Re: Public Comment on Valles Caldera National Preserve's draft General Management Plan and Environmental Assessment

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We are writing on the behalf of the more than 2,000 members of the Sangre de Cristo Chapter of the National Audubon Society to share our broad support for the draft Management Plan and Environmental Assessment for Valles Caldera National Preserve and to expand on and place special emphasis on certain aspects of the plan. Since the original Valles Caldera Trust's inception, the Sangre de Cristo Chapter has advocated for preservation and public ownership of this land and regards this management plan as an important blueprint for the future of the preserve.

Although Valles Caldera N.P. has been called a "mini-Yellowstone," the preserve covers but a tiny fraction of the total acreage of Yellowstone and must be managed with great care so that greater public enjoyment of the preserve does not degrade the qualities that make it such a natural treasure. With 130 miles of trails, including 14 miles for hiking, 41 miles of hiking/equestrian trails, and 74 miles of mountain biking trails, Valles Caldera National Preserve offers an exceptionally high-quality outdoors experience for New Mexicans and out-of-state visitors.

After reviewing both the management plan and environmental assessment, we believe that the "new appropriate facilities alternative" offers the best option for encouraging the public to enjoy Valles Caldera's beauty and serenity without compromising the preserve's natural, cultural and historic values.

We also offer the following comments to place special emphasis or expand on certain parts of the NPS preferred alternative:

- 1. Activities and improvements should be directed away from areas vital to Valles Caldera's three threatened or endangered species Spotted Owl, New Mexico Meadow Jumping Mouse, and Jemez Mountains Salamander as well as away from culturally sensitive areas. Habitat and potential habitat for these species must be recognized without bringing it to the attention of visitors and protected as a high priority in the final plan.
- 2. Off Road Vehicles, ATVs, dirt bikes, and other motorized recreation vehicles should be prohibited from entering the preserve. Allowing such vehicles in the preserve would raise noise pollution to unacceptable levels, damage habitat, disturb wildlife, and degrade the visitor experience. Only street-legal vehicles should be permitted past the proposed new visitor center and should be restricted to the visitor engagement zone, unless with a special permit to the self-guided zone.

- 3.We support moving the visitor center from its existing location to a location near the NM 4 entrance and realigning the access road to the cabin district away from the wetlands in the Valle Grande. The access road should be paved to reduce airborne dust stirred up by traffic.
- 4. NPS should pursue Wilderness status for the 52,000 acres eligible for such status and National Wild and Scenic River status for the preserve's 64 miles of eligible streams at the earliest appropriate opportunity.
- 5. A majority of the preserve's estimated 1,000 miles of logging roads should be decommissioned except to the extent they are needed to access trails for hikers, equestrians and mountain bikers and streams for anglers or are necessary for access in the event of wildfires and administrative needs.
- 6. To reduce the risk of wildfire, powerlines need to buried.
- 7. NPS needs to take additional necessary steps to eliminate the incidence of cattle entering the preserve from Santa Fe National Forest.
- 8. NPS should continue to manage the number of backcountry permits so that they are commensurate with the pace of improvements and staff resources and do not degrade the Valles Caldera experience. Should visitation rise to the extent resources are strained, NPS should consider a shuttle bus for visitor access to the backcountry.
- 9. NPS needs to coordinate with the U.S. Forest Service on improved parking and trail access to Sulphur Springs and Redondo Meadows. In addition, Bandelier National Monument offers additional opportunities to link Valles Caldera trails, such as Rabbit Ridge, and Bandelier trails, such as Cerro Grande.

We applaud your plans for the protection and enhancement of the preserve and greatly appreciate the opportunity to comment. We trust that these plans can become reality in the near future.

Respectfully submitted,

The Board of Directors, Sangre de Cristo Chapter of the National Audubon Society

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