within approximately 18,000 acres of occupied or potential habitat, such as by increasing the amount of downed logs and reducing the risk of stand-replacing fires" (USFS 2010d). The result would be a beneficial impact on the salamander in the future.

Page 4-89: Revise the third and fourth sentences of the first paragraph as follows:

Golden eagles ~~would be adversely impacted by deconstruction and construction activities; however, S~~urveys for bald and golden eagle nests would be conducted prior to ~~deconstruction and construction activities~~ these actions. These activities would also be scheduled ~~to occur outside of breeding and nesting, as well as migration, seasons to the extent possible~~ to avoid impacts on special-status species, including migratory birds.

Page 4-92: Revise second paragraph as follows:

Surveys for ~~bald and~~ golden eagle nests would be conducted prior to deconstruction and construction activities. ~~If any nests are found, they would be relocated. The VCT would allow a 660-foot buffer between the nest or key use areas and the use of heavy equipment or land clearing. These activities would also be scheduled occur outside of breeding and nesting, as well as migration, seasons to the extent possible~~ to avoid impacts on special-status species, including migratory birds.

Page 4-93: Second full paragraph, second sentence, replace ~~habitat~~ with wildlife.

Page 4-94: Delete text from second paragraph, first sentence as follows:

More unlimited access via personal vehicle—~~for instance, the use of 4-wheel-drive vehicles to access remote locations~~—could result in increased collection of special-status species, such as the wood lily, or illegal hunting of special-status species.

Page 4-95: Revise third paragraph as described for page 4-92.

Page 4-113: Insert new text after the first paragraph under Methodology for Analyzing Impacts:

The area of impact for the Waters of the U.S. was determined through geographic information system (GIS) analysis of the wetland or stream locations within the construction limits of the project alternatives. Digitized spatial data of potential wetland areas (wetlands, wet meadows, and montane riparian shrublands) at a 3-meter resolution were used to determine a maximum potential area of impact to wetland habitat types. Streams impacts assumed full roadways at crossings. Actual impact values are anticipated to be lower with delineations, culvert planning, and incorporation of avoidance and minimization measures during development of final design.

Page 4-118: First full paragraph change first sentence as follows: ~~Between 0.5 and 1.0 acre of wet meadows~~ Up to 7.8 acres of wetlands would be directly affected by the construction of the access road and other facilities.

Page 4-118: First full paragraph, change last sentence as follows: Assuming that the wetlands, wet meadows, and montane riparian shrublands ~~would~~ qualify as wetlands regulated under Section 404 of the Clean Water Act, these impacts would be avoided and minimized to the greatest extent practicable. ~~Remaining impacts that could not be avoided or minimized would need to be compensated~~ Unavoidable impacts will be fully mitigated on-site with restoration of in-kind resources.

Page 4-118: Second full paragraph, insert new text before first sentence: Up to 1,379 feet at two stream crossings potentially could be affected by the construction of the access road and facilities.

Page 4-122: Second full paragraph, replace first two sentences as follows:

~~Long-term water resource impacts from this alternative would be similar to those under alternative 3A, with a similar-sized visitor center, parking, picnic area, and trails. However, the access road from NM-4 would be substantially shorter, and the construction of the facility would require cutting into a slope. Several wetlands are located near the treeline that could be affected by trail or utility construction. Also, several wet meadows could be affected by parking lot and access road construction. Long-term water resource impacts from this alternative would be less than those under alternative 3A, because the access road to NM-4 would be substantially~~

shorter. Up to 1.8 acres of wetlands would be directly affected by the construction of the access road and facilities. Up to 504 feet at one stream crossing potentially could be affected.

Page 4-122: Second full paragraph, insert new text to the end of the third sentence as follows: However, in accordance with federal policies and regulations, the VCT would avoid impacts on streams and wetlands to the greatest extent practicable and would fully mitigate unavoidable impacts.

Page 4-142: Alternative 2 Summary Table: Intensity column both implementation and programmatic level rows, insert Localized before Major.

Page 4-142: First paragraph under Alternative 2, insert new text to last sentence as follows: Nonmotorized access from the visitor contact station to the existing network of trails in the area would be generally open and unlimited, but no motorized off-road access would be permitted.

Page 4-143: Second full paragraph, last two sentences: Insert localized before major and delete and mitigate impacts to a less than significant level.

Page 4-144: Revise fourth paragraph, last two sentences as for page 4-143.

Page 4-145: Revise Alternative 3A Summary Table as for page 4-142.

Page 4-146: Revise first full paragraph, last two sentences as for page 4-143.

Page 4-146: Last paragraph, revise as for page 4-143.

Page 4-147: Revise Alternative 3B Summary Table as for page 4-142.

Page 4-147: First paragraph under alternative 3B, last sentence, revise as for page 4-143.

Page 4-147: Revise last paragraph, last two sentences as for page 4-143.

Page 4-148: Revise Alternative 4A Summary Table as for page 4-142.

Page 4-148 — 4-149: Revise first two sentences top of page 4-149 as for page 4-143.

Page 4-149: Revise third full paragraph as for page 4-143.

Page 4-150: Revise Alternative 4B Summary Table as for page 4-142.

Page 4-150: Revise first paragraph, last sentence as for page 4-143.

Page 4-150: Revise second paragraph, last two sentences as for page 4-143.

Page 4-155: Revise full first sentence as for page 4-26.

Page 4-185: Revise third full paragraph, last sentence, as for page 4-26.

Page 4-194: Revise fourth bullet as follows:

- Fish and Wildlife, Special-status Species: Increased visitor use may result in habitat fragmentation, may adversely affect habitat use and migration patterns by some wildlife species, and may increase the risk of animal/vehicle collisions, resulting in direct mortality to elk and other species. Conversely, some wildlife may be attracted to human presence and new sources of food. An increase in the number of anglers could impact special-status fish through direct mortality, and could disturb special-status species that

inhabit wetlands and aquatic areas. Increased visitation may also adversely affect elk calving through disturbance or disruption.

Page 4-194: Revise second sentence of last bullet as follows: ~~Between 0.5 and 1.0 acre of wet meadows~~ Up to 7.8 acres of wetlands would be directly affected by the construction of the access road and other facilities.

Page 4-195: Insert new first sentence for third bullet as follows: Up to 1,379 feet at two stream crossings potentially could be affected by the construction of the access road and facilities. . . .

Page 4-195: Revise last sentence of second bullet under Alternative 3: Entrada del Valle Visitor Center — Primary Access via Personal Vehicle as follows for page 4-94.

Page 4-196: Revise third bullet, last sentence as follows: ~~Several slope wetlands, which are relatively rare in the southern Rocky Mountains, could be affected by trail or utility construction.~~ Up to 1.8 acres of wetlands would be directly affected by the construction of the access road and facilities.

Page 4-196: Insert new bullet after third bullet under Alternative 4A: Vista del Valle Visitor Center — Primary Access via Shuttle System:

- Water: Up to 504 feet at one stream crossing potentially could be affected by the construction of the access road and facilities.

Page 4-197: Insert new text to last sentence of second full paragraph: These impacts would be mitigated to the extent possible as described in chapter 2.

Page 4-197: Revise third and fourth bullets as follows:

- Surveys for ~~bald and~~ golden eagle nests would be conducted prior to short-term deconstruction and construction activities. ~~If any nests are found, they would be relocated. These activities would also occur outside of breeding, nesting, and migration seasons to the extent possible. The VCT would allow a 660-foot buffer between the nest or key use areas and the use of heavy equipment or land clearing.~~ Therefore, short-term uses of the environment for deconstruction and construction activities would not affect the long-term sustainability of ~~bald and~~ golden eagles.
- The construction of the visitor contact station would result in permanent impacts on approximately 3.0 acres of grassland and forest habitat, which would displace a variety of wildlife. Mitigation measures described in chapter 2 would be implemented to minimize impacts to wildlife, including elk, and special-status species to the extent possible. ~~However, considerable habitat exists throughout the preserve to provide continued long-term sustainability of wildlife and special-status species.~~

Page 4-199: Insert new first sentence to second full paragraph (under Alternative 2: Banco Bonito Visitor Contact Station): Direct mortality would occur to individuals of some wildlife and special-status species.

Page 4-199 — 4-200: Insert the following new text to the first sentence to the last four paragraphs: The potential for some irreversible and irretrievable impacts on cultural resources and wildlife/special-status species would be expected,

Appendix B - Errata

Section Change – Chapter 2, New Mitigation

(Revisions are shown in red in the text that follows. Additions are underlined and deleted text is crossed out.)

existing temporary facilities, which would be removed, would not be replaced. Visitors would still be able to hike the trails located at Rabbit Mountain without a permit or fee. However, spontaneous access to the majority of the preserve would be limited. The VCT would continue to conduct fee-based tours and activities on a scheduled basis. Additional orientation and interpretive information would not be provided other than what is available on the website or at the Jemez Springs administrative facility. Existing highway signs would remain limited to interpretive exhibits along NM-4 pullouts. No improvements would be made to roads or parking facilities. Access for the grazing program would continue, but the VCT would not enter into any new agreements or grants. The current tribal access policy would continue.

Implementation Decisions

Temporary facilities established in support of interim programs would be removed.

Programmatic Decisions

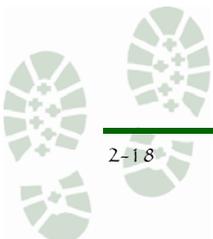
Current access through staging areas, as well as interim programs and activities, would be phased out.

Elements Common to All Action Alternatives

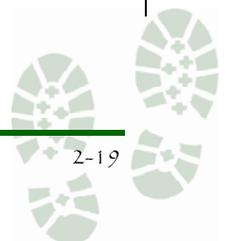
Performance Requirements

All the proposed action alternatives would include the following elements and performance requirements considered.

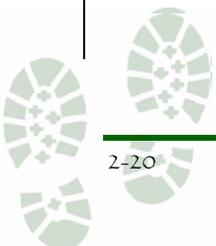
- The current interim recreation program would continue in the short term as infrastructure and facilities are developed and a transition is made to the selected alternative.
- The VCT's facilities at Jemez Springs would continue to provide ancillary support to visitors, particularly to visitors arriving from the south.
- Each action alternative would include space for maintenance activities within the footprint of the visitor contact station / visitor center. This area may be incorporated into the main structure and would have a separate entry. The area would not likely be larger than 300 square feet. Details would be determined during design.
- ~~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.~~
- Each action alternative would include an upgraded public road to the visitor contact station / visitor center and farther into the preserve to varying degrees. These roads would be upgraded to Level 4, which provides a moderate degree of comfort and convenience at moderate travel speeds (see the "Transportation" section of chapter 3 for a definition of USFS road levels). Currently, all roads in the preserve are Level 1 through 3; no Level 4 roads exist. All other roads would remain at their current level.



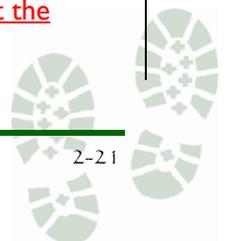
- Each action alternative would include an entry portal. Before reaching this gateway, visitors would be provided clear direction by well-placed signs along NM-4. The entry roads would include appropriate traffic controls (e.g., acceleration and deceleration lanes) so visitors can enter and exit with safety and convenience (USFS 2001).
- During winter, visitors would recreate using trails at the visitor contact station or visitor center ~~(figure 2-8 and figure 2-9)~~.
- Design of new facilities would comply with requirements of the Americans with Disabilities Act (ADA).
- The USFS has identified sustainable design concepts for lands in its jurisdiction. The design of the visitor center and/or visitor contact station structure, as well as the affected landscape as a whole, would incorporate principles of sustainable design, described in more detail below.
- The VCT will also implement the following mitigation measures:
 - Conduct construction and waste disposal activities in accordance with applicable local, state, and federal statutes and regulations.
 - Implement best management practices as defined under the NMED Air Quality Bureau San Juan Voluntary Innovative Strategies for Today's Air Standards program, a voluntary emission control program to help improve air quality.
 - Prepare a construction emissions mitigation plan, which will include use of cleaner fuels, such as low-sulfur diesel, in construction equipment.
 - Prevent wildlife from consuming artificial food sources, implement regulatory actions, provide information and education to visitors, control any problem animals, and conduct research and monitoring to help prevent wildlife from becoming conditioned to human foods.
 - Influence visitor behavior toward wildlife through education and interpretation programs.
 - Site new visitor recreational facilities to avoid or minimize wildlife critical life stage habitat, water and forage resources, wildlife travel corridors, and escape terrain.
 - Define minimum approach distances between visitors and wildlife based on wildlife flight distances; for both roadways and non-motorized trails.
 - Implement area closures, including roads and trails, when necessary to protect wildlife, particularly during critical life stages such as calving and rut. Consider limiting the number of recreationists on trails or using specific facilities if warranted to protect wildlife.



- Route recreation facilities and activities away from key elk foraging areas and reduce human intrusions into areas where ungulates are limited or areas of high quality habitat.
- Establish designated travel routes to make human use of elk wintering areas as predictable as possible.
- Monitor elk use of areas that receive high winter use by skiers and snowshoers.
- Enforce travel restrictions on ungulate winter ranges and use signs to inform users of the importance of ungulate winter range and to keep a specific distance away from elk and deer.
- Use signs to inform users of the importance of keeping a distance from elk calving areas.
- Retain important vegetative cover for elk and mule deer.
- Incorporate blinds or visibility shields to reduce human intrusions on elk activity while facilitating visitor viewing.
- Consider creating recreation zones to allow certain recreational activities in some areas but not in others.
- Conduct surveys for golden eagle nests in suitable habitat prior to short-term deconstruction and construction activities. Allow a 660-foot buffer between the nest or key use areas and the use of heavy equipment or land clearing.
- Evaluate and monitor wildlife impacts and apply adaptive management to address recreation and wildlife concerns as needed; (e.g., spatially and temporally separate humans and wildlife from key areas at critical times by closing roads or trails, changing access points, and/or implementing a zoning strategy in which recreational uses are allowed in carefully selected areas).
- Conduct surveys for Jemez Mountain salamanders or suitable habitat characteristics prior to activities proposed in potentially suitable salamander habitat. If any salamanders are found, the VCT will consult with the USFWS on the potential impacts and the following mitigation measures:
 - Avoid the activity at those locations during the time of the salamander's highest activity when conditions are saturated during summer monsoonal rains, approximately mid-July through August.
 - Avoid ground disturbance at those locations such as excavation, churning, compaction, or any activity that reduces interspaces and subsurface channels to the extent practicable.



- Avoid vegetation modification at those locations to the extent that ground surface microclimate is made drier or otherwise altered through increased exposure to sun and wind.
- Consult with the New Mexico Endemic Salamander Team to define appropriate and feasible site-specific mitigation methods for potential impacts.
- Adopt mitigation measures to minimize the potential for downslope erosion near NM-4 that could occur from underpass and highway lane modifications.
- Implement a stormwater pollution prevention plan to address potential impacts from stormwater flowing over construction sites, resulting in no change to the long-term sustainability of the preserve's water resources from construction-related activities. The plan would also address mitigation for soil disturbance and dust generation during construction and during the removal of the existing facilities.
- Avoid impacts to streams and wetlands where practicable and minimize impacts where unavoidable; incorporate avoidance and minimization measures into final design. Where practicable, active restoration of wetlands and streams will be incorporated as construction tasks. Unavoidable impacts will be fully mitigated on-site with restoration of in-kind resources.
- Conduct wetland determinations and delineations prior to final design. Develop culvert plans for drainage crossings during final design.
- Identify an area of potential effects for the proposed visitor contact station, parking lots, picnic areas, and road improvements would be identified and the Section 106 process completed to assess the effects of the construction and use of the new visitor facilities and removal of the staging areas on cultural resources.
- Notify appropriate Pueblos or Tribes if any new cultural resources sites are discovered or artifacts removed, and provide photographs of any such items.
- Work with local Tribes and Pueblos to identify methods of sustaining on-site visits for cultural and religious practices without interference from increased public visitation, as well as identify and protect areas where Tribes and Pueblos gather important medicinal plants, herbs, and other resources.
- Investigate the possibility of employing "Cultural Guides" from the local Tribes and Pueblos to provide educational services at the visitor contact station and vicinity.



- Continue to implement mitigation measures defined in previous plans, including its Framework and Strategic Guidance for Comprehensive Management (VCT 2005i):
 - Apply restrictions on visitor use to avoid conflict with episodic wildlife needs (e.g., elk calving, foraging of certain migrating raptors), weather conditions, or preserve programs (e.g., elk hunts, livestock management, fishing).
 - Consider “quiet times” — respites from all or most visitor disturbances.
 - Monitor impacts of visitor activities and subsequently modify activities through adaptive management if needed.

Sustainable Design

Sustainable construction can lessen impacts on the environment through green building and by integrating the building into natural systems and the region’s particular environment. Green buildings typically use 30 percent less energy than conventional buildings, primarily due to reduced electricity purchases and reduced peak energy demand. The financial benefits of reduced consumption equal or exceed the average additional cost associated with sustainable building (Kats 2003b). For the USFS, sustainability “considers energy conservation at every level, from the energy required to transport materials to the energy consumed by heating, cooling, lighting, and maintaining a structure” (USFS 2001).

USFS sustainable design guidelines note that “visitors to national forests expect to see natural-appearing landscapes. To fulfill those expectations, Forest Service facilities should harmonize with their landscape settings.” In this regard, sustainability responds primarily to three contexts (USFS 2001), which include the following:

- **ecological**—the natural forces that shape landscape, including climate, geology, soils, water, elevation, and vegetation
- **cultural**—the human forces that shape and define the landscape, including history, development patterns, agriculture, and social uses
- **economic**—the budget realities and cost-saving considerations that shape the built environment

The USFS has identified eight geographic areas based on the contexts of ecology and culture. Valles Caldera National Preserve is located in the Rocky Mountain Province, which is characterized by sparse rainfall, low humidity, abundant and intense sunlight, dramatic freeze/thaw cycles, visible geology (e.g., rock outcrops), long vistas with dramatic views, wide open landscapes, high winds, thin soils, less diverse vegetation, mountainous terrain, high elevation, and clear, brilliant skies. Cultural influences include Native American, European, and Mormon cultures; ranching; a strong heritage of rustic architecture; large amounts of public land; tourism; a fast-growing population with strong demands and expectations for outdoor recreation; and strong public expectation of a “wilderness experience” (USFS 2001). The preserve embodies these characteristics, and the sustainable design concepts

Appendix B - Errata

Section Change – Chapter 2, Preferred Alternative

(Revisions are shown in red in the text that follows. Additions are underlined and deleted text is crossed out.)

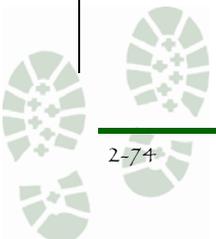
Agency Preferred Alternative

The Executive Director of Valles Caldera Trust has selected Alternative 3A; Entrada del Valle—Primary Access via Shuttle System as the recommended preferred alternative. The selection of the preferred alternative was made following careful consideration of the potential impacts of each of the alternatives, including environmental, economic, technical, and other factors presented in the Draft EIS. The Executive Director also reviewed and considered the comments submitted by the public, including agencies, organizations, and individuals, and the unanimous recommendation of the Board of Trustees put forward at a public meeting of the board on September 20, 2012. The Executive Director finds that alternative 3A would allow the trust to “expand the current level of public access and use on the preserve while protecting and preserving its natural and cultural resources and values and to provide quality outdoor recreation and interpretive opportunities that promote long-term financial self-sustainability consistent with other purposes,” which is the stated purpose of this plan. The selection of this alternative would best fulfill the statutory mission and responsibilities of the trust (the need for action).

The VCT acknowledges that alternative 3A would impact the preserve’s biological and physical environment, including its historic, cultural, and natural resources as disclosed in this document. Section 108(d) of the Valles Caldera Preservation Act directs the VCT to implement a program that “does not unreasonably diminish the long-term scenic and natural values of the area, or the multiple use and sustained yield capability of the land” (16 USC 698v). Therefore, the VCT must find a balance between providing for multiple use while protecting the preserve’s long-term values.

The Valles Caldera Board of Trustees noted that the Entrada del Valle site would welcome visitors into the preserve and that the location, being offset from the Valle Grande, would not overtly alter the view and experience for visitors or people traveling through the area. All members of the Board of Trustees supported primary access via a shuttle system, and agreed that the shuttle system would help maintain the values that people felt for the preserve, protect the environmental and cultural resources on the preserve, and ultimately provide the best experience. Additionally, alternative 3A was the most favored alternative noted by members of the public expressing support for one alternative or another, with the shuttle system being expressed as a preference by many who did not have a preferred site for the visitor center/contact station. The public and agency involvement process that supported the decision is summarized in chapter 5 of this document.

As described in the introduction of this chapter, the alternatives include both implementation-level actions and programmatic-level decisions. The decision on the implementation-level actions would allow the design and construction of a visitor center and related facilities within the Entrada del Valle site. These implementation-level decisions are site-specific actions to be implemented following the publication of the ROD for this EIS. Additional engineering and design work will be completed during this process to determine the most efficient layout of the site. The conceptual designs presented in this EIS provide a guide to the scale and range of facilities expected to be developed at the visitor center, but the exact placement of



structures, parking lots, picnic areas, and other infrastructure will be determined during final design, allowing the VCT to maintain flexibility by responding to site-specific details as design issues and criteria arise. These decisions may be implemented without further review under NEPA:

Programmatic-level decisions guide or prescribe future actions. For the preferred alternative, these actions include selection of a shuttle system as the primary means of transportation within the preserve, development of single-lane roads and bicycle paths, parking areas at fishing accesses and trailheads, recreation facilities, additional staging or visitor contact areas, development of equestrian facilities and access, and development of primitive educational or ecotourism facilities. This EIS considers only a general area of impact that could occur in any area of the preserve. These programmatic elements of the alternative will be further defined and will require additional planning and decision-making in compliance with NEPA prior to implementation.

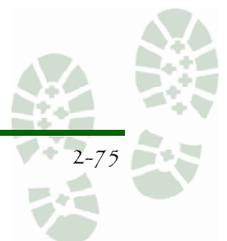
Environmentally Preferred Alternative

Section 1505.2(b) of NEPA requires that, in cases where an EIS has been prepared, the ROD must identify all alternatives that were considered, “specifying the alternative or alternatives which were considered to be environmentally preferable.” In addition, CEQ guidelines state that “the lead agency official responsible for the EIS is encouraged to identify the environmentally preferable alternative(s) in the EIS.” According to CEQ, “the environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA’s Section 101.” Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources” (CEQ 1981). CEQ notes that “the concept of the ‘agency’s preferred alternative’ is different from the ‘environmentally preferred alternative’” and the council-CEQ “recognizes that the identification of the environmentally preferable alternative may involve difficult judgments....” (CEQ 1981).

The VCT has identified alternative I, the no-action alternative, as the environmentally preferred alternative based on the guidance from CEQ. The minimal level of access and careful management of such access called for under alternative I would cause the least damage to the biological and physical environment and would best protect, preserve, and enhance the preserve’s historic, cultural, and natural resources.

Alternatives Considered but Eliminated from Detailed Analysis

The following alternatives were eliminated from detailed analysis because they did not meet the purpose of and need for action or were not technically or economically feasible.



Appendix B - Errata

Section Change – Chapter 3, Fish and Wildlife

(Revisions are shown in red in the text that follows. Additions are underlined and deleted text is crossed out.)

information about the forage, and, to a lesser degree, steep slopes and a lack of nearby water sources. The highest potential herbaceous productivity is located in the broad grassy valleys. Climate, especially moisture, is the limiting factor of forage production in the majority of sites, and vegetation growth rates vary widely depending on the timing and form of annual precipitation. As a result, average biomass production can change significantly in a relatively short time. For example, overall forage production doubled between a dry year in 2002 and a wet year in 2007 (VCT 2009b).

Fish and Wildlife

The alternatives include activities that could affect fish and wildlife directly, through injury or mortality during construction, or indirectly, through modification of habitat. An increase in visitation to and recreational use of the preserve could also impact fish and wildlife.

This section describes the types of fish and wildlife that could be affected by the proposed alternatives so that potential impacts on them can be adequately analyzed. The “Special-status Species” section contains descriptions of plant and animal species that have special state or federal designations based on rarity or other need for special protection. This “Fish and Wildlife” section focuses on fish and wildlife species that do not have such protections or designations, but are vital components of the preserve’s ecosystem.

The preserve supports a great diversity of animals that live in various habitats (see the “Vegetation” section for more information). Inventories conducted from 2001 to 2006 identified 69 species of mammals, 102 birds, 6 reptiles, 3 amphibians, and 6 fish. While inventories of insects are ongoing, 134 species of aquatic insects were collected in streams and wetlands in 2003 to 2004 (Vieira and Kondratieff 2004, as cited in VCT 2009b), and 54 species of butterflies were identified in surveys in 2001 (Kleintjes 2001, as cited in VCT 2005i). Beyond elk, preserve wildlife was poorly documented until baseline studies began in 2001. These studies have included identifying the type and distribution of plants, mammals, birds, reptiles, amphibians, fish, fungi/lichens, aquatic insects, and many groups of beneficial and harmful insects (VCT 2009b). Ongoing studies in 2010 included a cooperative biodiversity study between the preserve, the USDA Systematic Entomology Laboratory, and the Smithsonian Institution for the inventory of beneficial and pest insect species on the preserve, volunteer breeding bird surveys, a survey of Gunnison’s prairie dogs, bald eagle monitoring, and a survey for short-horned lizards (VCT 2010d).

The alternatives proposed in this plan include activities, such as construction, that could affect fish and wildlife either directly through injury or mortality during construction, or indirectly through modification of habitat. An increase in visitation to and recreation use of the preserve could also impact fish and wildlife through disturbance. Outdoor recreation has the potential to disturb wildlife, resulting in energetic costs, impacts to animal behavior and fitness, and avoidance of otherwise suitable habitat (Taylor and Knight 2003). Wildlife responses to disturbance are shaped by six factors (Canfield et al. 1999):

1. Type of activity
2. Predictability of activity
3. Frequency and magnitude of the activity

4. Timing (e.g., breeding season)
5. Relative location (e.g., above or below on a slope)
6. Type of animal, including size, group size, sex, and age

Although wildlife responses to humans may vary, they can be broadly classified as attraction, habituation, and avoidance.

- Attraction is the strengthening of an animal's behavior because of positive reinforcement. Attraction is often related to food conditioning, but is equally applicable to behaviors that attract wildlife to shelter or security (Whittaker and Knight 1998).
- Habituation is a waning of response to a repeated neutral stimuli. Wildlife are capable of becoming habituated to people, human-made environments, and almost any human stimuli (Whittaker and Knight 1998). In some cases, wildlife may habituate to predictable disturbance from recreation, but in other cases they may not (Taylor and Knight 2003).
- Avoidance is the opposite of attraction; it is an aversion to negative consequences associated with a stimulus (Whittaker and Knight 1998). The presence of humans in wildlife habitat may result in animals avoiding parts of their normal range, which may be sufficient to reduce the carrying capacity of some public lands for wildlife (Taylor and Knight 2003).

Attraction, habituation, or avoidance responses are not intrinsically good or bad. Value judgements are commonly attached to these terms, and can be an obstacle to effective management (Whittaker and Knight 1998). The vulnerability of wild animals is complex. Much of the complexity results from the ability of animals to learn from experience and thereby adapt to recreational disturbance. Several studies suggest that animals subjected to predictable, non-threatening disturbances can become habituated to and tolerant of those disturbances (Cole 1993). For example, elk in Rocky Mountain National Park are "highly habituated" and have become less fearful of humans, allowing people to approach very closely (NPS 2007). Conversely, animals are likely to respond to frequent and predictable negative encounters by avoiding them. Since this behavior is largely learned, two individuals of the same species may differ greatly in their vulnerability to the same disturbance (Cole 1993).

An animal's behavior is not simply habituated or nonhabituated, but a matter of degree. Wildlife responses occur in differing magnitudes in different contexts. Wildlife also behave differently in different locations and during different activities, and the learned outcomes of these interactions affect subsequent interactions (Whittaker and Knight 1998).

The presence of humans has potential to create, enhance, ameliorate, or even reverse direct interactions between species (Muhly et al. 2011). Negative effects of disturbance on one species may have positive consequences for its competitors or prey, and disturbance may thereby alter the interactions among species in a community. Human activity can substantially alter the predation risk in important nesting habitat (Leighton, Horrocks, and Kramer 2010). A study conducted in 2011



demonstrated that areas experiencing high levels of human disturbance can displace large carnivore predators, even in non-hunted, protected animal populations, thus indirectly creating a refuge for prey species. Some prey species even appear to select space close to humans where predator densities are high as a means to avoid encounters with human-avoiding predators, such as large terrestrial carnivores, which are generally sensitive to human disturbance. Thus, predator displacement by humans can provide refuge for prey species. In addition, high-quality forage resources have been correlated with roads and trails experiencing high human use, and humans might therefore provide the best habitat patches for herbivores by both deterring predators and improving food resources (Muhly et al. 2011). A study conducted in 2007 demonstrated how moose selected birth sites near paved roads, possibly to avoid traffic-averse brown bears. The study states that “observations among diverse mammalian taxa suggest analogous use of human infrastructure to buffer against danger,” and states that the findings “offer rigorous support that mammals use humans to shield against carnivores” (Berger 2007).

Numerous studies have been conducted regarding the effects of roads on wildlife. Species that are vulnerable to traffic disturbances (e.g., noise, lights, pollution, traffic motion) and species that are vulnerable to road mortality are negatively affected by road traffic. Studies of large mammals have documented behavioral avoidance of roads for some species. However, when animals are attracted to roads for a resource (e.g., food), and have the ability and speed to avoid being killed by vehicles, roads can result in a positive effect on abundance of some species, such as those that take advantage of road-killed animals. This can result in high densities of particular species near roads. If a species is prey for other species that are negatively affected by roads, the abundance of prey species may be positively related to roads due to the protection from predation in roaded areas (Fahrig and Rytwinski 2009).

Roads are also believed to create barriers to wildlife movement across habitats, resulting in reduction in landscape connectivity and decreased animal abundance near roads. A 2009 study by Fahrig and Rytwinski states that it is fairly common to interpret such conclusions as a behavioral avoidance of roads, although reduced abundance could be based on direct mortality or avoidance. In a review of 79 studies related to animal abundance and road traffic, the authors state that many of the studies were compromised because of weakness in study design; information on behavior responses to roads needs to be clearly distinguished from information on road mortality. In addition, when a road presents a physical barrier to movement, such as fencing along the road, the effect is equivalent to an animal showing an extremely strong behavioral avoidance of the road itself. However, Fahrig and Rytwinski conclude that, although more research is needed, the evidence is strong enough to merit mitigation of effects in road construction and maintenance projects (Fahrig and Rytwinski 2009).

Scientific studies have shown that wildlife can be adversely affected by sounds that intrude on their habitats. Although the severity of the impacts varies depending on the species and other conditions, research has found that wildlife can suffer adverse physiological and behavioral changes from intrusive sounds. Some sound

characteristics have been associated with suppression of the immune system and increased levels of stress-related hormones in animals (NPS 2011).

Although numerous wildlife studies have demonstrated effects of recreationists on wildlife, a survey conducted in Utah showed that the general public believes recreation is benign and does not affect wildlife. Approximately 50 percent of visitors surveyed did not believe that recreation was having a negative impact on wildlife. In addition, visitor perceptions of wildlife flight distance differed remarkably from research data. Horseback riders tended to believe that they had the least impact on wildlife of any user group. The authors note that, "If visitors believe they can approach wildlife more closely than animals will actually allow, then recreationists will disturb wildlife in a majority of encounters" (Taylor and Knight 2003).

Study Area

The study area for evaluating impacts on fish and wildlife for implementation-level decisions is the specific proposed visitor contact station / visitor center location and vicinity for each action alternative; for programmatic-level decisions, the study area encompasses the entire preserve.

Fish

Overview

The preserve's streams contain a variety of native fish, as well as introduced rainbow and brown trout. These waters previously contained Rio Grande cutthroat trout (*Oncorhynchus clarkii virginalis*) (Anschuetz and Merlan 2007), a candidate species for federal listing under the Endangered Species Act described in more detail in the "Special-status Species" section. Approximately 27 miles of streams in the preserve offer habitat suitable for trout, out of a total of approximately 75 miles of perennial streams. Stream and fish surveys of the preserve's two major streams/rivers (East Fork of the Jemez River and San Antonio Creek) have been conducted (Simino 2002, Goodman 2003; as cited in VCT 2009b), as well as twice-yearly fish sampling at permanent monitoring stations in the lower, middle, and upper reaches of each of these two streams (2003–2009).

Four native fish species are found on the preserve (VCT 2010c):

- Rio Grande sucker (*Catostomus plebeius*)
- Rio Grande chub (*Gila pandora*)
- Fathead minnow (*Pimephales promelas* Rafinesque)
- Longnose dace (*Rhinichthys cataractae*)

Three nonnative species are found on the preserve:

- Rainbow trout (*Oncorhynchus mykiss*)
- Brown trout (*Salmo trutta*)
- White sucker (*Catostomus commersonii*)



The Rio Grande sucker and Rio Grande chub are USFS sensitive species and are described in the “Special-status Species” section.

East Fork of the Jemez River

The East Fork of the Jemez River provides 21.4 miles of fish habitat, with fish inhabiting the river from its headwaters to its mouth. There are four perennial tributaries, of which two have names—La Jara Creek and Jaramillo Creek (Simino 2002, as cited in VCT 2009b). Fisheries data are available only for Jaramillo Creek, where only trout have been found (Aquatic Consultants, Inc. 2003, as cited in VCT 2009b).

Riparian conditions along the East Fork of the Jemez River and its tributary, Jaramillo Creek, are improving in the perennial reaches from below the headwater springs to the preserve’s southern boundary, which improves instream habitat conditions for fish. In the intermittent reaches above the springs, riparian conditions have not improved and are classified as “functioning-at-risk” (TEAMS 2007, as cited in VCT 2009b).

San Antonio Creek

San Antonio Creek provides 30.5 miles of fish habitat, with fish inhabiting the creek from its headwaters to its mouth (Goodman 2003, as cited in VCT 2009b). This creek has four perennial tributaries: Sulphur Creek, San Luis Creek, Rito de los Indios, and an unnamed tributary. No fisheries data is available for the tributaries, but fish are unlikely to exist in Sulphur Creek, which is a naturally acidic creek with sulfur springs and geothermal activity (Vieira and Kondratieff 2004, as cited in VCT 2009b). Fish presence is assumed in the other three tributaries.

The main stem of San Antonio Creek was likely altered considerably prior to the 1960s. Although the condition of this creek appears to be improving based on monitoring, it is not properly functioning for trout habitat along most of its length, according to USFS habitat standards. According to the 2002 stream survey, physical parameters that were not properly functioning included relative sediment content in riffles, the density of large woody debris, pool development, temperature, and width-to-depth ratio (Goodman 2003, as cited in VCT 2009b).

Reptiles and Amphibians

Amphibian surveys conducted in 2002 found abundant chorus frogs (*Pseudacris maculata*) and tiger salamanders (*Ambystoma tigrinum*) (Cummer, Christman, and Wright 2003). Northern leopard frogs (*Rana pipiens*), abundant as recently as the 1970s along Redondo Creek, appear to have been extirpated from the preserve, as is the case across much of the region, perhaps due to the spread of disease (VCT 2005i). Jemez Mountain salamanders (*Plethodon neomexicanus*) exist on the preserve and are discussed under “Special-status Species.” In addition, two lizard and three snake species have thus far been found on the preserve (VCT 2005i).



Birds

Overview

Bird surveys conducted in 2001 and 2002 found at least 107 species on the preserve, of which 92 showed evidence of breeding locally. Uncommon species recorded include Wilson's snipe (*Gallinago delicata*), savannah sparrow (*Passerculus sandwichensis*), eastern meadowlark (*Sturnella magna*), and ruby-crowned and golden-crowned kinglets (*Regulus calendula* and *R. satrapa*). Representative raptor species found include northern goshawk (*Accipiter gentilis*), golden eagle (*Aquila chrysaetos*), bald eagle (*Haliaeetus leucocephalus*), and peregrine falcon (*Falco peregrinus*). The abundance of fish and the presence of elk carcasses attract significant numbers of bald eagles in the fall, which feed and roost on the preserve for weeks (Fettig, Rustay, and Henderson 2003; VCT 2005i).

Below elevations of 8,500 feet, representative bird species include blue grouse (*Dendragapus obscurus*); Merriam's turkey (*Meleagris gallopavo merriami*); several raptors (hawks and owls); American robin (*Turdus migratorius*); house wren (*Troglodytes aedon*); woodpeckers; nighthawk (*Chordeiles minor*); white-throated swift (*Aeronautes saxatalis*); western meadowlark (*Sturnella neglecta*); chickadee (*Poecile* sp.); golden and bald eagle; and several species of hummingbirds, sparrows, and warblers (Fettig, Rustay, and Henderson 2003; VCT 2005i).

Between 8,500 and 12,000 feet above sea level, representative birds include northern goshawk, Steller's jay (*Cyanocitta stelleri*), dark-eyed junco (*Junco hyemalis*), several kinglet species (*Regulus* spp.), and mountain bluebird (*Sialia currucoides*), as well as multiple species of grouse, woodpeckers, hummingbirds, sparrows, and warblers (VCT 2009b).

Migratory birds are protected under the Migratory Bird Treaty Act, discussed in the "Special-status Species" section.

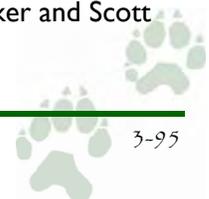
Species of Interest

The following section describes species that have a higher level of interest from a management perspective, but do not have a separate state or federal status. Generally, this includes species managed as game animals.

Merriam's Turkey

This upland game bird primarily uses ponderosa pine and pine/oak, as well as the transition habitats between ponderosa and pinyon/juniper woodland habitats and ponderosa and mixed conifer. There are three essential habitat components for Merriam's turkey: surface water, roosting trees, and openings for summer brood areas (Kamees 2002).

Merriam's turkeys prefer to roost in tall, mature or over-mature ponderosa pines with relatively open crowns and large horizontal branches starting at 20 to 30 feet (6 to 9 meters) from the ground. Trees with a diameter at breast height of over 14 inches are used as roosts. Preferred roost sites are often located just below a ridgeline. Hens (females) normally nest within 0.5 mile of water (Boeker and Scott



1969). Although no surveys have been completed on the preserve, turkeys are numerous and frequently seen by VCT personnel (Moser 2009).

Blue Grouse

The blue grouse is native to New Mexico and is found most commonly in the mountainous area of the north-central portions of the state. The Sangre de Cristo, San Juan, and Jemez Mountains are principal areas of this species (Biota Information System of New Mexico [BISON-M] 2009).

Structural diversity is a major determinant of habitat suitability for blue grouse. Structure of habitat is more important than species composition. Important forest cover types include spruce/fir, Douglas-fir, and ponderosa pine. Mixed-species forests are probably the most important habitat type in high-elevation sites (BISON-M 2009).

Blue grouse forage in conifer trees, on the forest floor, along ridgetops, and in openings. Major food items in the spring are needles, buds, and new cones of conifers. In the summer and fall, they feed mainly on grasses, forbs, and fruits of low-growing plants. During the winter, they eat mostly conifer needles (BISON-M 2009).

Blue grouse selectively feed and roost in the oldest and largest Douglas-fir trees available. Douglas-fir trees repeatedly used in winter and between winters are typically those growing under stressful conditions such as on dry, steep, talus slopes, and have endured stresses such as lightning strikes or boulder impacts (Remington and Hoffman 1996). VCT personnel have observed blue grouse on the preserve, but no formal surveys have been completed (Moser 2009).

Mammals

Overview

Below elevations of 8,500 feet, representative mammals that are found on the preserve include elk (*Cervus elaphus nelsoni*), mule deer (*Odocoileus hemionus*), coyote (*Canis latrans*), bobcat (*Lynx rufus*), Gunnison's prairie dog (*Cynomys gunnisoni*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), cottontail (*Sylvilagus* sp.), woodrat (*Neotoma* sp.), weasel (*Mustela* sp.), beaver (*Castor canadensis*), badger (*Taxidea taxus*), black bear (*Ursus americanus*), mountain lion (*Puma concolor*), and several species of small mammals including squirrels, chipmunks, voles, and mice. Between elevations of 8,500 and 12,000 feet, mammals include elk, mule deer, black bear, gray fox (*Urocyon cinereoargenteus*), and several species of weasels, squirrels, chipmunks, mice, and shrews (VCT 2007).

Coyotes are common on the preserve. Black bears, mountain lions, and bobcats are rarely observed, but their populations are presumed to be viable and proportionate to available habitat, given the abundance of prey and the absence of recent hunting pressure (VCT 2005i).

Many other smaller mammals are also present, including the isolated Jemez Mountains population of Goat Peak pika (*Ochotona princeps nigrescens*), a federal

sensitive species described further in the “Special-status Species” section. The preserve also supports substantial numbers of Gunnison’s prairie dog, another federal sensitive species, which is relatively common throughout the grasslands of the caldera and is described further under “Special-status Species” (VCT 2005i).

The last beavers in the caldera were observed along Indian Creek in the 1990s. Eventually, if woody vegetation can be restored to key riparian habitats and if substantial stands of aspen can be reestablished, the reintroduction of beaver may become practical (VCT 2005i).

Species of Interest

Rocky Mountain Elk

Elk hunting and viewing are among the greatest attractions at the preserve. Elk populations are shaped by many factors, including habitat, a herd’s learned behavior, weather, disease, events on adjacent lands, and the number, kind, and behavior of predators. Elk management encompasses an array of matters that are subject to high levels of uncertainty (VCT 2005i). Elk management will likely always be a major issue on the preserve for the VCT and the NMDGF (VCT 2005i). Therefore, this species is of interest to the VCT.

Elk use a variety of habitats, including most forest types, during the course of their lives. Weather, time of day, and quantity and quality of forage influence their habitat use. Elk forage on a variety of plants, which vary based on habitat used and season. They consume largely green grass in the spring, adding more forbs and woody vegetation in summer, dried grass and woody vegetation in fall, and shrubs and conifers in winter. Elk generally rut (mate) beginning in September and calve (give birth) from mid-May to mid-June (NMDGF 2009b). Elk have been found to expand their home range from spring through midsummer and thereafter reduce areas of use through early fall (Canfield et al. 1999). Elk tend to inhabit lower elevations in winter than the rest of the year. Movements to lower elevations from high-elevation summer ranges are likely driven by snow depth and lack of abundance or quality of forage. However, elk may stay in the same area year-round when conditions are suitable (NMDGF 2009b).

Elk were extirpated from the Jemez Mountains by 1900, but following the transplants of 49 elk in 1947 and an additional 58 in 1964, they are now abundant and conspicuous, especially in the preserve (VCT 2005i). The preserve’s elk population is far greater than has previously been the case in the long-term natural history of the caldera (VCT 2005i).

NMDGF intentionally reduced the elk herd size in the Jemez Mountains during the late 1990s and early 2000s (at the same time the preserve was created), 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 (Parmenter, pers. comm. 2012).



The population trend for the Rocky Mountain elk is stable to increasing in New Mexico. Since 1995, the NMDGF has conducted aerial elk counts over the Jemez Mountains. The most recent population estimate in the Jemez Mountains is 5,500 to 8,400 (Liley, pers. comm. 2008, as cited in VCT 2009b).

The preserve is a core breeding ground for elk in the Jemez Mountains, with an estimated 3,500 elk living on the preserve in the summer (Liley, pers. comm. 2008, as cited in VCT 2009b). Although deep winter snows drive many elk to lower elevations on nearby lands, in dry winters, large numbers remain on the preserve year-round (VCT 2005i). The entire preserve is classified as critical summer range, winter range, and calving area habitat. The Valle Jaramillo (directly west of Cerro del Medio) is a key elk calving and nursery area, and receives heavy and sustained impacts from elk (VCT 2005i). Field data collected on the preserve have found that elk calving is concentrated along the edges of the valles. Calving areas are also concentrated along VC01 (the current entrance road to the Valle Grande Staging Area), as well as along VC02 between VC01 and VC03. Some calving areas also exist farther north on VC02 near its intersection with VC09 (see figure 3-26 for a map of the preserve's roads). Historically, elk used the west side of the preserve and wintered to the south and west; however, elk now concentrate on the east and north sections of the preserve, which are in or associated with the large grassland valles, and winter to the north and east (TEAMS 2007, as cited in VCT 2009b). The primary elk grazing areas in the preserve are the central parts of the Valle Grande near the East Fork Jemez River and Jaramillo Creek, and along the VC01 and VC02 roads around the valle (Parmenter, pers. comm. 2012).

Response to Recreational Activities

Environmental factors and experience with humans and their recreational activities can have substantial impacts on the behavior of ungulates (hoofed animals such as elk and deer) (Stankowich 2008). Recreationists can impact ungulates through direct disturbance or by disrupting access to essential forage resources (Canfield et al. 1999). Factors that influence flight decisions can vary both spatially and temporally (Stankowich 2008). Ungulate populations may differ in the way they respond to human disturbance based on experience with humans, availability of alternative habitats, population size, presence of other predators, and physical terrain. Ungulates pay attention to approacher behavior, have greater perceptions of risk when disturbed in open habitats, and females or groups with young offspring show greater flight responses than adult groups. The availability of alternative sites also determines an animal's decision to flee human disturbance. When there is little cover or distance to refuge is great, risk is greater and ungulates flee at greater distances (Stankowich 2008). One study demonstrated that elk increased their travel more in the mornings than afternoons, likely by moving away from disturbance and avoiding it for the remainder of the day. Elk returned to prior behavior patterns once the disturbance ended each day (Naylor, Wisdom, and Anthony 2009). Similarly, according to Rumble, Benkobi, and Gamo (2005), effects of human activity on elk have shown to be short term, with elk returning to areas when the human activity ceased. A study on the effects of cross-country skiers on

elk found that, although animals moved away from trails with the onset of skiing, they did not move any additional distance as the number of skiers increased (Ferguson and Keith 1982, as cited in Cole 1993).

The appearance of a human on foot has been found to be more frequently associated with targeted harassment (e.g., hunting) than humans in vehicles; therefore, ungulates interpret humans on foot as more threatening (Stankowich 2008; Shultz and Bailey 1978). Brown et al. (2012) note that pedestrians are more likely to elicit responsive behaviors “consistent with prior studies implicating the human form as an important source of disturbance for ungulates.” Trails have been shown to have a stronger spatial effect on elk resource selection than roads (Rogala et al. 2011). Some studies have shown that humans on foot are the most disturbing and more evocative to ungulates than humans on horseback, on bicycles, or in cars. One study showed that people on foot moving close to elk usually caused elk to leave open areas, although elk movements were not substantially affected by people watching them from parking areas and roads. The study found that bicycles were not an important predictor of responsive behavior (Stankowich 2008). Another study “found no biological justification for managing mountain biking any differently than hiking” (Taylor and Knight 2003).

Conversely, a study conducted at Oregon’s Starkey Experimental Forest and Range found that elk are more likely to flee during mountain biking activity compared to hiking. Hikers had little effect on flight when beyond 550 yards from an elk, compared to 820 yards from horseback riders and 1,640 yards from mountain bikers. Mountain biking and hiking did not disturb elk once the elk moved away from the routes being used by recreationists, and elk were able to make up any energy lost by resuming foraging activity. The study also demonstrated that elk did not exhibit flight response when close to an off-road recreational activity 35 percent of the time. Although habituation was not observed during the study, conclusions noted that the results might change if elk eventually become habituated to some or all of the off-road activities studied (ATV use, horseback riding, mountain biking, and hiking) (Wisdom et al. 2004). Elk were not as affected by horseback riding as ATV use, mountain biking, and hiking, although elk may have habituated to horseback riding or simply avoided areas near horseback routes (Naylor, Wisdom, and Anthony, 2009).

Ungulates are more responsive to human activities when the animals are in smaller herds, dispersed rather than clustered, and closer to roads, suggesting they are not completely tolerant of human activity (Brown et al. 2012). Elk selection of locations near trails depends on hourly human activity levels and the distance to the trail. Elk have been shown to prefer areas at distances 440–875 yards from trails, avoiding areas 55 yards or less from trails in response to low levels of human activity. Elk responses in areas between 55 and 440 yards from trails were dependent on the level of human activity. Once human activity levels were greater than two people per hour, elk responded with avoidance of areas 55–440 yards from trails (Rogala et al. 2011). Seventy-five percent of flight behavior by elk occurred within 710 yards of cross-country skiers. The distance moved by elk in Yellowstone National Park after being disturbed by cross-country skiers ranged widely and was related to distance



to nearest ridges, where they may be more tolerant of human presence (Cassirer, Freddy, and Ables, as cited in Rogala et al. 2011).

Human-induced disturbance during calving season may exacerbate elk vulnerability, demonstrated in a study in Colorado that simulated “recreational hiking.” The study was able to show that repeated displacement during the calving season resulted in declines in survival of elk calves (Phillips 1998, as cited in Canfield et al. 1999; Phillips and Alldredge 2000). “Where summer recreational activities approach high levels, impacts on reproductive performance of ungulate populations may be expected” (Canfield et al. 1999). However, the study “did not specifically address the effects of trail-based recreational disturbance on elk” (Phillips and Alldredge 2000).

Response to Hunting

As mentioned under the “Visitor Experience” section, the preserve currently allows elk hunting, which is an important tool for managing the size of the preserve’s elk herd (VCT 2005i) and would continue under the proposed action alternatives. Studies have shown that the presence of hunting increases effects on flight behavior, and hunted ungulate populations show substantially greater flight responses than non-hunted populations (Stankowich 2008). During periods of human disturbance, such as hunting seasons, elk have been shown to seek areas that provide greater cover, whereas elk selected open grassland habitat before fall hunting seasons. Elk avoid open grasslands during the day during hunting seasons, and spend more time in areas of refuge when they are accessible to hunters (Rumble, Benkobi, and Gamo 2005; Cleveland 2010). Elk movements have been shown to increase on the opening day of firearm elk season, and the first and second weekends of the season (Rumble, Benkobi, and Gamo 2005). Cleveland (2010) found that “focused hunting has a significant impact on elk movement patterns over a more general hunting season structure that is designed to control regional elk populations.”

Thompson and Henderson (1998) note that hunted elk populations typically continue to avoid humans during non-hunting seasons. However, other studies have shown that ungulates may not show behavioral differences in response to hunting if they also experience humans in a non-threatening context. Therefore, ungulates that routinely encounter and habituate to humans in non-threatening contexts may only suffer minimal impacts on their behavior towards humans if exposed to seasonal hunting (Stankowich 2008).

Response to Roads

The nature of the preserve’s topography dictates the placement of roads within the low valleys or narrow corridors that separate the steep-sided volcanic domes. These corridors are often natural avenues for the movement of wildlife, especially elk (VCT 2005i). The primary effect of roads on elk may be habitat fragmentation; heavily roaded areas may contain few patches of forest cover large enough to function effectively for elk, especially where elk are hunted. Roads may also facilitate the spread of exotic vegetation, which may reduce quality and abundance of forage available to elk (Rowland et al. 2005).



Indirect habitat loss caused by avoidance of trails and roads has been documented for elk with variable responses. Where some authors reported avoidance, others reported selection for areas near human activity. The analyses assume a constant response across time and space, and may obscure the true relationship between humans and wildlife because human activity levels vary spatially and temporarily (Rogala et al. 2011). -Roads can induce a range of behavioral responses in ungulates, which in some cases seem attracted to or unaffected by road activity (Brown et al. 2012). Rowland et al. (2005) note “we know that elk response to roads generally varies depending on the level and type of motorized traffic, but we have little knowledge about the precise levels of such disturbance that elicit a response and the duration of that response.”

A number of studies have demonstrated that vehicle traffic on forest roads can establish a pattern of habitat use in which the areas nearest the road are not fully available for use by elk. “The extent of reduced habitat use can be very substantial” (Canfield et al. 1999). However, elk have been shown to adapt to human disturbance along roads that experience “normal” and “heavy” use. A study of un hunted elk at Rocky Mountain National Park produced no statistical evidence that either abundant tourist activity in autumn or planned disturbance in winter and early spring affected distribution of elk, bugling activity, behavior of rutting bulls, timing of movements, or willingness to use areas near roads. “This acceptance of human activity seems to be a learned response of un hunted elk” (Schultz and Bailey 1978). Canfield et al. (1999) note, “Relatively high levels of human disturbance are often confined within a narrow corridor through wildlife habitat, such as a road. These may have little or no measurable impact on ungulates during summer if essential foraging sites are not directly impacted or limited in availability across the summer home range” (Canfield et al. 1999). A study on the effects of noise on ungulates found that, “contrary to our predictions, ungulates were not more likely to respond, but rather less likely to respond to increased vehicle traffic” (Brown et al. 2012). Research conducted by Rogala et al. (2011) “found insufficient evidence of elk response to road activity”; however, the authors note that “in contrast to this, other research has found negative effects of road activity on elk and other ungulates.”

A 2012 report showed that high traffic levels may result in reduced flight responsiveness of ungulates to roads. Ungulates spent less response time with increased vehicle traffic, allowing more time for activities like feeding. The authors of the study suggest that the animals had become habituated to the frequent stimuli caused by road traffic, stating that ungulates are known to habituate to regular exposure to noise and other non-lethal human activities, and display individual variation within populations in their avoidance or tolerance of roads. Elk in particular exhibit behavioral patterns that suggest habituation along roads and other areas disturbed by human activities. The decreased responsiveness with increased traffic levels could indicate that passing vehicles provide a refuge from predators such that ungulates have come to perceive reduced predation risk when traffic and their associated noise levels are high, or that the animals cannot afford to maintain high levels of responsiveness to such continuous and pervasive disturbance.



Unresponsive behavior could have negative implications, such as reducing the animals' ability to visually detect predators and other environmental cues. Reduced responsiveness to road traffic could also lead to increased human conflicts, such as negative encounters with recreationists or collisions with vehicles (Brown et al. 2012).

Hunting activity may affect use of roads by elk. A study of hunted elk on a national forest near Rocky Mountain National Park indicated that elk avoid moderately and heavily used roads on winter ranges (Schultz and Bailey 1978). Rumble, Benkobi, and Gamo (2005) believe that elk dispersion patterns during hunting seasons relative to roads result from the type of equipment and methods used by hunters, for example, "road hunting." Although elk avoided roads, their response to firearm hunters was found to depend on the extent of available cover rather than a specific distance to the nearest road (Rumble, Benkobi, and Gamo 2005). Similarly, Witmer and deCalesta (1985) found that elk spent substantially more time in cover during the hunting season, during which time they also avoided roads, but not more than the yearly average.

In contrast, a study published in 2004 states that "road effects [on elk] are far more pervasive than originally believed" (Rowland et al. 2005), and that elk response to road use varies based on traffic rates, forest canopy cover adjacent to roads, topography, and road type (e.g., improved vs. primitive). Entire ranges can be abandoned if disturbance from traffic on roads and the associated habitat loss and fragmentation exceed some threshold level. The ultimate effect of displacement of elk by motorized traffic (as well as other disturbances) is a temporary or permanent reduction in effective elk habitat (Rowland et al. 2005). Shifts in elk distribution away from roads may occur across a range of temporal and spatial scales. Daily elk movements and size of home ranges may decrease when open road density decreases (Rowland et al. 2005). Ungulates are more likely to respond when herds are dispersed and are closer to the road (Brown et al. 2012). Females bearing calves may avoid roads; Witmer and deCalesta (1985) found some pregnant females avoiding roads during calving.

Habituation

Ungulates in areas with frequent contact with humans have shown reduced flight responses compared to those in areas where human contact is rare. Learning plays a substantial role in the manner and degree to which ungulates respond. Animals in general show decreased flight responses in areas with larger human populations (Stankowich 2008). According to Stankowich (2008), "the ubiquity of the [habituation] effect across studies suggests that ungulates do habituate to humans in heavily populated areas." Thompson and Henderson (1998) note that "Elk are readily domesticated and may habituate to human activity that is predictable and harmless Habituation is an adaptive behavioral strategy that elk may selectively employ to maximize reproductive fitness." However, human disturbances can be particularly detrimental during certain critical periods of an animal's life or during the year when they are in poor condition or more vulnerable to injury, such as pregnancy and calving (Stankowich 2008).

Elk display site fidelity and may not abandon traditional ranges because of disturbance if adequate cover is available. Free-ranging elk in Yellowstone National Park tolerate human presence, particularly in the area of concentrated human activity around Mammoth, Wyoming. Elk are especially prone to habituate during winter, when they are confined by deep snow to a fraction of their year-round home range (Thompson and Henderson 1998).

Ungulates have been shown to exploit predator avoidance of human activity to reduce their own predation risk. Elk may try to minimize their predation risk from cougars and black bears, since large mammalian predators are known to avoid humans (Rogala et al. 2011). Elk in Banff National Park, Canada, are more habituated to disturbance than wolves, which are their main predator. Elk therefore benefit from low predation vulnerability near human settlements (Kloppers, St. Clair, and Hurd 2005).

Human-caused noise can affect ungulates through habitat selection, foraging patterns, and overall energy budgets, with potential population-level effects. However, noise may not have lasting negative effects if animals habituate to the disturbance; that is, exhibit reduced responsiveness after repeated exposure without consequence (Brown et al. 2012).

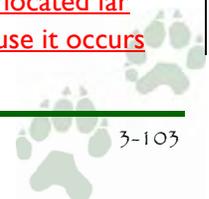
The recent Los Conchas fire likely expanded favorable habitat by restoring meadow habitats on the forested domes on the eastern third of the preserve, although it is too recent to quantify this supposition.

Mule Deer

Mule deer inhabit most forest types with good forage and cover. They use a variety of habitats during the course of their lives. Mule deer use higher elevations in the spring and summer, and migrate down to lower elevations in the fall and winter. They browse on a wide variety of woody plants, and graze on grasses and forbs. No formal surveys have been completed for deer on the preserve. However, VCT personnel rarely observe deer on the preserve, so the VCT believes the number present to be quite low (Moser 2009).

Once considered plentiful in the preserve, mule deer are now scarce. The decline of mule deer is a regionwide phenomenon and, while not fully understood, is usually attributed to a combination of factors including overhunting, territorial competition with elk, increased predation by coyotes, and a decrease in the early successional shrubby vegetation that is a mainstay of their diet. The last three of these factors may account for the low deer numbers in the preserve. It is unknown whether deer numbers are continuing to decline or have stabilized at low levels (VCT 2005i).

As mentioned above, human recreation can affect ungulates such as deer. Studies have shown little difference between hiking and biking regarding alert distance, flight distance, or distance mule deer moved when disturbed. Results indicated little difference in wildlife response to hikers versus mountain bikers. Mule deer responses were greater to off-trail disturbance than to on-trail disturbance. Animals close to trails became alert and fled at shorter distances than animals located far from the trail. On-trail recreation may appear more predictable because it occurs



frequently and along a particular line of movement, and animals may habituate to this type of activity. However, it is still likely that animals will take flight from on-trail recreation, particularly if they are encountered in the open. Thus, even on-trail recreation could result in displacement (Taylor and Knight 2003). Cole (1993) notes that many of the immediate responses to disturbance are short term, and that deer have been shown to typically return within hours to areas they have left after being disturbed. However, even short-term effects can have a substantial impact on animals living in stressful conditions, such as deer trying to survive in deep snow and cold (Cole 1993).

Mule deer have been shown to flee only to the nearest cover before stopping. "Because increasing cover generally decreased wildlife response, mule deer in cover could be expected to show a lesser response than animals in the open" (Taylor and Knight 2003). Wisdom et al. (2004) note, "It is possible that mule deer may respond to an off-road activity by seeking cover, rather than running from the activity . . . which could result in reduced foraging opportunities."

Mule deer have demonstrated greater flight distances during mornings, indicating a greater tolerance of recreationists during the evening. In addition, the larger the group size, the greater their response distances. A recreationist above mule deer elicited a stronger response than a recreationist located level with or below mule deer (Taylor and Knight 2003).

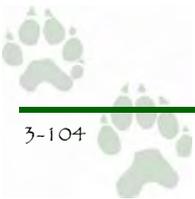
Black Bear

Black bears are highly mobile and readily disperse long distances across many types of habitat. Bears prefer mixed deciduous/coniferous forests with a thick understory. When inactive, they occupy dens under fallen trees, in ground-level or above-ground-level tree cavities or hollow logs, in underground cave-like sites, or in dense cover. The black bear is an opportunistic omnivore and has a variable diet of plants and animals (vertebrate and invertebrate), commonly including fruits, insects, animal carcasses, and garbage (Moser 2009).

No surveys have been completed for bears on the preserve, but they are frequently observed by VCT personnel (Moser 2009). An estimated 33 to 66 individuals are believed to exist within the boundaries of the preserve (Winslow 2008).

Mountain Lion

Mountain lions inhabit rough, broken foothills and canyon country, often in association with montane forests, shrublands, and pinyon/juniper woodlands (Fitzgerald, Meaney, and Armstrong 1994, as cited in VCT 2009b). Mountain lions tend to avoid people, but can and do live close to humans. They tend to be more active when there is less human presence, and are most active during the night, with peak activity at dawn and at dusk (NMDGF n.d.a). The diet of mountain lions consists mainly of hoofed mammals, such as deer and elk. A large population of lions has been documented on Bandelier National Monument (BISON-M 2009), which is adjacent to the preserve, so that migration between the two areas is likely. VCT personnel have observed mountain lions on the preserve, but no formal surveys



have been completed. It is estimated that five to eight individuals exist within the preserve's boundaries (Winslow 2008).

Coyote



Coyotes are found in a wide range of habitats, from open prairies to heavily forested regions, and even in cities. Coyotes are highly mobile and readily disperse 50 to 99 miles (80 to 160 kilometers) or more across many types of habitats; populations tend to encompass huge areas. Dens, commonly used in subsequent years, are generally located in a burrow, at the base of a tree, in a hollow log or rock crevice, or under a building (Moser 2009).

VCT personnel have documented coyotes on the preserve, but no formal population estimates have been completed. A recent study by Gifford et al. (2008) was conducted to describe the ecology and natural history of the coyote on the preserve. Preliminary diet assessment based on fecal analysis suggests that the coyote diet on the preserve consists primarily of rodents, followed by insects and then elk. Preliminary habitat use analysis suggests a late summer avoidance of forest and preference for wet meadows (Gifford et al. 2008).

Bobcat

Bobcats are found in various habitats, including deciduous/coniferous woodlands and forest edges, brush, deserts, and other areas with thick undergrowth. When inactive, they occupy rocky clefts, caves, hollow logs, or spaces under fallen trees. The young are born in a den in a hollow log or space under a fallen tree, or in a rock shelter. Bobcats prey extensively on cottontail and jackrabbits. They also eat a variety of rodents. No surveys for bobcats have been conducted on the preserve, but occasional observations by personnel confirm their presence (Moser 2009).

Gray Fox

The gray fox is common and widespread in open terrain, woodland, and lower forest zones. Gray foxes are perhaps most common in pinyon/juniper and oak woodlands, but seem to be absent from grasslands that lack rock outcrops or at least some encroachment of juniper. The species is essentially absent from well-developed mixed coniferous and spruce/fir forest. Gray foxes use brush and brushy woods in most areas (Moser 2009).

The gray fox is an opportunistic omnivore. Diet often chiefly depends on rabbits and other small mammals in winter, and insects and fruit in summer. VCT personnel have observed gray foxes on the preserve, but no formal surveys have been completed (Moser 2009).

Special-status Species

This section describes the existing conditions of special-status species on the preserve. These plant and animal species are those that have been assigned special

Appendix B - Errata

Section Change – Chapter 4, Fish and Wildlife

(Revisions are shown in red in the text that follows. Additions are underlined and deleted text is crossed out.)

moderate adverse impacts expected under alternative 4B are combined with the overall beneficial impacts of other present and reasonably foreseeable future activities, cumulative impacts would be minor and adverse.

Fish and Wildlife

Guiding Regulations and Policies

The following laws, regulations, and policies guide or constrain the management of fish and wildlife on the preserve.

The Valles Caldera Preservation Act of 2000 includes provisions that affect the management of vegetation. These specific provisions direct the preserve to

- protect and preserve the [fish and wildlife] values of the preserve, and provide for multiple use (16 USC 698v-3[b])
- develop a management plan that will provide for multiple use and sustained yield of renewable resources within the preserve
- develop a comprehensive program for the management of lands, resources, and facilities within the preserve (16 USC 698v-6[d])

While policies that guide or constrain actions of the USFS do not apply to the VCT or the management of the preserve, such direction has been considered where applicable. USDA Departmental Regulation 9500-4 directs the USFS to recognize and enhance, where possible, the values of fish and wildlife, both terrestrial and aquatic. The regulation also “recognizes the rights of individual states to manage fish and wildlife populations under their jurisdictions” (USDA 1983). Fish and wildlife in New Mexico are regulated under chapters 30–36, title 19, of the New Mexico Administrative Code, including regulations for hunting, fishing, trapping, and management of wildlife habitat and lands.

FSM 2600—Wildlife, Fish, and Sensitive Plant Habitat Management (USFS 1991) stipulates policies and procedures for the management of wildlife and fish habitat, and reiterates policy from USDA 9500-4. The manual includes an objective to “Provide a sound base of information to support management decision making affecting wildlife and fish” (USFS 1991).

Methodology for Analyzing Impacts

Potential impacts on fish and wildlife were analyzed based primarily on two factors: documented presence of species and presence of suitable habitat. If a particular species is not documented to exist in the study area, but suitable habitat is present and potentially affected by one of the alternatives, then it was assumed that the species would be potentially affected.

The area of impact includes locations of proposed development and the extent of potential influence of project activities. The farthest extent of impacts to wildlife would be from construction noise, vehicle noise during operations, and recreational activities. The impact to wildlife was analyzed on the basis of existing conditions, documented wildlife use, and presence of suitable habitat.

Disturbance may have both immediate and long-term effects on wildlife. The immediate response of many animals to disturbance is a change in behavior, such as cessation of foraging, feeding, or altering reproductive behavior. Over time, energetic losses from flight, decreased foraging time, or increased stress levels come at the cost of energy needed for individuals' survival, growth, and reproduction. Noise, like outdoor recreation, has the potential to disturb wildlife, resulting in energetic costs, impacts to animals' behavior and fitness, and avoidance of otherwise suitable habitat (Taylor and Knight 2003).

Cole (1993) states that recreational impact occurs when there is interaction between recreational users and an environment that is vulnerable to disturbance. The spatial and temporal effects of noise and recreation, including the amount of recreational use, type of recreational activity, and behavior of recreationists, were assessed and compared to the spatial and temporal needs of wildlife to determine the level of impact.

Alternative 1: No Action

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: beneficial
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: beneficial Long term: beneficial
Cumulative	Actions listed in table 4-1	Beneficial

Direct/Indirect Impacts

Implementation Level

Throughout the preserve, impacts to fish and wildlife would be beneficial due to reduced human activity under alternative 1.

This alternative would result in the removal of the Valle Grande and Banco Bonito Staging Areas and the elimination of the interim recreation program. The VCT would phase out current access through these staging areas, as well as interim programs and activities. Negligible adverse short-term impacts may result from deconstruction activities associated with removing existing temporary facilities. The removal of the Valle Grande Staging Area would also reduce disturbance and pollutants resulting from the concentration of people and vehicles. The long-term result would be a beneficial impact on fish and wildlife by reducing human activity levels in the preserve, which would reduce disturbance to all wildlife species.

Programmatic Level

Short- and long-term beneficial impacts on fish and wildlife would result from the elimination of the interim recreation program, because existing levels of human activity would decrease. Current grazing and other approved land management activities would continue on the preserve, with no measurable changes to wildlife compared to existing conditions.



Cumulative Impacts

Actions and activities that would affect fish and wildlife include those listed in table 4-1 for fish and wildlife. Past actions have had considerable effects on the presence of individual species of fish and wildlife in the preserve, including the extirpation of the Rio Grande cutthroat trout through the introduction of nonnative stocked trout, the extirpation of the gray wolf by overhunting, the extirpation of black-tailed prairie dogs due to poison control, and the extensive use of the preserve for livestock grazing, which created widespread ecological changes for many wildlife species. Also, logging of the high-elevation forests on the preserve have changed available habitat for species such as Mexican spotted owl, northern goshawk, southern red-backed vole, and American marten. However, since the cessation of logging, forest cover has returned to the preserve's mountains, and the implementation of the Multiple Use and Sustained Yield of Forage Resources program allocates forage to the needs of wildlife, plant regrowth and ecosystem services before providing an allocation to livestock or other use. The preserve still provides extensive protected habitat for a wide variety of fish and wildlife species.

The Las Conchas fire that burned much of the Bandelier National Monument and one-third of the preserve in 2011 had an adverse impact on individual wildlife through direct mortality. As a result of the Las Conchas fire, overland flows moved debris into stream channels throughout the preserve. Fish populations declined in the upper reaches of the East Fork of the Jemez River, and almost all fish in the headwaters of San Antonio Creek were killed (DeVault 2011). Habitat suitability for terrestrial wildlife was reduced and in some cases potentially eliminated through hardening of the soil, as was the case at Bandelier. Habitat loss at Bandelier may influence some terrestrial species to migrate to the preserve. This may be particularly true for black bears, which the national monument believes will take some time to return to Bandelier. However, at both the preserve and Bandelier, vegetation is beginning to regrow, with beneficial impacts on specific species such as coyote and deer. As burned areas recover, impacts on wildlife will become more beneficial. This benefit would be enhanced by the reduction in human presence under the no-action alternative.

The current update of the *Santa Fe National Forest Land and Resource Management Plan* (USFS 1987) to include the *Jemez National Recreation Area Management Plan* (USFS n.d.a) will improve habitat conditions for fish and wildlife, as will the implementation of the Collaborative Forest Landscape Restoration project (USFS and VCT 2010) in the southwest Jemez Mountains (including the preserve). Treatments are designed to improve terrestrial wildlife habitat for a wide variety of native species. Many of the recommendations target improvements to riparian and aquatic ecosystems. These restorative actions will beneficially affect the preserve's fish and wildlife populations. Specifically, tens of thousands of acres of habitat will be improved for the northern goshawk and peregrine falcon. Improvements to riparian habitat will also benefit beavers, as well as many birds and small mammals ~~(USFS 2010d)~~. Removing conifers and restoring historic meadows and grasslands, and increasing forest openings filled with herbaceous vegetation would greatly improve foraging habitat for deer, elk, bear, small mammals, and many bird species (USFS 2010d).



The USFS has eliminated several miles of unneeded roads on nearby lands, and plans to close and decommission more in the future. In addition, the VCT also plans to close or decommission approximately 1,000 miles of roads in the preserve over the next 10 years. These actions would support future transportation planning, reduce vehicular use, and improve habitat connectivity, beneficially impacting wildlife, especially elk. Daily movements and size of home ranges of elk may decrease when open road density decreases, which could lead to energetic benefits that translate into increased fat reserves or productivity and reduced stress levels. Road closure may also decrease illegal poaching levels (Rowland 2005).

The extirpation of some individual species from the preserve and past logging activities within the preserve have resulted in adverse impacts. One extirpated species, elk, have been re-established and the population has stabilized. In 1947 the NMDGF released 47 head of elk imported from the Yellowstone, Wyoming, area into the Río de las Vacas valley west of the Baca Location (VCT n.d.). Although the Jemez Mountains grasslands provided favorable habitat, the introduced elk herd increased at a slow rate, with the population reaching only an estimated 200 animals in 1961. The NMDGF introduced another 58 elk from Jackson Hole, Wyoming, between 1964 and 1965. The populations continued their slow increase in the Valles Caldera over the next decade (VCT n.d.). Dramatic ecological change that had both an immediate and great impact on local elk demography occurred in 1977. In June of that year, the 25,000-acre [10,000-ha] La Mesa fire burned in the ponderosa pine forests on the Pajarito Plateau at Bandelier National Monument. The fire converted the forest into grassland and opened up considerable winter habitat for the Jemez elk population. With favorable climatic conditions, the elk herd expanded to about 7,000 in 1989. In 2001 it was estimated that between 4,000 and 6,000 elk used the Baca Ranch for summer range (VCT n.d.). The preserve's elk population is now far greater than has previously been the case in the long-term natural history of the caldera (VCT 2005i) — a beneficial result.

Reasonably foreseeable future actions are beneficial overall, because and would affect a wide variety of fish and wildlife species exist at the preserve. When the long-term beneficial impacts anticipated under the no-action alternative are combined with the adverse and beneficial impacts of past, present, and reasonably foreseeable future activities, cumulative impacts would be beneficial because the current and future long-term beneficial impacts are expected to outweigh or reasonably overcome the past adverse effects through regional and local restoration activities.

Alternative 2: Banco Bonito Visitor Contact Station

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: moderate with localized major and adverse Long term: moderate -minor and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: minor and adverse Long term: minor to moderate and adverse
Cumulative	Actions listed in table 4-1	Minor to moderate and adverse

Direct/Indirect Impacts

Implementation Level

Noise generated during construction may not directly harm individual animals, but could affect feeding and breeding behaviors.

Under alternative 2, the existing Banco Bonito Staging Area would be removed and new development would occur, as described in chapter 2. As described in the “Vegetation” section, the new construction would affect mostly lower and upper montane grassland and some surrounding ponderosa pine forest. Forested areas adjacent to NM-4 would be permanently affected by the construction of an acceleration and deceleration lane on each side of the road. Approximately 3.0 acres of grassland and forest habitat would be affected by construction of the visitor contact station, parking lots, picnic area, and road improvements. The loss of this habitat would displace a variety of wildlife, including rodents, reptiles, game birds, songbirds, small and large carnivores, and foraging raptors. The type of forest impacted (mid-age closed ponderosa pine forest) is abundant in the area. Large predators such as black bears, coyotes, and mountain lions would only be expected to be present in this area on a transient basis. Elk now concentrate on the grassland valleys in the east and north sections of the preserve, so the proposed visitor contact station is not expected to substantially affect elk calving or foraging. Fish habitat would not be affected by this alternative because none exists at this location.

Some wildlife may have become habituated to human presence at the alternative 2 site, although noise from increased visitation would reduce the likelihood that wildlife would use this area.

Noise generated during deconstruction and construction from heavy equipment, such as bulldozers, dump trucks, and excavators, would affect wildlife. The equipment would not generally be operated continuously or simultaneously, resulting in variable noise levels. Noise generated during construction may not directly harm individual animals, but could affect feeding and breeding behaviors, which could have adverse indirect impacts on long-term population levels. The result would measurably alter the structure, composition, or function of wildlife species during construction, but within a localized area.

~~Alternative 2 would have moderate~~ Moderate with localized major adverse short-term impacts ~~would result,~~ which would temporarily displace wildlife most affected by construction noise. Some of these species may return, particularly those least affected by human presence.

~~Alternative 2 would have minor/moderate adverse long-term impacts due to an increase in human activity in the vicinity of the new contact station and concentrated vehicle use from the new contact station into the preserve. This site is already used as a staging area, and some wildlife may have become habituated to human presence. No new roads would be built under this alternative. However,~~ Only 15 percent of all motorized access onto the preserve comes through the [Banco Bonito Staging Area](#). Motorized access onto the preserve beyond the [Banco Bonito Staging Area](#) is currently limited to administration, and some hunting and weekend hiking shuttles. The construction of new recreational facilities would increase visitation to this area, increasing the level of noise from pedestrian and vehicle sources as well as increasing the amount of regular, routine maintenance activity in and around the visitor contact station. ~~As noted in chapter 3, wildlife can be adversely affected by sounds that intrude on their habitats.~~ These indirect impacts would reduce the likelihood that wildlife would use this immediate area on a transient basis in the future.



Conversely, humans can provide refuge from some prey species that may habituate to areas of human use to avoid predators. However, the displacement of predator species by humans can potentially have indirect effects on interacting prey species (Muhly et al. 2011). Some wildlife, such as bears, may be attracted to human presence and new sources of food. Visitors may also be tempted to feed wildlife, which can result in human/animal conflicts and alter animal behavior. In many recreational areas, animals like black bears, raccoons, squirrels, chipmunks, mice, crows, and jays actively forage for garbage and food items in areas such as picnic areas. The degree of this activity depends on location and the types of animals in the area. Bears in particular can become habituated to people and also conditioned to human foods.¹ Mitigation to offset these potential problems would include ~~removing~~ preventing wildlife from consuming artificial food sources, implementing regulatory actions, providing information and education to visitors, controlling any problem animals, and conducting research and monitoring (MADGF n.d.).

Alternative 2 would have adverse long-term impacts due to an increase in human activity in the vicinity of the new visitor contact station. This site is already used as a staging area and some wildlife may have become habituated to human presence. The location is not an elk calving or grazing area. Mitigation would help address adverse impacts of habituation. Changes at the implementation level would be measurable but would not alter the structure, composition, or function of the preserve's wildlife and would be limited to the visitor contact station location. For these reasons, impacts are expected to be minor.

Programmatic Level

The presence of the visitor contact station and associated recreational facilities would increase visitation over existing conditions. Visitors would recreate beyond the immediate location of the visitor contact station, increasing human activity in habitats where such activity is currently limited and increasing human presence in areas potentially used by fish and wildlife species. Although some day-use amenities would be provided under this alternative, the visitor contact station would not likely function as a primary destination for the majority of visitors. Most visitors are expected to drive beyond the visitor contact station to access the preserve's interior. ~~Expanded and widespread human activity within the preserve has not occurred before; wildlife is not habituated to human presence.~~

At the programmatic level, most impacts would result from disturbance rather than direct impacts to ~~habitat~~ wildlife.

Off-road motorized access is currently restricted on the preserve. Routes from this visitor center location would be limited to high clearance vehicles until future transportation planning and associated improvements to roads were made. The presence of roads has been shown to have pervasive effects on elk, including reduced habitat use. However, elk have also been shown to adapt to human disturbance along roads that experience normal and heavy use. Although elk have also been shown to tolerate people watching them from parking areas and roads, unpredictable or intrusive human behavior could lead to displacement or collisions with vehicles. Elk primarily graze in the central

¹ "Habituation" implies tolerance of the close proximity of people once the animal perceives no consequence as a result. "Food conditioning" occurs when the animal then makes an association between humans and food.

parts of the Valle Grande, where they would be a sufficient distance from roads. Elk also graze and calve along VC01 and VC02 roads around the valleys, where they could be affected by increased traffic.

Improvements to the preserve's Level 3 and Level 4 roads and development of additional small parking lots throughout the preserve would also occur. Short-term construction impacts on fish and wildlife habitat would be minor and adverse. There would be long-term increases in human activity and numbers of vehicles along these existing corridors, which can create barriers to wildlife movement across habitats, with decreased animal abundance near roads and adverse effects to landscape connectivity. Most impacts would result from noise or recreational disturbance rather than direct impacts to habitat/wildlife as improvements would be designed to minimize new impacts on wildlife habitat. Road improvements would improve access for hunters and anglers, potentially increasing harvesting pressure on fish and wildlife resources. However, these activities would continue to be managed on a permit fee basis, which allows the preserve to manage the removal pressure. Also, the paving of any roads would lead to potential roadside effects from an increased runoff rate, additional associated roadside scour, and sedimentation in adjacent aquatic habitats, which could lead to further degradation of fish habitat and habitat for amphibians such as the northern leopard frog. However, a hard road surface may allow for more precise runoff control.

Long-term increases in visitation would increase traffic volumes on preserve roads and on NM-4. Increases in traffic would increase the risk of animal/vehicle collisions, which can harm humans and wildlife. There is no current data on roadkill in the preserve, but anecdotal observations indicate that individuals from multiple species, including elk, Abert's squirrels (*Sciurus aberti*), chipmunks, raccoons, and various reptiles, occasionally die from vehicle strikes (Parmenter, pers. comm. 2011). NMDGF staff members have stated that about four elk are hit by motor vehicles annually on the stretch of NM-4 within preserve boundaries (Trujillo, pers. comm. 2011a). The expected increases in daily and seasonal vehicle trips to the new visitor contact station and along various internal preserve roads would likely lead to increased mortality rates for various wildlife species.

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.

The development of campgrounds and picnic areas would have potential adverse impacts on wildlife, and increase the chance of negative wildlife/human interactions, which can lead to the need for lethal and nonlethal animal control actions. Deliberate and inadvertent feeding of wildlife by humans may lead to conflicts and property damage, as well as alterations in animal behavior, foraging habits, reproductive rate, physical size, distribution, and numbers (MADGF n.d.). As mentioned above, mitigation measures to prevent habituation could be employed to reduce the level of impact and the need for lethal control. By concentrating use in specific areas, animals could habituate to predictable level of human activity, reducing the adverse effects of flight response. Other animals may respond to frequent and predictable encounters by avoiding them.



Hikers, mountain bikers, and equestrians would recreate on existing trails and primitive roads within the preserve. The majority of the preserve's equestrian and mountain biking trails are located in forested areas near Banco Bonito, which does not contain the open habitats of the valleys that elk use for grazing. Therefore, minor impacts to elk recreating on the mountain bike and horseback trails near Banco Bonito are expected. Changes to elk behavior would be measurable but would not alter the structure, composition, or function of the preserve's herd and would be limited in context.

Visitors' attempts to get close to animals may have detrimental effects on elk. An increase in visitation throughout the preserve may cause indirect effects on daily and seasonal habitat use patterns by individuals of these species. Existing wildlife movement and migration patterns could be affected. Most disturbances would continue to occur along existing trails on Level I roads, albeit at an increased level.

Elk generally have greater perceptions of risk when disturbed in open habitats, such as the preserve's valleys. No development or recreational facilities are being proposed in the Valle Grande or Valle Jaramillo, a key calving and nursing area. The VCT would route recreation facilities and activities away from calving, foraging, and quality habitat areas. Blinds or visibility shields could be incorporated to reduce human intrusions on elk activity while facilitating visitor viewing. Signs would be used to inform users of the importance of keeping a distance from elk calving areas.

During winter, snowshoers and cross-country skiers would recreate off designated trails in the Valle Grande, where elk are more likely to concentrate during seasons with heavy snow. Because humans on foot can be perceived as most threatening to elk, such winter activities would have adverse impacts on elk. The VCT would route winter-use facilities, trails, and/or roads away from key ungulate wintering areas. The VCT would use signs to inform users of the importance of ungulate winter range and to keep a specific distance from elk and deer.

Elk would continue to experience adverse impacts during hunting, including direct mortality and increased flight response. As noted in chapter 3, hunting designed to control regional elk populations would have less of an impact than focused hunting. Studies vary on whether hunted elk populations will habituate to or avoid humans during non-hunting seasons. If the latter, increased recreational activity in the preserve may result in a sustained level of movement by elk throughout the year. However, these activities would continue to be managed on a permit fee basis, which allows the preserve to manage the removal pressure.

Rumble, Benkobi, and Gamo note that "estimating elk response to disturbance such as recreation may be difficult because timing may constrain occurrence of human activity to weekends or hunting seasons." According to Richens and Lavigne (1978, cited in Stankovich 2008), "it is not uncommon for species to show short-term effects on flight behavior but suffer no long term ill effects." However, adverse impacts would occur to some extent with increased visitor use. To avoid and minimize these impacts, the VCT would implement these additional mitigation measures:

- Evaluate and monitor wildlife impacts and apply adaptive management to address both recreation and wildlife concerns as needed (e.g., spatially and temporally

separate humans and wildlife from key areas at critical times by closing roads or trails, changing access points, and/ or implementing a zoning strategy in which recreational uses are allowed in carefully selected areas).

- Implement programs to educate visitors about the effects of their activities on wildlife, with a goal of influencing the behavior of recreationists and reducing the potential negative effects on wildlife. Integrate ecological research and monitoring into education programs, and stress that management may be necessary to protect species. Educational and interpretation programs would (1) make people aware of the link between in appropriate behavior and specific ecological problems, (2) clearly demonstrate appropriate ways for visitors to behave so that problems can be avoided, and (3) encourage a sense of commitment in people to do something about these problems (Cole 1993). Educational programs would also be designed to address behavior of visitors in proximity to habituated animals, such as feeding wildlife.
- Further refine and identify key critical life history locations for wildlife and analyze potential flight impacts to avoid and minimize flight response from noise and various recreation activities.

In the short term, minor adverse impacts on fish and wildlife would be expected at the programmatic level due to construction activities within the preserve's interior at specific locations. 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 and spring when visitation is lowest. The degree of disturbance would be based on results of mitigation, which would be adaptively managed to minimize impacts.

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 2 as well. When the potential long-term minor to moderate adverse impacts of alternative 2 on fish and wildlife species are combined with the adverse and beneficial impacts of past, present, and reasonably foreseeable future activities, cumulative impacts would be minor to moderate and adverse.



Alternative 3A: Entrada del Valle Visitor Center—Primary Access via Shuttle System

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: moderate with localized major and adverse Long term: minor to moderate and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: minor to moderate and adverse Long term: minor to moderate and adverse
Cumulative	Actions listed in table 4-1	Minor to moderate and adverse

A variety of wildlife species could use some portion of the alternative 3A implementation areas as breeding habitat, foraging habitat, or cover. Elk that may use the area for summer foraging and calving habitat may be disturbed.

Direct/Indirect Impacts

Implementation Level

Under alternative 3A, the existing Valle Grande Staging Area would be removed and new development would occur in a new location closer to NM-4 and the periphery of Valle Grande. This new construction would consist of a new full-service visitor center, day-use facilities, roads, recreational facilities, and parking lots, all located just west of the existing main gate on NM-4. Habitat impacts would result from the following construction elements:

- A new approach road approximately 1 mile long would be added, starting at NM-4 and connecting to the existing VC01. This road would consist of permeable fill and would incorporate culverts to address seasonal drainage issues. The new road would require a slight realignment of NM-4 in the vicinity of the access road, including the addition of acceleration and deceleration lanes.
- A full-service visitor center up to 10,000 square feet would be built, with supporting administrative facilities of up to an additional 5,000 square feet. It is anticipated that more than 120,000 guests would visit this facility each year.
- Parking would be provided for up to 100 vehicles, with RV, bus, and overflow parking to support high-use days and special events.
- From the visitor center, an ADA-compliant day-use area would be developed, including access to the East Fork of the Jemez River, overlooks, picnic areas, staging for groups and special events, and interpretive sites. From here, additional trails would provide access to the interior of the preserve.

These new facilities would be estimated to impact between 5 and 10 acres of previously undisturbed habitat composed primarily of lower and upper montane grassland, wet meadow, mixed-conifer forest, ponderosa pine forest, and blue spruce fringe forest. Some trees would likely be removed, although the number and size cannot be determined at this time. Most of the forest impacts would result from the construction of the new access road, which would skirt the edge of the Valle Grande before reaching the new visitor center. A variety of wildlife species could use some portion of the

If facilities are located in riparian or wetland habitats, impacts would be more likely to affect fish and aquatic wildlife.

implementation areas as breeding habitat, foraging habitat, or cover during daily movements. These include rodents, reptiles, game birds, songbirds, small and large carnivores, and foraging raptors. Impacts would occur on grassland habitat and wet meadow habitat, as well as potentially on rock outcrops. Rock outcrops can be used as shelter and breeding habitat for a number of wildlife species, such as gray fox and coyote. Elk that may are known use the southern edge of the Valle Grande for summer foraging and calving habitat may be disturbed or displaced. Approximately 80 percent of the preserve's visitation occurs from May through October, overlapping with the mid-May through June elk calving season. Under this alternative, the new access road proposed from NM-4 would divert visitor and shuttle bus traffic from VC01, along which elk graze and calve. Visitors would no longer drive along VC01 to reach the Valle Grande Staging Area, resulting in a beneficial effect. Mitigation measures identified under alternative 2 would also be applied to minimize the level of impact, particularly to calving. The construction of new trails along the East Fork of the Jemez River may have minor impacts on riparian habitat.

As described for alternative 2, some wildlife species may become attracted to the visitor center and its associated recreational facilities, such as picnic sites. Visitors may also be tempted to feed wildlife, and animals can become habituated to people and conditioned to human foods. To address this potential issue, the VCT would implement the mitigation measures described for alternative 2.

Noise impacts would occur as described for alternative 2, but to a greater extent due to the substantially increased visitation, larger parking facilities, and new access road. Wildlife would not likely use this immediate area on a transient basis in the future.

Overall, moderate with localized major adverse effects would occur in the short term, with some wildlife permanently displaced as described for alternative 2. Visitation and human presence is expected to increase substantially in the long term, affecting all habitats to some degree. The location of the entrance and visitor center in the Valle Grande is expected to attract an extensive amount of visitors compared to existing conditions. ~~As mentioned under alternative 2, wildlife in the preserve has not been exposed or become habituated to the presence of large numbers of people.~~ Minor to moderate adverse impacts are expected in the long term as wildlife habituate to the new facilities and adjust their daily and seasonal use patterns.

Programmatic Level

The presence of the visitor center and associated recreational facilities would increase visitation over existing conditions. Although hiking would continue to be primarily on Level 1 roads, hiking trails would be expanded preserve-wide to provide short day loops and multi-day backpacking opportunities. Where trail users are limited to existing roads, impacts would be similar to alternative 2, but with substantially more use. Improvements to the preserve's Level 3 and Level 4 roads and development of additional parking lots throughout the preserve would also occur, and a bicycle path would be created to parallel the loop road. Short-term construction impacts on fish and wildlife species would be minor to moderate and adverse because these actions would be related to campground and trailhead development and road upgrades, rather than new road development. Long-term impacts due to disturbance would be minor to moderate and

adverse due to the increase in number and frequency of shuttle buses using the Level 4 roads. There would also be an increase in human presence on trails and roads, and possible increased roadside scour and sedimentation impacts from an increase in impervious surface along paved roads, which could affect fish habitat. However, like alternative 2, a hard road surface may allow for more precise runoff control.

Similar to alternative 2, increased visitation would likely increase fishing and hunting pressure in the long term, as well as potentially increasing wildlife mortality from vehicle collisions, but to a greater degree.

As described for alternative 2, recreational activities in campgrounds can promote habituation and a conditioned response to human foods. Feeding of wildlife by humans may result in adverse effects on both humans and animals (MADGF n.d.). As mentioned above, mitigation measures to prevent habituation could be employed to reduce the level of impact.

Noise disturbance would occur as described for alternative 2, but with substantially more visitors using recreational facilities in the preserve. ~~However, sufficient habitat exists in the preserve that adverse physiological and/or behavioral changes to wildlife would not be anticipated.~~ The use of a shuttle system would offset disturbance in the preserve's interior that would be expected with a considerable increase in visitation.

Management actions that disperse animals from roadsides and other visitor use areas and that close roads and trails to protect animals reduce chances of visitors seeing animals. Wright (1998) notes that "innovative techniques are needed to allow visitors the opportunity to view wildlife without causing disruptions." Ongoing research has demonstrated that a public transportation system, such as shuttle bus use within some national parks, lessens impacts to wildlife along road corridors and greatly increases wildlife viewing opportunities (Wright 1998). Although visitation would increase substantially under this alternative, the use of shuttle buses would help contain and manage recreational impacts to wildlife. While some visitors would expect to use the shuttle to access specific destinations to pursue recreational activities, others would be satisfied to simply tour the Level 4 loop road and remain on the shuttle. Wildlife, especially elk and mule deer, may habituate to predictable shuttle schedule and route, along with predictable visitor behavior along roads, decreasing the likelihood of flight and lessening associated impacts. Canfield et al. (1999) note that the most detrimental disturbances to wintering ungulates are those that are unanticipated.

Impacts to elk from recreational disturbance and increased road use would occur as described under alternative 2. These impacts would be greater given the substantially higher levels of visitation expected, yet would be mitigated to a certain degree by the use of a shuttle system, which would consolidate visitors from multiple vehicles into one. The VCT would implement the same mitigation measures described for alternative 2. In addition, shuttle buses would avoid some elk calving areas along VC01, using the new access road to reach the visitor center and circumventing a section of VC01 to transport visitors farther into the preserve. Shuttle drivers would be educated about the sensitivity of the grazing and calving areas along VC01 and VC02 as they follow the proposed loop route through the preserve.

As noted under alternative 2, it is difficult to precisely predict how wildlife, particularly elk, would be affected by increased recreational activity and road use. In general, the substantial increase in human activity would create minor to moderate adverse disturbance impacts on fish and wildlife species in the long term at the programmatic level. Similarly, habitat-wildlife impacts would be minor to moderate and adverse depending on the specific locations and sizes of ancillary facilities (parking lots, additional staging area / visitor contact areas, etc.). If these facilities are located in riparian or wetland habitats, impacts would be more likely to affect fish and aquatic wildlife, as well as species such as frogs, which inhabit wet areas.

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 3A as well. When the long-term minor to moderate adverse impacts anticipated under alternative 3A are combined with the adverse and beneficial impacts of past, present, and reasonably foreseeable future activities, cumulative impacts would be minor to moderate and adverse, primarily because of impacts in previously undisturbed areas and substantial increases in human activity.

Alternative 3B: Entrada del Valle Visitor Center—Primary Access via Personal Vehicle

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: moderate to localized major and adverse Long term: minor to moderate and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: minor to moderate and adverse Long term: moderate and adverse
Cumulative	Actions listed in table 4-1	Moderate and adverse

Direct/Indirect Impacts

Implementation Level

Alternative 3B would differ from alternative 3A in that visitors would access the preserve using personal vehicles rather than shuttle buses, as described below. Implementation-level impacts would be the same as those under alternative 3A: moderate to localized major and adverse in the short term, and minor to moderate and adverse in the long term.

Programmatic Level

The transportation system would include the development of a Level 4, two-lane paved or gravel road. Although the parking area at the visitor center would be smaller than for alternative 3A, larger parking areas would be developed at recreation areas throughout the preserve to accommodate personal vehicles at those locations. The use of personal vehicles would create more frequent, persistent and widespread disturbance to

The use of personal vehicles under alternative 3B would create more frequent, persistent, and widespread disturbance to terrestrial wildlife than a shuttle system.

terrestrial wildlife than a shuttle system, and would likely result in more collisions with wildlife. Personal vehicles would be more widespread throughout the preserve, using Level 2 as well as Level 1 roads. 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. ~~Therefore, impacts from noise would be greater than similar to those under alternative 3A due to higher traffic volume, with more disturbance from different motor vehicle engines.~~

~~Impacts to elk from recreational disturbance and increased road use would occur as described under alternative 2, but to a greater degree due to substantially increased visitation. Like alternative 3A, a portion of VC01 where elk calving occurs would be closed to vehicular use, resulting in a localized beneficial effect in that area. However, calving areas farther along VC01 and VC02 would experience increased adverse effects from more motorized use. More unlimited access via personal vehicle—for instance, the use of 4-wheel drive vehicles to access remote locations—could also result in potential illegal hunting and further loss of undisturbed habitat areas for elk breeding, calving, and foraging. These differences would result in increased measurable changes to fish and wildlife compared to alternative 3A. Short term impacts would be minor to moderate adverse. Localized moderate impacts within the construction site would be expected in the long term for the reasons described for alternative 3A.~~

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 3B as well. When the long-term primarily moderate adverse impacts expected under alternative 3B are combined with the adverse and beneficial impacts of other past, present, and reasonably foreseeable future activities, cumulative impacts would be moderate and adverse.

Alternative 4A: Vista del Valle Visitor Center—Primary Access via Shuttle System

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: moderate with localized major and adverse Long term: minor and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: minor to moderate and adverse Long term: minor to moderate and adverse
Cumulative	Actions listed in table 4-1	Minor to moderate and adverse

Under alternative 4A, most of the affected habitat is relatively close to NM-4, which would reduce its value to wildlife.

Direct/Indirect Impacts

Implementation Level

This alternative is similar to alternative 3A but would locate the full-service visitor center south of NM-4 below Rabbit Mountain. Where alternative 3A focuses on day-use experience around access to the East Fork of the Jemez River and hiking at South Mountain, alternative 4A would develop a day-use area focused on views of the Valle

The alternative 4A location is not widely used by large game due to its exposure and proximity to NM-4.

Grande, interpretation of geology, and proximity to the adjacent day-use area at Bandelier National Monument, which consists of a cross-country ski trail and hiking trail leading from the preserve boundary. An underpass would be developed to provide access below NM-4 for wildlife viewing and hiking. Interpretive trails and picnic areas would be developed south of NM-4, also emphasizing views of the Valle Grande. Like under alternatives 2 and 3A/B, NM-4 would be modified to include acceleration and deceleration lanes. Also similar to alternative 3A, a shuttle system would serve as the primary mode of access into the preserve.

Habitat impacts from this alternative would be similar to those under alternative 3A, with a similar-sized visitor center, parking, picnic area, and trails. However, the access road from NM-4 would be considerably shorter, and the construction of the facility would require cutting into a slope. The type of habitat impacted by this alternative would be limited primarily to grassland habitat, with some trees removed at the proposed location of the visitor center. Several wetlands are located near the treeline that could be affected by trail or utility construction. These wetlands would be avoided to the extent possible.

The visitor center and associated infrastructure would be developed away from large streams. Most of the affected habitat is relatively close to NM-4, which would reduce its value to wildlife. Proposed facilities farther from the visitor center, such as utilities or trails, would have more likelihood of impacting undisturbed wildlife habitat.

Impacts from potential wildlife habituation and conditioning to human food at the visitor center would be mitigated as described under alternative 2. Noise impacts would also be similar to those under alternative 3A, although the proximity of this alternative to NM-4 may mean that wildlife will have adjusted to some human-caused noise or may avoid the area.

As mentioned in chapter 3, a large population of mountain lions has been documented on Bandelier National Monument, which is adjacent to the preserve, making migration between the two areas likely. Although mountain lions are most active at night, the presence of a large visitor center and a substantial increase in human presence at this location could affect mountain lion migration. However, mountain lions can coexist with human presence, and the species may currently avoid areas near NM-4.

The Vista del Valle location is not widely used by large game due to its exposure and proximity to NM-4. The underpass and wildlife viewing area associated with alternative 4A would provide an unobtrusive vantage point for visitors to observe elk and other wildlife from a distance.

Moderate with localized major adverse short term impacts on fish and wildlife would result, as described for alternative 2. Long-term impacts would be minor and adverse because of the proximity to NM-4 and the minimal impacts on forest and stream habitat. Changes proposed under this alternative would be measurable but would not alter the structure, composition, or function of the preserve's wildlife.



Programmatic Level

Programmatic-level impacts on fish and wildlife would be similar to those under alternative 3A, resulting from increases in human activity and noise in the preserve and the development of parking lots, shuttle bus stops, and other ancillary actions. Unlike alternative 3A, shuttle buses would follow VC01, along which elk calve, to access the preserve from NM-4. Shuttle buses would also increase the level of traffic along the Valle Grande on NM-4 between the proposed visitor center and VC01, potentially increasing disturbance to elk. Short-term and long-term impacts would be minor to moderate and adverse at the programmatic level, depending on the level of visitor use and the specific location of additional facilities.

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 4A as well. The wildfires that occurred in 2011 burned the area of the preserve where this alternative is proposed. Direct mortality to some individual wildlife occurred, and habitat quality was reduced in the short term. Mountain lion migration has likely ceased until sufficient habitat is restored at Bandelier and the preserve. As at Bandelier National Monument, the burned area at the preserve is recovering and wildlife will respond. Some wildlife species are attracted to burned areas, which provide new browse for herbivores such as deer and elk. When the long-term minor to moderate adverse impacts expected under alternative 4A are combined with the adverse and beneficial impacts of other past, present, and reasonably foreseeable future activities, cumulative impacts would be minor to moderate and adverse.

Alternative 4B: Vista del Valle Visitor Center—Primary Access via Personal Vehicle

Summary

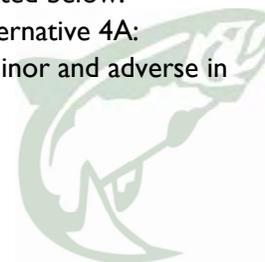
Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: moderate with localized major and adverse Long term: minor and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: Moderate and adverse Long term: Moderate and adverse
Cumulative	Actions listed in table 4-1	Moderate and adverse

Implementation-level impacts under alternative 4B would be similar to alternative 4A. Programmatic-level impacts would be similar to alternative 3B.

Direct/Indirect Impacts

Implementation Level

Alternative 4B would differ from alternative 4A in that visitors would access the preserve using personal vehicles rather than shuttle buses, as evaluated below. Implementation-level impacts would be the same as those under alternative 4A: moderate with localized major and adverse in the short term and minor and adverse in the long term.



Programmatic Level

Personal vehicle use would increase the level of traffic along the Valle Grande on NM-4 between the proposed visitor center and VC01, potentially increasing disturbance to elk. Overall, visitor access to the preserve using personal vehicles would have similar impacts to alternative 3B: moderate and adverse in the short and long term.

Cumulative Impacts

Cumulative impacts would be moderate and adverse, as described for alternative 4A.

Special-status Species

Guiding Regulations and Policies

In addition to the regulations and policies that are pertinent to general fish and wildlife species, which are described in the “Fish and Wildlife” section, the following laws, regulations, and policies guide or constrain the management of special-status species in the preserve.

Section 7 of the Endangered Species Act (16 USC 1531 et seq.) requires each federal agency to ensure that its actions to authorize, permit, or fund a project do not jeopardize the continued existence of any threatened or endangered species. Section 7 requires federal agencies to determine whether their actions may affect federally listed threatened or endangered species and species of special concern, or designated and proposed critical habitat. If the VCT determines that a proposed action may affect such resources (in this case, critical habitat for the Mexican spotted owl), the VCT must request concurrence from the USFWS or request formal consultation with the USFWS. Both actions require the submittal of a written analysis to the USFWS that records the conclusions and supporting rationale regarding the effects of proposed actions on federally listed species and/or critical habitat. The USFWS has defined specific determinations to use in the analysis, described below (USFWS 2011b).

1. No effect: there would be no impacts, positive or negative, to listed or proposed species or habitat. No listed resources would be exposed to the action and its environmental consequences.
1. May affect, but not likely to adversely affect: All effects would be beneficial, insignificant, or discountable. Beneficial effects have positive effects without any adverse effects to the species or habitat. Insignificant effects relate to the size of the impact and include those effects that are undetectable, not measurable, or cannot be evaluated. Discountable effects are those extremely unlikely to occur.
2. May affect, and is likely to adversely affect: listed resources are likely to be exposed to the action or its environmental consequences and would respond in a negative manner to the exposure.
3. May affect, and is likely to adversely affect: listed resources are likely to be exposed to the action or its environmental consequences and would respond in a negative manner to the exposure.



Appendix B - Errata

Section Change – Chapter 4, Environmental Justice

(Revisions are shown in red in the text that follows. Additions are underlined and deleted text is crossed out.)

Environmental Justice

Guiding Regulations and Policies

The following regulations and policies provide guidance for analyzing environmental justice impacts.

Title VI of the Civil Rights Act of 1964 prohibits discrimination based on race, color, national origin, and sex in the provision of benefits and services under any program or activity receiving federal financial assistance.

Executive Order 12898, “Federal Actions to Address Environmental Justice in Minority and Low-income Populations,” was signed by the president on February 11, 1994, and requires that federal agencies administer and implement their programs, policies, and activities that affect human health or the environment to identify and avoid “disproportionately high and adverse” effects on minority and low-income populations. The executive order ensures that agency actions do not have disproportionately high and adverse effects on environmental justice populations, or otherwise have the effect of

- excluding persons (including populations) from participation
- denying persons (including populations) from benefits
- subjecting persons (including populations) to discrimination because of their race, color, or national origin

Executive Order 12898 requires that each federal agency develop an agency-wide environmental justice strategy that

- promotes enforcement of all health and environmental statutes in areas with minority and low-income populations
- ensures greater public participation
- identifies differential patterns of consumption of natural resources among minority and low-income populations

Regarding public participation, Section 5-5 of Executive Order 12898 states that each agency, whenever practicable and appropriate, shall translate crucial public documents, notices, and hearings relating to human health or the environment for limited English-speaking populations. Section 6-606 states that Executive Order 12898 shall apply equally to Native American programs.

The CEQ has issued guidance on how to implement Executive Order 12898 and conduct an environmental justice analysis (CEQ 1997b), as has the USDA (1997).

The presidential memorandum that accompanied Executive Order 12898 specifically recognized the importance of procedures under NEPA for identifying and addressing environmental justice issues. Goals defining the purposes and policies of NEPA are consistent with the attainment of environmental justice (CEQ 1997b), as follows:

- to ensure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings

- to attain the widest range of beneficial uses of the environment without degradation, risk to health or safety, or other undesirable and unintended consequences
- to preserve important historic, cultural, and natural aspects of our natural heritage, and to maintain, wherever possible, an environment that supports diversity and variety of individual choice
- to achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities

Executive Order 12898 requires that, in complying with NEPA, agencies shall

- Analyze the environmental effects of proposed Federal actions, including human health, economic, and social effects on minority and low-income populations.
- Whenever feasible, identify mitigation measures that reduce significant and adverse environmental effects of proposed Federal actions on minority and low-income populations.
- Provide opportunities for community input in the NEPA process (see chapter 5 for more information about public involvement).

Departmental Regulation 5600-2 (USDA 1997) states that the USFS will analyze the environmental effects, including human health, economic, and social effects, of federal actions on minority and low-income communities when such analysis is required by NEPA.

Per 5600-2, in determining whether

- an effect on a minority and/or a low-income population is disproportionately high and adverse, agencies should consider whether the adverse effect is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.
- there are disproportionately high and adverse environmental or human health effects, including social and economic effects, on an identifiable low-income or minority population, agencies should consider, as appropriate, such effects as ...destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality (USDA 1997).

Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency," is intended to improve access to federal programs and activities for persons who, as a result of national origin, are limited in their English proficiency (LEP). Executive Order 13166 requires Federal agencies to examine the services they provide, identify any need for services to those with LEP, and develop and implement a system to provide those services so LEP persons can have meaningful access to them. The Department of Justice (DOJ) *Federal Agency LEP Guidance and Language Access Plan* is currently pending (DOJ n.d.). However, the "Language Access Assessment and Planning Tool for Federally Conducted and Federally Assisted



Programs,” published by the Department of Justice in May 2011, offers guidance on identifying limited English proficiency communities (DOJ 2011).

Valles Caldera Preservation Act restricts access to Redondo Peak within the preserve, as follows:

Section 105(g) REDONDO PEAK.— (1) IN GENERAL.—For the purposes of preserving the natural, cultural, religious, and historic resources on Redondo Peak upon acquisition of the Baca ranch under section 104(a), except as provided in paragraph (2), 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. (2) EXCEPTIONS.—Nothing in this subsection shall preclude— (A) the use and maintenance of roads and trails existing as of the date of enactment of this Act; (B) the construction, use and maintenance of new trails, and the relocation of existing roads, if located to avoid Native American religious and cultural sites; and (C) motorized access necessary to administer the area by the Trust (including measures required in emergencies involving the health or safety of persons within the area).

Valles Caldera Preserve Authorization assigned to Santa Clara Pueblo the right to purchase 5,046 acres at the headwaters of Santa Clara Creek in the northeast corner of the preserve. Santa Clara completed this transaction on July 25. Santa Clara and the United States also subsequently carried out a reciprocal exchange of conservation easements along their common boundary at the northeast corner of the preserve. These easements guarantee that no inappropriate development will occur along the part of the caldera rim that defines the boundary (VCT 2005i).

Valles Caldera National Preserve, Framework and Strategic Guidance for Comprehensive Management (2005) presents the framework for decision-making that the Valles Caldera Trust proposes to use as it develops programs and policies for the management and use of the preserve. Page 107, “Visitor Programs and Guidelines,” states, “activities must not conflict with religious and cultural priorities and uses” (VCT 2005i).

Methodology for Analyzing Impacts

The methodology for determining impacts on environmental justice is based on the guidance above. The geographic area of concern and the affected populations are identified in chapter 3, “Affected Environment.”

CEQ guidance on environmental justice acknowledges that “there is no standard formula for how environmental justice issues should be identified or addressed.” However, the CEQ provides principles as general guidance, and Departmental Regulation 5600-2 (USDA 1997) provides methodology for analyzing impacts on environmental justice. These documents were used to develop the following methodology for analyzing impacts:

- I. Identify the minority and low-income populations and Indian Tribes in the affected area that might be disproportionately affected (described in chapter 3).
- I. Identify cultural, social, occupational, historical, or economic factors that may amplify the natural and physical environmental effects of the alternatives, such as

None of the alternatives are expected to have a disproportionately high impact on environmental justice populations.

sensitivity of the community or population to particular impacts, the effects of disruption on community structure, and the nature and degree of the impact on the physical and social structure of the community.

2. Analyze potential impacts on the economic and social factors identified in step 2 above, as well as to subsistence consumption and human health related to such consumption, for each alternative. Determine differences in rates and patterns of subsistence consumption as compared to rates and patterns of the general population.
3. Determine whether the proposed alternatives would have a disproportionately high and adverse effect on human health or the environment, including socioeconomic effects, of minority, low-income, or tribal populations. Consider destruction or disruption of human-made or natural resources, destruction or diminution of aesthetic values, and destruction or disruption of community cohesion or a community’s economic vitality. As recommended by the CEQ, to determine disproportionately high and adverse environmental effects, this methodology considers the following (CEQ 1997):
 - whether the impacts meet the definition of significant under NEPA. Relevant NEPA significance criteria include:
 - effects on public health and safety
 - unique characteristics of the geographic area
 - precedent-setting effects for future actions
 - cumulative effects
 - loss or destruction of significant scientific, cultural, or historic resources
 - whether the impacts are significant (as defined by NEPA, above) and appreciably exceed or are likely to appreciably exceed those on the general population
4. Determine impacts on populations and/or individuals with limited English proficiency based on the number or proportion of persons with limited English proficiency likely to be affected by the alternatives.

Alternative 1: No Action

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: none Long term: negligible and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: negligible and adverse
Cumulative	Actions listed in table 4-1	Beneficial



Direct/Indirect Impacts

Implementation Level

Alternative 1 would result in negligible impacts due to the reduction in services and access to low-income, minority, and Native American visitors.

This alternative would result in the removal of the Valle Grande and Banco Bonito Staging Areas and the elimination of the interim recreation programs and activities. No additional structures or facilities would be built to accommodate visitors. There would be no measurable short-term impacts at the implementation level. Low-income, minority, and Native American visitors to the preserve would be adversely affected in the long term by a reduction in visitor services, as described in the “Visitor Experience” section. However, these impacts would be negligible and adverse and would not be disproportionately high compared to the general population.

The removal of the staging areas would not measurably affect persons with limited English proficiency. The preserve would notify the public of the effects of this alternative in English as well as in the most frequently encountered languages in the area.

Programmatic Level

The VCT would phase out current access through the staging areas, as well as interim programs and activities. Visitation would decrease considerably under this alternative compared to existing conditions. The result would be an adverse impact on local economies, as described in the “Socioeconomics” section, which would also affect low-income, minority, and Native American populations that rely on tourism income. These impacts would not be expected to disproportionately affect environmental justice populations, and there would be no impact on an environmental justice community’s economic vitality. Overall short- and long-term impacts related to tourism spending would be negligible and adverse.

Phasing out current access and interim programs and activities, with associated decreased visitation, would not affect community cohesion for any environmental justice populations in the study area.

Under alternative 1 would not change the landscape features that are important to the local Pueblos. Native American groups would continue to be allowed access for game hunting, plant gathering, mineral collecting, and ceremonial pilgrimage as under existing conditions.

As noted in chapter 3, the preserve is an important agricultural resource for many minority residents. Access for grazing or other land management activities would continue, consistent with the decisions and environmental documents guiding those specific actions. No impact on the affected populations would be expected compared to existing conditions because access for grazing would continue to be provided.

Also as noted in chapter 3, the preserve is a sacred place to Native Americans. Under this alternative, there would be no changes to landscape features that serve as focal points for physical and metaphysical interaction for local Pueblos. The removal of the staging areas may improve certain landscape features, such as the Valle Grande. Although general visitation would be curtailed under this alternative, Native American groups would still be permitted periodic on-site visits for game hunting, plant gathering, mineral collecting, and ceremonial pilgrimage as under existing conditions. Such access would continue to maintain and affirm cultural identities while also providing for subsistence consumption, with no related adverse health effects. Therefore, there would be no adverse impact or disproportionately high adverse impact on Native Americans seeking access to and traditional use of the preserve.

There would be no measurable change to persons with limited English proficiency from the reduction in visitor services. The preserve would notify the public of the effects of this alternative in English as well as in the most frequently encountered languages in the area.

Overall, there would be no disproportionately high adverse impacts on environmental justice populations under alternative 1. There would be little change from existing conditions. Any adverse impacts would be related to decreased tourism revenue and would be negligible.

Cumulative Impacts

Actions and activities that would affect this resource include those listed in table 4-1 under “environmental justice.” The 1993 Jemez National Recreation Area Act resulted in a beneficial impact on Native Americans by allowing the temporary closure of portions of the Jemez National Recreation Area to protect traditional and customary uses by local Tribes. This law currently benefits and will continue to benefit Tribes in the future. Actions described in the “Socioeconomics” section would also affect all environmental justice populations through employment opportunities. When these beneficial impacts are combined with the overall negligible adverse impacts from the no-action alternative, cumulative impacts would be beneficial because the effects of alternative 1 would not be substantial.

Alternative 2: Banco Bonito Visitor Contact Station

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial
Programmatic level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial
Cumulative	Actions listed in table 4-1	Beneficial

Direct/Indirect Impacts

Increased visitation under alternative 2 would increase tourism spending, and generate jobs for construction and visitor services, potentially benefiting environmental justice populations. Bilingual staff may be needed to serve visitors.

Implementation Level

Under alternative 2, the existing Banco Bonito Staging Area would be removed and a small-scale visitor contact station would be developed (up to 5,000 square feet), with associated day-use facilities, a small parking area, and roads to provide access to the preserve for personal vehicles and/or shuttles. Nonmotorized access from the visitor contact station [to the existing network of trails in the area](#) would be generally open and unlimited. As described under the “Socioeconomics” section, short-term deconstruction and construction impacts may result in the purchase of local goods and employment of local workers, including environmental justice populations. This beneficial impact would be slight.

The new visitor contact station and associated day-use facilities would draw considerably more visitors to the preserve, and thus to the general area, with increased spending locally on food, lodging, and other services (more detail is provided under

“Programmatic Level” for this alternative). The VCT may need to hire additional employees to operate and maintain the visitor contact station. As noted in chapter 3, a substantial proportion of the local population is Hispanic or Latino, with 24% speaking Spanish. Department of Justice guidance notes that “the greater the number or proportion of limited English proficiency persons in an area, the more likely language services are needed,” and recommends hiring bilingual staff for public contact positions (DOJ 2002). In addition, the VCT would also investigate the possibility of employing “Cultural Guides” from the local Tribes and Pueblos to provide educational services at the visitor contact station and vicinity. This would result in a slight beneficial impact on local environmental justice populations.

The Pueblo of Jemez has identified a sacred pilgrimage trail from the village of Walatowa to Redondo Peak, the Pueblo’s most important landmark in the preserve, which passes through the area of the proposed visitor contact station. The VCT would work with the Pueblo during final design to help identify a site for the visitor contact station and associated facilities that would avoid this trail and minimize impacts to it and its use by the Pueblo. The VCT would also work with the Pueblo to avoid and protect important plant procurement areas the Pueblo has identified in the vicinity.

Programmatic Level

Programmatic-level actions proposed under alternative 2 would increase visitation substantially over existing conditions by providing increased access and recreational opportunities throughout the preserve. Approximately 50,000 visitors would be expected annually, which would beneficially affect local economies through spending on food, lodging, and other services. These benefits would affect environmental justice populations employed in these sectors in both the short term and the long term.

As noted in chapter 3, a fairly high percentage of minority populations in the area live below the poverty level. Increased tourism to the area is expected to result in the need for additional services, potentially providing the opportunity for new business development and the need to hire employees. Increased tourism may also generate a desire for locally made crafts and interest in indigenous customs, also potentially creating job opportunities that support existing skills, knowledge, and expertise. As noted on the preserve’s web site, “The Valles Caldera National Preserve has long attracted people who wish to study and learn about a wide range of topics, such as ... cultural history In the years to come, the VCT will be exploring options to create meaningful programs on the preserve that offer lasting, long-term benefits to the area’s local communities, the state of New Mexico and the world beyond.” This commitment to education is reflected in the *Strategic Management Plan for the Valles Caldera National Preserve, Fiscal Years 2012-2018*, which calls for the establishment of “permanent and formal education programs for all ages” (VCT 2012). The VCT recognizes the educational value that minority populations in the area can provide to visitors, and will work with these populations to integrate them into high-quality educational programs. For example, the VCT would investigate the possibility of employing “Cultural Guides” from the local Tribes and Pueblos to provide educational programs within the preserve. These new opportunities would be designed to help address local populations living at and below poverty levels.

The development of the visitor contact station and associated increased visitation would not affect community cohesion for any environmental justice populations in the study area.

Access for grazing or other land management activities would continue. The preserve would continue to be an important agricultural resource for many minority residents. No impact on the affected populations would be expected compared to existing conditions because these programs would continue to be provided.

Under this alternative, improvement and increased use of preserve roads, increased recreational amenities (such as campgrounds), and the presence of substantially more visitors could change landscape aesthetics and features that are important to local Pueblos. However, the removal of the staging areas may improve certain landscape features, such as the Valle Grande.

Under alternative 2, shuttles and private vehicles would have access only to Level 3 and Level 4 roads, as shown in chapter 2. None of the preserve's Level 1 or Level 2 roads from the Valle Toledo to the Santa Clara Indian Reservation would be open to shuttle or private vehicle use. Therefore, no access to the Santa Clara Reservation or the easement would be permitted.

VCT staff would work with local Tribes and Pueblos to identify methods of sustaining on-site visits for cultural and religious practices without interference from increased public visitation, as well as identify and protect areas where Tribes and Pueblos gather important medicinal plants, herbs, and other resources. 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. Therefore, there would be no adverse impact or disproportionately high adverse impact on Native Americans seeking access to and traditional use of the preserve.

Increased visitation may result in a need to hire additional employees and an opportunity to comply with limited English proficiency guidance by hiring bilingual individuals. This would result in a slight beneficial impact on local environmental justice populations.

Overall, there would be no disproportionately high adverse impacts on environmental justice populations under alternative 2. Slight beneficial impacts would be expected primarily from increased local spending by visitors, which would affect environmental justice populations as well as general populations.

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 2 as well. When the beneficial impacts expected under alternative 2 are combined with the overall beneficial impacts of other past, present, and reasonably foreseeable future activities, cumulative impacts would be beneficial.



Alternative 3A: Entrada del Valle Visitor Center—Primary Access via Shuttle System

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial
Programmatic level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial
Cumulative	Actions listed in table 4-1	Beneficial

Direct/Indirect Impacts

Implementation Level

The same benefits expected under alternative 2 to environmental justice populations would occur, but to a greater degree due to higher visitation levels. Bilingual staff may be needed to serve visitors.

As mentioned in the “Socioeconomics” section, the central feature of alternative 3A is the development of a full-service visitor center that would offer a wide variety of visitor services and amenities, as well as associated day-use facilities. Short-term deconstruction and construction impacts may result in the purchase of local goods and employment of local workers, which could include environmental justice populations. This beneficial impact would be slight.

The visitor center and associated day-use facilities could become a destination in itself due to the extent of its offerings. The VCT would need to hire additional employees or concessionaires for the visitor center, providing an opportunity to comply with limited English proficiency guidance by hiring bilingual individuals. The VCT would also investigate the possibility of employing “Cultural Guides” from the local Tribes and Pueblos to provide educational services at the visitor center and vicinity. This would result in a slight beneficial impact on local environmental justice populations in the short and long term.

The VCT would work with local Tribes and Pueblos during final design to help identify a site for the visitor contact center and associated facilities to protect important plant procurement areas and archeology.

Programmatic Level

The VCT would work with local Pueblos to identify methods of protecting culturally important features of the preserve.

Alternative 3A would result in an increase to 120,000 visitors to the area, which would beneficially affect local economies, including environmental justice populations, through local spending on food, lodging, and other services. New employment opportunities as described under alternative 2 (such as hiring “Cultural Guides”) would also apply to this alternative, and would be designed to help address local populations living at and below poverty levels.

Increased visitation would not affect community cohesion for any environmental justice populations in the study area.

Access for grazing or other land management activities would continue as described under alternative 2. No impact would be expected compared to existing conditions because these programs would continue to be provided.



Alternative 3A could result in a change to landscape aesthetics and features that are important to local Pueblos, as described for alternative 2. Similarly, the preserve would work with local Tribes to identify methods of protecting these features, as well as areas where Tribes and Pueblos gather important medicinal plants, herbs, and other resources. VCT staff would also work with local Tribes to identify methods of sustaining on-site visits for cultural and religious practices without interference from increased public visitation. Therefore, there would be no adverse or disproportionately high impact on Native Americans who value and use the preserve.

Under alternative 3A, shuttle access would be restricted to only Level 4 roads as shown in chapter 2. None of the preserve’s Level 1 or Level 2 roads from the Valle Toledo to the Santa Clara Indian Reservation would be open to shuttle or private vehicle use. Therefore, no access to the Santa Clara Reservation or the easement would be permitted.

Like under alternative 2, increased visitation may result in a need to hire additional bilingual employees, such as shuttle bus drivers or resource interpreters, resulting in a slight beneficial impact on local environmental justice populations.

Overall, there would be no disproportionately high adverse impacts on environmental justice populations under alternative 3A. Beneficial impacts would be expected primarily from increased local spending by visitors, which would affect environmental justice populations as well as general populations.

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 3A as well. When the beneficial impacts expected under alternative 3A are combined with the primarily beneficial impacts of other past, present, and reasonably foreseeable future activities, cumulative impacts would be beneficial.

Alternative 3B: Entrada del Valle Visitor Center—Primary Access via Personal Vehicle

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial
Programmatic level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial
Cumulative	Actions listed in table 4-1	Beneficial

Direct/Indirect Impacts

Implementation Level

Alternative 3B would differ from alternative 3A in that visitors would access the preserve using personal vehicles rather than shuttle buses, discussed under “Programmatic Level” for this alternative. Implementation-level impacts would be the same as those under alternative 3A: beneficial.

Increased access under alternative 3B could affect landscapes that are important to local Tribes, and the use of the preserve for cultural and religious practices. VCT staff would work with Tribes to mitigate this possibility.

Programmatic Level

Impacts would be similar to those under alternative 3A. However, visitors would have more direct access to areas of the preserve, which could affect landscape aesthetics and features that are important to local Tribes, as well as affecting the use of the preserve for cultural and religious practices. Under alternative 3B, private vehicle access would be restricted to only Level 4 roads as shown in chapter 2. None of the preserve’s Level 1 or Level 2 roads from the Valle Toledo to the Santa Clara Indian Reservation would be open to private vehicle use. Therefore, no access to the Santa Clara Reservation or the easement would be permitted.

Like under alternative 3A, the preserve would work with local Tribes to identify methods of protecting these important cultural features, as well as areas where Tribes and Pueblos gather important medicinal plants, herbs, and other resources. VCT staff would also work with local Tribes to identify methods of sustaining on-site visits for cultural and religious practices without interference from increased public visitation. Programmatic-level impacts would therefore be beneficial, as described for alternative 3A.

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 3B as well. When the beneficial impacts expected under alternative 3B are combined with the primarily beneficial impacts of other past, present, and reasonably foreseeable future activities, cumulative impacts would be beneficial.

Alternative 4A: Vista del Valle Visitor Center—Primary Access via Shuttle System

Summary

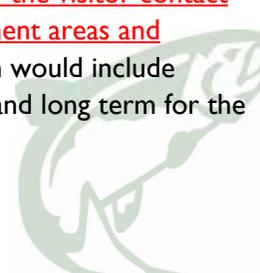
Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial
Programmatic level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial
Cumulative	Actions listed in table 4-1	Beneficial

Direct/Indirect Impacts

Implementation Level

Implementation and programmatic level impacts under alternative 4A would be similar to alternative 3A.

Like alternative 3A, the central feature of alternative 4A is the development of a full-service visitor center, with similar amenities and facilities. The VCT would work with local Tribes and Pueblos during final design to help identify a site for the visitor contact center and associated facilities to protect important plant procurement areas and archeology. Implementation-level impacts to local economies, which would include environmental justice populations, would be beneficial in the short and long term for the same reasons described for alternative 3A.



Programmatic Level

Alternative 4A would result in an increase to 120,000 visitors to the area, with the same beneficial economic impacts on environmental justice populations as described for alternative 3A. Other impacts on environmental justice populations at the programmatic level would be the same as those under alternative 3A, because the difference in the location of the visitor center and the amenities provided under alternative 4A would not create measurably different effects compared to alternative 3A.

Overall, there would be no disproportionately high adverse impacts on environmental justice populations under alternative 4A. Beneficial impacts would be expected primarily from increased local spending by visitors, which would affect environmental justice populations as well as general populations.

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 4A as well. When the beneficial impacts expected under alternative 4A are combined with the primarily beneficial impacts of other past, present, and reasonably foreseeable future activities, cumulative impacts would be beneficial.

Alternative 4B: Vista del Valle Visitor Center—Primary Access via Personal Vehicle

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial
Programmatic level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial
Cumulative	Actions listed in table 4-1	Beneficial

Direct/Indirect Impacts

Implementation-level impacts under alternative 4B would be similar to alternative 4A. Programmatic-level impacts would be similar to alternative 3B.

Implementation Level

Alternative 4B would differ from alternative 4A in that visitors would access the preserve using personal vehicles rather than shuttle buses, discussed under “Programmatic Level” for this alternative. Implementation-level impacts would be the same as those under alternative 4A: beneficial.

Programmatic Level

Impacts would be similar to those under alternative 3B regarding more direct visitor access to the preserve. Programmatic-level impacts would therefore be beneficial, as described for alternative 3B.

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 4B as well. When the beneficial impacts expected under alternative 4B are combined with the primarily beneficial impacts of



other past, present, and reasonably foreseeable future activities, cumulative impacts would be beneficial.



Appendix B - Errata

Section Change – Chapter 4, Carbon Footprint and Air Quality

(Revisions are shown in red in the text that follows. Additions are underlined and deleted text is crossed out.)

Carbon Footprint and Air Quality

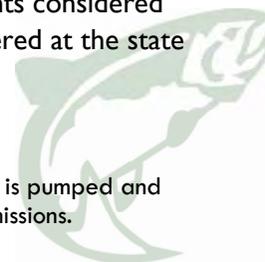
Guiding Regulations and Policies

Executive Order 13514, “Federal Leadership in Environmental, Energy, and Economic Performance,” requires all federal agencies to submit a comprehensive GHG inventory and establish a percentage reduction target. Executive Order 13423, “Strengthening Federal Environmental, Energy, and Transportation Management,” identifies six areas for reducing the environmental footprint. GHG reporting will help agencies understand their emission profile and improve environmental performance in the following six environmental footprint areas (the scopes described in chapter 3 are added to each):

- Energy (Scopes 1 and 2)
 - Improve energy efficiency and reduce greenhouse gas emissions through the reduction of energy.
 - Shift toward renewable energy such as solar power and biomass.
- Water (Scopes 1 and 2)
 - Reduce water consumption in buildings, grounds, and related facilities.¹
- Green purchasing (Scope 3)
 - Increase the sustainability performance of purchased goods and services and the performance of suppliers, contractors, and partners.
 - Increase the number of buildings that are Leadership in Energy and Environmental Design (LEED) certified.
- Fleet and transportation (Scope 1)
 - Improve transportation and travel practices, which in turn will reduce harmful emissions, increase operational and fuel efficiency, and reduce the use of nonrenewable fuel.
- Waste prevention and recycling (Scope 3)
 - Minimize waste generation and reduce landfill use. Reduce, reuse, and recycle materials.
- Sustainability leadership
 - Make strong efforts to meet or exceed the requirements of executive orders and policies related to sustainable operations.
 - Leadership and management have a commitment to communicate the agency’s vision for sustainable operations (USFS 2010c).

As mentioned in chapter 3, the Clean Air Act has defined national air quality standards that set allowable concentration and exposure limits for six pollutants considered harmful to human health. These standards are applied and administered at the state

¹ Water typically requires treatment prior to use and prior to return to the environment, and it is pumped and pressurized to reach consumers. These activities require energy, resulting in greenhouse gas emissions.



level. Areas that do not comply with NAAQS are known as “nonattainment” and must comply with a number of special requirements.

Methodology for Analyzing Impacts

Changes to GHG emissions (which ultimately affects climate change) and air quality can result in regional and/or global effects. This analysis considers the impacts of those changes at the regional level. The methodology for determining impacts on the preserve’s carbon footprint uses a qualitative approach based on how the alternatives address the six areas for reducing the environmental footprint described in the guidance above. The context for assessing direct impacts is the preserve itself, and areas under its direct influence. The context for indirect impacts extends outside the preserve to varying degrees to account for visitor miles traveled, transportation of purchased goods and generated waste, etc.

Air quality is evaluated in a dynamic setting of space and time, and relates to the production of particulate matter and its dispersion. The methodology for determining impacts to air quality uses a qualitative approach based on how the alternatives could affect criteria pollutant emissions and nearby Class I areas through increased visitation to the preserve (implementation level) and within the preserve (programmatic level).

Alternative 1: No Action

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial to negligible and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short/long term: beneficial
Cumulative	Actions listed in table 4-1	Moderate -Minor and adverse

Direct/Indirect Impacts

Implementation Level

Energy consumption would decrease under alternative 1, but there would be no opportunity to communicate the VCT’s vision for sustainable operations.

This alternative would result in the removal of the Valle Grande and Banco Bonito Staging Areas and the elimination of the interim recreation programs and activities. Energy consumption would be reduced and waste generation slightly reduced through the removal of the staging areas, although the change to the amount of CO₂ emitted from stationary combustion sources or electricity usage would be slight. No change related to fugitive emissions would occur. There would be no change to water consumption because the staging areas do not use surface water or groundwater. There would be no measurable change regarding how the VCT purchases goods and services. No LEED-certified buildings would exist at the preserve. There would be limited opportunity to communicate the VCT’s vision for sustainable operations. For these reasons, carbon footprint impacts at the implementation level would range from beneficial to negligible and adverse in the short and long term compared to existing conditions.

Approximately 25,000 people participated in public programs at the preserve in 2010. Assuming no change in visitation under the no-action alternative, 25,000 fewer people would drive to the preserve to recreate. Some people may still drive to the preserve to hike the two free trails near Rabbit Mountain. It is expected that many of these visitors would be local or passing through on the way to other destinations, representing a small number of visitors and a negligible adverse indirect impact on carbon footprint and air quality.

Programmatic Level

The visitor services currently provided by the existing temporary facilities would not be replaced. Reducing the amount of tours available would slightly reduce harmful emissions from vans, increase operational and fuel efficiency, and reduce the use of nonrenewable fuel. The amount of emissions from mobile combustion sources would decrease due to fewer tours and fewer visitors driving to and in the preserve. Under the no-action alternative, the number of miles driven within the preserve is expected to be reduced from approximately 75,000-100,000 to approximately 30,000-50,000 annually (Rodriguez, pers. comm. 2012c). As a result, short- and long-term impacts would be beneficial at the programmatic level.

Cumulative Impacts

Actions and activities that would affect visitors include those listed in table 4-1 for carbon footprint and air quality. GHG and criteria pollutant emissions increased in the past from roadway development on nearby USFS lands, which allowed for more vehicle emissions, including emissions from logging trucks. Logging and clearing trees for roads also reduced the area's capacity to offset GHGs locally. The 1987 *Santa Fe National Forest Land and Resource Management Plan* (USFS 1987) increased old-growth management areas, eliminated unneeded roads, and decreased sawtimber sales, which would have helped offset past GHG impacts. In the preserve, forest cover has returned to previously disturbed areas, and all unplanned fires are suppressed. The presence of more trees will help sequester CO₂ and offset GHG emissions. Similarly, the Collaborative Forest Landscape Restoration project (USFS and VCT 2010) will restore sustainable ecological forest conditions on 210,000 acres in the Jemez Mountains.

Increased tourism and transportation improvements have drawn visitors to the area, whose vehicles contribute to GHG and criteria pollutant emissions. Plans to increase tourism (e.g., by adding scenic byways) and improve the local economy would continue that impact. Planned public transportation services and bike routes would help offset some emissions from personal vehicles.

Oil and gas production on USFS land and in Rio Arriba County has contributed, and will continue to contribute, to GHG and criteria pollutant emissions through the provision of fossil fuels for consumption. Recent wildfires contributed greatly to GHG and particulate matter emissions through the burning of wood. As the forests recover, trees will return to the area to sequester GHG emissions. The implementation of the *Santa Fe National Forest Land and Resource Management Plan* (USFS 1987) will allow for natural recovery from wildfire. The plan also permits timber harvesting for commercial purposes.

The actions described above have had and will continue to have both adverse and beneficial effects on GHG and criteria pollutant emissions. In general, these actions increased emissions in the area, with oil and gas production having a broader impact. The result would be a ~~moderate-minor~~ adverse effect at the regional level. The slight beneficial effects expected under the no-action alternative would not affect the overall impacts from these other actions. Therefore, cumulative impacts would remain the same: ~~moderate-minor~~ and adverse.

Alternative 2: Banco Bonito Visitor Contact Station

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: minor to moderate <u>negligible</u> and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: moderate <u>negligible</u> and adverse
Cumulative	Actions listed in table 4-1	A moderate <u>Minor</u> and adverse

Direct/Indirect Impacts

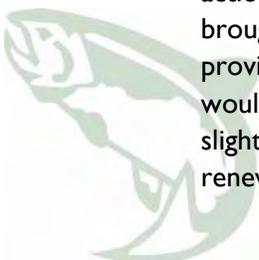
Implementation Level

Carbon and criteria pollutant emissions would increase due to the development of the visitor contact station, activities associated with the increased number of guests, and increased services (shuttles, programs) under alternative 2 compared to existing conditions.

Under alternative 2, the existing Banco Bonito Staging Area would be removed and a small-scale visitor contact station would be developed (up to 5,000 square feet), with associated day-use facilities, a small parking area, and roads to provide access to the preserve for personal vehicles and/or shuttles, which would be used on high-use days to accommodate increased visitation.

The visitor contact station would be LEED certified and would incorporate recycled materials. The building would be located in a previously disturbed area. Therefore, no trees, which sequester CO₂, would be removed. As described in chapter 2, the building would use renewable energy sources and incorporate several energy efficiency concepts, such as passive and active solar power, Trombe walls, and a geothermal heat pump to reduce heating requirements. Passive and active solar power would produce electricity, with the potential to return electricity to the grid. The use of daylighting and low-energy appliances would reduce electrical demand. Therefore, the use of stationary combustion sources would be minimal.

Securing a water source at this location would be difficult. Rainwater harvesting would be used if appropriate, and potable water would be used only for hand washing and drinking. The preserve would use graywater in toilets or composting toilets. These actions would reduce or eliminate the amount of potable water that would need to be brought to the site. If water did need to be pumped to the site, solar energy would provide the pumping power and the energy needed to do so. Purchased electricity would be used if solar was not sufficient, in which case GHG emissions would increase slightly where electricity is generated, depending on the source (e.g., coal vs. renewable).



Waste generated at the visitor contact station would be minimized and recycled to the extent practicable. The VCT would purchase local goods and use local services when feasible to help control the amount of GHGs emitted regionally. The visitor contact station would provide an opportunity for the VCT to communicate sustainable design concepts in operation and to demonstrate nature and technology working together. The LEED design and other sustainable practices would provide educational opportunities for the public.

Annual visitation, which was approximately 25,000 in 2010, would increase to an estimated 50,000, representing an approximate doubling of visitors. This would result in an increase of mobile combustion sources from visitors driving to and from the visitor contact station. It is assumed that the percentage of New Mexico visitors to the preserve would remain high, at approximately 84%, with the majority coming from the preserve's region. It is also assumed that the majority of visitors from other states would include the preserve as part of a larger northern New Mexico itinerary, resulting in a small proportion of GHGs ~~and criteria pollutants~~ emitted to visit the preserve. ~~Although this increased level of visitation would represent a considerable increase in vehicles traveling to the preserve, the magnitude of change would not be measurable in the regional context, measurable regional indirect impact, but would not alter the amount of emissions in the area, resulting in a long-term minor adverse impact. Long-term impacts would be negligible.~~

Negligible, localized adverse short-term impacts at the implementation level would occur due to emissions from construction vehicles. Some long-term beneficial impacts would occur if the VCT returns electricity to the grid. Beneficial impacts would also result from educational opportunities provided by the LEED building and other practices. This alternative would represent the VCT's commitment to meet or exceed the requirements of the sustainability executive orders.

Although implementing sustainable building concepts at the visitor contact station would limit stationary combustion sources as much as possible, GHG emissions would still increase over existing conditions because no visitor contact station or visitor center currently exists. Visitors driving to the preserve would nearly double, increasing indirect GHG ~~and criteria pollutant~~ emissions. No shuttle or personal vehicle access would be permitted beyond the visitor contact station into the preserve during winter when inversions and associated poor ventilation typically occur. Because the visitor contact station is not expected to function as a primary standalone destination, few visitors are expected there during winter.

As noted in the "Transportation" section, the level of service for this alternative would remain at B or better, where traffic would operate at a reasonable free-flow rate (i.e., idling and stop-and-go traffic that contributes to carbon monoxide would be infrequent).

Criteria pollutant emissions at the state level have decreased in the past five years, with particulate matter emissions below the NAAQS for Sandoval County. As mentioned in chapter 3, the EPA states that substantial progress made by motor vehicle emission control is expected to continue into the future. Increased visitation to the preserve, coupled with increasing improvements, is not expected to exceed the NAAQS. Similarly, increased emissions resulting from more visitors driving to the preserve are

not expected to measurably affect the Class I areas at Bandelier or San Pedro Parks. Overall, long-term implementation-level impacts would not be measurable ~~and would affect the region as more people drive to the visitor contact station, but the contribution would be slight~~. Therefore, long-term impacts would be ~~minor to moderate and adverse~~ negligible at a regional level.

Programmatic Level

As noted in chapter 3, the total carbon footprint from transporting visitors within the preserve is estimated at approximately 33 tons of CO₂ emissions per year, which would be 66 when doubled (i.e., from visitation increasing from approximately 25,000 in 2010 to approximately 50,000). Under this alternative, visitors would have more vehicular access farther into the preserve than under existing conditions, ~~substantially~~ increasing the amount of mobile combustion sources and associated GHG and criteria pollutant emissions in the preserve. Shuttles would be used on high-use days as warranted and for special events and tours. It is not known precisely how often shuttles would operate, so it is not possible to predict the amount of GHGs and criteria pollutants they would emit. Because vans are currently used to provide tours, which would continue under this alternative, it is assumed that shuttle use to handle peak demand would represent additional mobile combustion sources compared to existing conditions. Therefore, emissions from shuttle use would likely be higher compared to existing conditions. Over the years, the VCT would phase in more fuel-efficient shuttle vehicles, helping to reduce the amount of GHGs and criteria pollutants they emit. In addition, the preserve's peak visitation occurs during summer when the highest number of good to excellent ventilation days occur, which would help offset air quality impacts. During winter when weather inversions occur and ventilation can be poor, visitation is low, with corresponding fewer impacts on air quality. Overall, increased driving by visitors throughout the preserve when roads are open to personal vehicles in spring, summer, and fall, coupled with increasing motor vehicle emission control improvements, is not expected to exceed NAAQS or measurably affect the Class I areas at Bandelier or San Pedro Parks.

No new roads would be built; the VCT would upgrade existing roads for vehicular use. Driving on unpaved roads can reduce fuel economy (USDOE 2012). Upgraded roads may improve fuel efficiency, but likely not enough to offset increased vehicular use.

Negligible, localized adverse short-term impacts would occur from construction crews improving the preserve's roads and creating related facilities, such as parking lots. Although the number of vehicles driving within the preserve would increase substantially, changes to GHG and criteria pollutant emissions would not be measurable at the regional level. Long-term impacts would be negligible. In the long term, programmatic-level impacts would be adverse compared to existing conditions, primarily due to increased vehicular use in the preserve. Long-term programmatic-level impacts would be measurable and would influence the VCT's carbon footprint and, to a lesser extent, air quality, resulting in moderate adverse impacts.

Under alternative 2, increased visitation to the preserve, coupled with increasing improvements, is not expected to exceed the NAAQS. Vehicles used



Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 2 as well. When the long-term ~~minor to moderate~~negligible adverse impacts expected under alternative 2 are combined with the ~~moderate~~minor adverse impacts of other past, present, and reasonably foreseeable future activities, cumulative impacts would remain ~~moderate~~minor and adverse.

Alternative 3A: Entrada del Valle Visitor Center—Primary Access via Shuttle System

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: minor to moderate <u>negligible</u> and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: moderate <u>negligible</u> and adverse
Cumulative	Actions listed in table 4-1	moderate <u>Minor</u> and adverse

Emissions would increase under alternative 3A due to the development of the visitor center, activities associated with the increased number of guests, and increased services (shuttles, programs).

Direct/Indirect Impacts

Implementation Level

The central feature of alternative 3A is development of a full-service visitor center, with associated day-use and parking facilities. The visitor center would be up to 10,000 square feet, accommodating substantially more visitors than the existing Valle Grande Staging Area, which would be removed. Like under alternative 2, the visitor center would be LEED certified and would incorporate recycled materials. The building would use renewable energy sources and employ several energy efficiency concepts, as described in chapter 2. Passive and active solar power would produce electricity, with the potential to return electricity to the grid. The use of daylighting and low-energy appliances would reduce electrical demand. Therefore, the use of stationary combustion sources would be minimal.

The building would be located in a previously undisturbed area. Some trees, which sequester CO₂, would be removed to accommodate the new facilities (see the “Vegetation” section). This amount would be negligible in the context of the preserve’s forested landscape.

The highly developed visitor center and associated day-use facilities could become a destination in itself due to the extent of its offerings, drawing people to the site who may not explore the preserve further. Recreational uses concentrated at the visitor center would reduce the amount of vehicle trips farther into the preserve for those people who are satisfied with the visitor center’s offerings.

This alternative would greatly increase visitation. It is expected that approximately 120,000 guests would visit the visitor center each year, compared to approximately 25,000 visitors who participated in public programs in 2010. Such a change would

increase regional mobile combustion sources from people traveling to the preserve. ~~Impacts would be similar to those described for alternative 2 (e.g., regional vs. out-of-state visitation), but to a much larger degree. This increased visitation would represent a measurable regional indirect impact that may influence the amount of GHG and criteria pollutant emissions in the area, particularly if the visitor center becomes a primary destination for out-of-state visitors rather than an addition to an existing itinerary. The result would be a moderate adverse impact.~~

The site for alternative 3A has good water sources, which would require minimal transportation. Conservation actions would reduce or eliminate the amount of potable water that would need to be brought to the site, as described for alternative 2. If water did need to be pumped to the site, solar energy would provide the pumping power. Purchased electricity would be used if solar was not sufficient, in which case GHG emissions would increase slightly where electricity is generated, depending on the source (e.g., coal vs. renewable).

Like under alternative 2, waste generated at the visitor center would be minimized and recycled, and the VCT would purchase local goods and use local services when feasible. The visitor center would provide an opportunity to communicate sustainable design concepts, and the LEED design would provide educational opportunities for the public. This alternative would represent the VCT's commitment to meet or exceed the requirements of the sustainability executive orders.

Negligible, localized adverse short-term impacts would occur due to emissions from construction vehicles. Some long-term beneficial impacts would occur if the VCT returns electricity to the grid. Beneficial impacts would also result from educational opportunities provided by the LEED building and other practices.

Although implementing sustainable building concepts at the visitor center would limit stationary combustion sources as much as possible, GHG emissions would still increase over existing conditions because no visitor center currently exists. As noted in the "Transportation" section, the level of service for this alternative would remain at B or better, where traffic would operate at a reasonable free-flow rate. Highway performance could change to LOS C, which is a stable transportation flow, during peak hours. Due to improvements in transportation emissions technology, the increased number of vehicles traveling to the preserve is not expected to measurably affect mobile source GHG emissions at a regional level. Continued improvements to motor vehicle emission controls would help keep emissions below NAAQS, despite a substantial increase in motor vehicles being driven to the preserve. Increased emissions from more visitors driving to the preserve are not expected to measurably affect nearby Class I areas.

Overall, long-term implementation-level impacts would substantially increase GHG emissions from existing conditions at the preserve, but would not measurably affect GHG emissions or air quality at the regional level. Therefore, impacts would be negligible. ~~be measurable and would influence the VCT's carbon footprint and, to a lesser extent, air quality, primarily from increased visitation and associated indirect vehicle emissions. Impacts would therefore be minor to moderate and adverse.~~

Programmatic Level

Alternative 3A seeks to reduce emissions through the use of shuttles in lieu of personal vehicles.

Like alternative 2, programmatic level actions proposed under alternative 3A would provide increased access and recreational opportunities throughout the preserve. Alternative 3A seeks to reduce emissions through the use of shuttles in lieu of personal vehicles. These alternatives could create a demand for connecting existing bus routes in Los Alamos and Jemez Springs to the preserve². Primary visitor access would be via shuttle bus during peak season, with limited personal vehicle access through a permit system. Use of a shuttle system would limit the number of mobile combustion sources within the preserve; however, GHG and criteria pollutant emissions would be higher compared to existing conditions due to substantially increased visitation. As the VCT phases in fuel-efficient electric vehicles, emissions may be reduced somewhat, but would still occur where the purchased electricity is generated, depending on the source (e.g., coal or renewable resources).

Use of shuttles within the preserve would minimize impacts to air quality by limiting the number of vehicles emitting pollutants. No shuttle or personal vehicle access would be permitted beyond the visitor center into the preserve during winter when inversions and associated poor ventilation typically occur. People may still visit the visitor center and recreate using the facilities there, although visitation would be low. No measurable change to air quality is expected during winter months. No NAAQS exceedances and no measurable impacts to nearby Class I areas are expected from increased motor vehicle use within the preserve.

Visitors would be able to bike into the preserve along a dedicated bike path, which would also help limit the number of motor vehicles entering the preserve. Personal vehicles would be allowed to access the Banco Bonito Staging Area for horseback riding and special events, and hunters would continue to drive to their destinations, with associated emissions. It is not known how many visitors would drive their vehicles to Banco Bonito Staging Area or hunting destinations, so an increase or decrease in emissions from mobile combustion sources compared to existing conditions cannot be determined.

Slight beneficial impacts would result from carpooling programs for administrative staff and from providing non-motorized access to the preserve from its perimeter. Indirect beneficial impacts would result from proposed environmental and ecotourism activities that could focus on how visitors can reduce GHG and criteria pollutant emissions.

No new roads would be built; the VCT would upgrade existing roads for vehicular use. Upgraded roads would improve fuel efficiency, but not likely enough to offset increased vehicular use.

Negligible, localized short-term impacts would occur from improving the preserve's roads and constructing related facilities, such as parking lots. In the long term, programmatic level impacts would substantially increase GHG emissions from existing conditions at the preserve, but would not measurably affect GHG emissions or air

² While this hypothesis is reasonable, no market research has been undertaken to support it.

~~quality at the regional level. Therefore, impacts would be negligible, occur primarily due to increased vehicular use within the preserve. Long-term programmatic-level impacts would be measurable and would influence the VCT's carbon footprint and, to a lesser extent, air quality, resulting in moderate impacts.~~

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 3A as well. In addition, as noted under “Transportation” in table 4-1, MRCOG may provide public transportation services to areas along NM-4 as well as new biking facilities, providing alternatives to driving to the preserve. These facilities would combine with the preserve’s shuttle system to help reduce the reliance on personal vehicles to experience the preserve, which would constitute a beneficial impact. However, these actions would not be sufficient to change the overall cumulative impacts on the area’s emissions. When the ~~minor to moderate~~negligible adverse impacts expected under alternative 3A are combined with the ~~moderate~~minor adverse impacts of other past, present, and reasonably foreseeable future activities, cumulative impacts would remain ~~moderate~~minor and adverse.

Alternative 3B: Entrada del Valle Visitor Center—Primary Access via Personal Vehicle

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: minor to moderate <u>negligible</u> and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: major <u>negligible</u> and adverse
Cumulative	Actions listed in table 4-1	Major <u>Minor</u> and adverse

Direct/Indirect Impacts

Implementation Level

Alternative 3B would differ from alternative 3A in that visitors would access the preserve using personal vehicles rather than shuttle buses, discussed under “Programmatic Level” for this alternative. At the implementation level, there would be little measurable difference between the alternatives. Therefore, impacts would be the same as those under alternative 3A: negligible and adverse in the short and long term, ~~and minor to moderate and adverse in the long term.~~

Programmatic Level

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.

Air quality would be affected by a large increase in motor vehicles driving within the preserve. These impacts would be more prevalent during summer, when ventilation is typically good to excellent, which would reduce impacts. During winter, no shuttle or personal vehicle access would be permitted beyond the visitor center into the preserve when poor ventilation typically occurs. People may still visit the visitor center and recreate using the facilities there, although winter visitation would be low. No measurable change to air quality is expected during winter months. Short-term impacts would be the same as those described for alternative 3A, negligible and adverse. Overall, no NAAQS exceedances and no measurable impacts to nearby Class I areas are expected from increased motor vehicle use within the preserve when roads are open to personal vehicles in spring, summer, and fall.

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 1 would apply to alternative 3B as well. When the long-term ~~moderate to major~~negligible adverse impacts expected under alternative 3B are combined with the ~~moderate~~minor adverse impacts of other past, present, and reasonably foreseeable future activities, cumulative impacts would be ~~major~~minor and adverse.

Alternative 4A: Vista del Valle Visitor Center—Primary Access via Shuttle System

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: minor to moderate <u>negligible</u> and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: moderate <u>negligible</u> and adverse
Cumulative	Actions listed in table 4-1	Moderate <u>Minor</u> and adverse

Direct/Indirect Impacts

Implementation Level

Alternative 4A would have obstacles to providing water to the visitor center, and existing electrical power is almost two miles away. VCT would likely have to expand utilities to serve the visitor center.

Like alternative 3A, the central feature of alternative 4A is the development of a full-service visitor center, with similar amenities and facilities. The primary difference is that the alternative 4A site presents many obstacles to securing a viable water source, and electrical power is almost 2 miles away. Although renewable energy sources would be used as much as practical, they may not be sufficient to provide necessary utilities. Obtaining utilities at this location could require additional energy sources. However, this difference between alternatives 3A and 4A would not be substantial, and impacts would be the same for the reasons described for alternative 3A: negligible adverse short-term impacts would occur due to emissions from construction vehicles, and overall negligible long-term ~~implementation-level~~ impacts would result at the regional level would be

~~minor to moderate and adverse due to substantially more visitors driving to the preserve.~~

Programmatic Level

There would be no measurable difference between alternatives 3A and 4A at the programmatic level; therefore, negligible adverse short- ~~and long-term impacts and moderate adverse long-term impacts would occur.~~

Cumulative Impacts

The other past, present, and reasonably foreseeable future actions described for alternative 3A would apply to alternative 4A as well. When the long-term ~~minor to moderate~~ negligible adverse impacts expected under alternative 4A are combined with the ~~moderate-minor~~ adverse impacts of other past, present, and reasonably foreseeable future activities, cumulative impacts would be ~~moderate-minor~~ and adverse.

Alternative 4B: Vista del Valle Visitor Center—Primary Access via Personal Vehicle

Summary

Effect	Context	Intensity
Implementation level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: moderate-negligible and adverse
Programmatic level: direct/indirect	Within the bounds of the study area	Short term: negligible and adverse Long term: major-negligible and adverse
Cumulative	Actions listed in table 4-1	Major-Minor and adverse

Implementation-level impacts under alternative 4B would be similar to alternative 4A. Programmatic-level impacts would be similar to alternative 3B.

Direct/Indirect Impacts

Implementation Level

Alternative 4B would differ from alternative 4A in that visitors would access the preserve using personal vehicles rather than shuttle buses. Implementation-level impacts would be the same as those under alternative 3A: negligible and adverse in the short and long term ~~and moderate and adverse in the long term.~~

Programmatic Level

Short- ~~and long-term~~ impacts would be negligible and adverse ~~and long-term impacts would be major and adverse,~~ as described for alternative 3B, because only slight differences would exist between alternatives 3B and 4B.

Cumulative Impacts

Cumulative impacts would be major and adverse, as described for alternative 3B.



Chapter 5 Consultation and Coordination



The intent of NEPA is to encourage the participation of federal and state-involved agencies and affected citizens in the assessment procedure, as appropriate. This section describes the consultation that occurred during development of this EIS. This chapter also includes a description of the public involvement process, [a summary of the comments received during the public and agency comment period for the Draft EIS, and the selection of a preferred alternative based on review and analysis of public and agency input. Finally, this chapter includes](#) a list of the recipients of the draft document [and a list of preparers of the analysis.](#)



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5. Consultation and Coordination

The VCT undertook the following activities to involve the public and agencies in preparation of this EIS.

Public Involvement Activities

Public Scoping

Soon after the preserve transferred to federal ownership, the VCT held listening sessions with the public in 2001. Most people had never been to the preserve and had no frame of reference, so the VCT undertook an effort to introduce people to the landscape. The information from these sessions helped identify public concerns and desires and helped the VCT move forward with planning efforts.

In 2006, the VCT formally initiated access and use planning, which led to public workshops hosted by the VCT in 2007 to identify goals and assess sites for development. These workshops were held in Jemez Springs, Pojoaque, Los Alamos, and Rio Rancho, New Mexico, and consisted of open houses with staffed stations and facilitated workshops. Preserve staff members tried to solicit as much public feedback as possible about the landscape and potential changes to it within the framework of the act that established the preserve. Following these meetings, the VCT facilitated another workshop to identify values and activities, balancing various recreational activities and management actions. Information gathered at these workshops helped define the scope of analysis for this EIS.

Public Notification

The VCT published a notice of intent to prepare an environmental impact statement for a public use and access plan in the Federal Register Friday, August 28, 2009. The VCT posted information to its website, released a letter dated August 13, 2009, and released flyers inviting the public to give input on the EIS by attending public workshops or submitting comments online through the VCT website. The VCT held public workshops September 14 and 15, 2009, described in more detail below.

Public Workshops

The intent of the public workshops for this EIS was to solicit feedback on the preliminary conceptual alternatives the VCT had identified. The first meeting was held September 14, 2009, at the Hilton Garden Inn in Albuquerque, New Mexico. The second was held September 15 at the Santa Fe Community College in Santa Fe, New Mexico. Both meetings began at 5:30 p.m. and concluded at approximately 8:00 p.m. The general format of the meetings included an open house, where attendees could visit several stations with background information and descriptions of the various planning elements the preserve had identified to incorporate into alternatives development. The elements consisted of access, capacity, activities, level of development, financing, and values. VCT staff members and consultants were available to describe the process and answer questions. After each open house, the VCT presented a brief overview of the planning process, followed by group discussions.



Public Alternatives Meeting

The VCT hosted public meetings in Santa Fe and Jemez Springs, New Mexico, to solicit public input on the alternatives developed for analysis in the EIS. The meetings were held March 1, 3, and 5, 2011. The first was held in Santa Fe; the latter two were held in Jemez Springs at the VCT administrative offices. The meetings combined short presentations and open house areas where people could talk to VCT staff members. Brief overviews and presentations were supplemented by more detailed information available in both hardcopy and electronic formats. This information was available at the meetings, on the VCT web site, or by mail (upon request).

Other Public Outreach Activities

In preparation of the public workshops that followed the publication of the notice of intent, the VCT created an area of its website devoted to presenting information about elements the VCT had identified to help guide the development of alternatives. This web page was designed to allow users to provide comments and feedback about each planning element (access, capacity, activities, development, financing, and values) in order to help build the alternatives. Each element was fully described with a narrative and summary table. The public was able to register and enter comments that were visible to all site users. The website also included an overview, videos, maps, and a glossary of terms. As with the comments received during public meetings, the VCT considered the comments received on this interactive web page in the development of the alternatives. This web page was updated prior to the March 2011 alternatives meetings to provide detailed information about the purpose and need, proposed action, alternatives eliminated, and the alternatives being considered in detailed analysis. The public was provided



an opportunity to comment on these sections of the analysis through an interactive forum hosted on the web page. Following the comment period the web pages remained active throughout the analysis.

The Spring/Summer 2009 edition of the preserve's newsletter, *La Ventana en los Valles*, included an article on the back cover announcing the start of the public access and use planning process (VCT 2009i). This article described the study conducted by the Economics Group of Entrix, which identified possible alternatives the VCT could pursue to meet its goals of environmental and financial self-sufficiency. The article announced that these alternatives, along with others, would be available for public input through open houses planned for that summer. The article noted that the intent of the open houses was to "invite public participation and interaction with VCT specialists who will provide exhibits and interpret the access and use combinations. The public testing of these combinations will stimulate new ideas and concepts that will potentially add to self-sufficiency and long-term management of the preserve."

In August 2009 the VCT published a document titled Public Scoping Information on its website for the public access and use plan, which consolidated key documents from the website into a single pdf file. This included a letter to the public soliciting feedback, a flyer announcing public meetings held in 2009, a glossary of terms, guidelines for submitting comments online, a description of the initial alternatives, maps, and financing information.

The Fall 2009 *La Ventana en los Valles* newsletter included an article on the back cover about public participation in planning and decision-making as an essential component of NEPA, with specific details about how to become involved in the progression of this EIS (VCT 2009h). The article listed several methods the public could use to become involved and offer comments, encouraging participation in the public access and use planning process.

The Spring 2011 *La Ventana en los Valles* newsletter included an article about the public meetings held in March 2011 to present the alternatives to be analyzed in the EIS (VCT 2011a). The newsletter updated readers on the status of the EIS and assured them that public comments had been instrumental in developing the alternatives. The article also notified readers that the online interactive commenting feature developed on the VCT website, which had allowed people to share their comments about the EIS, had ended. The article noted that all information and reports about the EIS could still be downloaded from the website, and that readers could request that information be sent to them via surface mail by contacting the VCT via telephone or email or at its physical location in Jemez Springs.

Public Outreach Associated with Publication of Draft EIS

The VCT released the Draft EIS on June 11, 2012. The release was announced through a Notice of Availability published in the Federal Register, a legal notice published in the Albuquerque Journal, and press releases to the Albuquerque Journal and other local print, radio, and television media outlets. A newsletter was sent to 2,249 agencies, individuals, and organizations. The newsletter included detailed



information and electronic links to view the Draft EIS, find background information, attend public meetings, visit the locations being considered for development, and submit comments.

Paper copies of the complete Draft EIS, a CD, and separate summary were distributed to the USFS (Region, Forest, and District offices), Bandelier National Monument, and Jemez, Zia, and Santa Clara Pueblos (whose lands border the preserve). To ensure the public had access to paper copies of the Draft EIS, the complete package was also distributed to Caldera Action and the following local libraries: Los Alamos County Library, Albuquerque-Bernalillo County Library System, Cuba Public Library, Jemez Pueblo Community Library, Espanola Public Library, Santa Fe Public Library, Loma Colorado Library, and the New Mexico State Library in Santa Fe. On request, a paper copy was also sent to White Rock Public Library and Northwestern University. Packages containing a paper copy of the Draft EIS Executive Summary as well as a CD with all documents were distributed to other state and federal agencies and interested Pueblos and Tribes (see below for the distribution list).

Copies of the Draft EIS were supplemented with cover letters including information regarding the length of the comment period and how and where to deliver written comments, and a public hearing notice with the dates, times and locations of the public meetings, at which written comments could be received.

Electronic copies of the complete Draft EIS, individual chapters, and the executive summary were available on the VCT website. The VCT maintains a section of its web site dedicated to planning and public involvement. In addition to the Draft EIS, the public could access background information about the project, the VCT, or NEPA, and submit online comments and view the comments of others.

The VCT held two public meetings to discuss the Draft EIS in June 2012, during which the VCT presented an overview of the Draft EIS. VCT staff facilitated a group discussion about the Draft EIS and proposed alternatives, and resource specialists were present to interact with the public and answer questions. Attendees were able to provide comments in writing or by using a computer connected to the project web site.

The meetings were held on the following dates and locations:

- June 25, 2012: The Valles Caldera Trust Science and Education Center in Jemez Springs, NM
- June 26, 2012: The University of New Mexico – Los Alamos in Los Alamos, NM

Additionally, the VCT opened the three potential visitor center sites for members of the public and provided signage in the areas proposed for development. These areas were open to the public throughout the public comment period.

Public and agency comment periods began with publication of the Draft EIS and ended on August 14, 2012; comments could be submitted online or via surface or electronic mail. Comments submitted on the project web site were reviewed for



inappropriate or unrelated content and then posted¹. Comments received via direct mailing were entered into the online database by the VCT so all comments received were available for public viewing.

The VCT received 125 separate written communications in the form of letters, email, and project comment forms. Seven of these comments were from agencies or Pueblos and Tribes, and 118 were from members of the public, including citizen groups or organizations. Copies of the written communications and responses to comments are included in Appendix A. The comments are summarized below.

Agency Consultation and Coordination

Public Agencies and Organizations

Public agencies and organizations were included in all mailings and notices distributed to the public. In addition, they received planning status updates and schedules, and were provided with contact information for further inquiry.

Cultural Resource Consultation

Tribal governments and State Historic Preservation Office (SHPO) were included in communications throughout the development of the Public Access and Use Plan EIS. To avoid duplication of efforts, the VCT used the NEPA process to achieve public notification for NHPA Section 106. Concurrent notification and comment periods for were used for NEPA and NHPA.

The New Mexico SHPO was included in all mailings and notices distributed to the public. In addition, the SHPO and the Advisory Council of Historic Preservation received planning status updates and schedules, and were provided with contact information for further inquiry. It is anticipated that implementation-level and programmatic-level decisions will have unavoidable adverse effects to significant historic properties. To address this concern and to develop appropriate processes to resolve these effects, the VCT has met with SHPO to construct a programmatic agreement that addresses implementation-level and programmatic-level undertakings in multiple phases. The Advisory Council of Historic Preservation has been invited to participate in the programmatic agreement and may be included as a signatory pending their decision. Following a 30-day no-action period, which is initiated upon release of the Final EIS, ROD will be signed. The programmatic agreement will be finalized prior to the ROD.

Formal and informal tribal consultation has taken place throughout the planning process. Communications specific to the project included scoping, alternatives development, project updates, and distribution of the Draft EIS. The phased programmatic agreement between the VCT and SHPO specifies that tribal consultation will be included in development of all mitigation plans for resolution of adverse effect and in developing subsequent agreements for resolution of adverse effects. The VCT would work with local Tribes to identify methods of protecting

¹ One comment was rejected because it was unrelated to the Draft EIS. The comment was redirected to the Executive Director, and the commenter was notified of this action.

important cultural features by including tribal consultation in future planning and decision-making about the programmatic elements in the plan. Tribal governments and SHPO were included in all mailings and notices distributed to the public. In addition, received planning status updates and schedules, and were provided with contact information for further inquiry.

Threatened and Endangered Species Consultation

Formal consultation under Section 7 of the Endangered Species Act was not warranted for this project. The U.S. Fish and Wildlife Service was informed of the planning process in concert with the public and other agencies and organizations.

Summary of Comments on Draft EIS

During the public comment period, the VCT received 118 written comments from individuals or organizations, and 7 written comments from Tribes or government agencies. Project staff reviewed, categorized, and responded to each written communication received. In many cases one letter or email included several comments. Project staff responded to a total of 166 comments. The remainder of this section summarizes the public and agency comments.

Comments from the Public

Comments from the public fell into seven general categories. The categories are as follows:

- Stated preference
- Alternatives (applied when the commenter suggested modification of existing alternative or a new alternative)
- EIS Content
- Biology
- Cultural Resources
- Administration
- Transportation

A summary of the comments received follows, and a matrix containing the comments with responses is included in appendix A.

Stated Preferences

Many commenters expressed a preference for one alternative over another, or against a specific alternative. These preferences are tallied below. In addition to expressions of support for specific alternatives, eight people wrote to say they would like to see a shuttle system instead of personal vehicles used for access to the preserve.



Table 5-1: Stated Preferences for a Specific Alternative

<u>Alternative</u>	<u>Number of Comments Expressing Preference</u>
<u>Alternative 1</u>	<u>7</u>
<u>Alternative 2</u>	<u>19</u>
<u>Alternative 3</u>	<u>29</u>
<u>No preference between 3A and 3B: 6</u>	
<u>Alternative 3A: 14</u>	
<u>Alternative 3B: 9</u>	
<u>Alternative 4</u>	<u>19</u>
<u>No preference between 4A and 4B: 2</u>	
<u>Alternative 4A*: 14</u>	
<u>Alternative 4B: 3</u>	
<u>Shuttle (no preference for visitor center location provided)</u>	<u>9</u>

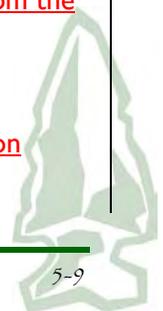
* Two commenters expressing supporting for this alternative later rescinded that support in writing. This total reflects the adjustment.

Alternatives

Several comments included ideas or suggestions for variations on the existing alternatives, or new alternatives, or features to include if an action alternative were to be selected. These ideas are summarized below:

- Only allow government vehicles off-road
- Hire Native American guides for cultural interpretation
- Encourage backcountry access (camps, scouting events, hunting/fishing clinics, etc.)
- Limit camping sites in developed areas and in the backcountry
- Enhance low-impact use (and limit use of vehicles within preserve)
- Develop a multi-use trail network within, around, and circling the preserve
- Eliminate grazing
- Build all parking and building facilities off site to protect the visual landscape
- Build campgrounds at Banco Bonito, away from the visitor center but near a water source
- Develop horse stables
- Develop a hotel for visitors
- Locate operations and maintenance facilities outside of public view
- Ban all-terrain vehicles, dirt bikes, and similar recreational vehicles from the preserve
- Allow off-road access to anglers and hunters

Additionally, several people suggested elements that would be part of an action alternative, including the following:



- Access for disabled persons
- Geologic education on formation of caldera
- Bicycle access

Chapter 2 of the EIS was revised to elaborate on these features of the alternatives. Regarding the access for disabled visitors, the EIS was revised to further stress that the VCT would comply with the ADA to provide access to disabled visitors to the fullest extent possible under all action alternatives.

Environmental Impact Statement Content

Several commenters asked for clarification of elements of the EIS, or noted gaps in the data or analysis presented. Appendix A describes how the VCT responded to all comments received on the Draft EIS. Specific topics or questions asked include the following:

- What are plans for spontaneous access of the preserve?
- How many people currently visit the preserve?
- Where is a link to agency procedures for NEPA?
- Provide more mitigation measures in Chapter 2.
- How was the severity of impacts defined in the Draft EIS?

Biology

Commenters requested more mitigation for wildlife and additional information in the EIS on potential impacts to elk and golden eagles, and requested that the VCT make decisions with natural resources in mind, rather than just needs and wants of people.

Cultural Resources

Commenters expressed concerns about access to sites of cultural importance to Pueblos and Tribes (e.g., concerns about protecting those resources, and concerns about excluding non-Tribal people from those same areas).

Administration

Multiple people suggested extending the VCT's management deadline of 2015 to 2020; several comments received were related to management of the preserve by the NPS. These issues were not within the scope of the decision to be made through this EIS. Others suggested strategies for phasing development in light of funding constraints.

Some commenters expressed concerns related to public safety, such as the need to augment additional law enforcement presence with increased visitation and safety related to co-mingling hunting activities with increased visitor access.

Transportation

In addition to the many comments expressing a preference for shuttle or private vehicle access within the preserve (with the majority suggesting shuttles); other



comments related to transportation included a suggestion to analyze the environmental impacts of the existing road system rather than use it as a baseline, and to disallow ATV use on the preserve.

Agency Comments

As noted above, seven government agencies or Tribes submitted written comments on the Draft EIS. The comments are summarized by sender, below.

Environmental Protection Agency

The USEPA reviewed the EIS and rated it “EC-2,” meaning the agency “has environmental concerns and request additional information in the FEIS.” Specifically, the USEPA requested inclusion of additional mitigation measures for anticipated environmental impacts, including development of a construction emissions mitigation plan, use of constructed wetlands for waste and stormwater treatment, and augmentation of the discussion of how the project could affect minority and low-income populations, particularly through job creation. Finally, the USEPA asked for more information regarding tribal involvement throughout the planning process.

New Mexico Department of Game and Fish (NMDGF)

NMDGF requested additional analysis on the potential effects of the project, specifically increased visitor use and vehicle access on elk behavior, particularly during calving periods. NMDGF also recommended closing selected roads during elk calving periods to mitigate impacts to those populations. NMDGF also offered corrections regarding the listing status of the Jemez Mountain Salamander.

New Mexico State Historic Preservation Office (SHPO)

The SHPO suggested two methods of approaching mitigation plans for impacts to cultural resources, allowing the VCT a choice in structuring agreements with them regarding those resources.

Council of the Incorporated County of Los Alamos

The Council of the Incorporated County of Los Alamos solicited input from residents and submitted that to the VCT (the individual letters are summarized above in public comment section). The council then recommended adoption of Alternative 3A or 3B for the preserve.

Pueblo of Laguna

The Pueblo of Laguna determined that none of the alternatives would have a significant impact at this time, but requested to be notified for review of any artifacts that may be discovered during implementation.

Jemez Pueblo

The Jemez Pueblo expressed a preference for alternative 1, the no-action alternative due to concerns about impacts to culturally significant areas. For the other alternatives, the Jemez Pueblo identified sites that hold cultural (medicinal, religious) significance.



The Hopi Tribe

The Hopi Tribe recommended alternative 1, the no action alternative. The Tribe requested copies of the cultural resources surveys of potentially affected areas and proposed treatment plans for their review and comment. They also inquired about funding plans and the potential for visitor entry fees.

Board of Trustees Recommendation of Preferred Alternative

The VCT Board of Trustees discussed the preferred alternative for this plan during a public meeting held Thursday, September 20, 2012. After consideration of the potential impacts as disclosed in the Draft EIS and review of public and agency input, the trustees unanimously stated their preference for Alternative 3A: Entrada del Valle Visitor Center—Primary Access via Shuttle System. The trustees noted that the site welcomed visitors into the preserve, but the location on the edge of the Valle Grande would not overtly alter the view or experience for visitors or people traveling through the area. Additionally, the trustees noted the practical aspects of the site, such as proximity of utilities (particularly water availability) and ease of entrance into and exit from the preserve for shuttles (e.g., no backtracking onto NM-4). All members of the Board of Trustees supported primary access via a shuttle system. The Supervisor of the Santa Fe National Forest stated that she believed the shuttle system would be important to maintain stakeholder's values and that the shuttle system would be best for the preserve's resources and would ultimately provide the best experience. The Superintendent at Bandelier National Monument noted that it is best to start with a shuttle system rather than change at a later time. There may be future potential of connecting the transportation systems between Bandelier National Monument and the preserve.

List of Recipients

The following agencies, organizations, and other interested parties will received a complete hardcopy or CD of the public access and use plan Draft EIS and/or will received letters with invitations to download more detailed information.

Recipient	Hardcopy or CD of EIS	Invitation to Download Info
Federal Agencies		
U.S. Forest Service		
Region 3	✓	
Santa Fe National Forest	✓	
Santa Fe National Forest Ranger Districts		
Jemez	✓	
Cuba	✓	
Espanola	✓	
Coyote	✓	
National Park Service (Bandelier National Monument)	✓	
U.S. Fish and Wildlife Service	✓	

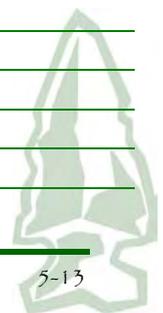


Recipient	Hardcopy or CD of EIS	Invitation to Download Info
Tribes		
Jemez Pueblo	✓	
Santa Clara Pueblo	✓	
Pueblo of Zia	✓	
All Tribal Governor's Offices ¹	✓	✓
New Mexico State Agencies		
New Mexico Department of Game and Fish	✓	
New Mexico Environment Department	✓	
New Mexico Mid-region Council of Governments		✓
New Mexico State Historic Preservation Office	✓	✓
Organizations		
Caldera Action	✓	
WildEarth Guardians	✓	✓
The Nature Conservancy	✓	✓
Regional and Local Agencies		
Mayors of Cities and Towns		
Jemez Springs		✓
Los Alamos		✓
San Ysidro		✓
White Rock		✓
Rio Rancho		✓
Santa Fe		✓
Cuba		✓
Sandoval County		✓

¹ Paper copies of the summary and full electronic copies of the Draft EIS were sent to the following: Pueblo of Acoma, Pueblo of Cochiti, Pueblo of Isleta, Pueblo of Laguna, Pueblo of Nambe, Ohkay Owingeh, Pueblo of Picuris, Pueblo of Pojoaque, Pueblo of San Felipe, Pueblo of San Ildefonso, Pueblo of Sandia, Pueblo of Santa Ana, Kewa Pueblo, Pueblo of Taos, Pueblo of Tesuque, Pueblo of Zuni, Jicarilla Apache Nation, Mescalero Apache Tribe, Navajo Nation, Navajo Nation Council, San Carlos Tribal Council, The Hopi Tribe, White Mountain Apache, Southern Ute Tribe, Ute Mountain Ute Tribe, Ysleta del Sur Pueblo, Apache Indian Tribe of Oklahoma, Cheyenne-Arapaho Tribes of Oklahoma, Comanche Nation, Fort Sill Apache Tribe, Kiowa Tribe of Oklahoma, Pawnee Tribal Business Council, and Wichita & Affiliated Tribes.

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