



# 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**

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**

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.**

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.

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**

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:**

- 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.

- 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.
- 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.
- 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.

**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.**

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