



P.O. Box 9314
Santa Fe, NM 87504-9314
Tel: 505-983-4609
Fax: 505-983-2355

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Via E-mail to Marie Rodriguez at mrodriguez@vallescaldera.gov
And to stewardship@vallescaldera.gov

Valles Caldera Trust
Attn: PAUP Comments
P. O. Box 359
Jemez Springs, NM 87025

Re: Audubon New Mexico's Comments to the Valles Caldera National Preserve Public Access and Use Plan Draft Environmental Impact Statement

Dear Valles Caldera National Preserve staff:

Please accept and fully consider these comments on the Public Access and Use Plan Draft Environmental Impact Statement (PAUP-DEIS) for the Valles Caldera National Preserve (the "Preserve") from Audubon New Mexico.

The Preserve has been designated as an Important Bird Area (IBA) by Birdlife International after nomination by Audubon New Mexico. The Preserve contains a stunning and unique mix of grasslands, forested mountains, and geologic features found nowhere else in the American Southwest. The land provides habitat for a wide range of wildlife, including 17 threatened or endangered species, and animals such as the black bear, mountain lion, goshawk, peregrine falcon and Rio Grande cutthroat trout. Breeding and resident bird populations at the Valles Caldera National Preserve IBA include birds on Audubon's national WatchList such as Lewis's Woodpecker, Flammulated Owl, Williamson's Sapsucker, Olive-sided Flycatcher, Virginia's Warbler, and Grace's Warbler.

As a field office of the National Audubon Society, Audubon New Mexico's mission is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity. Audubon aims to enhance the knowledge of New Mexico citizens to make informed decisions about the protection of wildlife and to empower them to be active stewards of the planet. Audubon is known for its science-based approach to advocacy and its accomplishments in the areas of nature education, conservation including citizen science, and public policy.

In New Mexico, Audubon has over 6,000 members and volunteers. There are four local Audubon chapters throughout New Mexico – Mesilla Valley Audubon Society, Southwestern New Mexico Audubon Society, Central New Mexico Audubon Society, and Sangre de Cristo Audubon Society – which are community-based organizations run entirely by local volunteers with programs that range from field trips to public policy advocacy. These chapters provide Audubon with a local constituency and leadership in many of New Mexico's largest and fastest growing communities including Albuquerque, Belen, Las Cruces, Santa Fe, and Silver City. Additionally, the chapters have organized into a statewide New Mexico Audubon Council to work on policy initiatives to benefit conservation in New Mexico.

Audubon members often travel to the Preserve to watch birds and we continue to be interested in the long-term conservation of this area. We submit the following comments as part of the official record on the Trust's current PAUP-DEIS.

Audubon New Mexico applauds the Preserve's efforts to develop a visitor's center, to develop connected infrastructure and facilities, and to guide future development. It is our understanding that the purpose of the PAUP is 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.

We applaud the removal of maintenance facilities and activities from the historic district—Baca Ranch headquarters – within the PAUP-DEIS. However, we are concerned 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.

Additional considerations for items within the PAUP-DEIS are listed below:

- We believe that Alternative 2, the Banco Bonito minimal development, is not adequate for the public's access and use of the Preserve. The estimates for the number of visitors seem low. 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 point in the above paragraph to separate the visitor center and operational/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, particularly from private vehicles, is a further encumbrance on the viewscape.
- We applaud the potential use of a shuttle system to provide primary access to visitors around the Preserve. We strongly encourage the Trust staff to plan for very limited private vehicle access to the Preserve. The special qualities that much of the public finds attractive at the Preserve are the peace and quiet and the good chance of seeing a variety of wildlife. These qualities can only be maintained by limiting motor noise, and therefore, limiting the intrusion of vehicles to the interior of the Preserve.
- 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 Preserve 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 potentially about 120,000/year. This seems like an appropriate level of visitation given visitation at Bandelier and the more remote location of the Preserve.
- 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 del Valle 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 the opportunity to comment on this DEIS and we hope that our comments will be helpful as you move forward with greater public access to the Preserve.

Sincerely,

Allen Sanborn, Chair
Audubon New Mexico's Board of Directors
sanborn@aol.com