

**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
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.
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.
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.
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.
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

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	<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>
<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>
<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>
<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>

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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>
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>
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>

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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.