

National Park Service
U.S. Department of the Interior

Valles Caldera National Preserve
New Mexico



FINDING OF NO SIGNIFICANT IMPACT AND DECISION DOCUMENT

General Management Plan and Valle Grande District Frontcountry Management Plan Environmental Assessment PEPC 112511

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JORGE SILVA-BANUELOS
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Recommended: _____

Jorge Silva-Bañuelos, Superintendent
Valles Caldera National Preserve

Date

HERBERT
FROST

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Approved: _____

Herbert C. Frost Ph.D., Regional Director (Acting)
National Park Service
Interior Regions 6, 7, 8

Date

The National Park Service has considered the factors mandated by the National Environmental Policy Act (NEPA). This decision document represents the National Park Services (NPS) good-faith effort to fulfill NEPA's requirements by prioritizing documentation of the most important relevant considerations within the statutorily mandated page limits and timeline. This prioritization reflects the NPS's expert judgment. The NPS certifies this Finding of No Significant Impact (FONSI) is substantially complete and thoroughly considered all relevant criteria raised in the NEPA process and the NEPA process has concluded. The NPS also certifies that the EA contained analysis adequate to inform and reasonably explain this decision to issue a FONSI regarding the proposed action.

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1. FINDING OF NO SIGNIFICANT IMPACT

1.1 INTRODUCTION

In compliance with the National Environmental Policy Act of 1969 (NEPA), as amended (42 United States Code [USC] 4321 et seq.), the National Park Service (NPS) prepared an environmental assessment (EA) for the general management plan and Valles Grande District development concept plan (GMP/DCP or plan) for Valles Caldera National Preserve (park), consistent with the applicable Department of the Interior NEPA regulations (43 Code of Federal Regulations [CFR] Part 46). The National Park Service has considered the environmental impacts of the selected action and alternatives as described in the EA and associated decision file.

The plan is based on a shared understanding of the conditions and level of development that will best achieve the park's purpose and conserve its fundamental resources and values. It provides park managers with an overarching management vision and a long-term, comprehensive decision-making framework for protecting fundamental resources and values; ensuring quality visitor uses and experiences; and determining the appropriate type, scale, and general location of future facilities needed to provide baseline services and amenities and enhance operational efficiency and visitor experiences. Facility investments identified in the plan are subject to available funding, conditions on the ground, and compliance processes.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis presented in the plan and EA and associated decision file. The plan is available at https://parkplanning.nps.gov/VALL_GMP. Relevant sections of the plan are summarized and incorporated into this FONSI by reference as indicated.

A summary of public comments received and responses from the National Park Service is provided as attachment A. Modifications to the text of the plan (errata) are provided in attachment B. The determination of nonimpairment, prepared in accordance with NPS *Management Policies 2006*, is provided in attachment C.

1.2 BACKGROUND

The National Park Service has prepared this plan to meet the requirements of:

- Public Law 113-291, which established Valles Caldera National Preserve as a unit of the national park system;
- The National Parks and Recreation Act of 1978; and
- NPS *Management Policies 2006*.

The plan builds on applicable legislation, resolutions, laws, policies, and the park's foundation document (NPS 2018) to establish a long-term management framework for the park. The plan's management vision and goals are informed by ongoing engagement with the public, Tribal Nations, partners, and stakeholders. As a comprehensive, parkwide document,

the GMP/DCP addresses key issues including landscape connectivity, resource stewardship, Tribal interests and engagement, climate change adaptation and sustainability, and the surrounding socioeconomic context. It also provides direction for ensuring broad public access to park resources and opportunities. The plan establishes broad management direction and does not prescribe site-specific implementation of individual programs or projects.

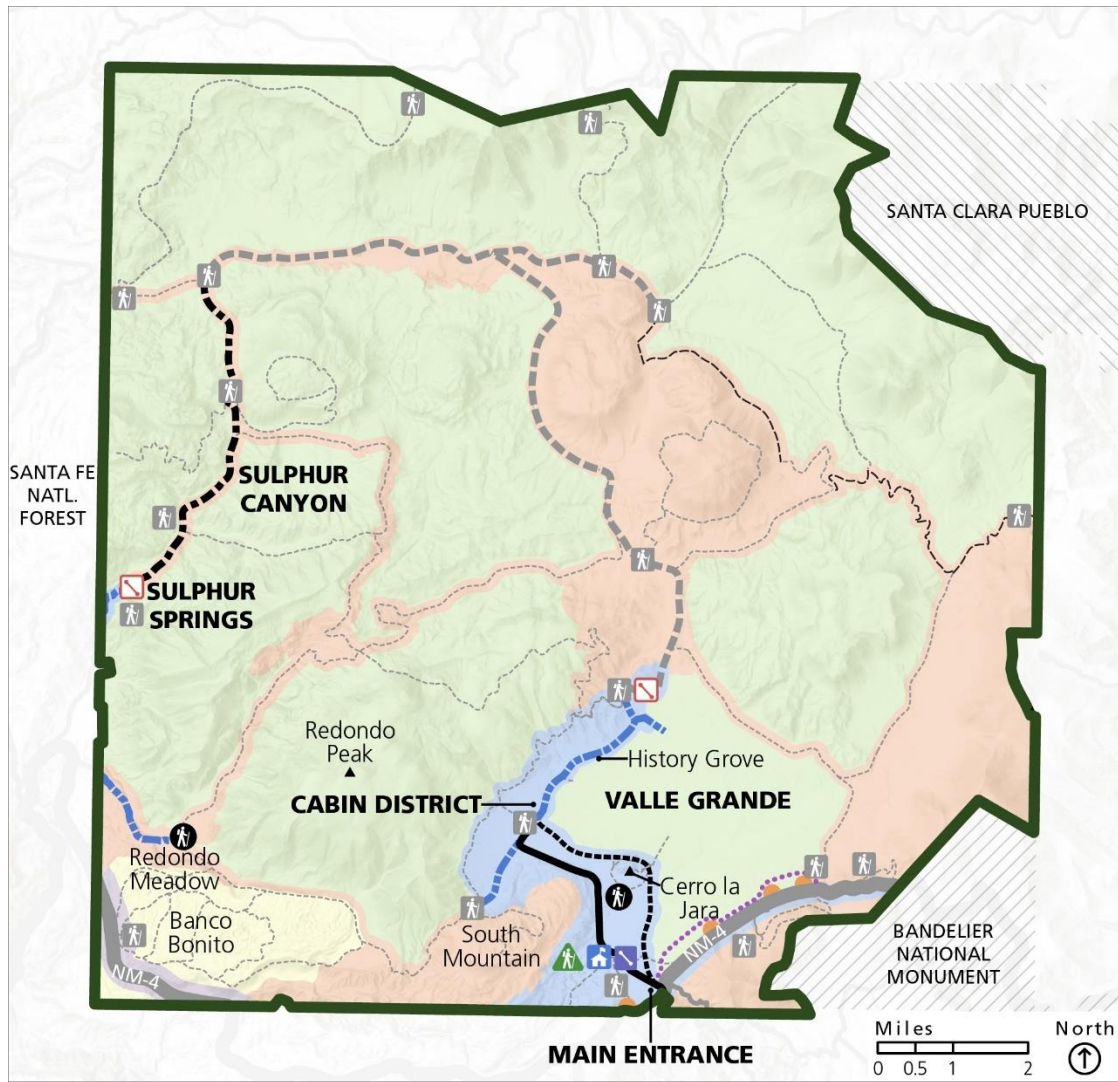
1.3 SELECTED ACTION AND RATIONALE FOR DECISION

The National Park Service analyzed three alternatives during the planning process: a no-action alternative and two action alternatives. Based on this analysis, the National Park Service selected action is the new appropriate facilities alternative described in detail in the final plan and chapter 2 of the EA and incorporated by reference here. The selected action was chosen because it best meets the purpose and need for the plan without causing unacceptable impacts on park resources. The selected action includes several beneficial changes to the park's circulation and visitor services infrastructure, the most notable of which are:

- relocating visitor services from the cabin district and Cerro La Jara to a new visitor services area near New Mexico State Route 4 (NM-4);
- realigning the entrance road (VC01) to the southwest and repurposing the existing alignment as an unpaved multiuse trail;
- improving the existing North Valle Grande Road (VC02) alignment;
- enhancing Sulphur Creek Road (VC08) from the park boundary with Forest Road 105 to Sulphur Springs and allow public access; and
- allowing visitor vehicular use beyond Sulphur Springs through a backcountry vehicle pass system (see map 1).

The selected action summarized in this FONSI is substantially the same as the preferred alternative described on pp. 6–22 of the EA. Some changes have been incorporated (see section 1.3.2, below) and are disclosed in attachment B. These changes are limited in scope and do not alter the impact analysis conducted in the EA.

Map 1. Selected Action



LEGEND

- | | | |
|---|---|--|
| Park Boundary | Proposed Multiuse Trail (Accessible, Unpaved) | Visitor Engagement Zone |
| Proposed Public Road (Paved) | Proposed Visitor Service Area | Self-Guided Zone |
| Existing Public Road (Permit Required, Unpaved) | Existing Trailhead | Backcountry/Self-Reliance Zone |
| Proposed Public Road (Permit Required, Unpaved) | Formalize Existing Trailhead | Sée Wâak'î Tùukwâ - Banco Bonito Visitor Engagement Zone |
| Proposed Public Road (Unpaved) | Proposed Trailhead | Sée Wâak'î Tùukwâ - Banco Bonito Aboriginal Use Zone |
| Existing Trail | Proposed Entrance Gate | |
| Minor Trail Relocation | Proposed Backcountry Gate | |
| Proposed Boardwalk | Improve Existing Road Pulloff | |

1.3.1 Selected Action

Overview

The selected action will enhance and expand visitor services by constructing new facilities near the intersection of the entrance road and NM-4. Visitor services and in-park administration will be moved out of the cabin district and concentrated in this new visitor services area. Entrance gate and fee collection functions will be moved from Cerro La Jara to the vicinity of the visitor services area. This area will serve as a hub for various visitor experiences, including hiking, accessible fishing access, and four-season recreation.

The cabin district will shift from an administrative and visitor services hub to a destination prioritizing preservation, interpretation, and recreation. The backcountry gate north of the cabin district will be moved to Cerro Piñon, and the existing North Valle Grande Road (VC02) alignment will be improved.

The park entrance road will be realigned to the southwest to improve scenic and historic views across Valle Grande. Sulphur Creek Road (VC08) will be enhanced from the park boundary with Forest Road 105 to Sulphur Springs and will be open to public access, including beyond Sulphur Springs through the backcountry vehicle pass system. Other backcountry vehicular use will continue to require a backcountry vehicle pass, and select backcountry roads will be improved in anticipation of higher usage if daily pass quotas are increased. Select trails and other visitor use infrastructure will also be improved (see Table 1. Alternatives Comparison Matrix on EA pp. 9–15).

Visitor Services Area

Under the selected action, the National Park Service will construct new facilities near NM-4. It will shift most existing visitor services and programs from the cabin district to this new visitor services area and add new visitor services and administrative functions.

Functions within the visitor services area will include visitor contact and orientation, concessions, and educational and interpretive programming (indoor and outdoor). Limited administrative offices and storage will also be included, along with access to recreation, including Architectural Barriers Act Accessibility Standards (ABAAS)-compliant opportunities.

Future design and compliance analysis will determine the specific facilities needed in this area to achieve these functions.

Cabin District

Historic structures and cultural landscape features will be stabilized and preserved, but few or none will be adaptively used for visitor services or administrative functions.

An ABAAS-compliant parking lot will be constructed near History Grove. The disposition of the Cowboy Cabin parking lots, including the relocation of parking areas behind the cabins, will be determined during the detailed project design and implementation phase.

Little or no other new infrastructure will be constructed.

Entrance Station and Backcountry Gate

A new fee booth will be constructed near the new visitor services area. The backcountry gate will be moved to Cerro Piñon.

Cerro La Jara

The existing visitor contact facility and parking lot at Cerro La Jara will be removed. Existing trailheads will be retained. The disposition of the existing vault toilet will be determined during future project design and compliance analysis.

Public Roads in the Valle Grande District

The entrance road (VC01) will be realigned to the southwest, and the existing alignment will be repurposed as an unpaved, ABAAS-compliant, multiuse trail.

The entire new entrance road alignment (new VC01) will be paved, extending from the park entrance at NM-4 to a parking lot behind the cabin district at a location to be determined. This paved road will cross North Valle Grande Road (VC02) and may incorporate a small section of it.

The existing North Valle Grande Road (VC02) alignment will be widened but retained as a gravel road from the South Mountain trailhead to the Cerro Piñon trailhead.

Public Roads in the Backcountry

Visitors will be required to obtain a backcountry vehicle pass (reservable on Recreation.gov or in person) for vehicular access to Central Caldera Road (VC02), Sulphur Creek Road (VC08), and Valle San Antonio and Valle Toledo roads (VC09).

The frontcountry segment of Sulphur Creek Road (VC08) from the park boundary with Forest Road 105 to Sulphur Springs will be enhanced as an improved road with two-way traffic. A parking lot will be constructed at Sulphur Springs. The backcountry segment of Sulphur Creek Road (VC08) will be improved but not paved.

Redondo Creek Road (the west branch of VC02) will be improved from the park boundary with Forest Road 379 to the Redondo Meadow trailhead parking area.

Pullouts on NM-4

Four of the existing pullouts will be paved with striped parking. One will serve as a trailhead for the Jemez River Trail. The other pullouts will connect to the proposed boardwalk or natural surface trail with its viewing platforms.

Picnic Areas and Ramadas

Picnic areas may be constructed at appropriate locations in the Valle Grande District.

Trailheads and Trails

Existing trailheads and trails will be retained. Other changes, including the following, will be made.

- A Jemez River Trailhead (formerly the “Missing Cabin/Hidden Valley Trailhead”) will be formalized.
- Three trailheads at Cerros del Abrigo will be consolidated into a single trailhead.
- A boardwalk or natural-surface trail will be constructed following the route of NM-4 where it passes along the southern extent of Valle Grande.

Future planning efforts (i.e., a trails management plan) may be pursued to identify appropriate trailhead hubs servicing multiple trails. These efforts would also define appropriate infrastructure at different trailheads and consider consolidating certain trails.

Establishing Visitor Capacity

Establishing zoning, desired conditions, thresholds, and visitor capacity will enable the park to more effectively manage a range of visitor experiences. This approach provides a clearer framework for visitor use management direction while supporting the protection and preservation of park resources for future generations. Identified visitor capacities include 400 people at one time in the North Valle Grande area and 2,500 people per day in the South Valle Grande area, both of which exceed current levels of use.

Establishing Management Zones

Five management zones will be established as described in the plan and are summarized below (see map 1).

Visitor Engagement Management Zone

This zone is where most short-term visitors to the park will go. These easy-to-reach areas will have higher visitor use and density. Visitors will be provided with opportunities to experience, appreciate, and connect with park resources in a more developed setting. Most of the development, visitor services, and facilities in the park will occur in this zone. Development could include a visitor service area, amphitheater, paved roads, parking areas, full-service restrooms, picnic areas, developed campgrounds, and administrative facilities and utilities. Most public roads in this zone will be open year-round. Visitors will be offered a variety of opportunities for all ability levels, including on-site interpretation and education to learn about park resources.

Self-Guided Management Zone

In this zone, visitors will have the opportunity to venture into the park away from the main hub of activity to directly experience the sights and sounds of the natural landscape. The zone includes development and facilities that are dispersed and designed for low to moderate densities of visitors. These might include trailheads, parking, well-engineered multiple-use trails, occasional waysides/signs, vault toilets, picnic areas, and primitive campsites. This zone includes transportation corridors to explore the park, and most facilities will occur within these corridors. Public roads in this zone will be open seasonally. Although a degree of self-reliance and outdoor skill will be necessary, areas in this zone are not so remote that they require a high level of skill or preparation.

Backcountry/Self-Reliance Management Zone

This zone encompasses large contiguous areas of the park where natural processes, ecosystem function, and natural wildlife behavior are prioritized. Visitors will be able to experience solitude in diverse natural landscapes with few encounters with other visitors. Areas in this zone will be remote and undeveloped, requiring a higher degree of outdoor skill and self-reliance. Beyond primitive trails and minimal signs, no visitor facilities will be maintained.

Sée Wâak'î , Tûukwâ—Banco Bonito Visitor Engagement Management Zone

This zone is where most short-term visitors will go when visiting Banco Bonito. This easy-to-reach area has higher visitor use and visitor density than other areas of Banco Bonito. Visitors are provided with opportunities to experience, appreciate, and connect with park resources—including Jemez Pueblo history, culture, and Hemish Traditional Knowledge—in a more developed setting with interpretive displays. Most of the development, visitor services, and facilities in Banco Bonito are in this zone and could include things like a parking area, trailheads, trails, restrooms, picnic areas, campground, and administrative facilities and utilities. The parking area in this zone may be open year-round, with highest use during the summer months. The zone is managed in accordance with Jemez Pueblo's continuing aboriginal Indian title consistent with the 2024 settlement agreement.

Sée Wâak'î , Tûukwâ—Banco Bonito Aboriginal Use Management Zone

In this zone, visitors will have an opportunity to venture into Banco Bonito away from the main hub of activity to directly experience the sights and sounds of the natural and cultural landscape and gain a better understanding and appreciation for the cultural heritage and continued use of the area, such as the Hemish fieldhouses and associated agricultural features constructed and occupied by the Hemish people between 1500 and 1650 CE, as well as contemporary efforts to promote forest health and management, which is necessary for Jemez Pueblo's traditional cultural uses and to support, conserve, and restore resources to traditional levels. The zone includes development and facilities that are dispersed and designed for low to moderate densities of visitors, such as trailheads, multiple-use trails, and occasional waysides/signage. Although a degree of self-reliance and outdoor skills would be necessary, areas in this zone are not so remote that they would require a high skill level or extensive preparation. Visitors would be provided with educational, research, and cultural opportunities in this zone. The zone is managed in accordance with Jemez Pueblo's continuing aboriginal Indian title consistent with the 2024 settlement agreement.

1.3.2 Changes to the Selected Action

Changes to the selected action based on public comments and tribal consultation during the plan review period resulted in no substantive change to outcomes of the impact analysis in the EA. The National Park Service made minor corrections and clarifications to the text of the plan and added a table to clarify allowable use types and access for specific roads, routes, and trails. In collaboration with the Pueblo of Jemez, two new zones were added to the plan specifically within the Banco Bonito area of the park.

Changes to the selected action were made to expand visitor opportunities and traditional uses while protecting park resources consistently with the purpose and need for the plan and the NPS Organic Act. Attachment B includes the full list of changes to the plan and EA.

1.3.3 Rationale for the Decision

The selected action best meets the plan's purpose and need and most effectively addresses the planning issues and opportunities described on plan pp. 8–10. The proposed visitor services area in the selected action will address inadequate visitor-related infrastructure within the park. Visitor use functions in the cabin district are limited by constraints on alterations to the cultural landscape, and access to the cabin district during winter conditions or periods of heavy precipitation can be difficult or impossible due to the entrance road becoming impassable. Relocating visitor services from the cabin district to the vicinity of NM-4 will allow the construction of purpose-built visitor infrastructure at a safely accessible, four-season location and will enhance resource stewardship and preservation of the cabin district. Construction of a realigned and paved entrance road improves public access and safety and removes a visual intrusion from the heart of Valle Grande. The selected action also expands the backcountry vehicle pass system to facilitate visitor access to more remote areas of the park such as Sulphur Canyon. Implementing the selected action will continue to support one of the park's legislated purposes by addressing impacts from legacy land use through ecological restoration and the rehabilitation and preservation of cultural resources.

1.4 MITIGATION MEASURES

The National Park Service places strong emphasis on avoiding, minimizing, and mitigating potentially adverse environmental impacts. As described in the EA on p. 23, potential mitigation measures were considered, but none were identified that exceed best management practices, standard operating procedures, or NPS policies. Specific mitigation measures will be identified during the design phase for individual project implementation.

1.5 POTENTIALLY AFFECTED ENVIRONMENT

The National Park Service identified important issues for detailed analysis in the EA through civic engagement, tribal consultations, and interdisciplinary team discussions. They also identified issues that could be eliminated from further study.

The planning area encompasses the entire park. The major proposed developments in the Valle Grande District development concept plan would be focused on the visitor engagement zone along NM-4 and the entrance road (VC01) in the Valle Grande District.

Valles Caldera National Preserve is located in the heart of the Jemez Mountains in north-central New Mexico, an 88,900-acre park that encompasses almost all of a 13-mi-wide volcanic caldera. This caldera contains expansive high-elevation grasslands with forested volcanic domes, meandering streams, and abundant wildlife. Its diverse ecosystems support hardy wetland and riparian habitats as well as habitats for several threatened, endangered, or candidate species.

Tribal consultation outcomes have clearly indicated that the caldera is an ethnographic landscape, although it has not been formally documented as such. The ethnographic landscape encompasses all the cultural and natural resources and landscape features within the park that are of traditional significance to Tribal Nations, including sacred sites and landforms, some of which have been disclosed. The caldera is of spiritual and ceremonial importance to numerous Tribal Nations, for whom the landscape remains part of traditional practices, beliefs, identity, and history. Their ancestors have used the landscape and its rich animal, plant, and mineral resources since time immemorial. Numerous archeological sites in the caldera attest thousands of years of human use of this landscape for hunting and gathering, seasonal habitation, and ceremonial pilgrimage. At least 90% of the cabin district has been surveyed to current standards and found to be rich in precontact archeological sites, all of which are characterized by obsidian tools and byproducts of toolmaking, some of which have Archaic-period components. The high-altitude precontact village(s) within the cabin district's Archaic-period archeological landscape is an excellent example of its type in the Jemez Mountains. Testing has indicated the potential for intact subsurface archeological deposits immediately below the ground surface. The southwest corner of the park features a basalt lava flow—known as Banco Bonito or *Sée Wâak'î Tûukwâ* (“Eagle Down Place”) in the Jemez Pueblo language of Towa—which contains 100 documented fieldhouses and associated agricultural features constructed and occupied by the Hemish people of Jemez Pueblo between 1500 and 1650 CE. To this day, Banco Bonito is the site of the highest-elevation fieldhouses ever discovered in the southwestern United States at approximately 8,000 feet.

Starting in 1860 and until 1899, the Cabeza de Baca family owned much of the caldera. Then ownership passed to the Otero, Bond, and Dunigan families. The Baca Ranch cabin district was the primary operations center during this private ranching period. It is on the northwest side of Valle Grande and retains buildings and structures from three of these ownership periods. “Cabin district” is a term of convenience used by the park to describe the general area of this ranching property. Within the cabin district is the Baca Ranch Cabin Area historic district, found eligible for listing in the National Register of Historic Places in 2024, and the Baca Cabin Area cultural landscape, which was documented in 2022 and has the same boundary as the historic district. This 603-acre historic vernacular landscape includes 13 buildings and features, including History Grove, that contribute to its period of significance from 1899 to 1965.

Visitors to the park enjoy hunting, fishing, hiking, biking, horseback riding, winter recreation, and other activities. Most visitors access the park by private vehicle through Valle Grande by way of the primary entrance road from NM-4. The main entrance and visitor services, such as orientation, interpretive materials, and programs, are located approximately 2 and 4 miles down a dirt entrance road (VC01) at the entrance station at Cerro La Jara and visitor contact facility in the cabin district, respectively. During the park's wettest periods, the current alignment of the entrance road (VC01) causes visitor and administrative access problems. The road is routinely flooded by the East Fork Jemez River and adjacent floodplain during years with high snowmelt. Visitors also access the park by foot or bicycle. Some of these pedestrian and bicycle entrances include the park entrance pedestrian access (when the vehicle entrance gate is closed), Valle Grande, Rincón, Rabbit Mountain, Banco

Bonito, Redondo Meadow, and Sulphur Canyon trailheads. These entrances take visitors to various destinations, including frontcountry and backcountry areas.

Visitor services are limited in the cabin district and include a visitor contact station, restrooms, waste disposal, interpretive materials, and public trails. Near the entrance station at Cerro La Jara are a small gravel parking area, vault toilets, Cerro La Jara Trailhead, and Valle Grande Exploration Trailhead.

Access beyond the backcountry gate near the intersection of the entrance road (VC01) and North Valle Grande Road (VC02) requires a backcountry vehicle pass. The park allows 35 vehicles per day to enter the backcountry. Vehicle access via Sulphur Creek Road (VC08) requires a special use permit for activities such as hunting, research activities, and road-based tours. There is no limit to visitors walking or biking into backcountry areas.

Park staff have collected and reported monthly and annual recreation visitation data since 2020. However, these data must be used with caution, as they only account for visitors entering through the main entrance. Data from 2020 were affected by limited visitor access due to the COVID-19 pandemic and may not fully represent visitor demand at that time. The park saw 30,434 visitors in 2020, 76,578 visitors in 2021, a 17% decrease to 63,738 visitors in 2022, a rebound back to 76,090 in 2023, an 8% increase to 82,111 in 2024, and a further 4% increase to 84,952 in 2025. (As of March 9, 2026, visitation data for 2025 is considered provisional, but it is not expected to change substantially). Based on this sample size, it is difficult to draw definitive conclusions about how visitation is trending. However, preliminary indications are that visitation is steadily increasing from year to year, by an annual average of 3.5% from 2021 to 2025, and that gradual yet steady pace may be expected to continue with these usual fluctuations.

1.6 DEGREE OF EFFECTS OF THE ACTION

The following topics have been considered in evaluating the degree of the effects of the selected action.

1.6.1 Visitor Use and Experience

The selected action will result in beneficial impacts on visitor use and experience, with some temporary and short-duration adverse impacts.

During the multiyear period of implementing the plan's actions, visitors would experience intermittent periods with noises, sights, and potentially dust inconsistent with the typical park setting. However, these impacts would be concentrated geographically near the entrance to the park and would be less likely to affect visitors as they proceed farther into the park. Additionally, these impacts would be mitigated by customary activities such as trip planning communication, visual screening, limits on the time of day when construction occurs, and other best management practices for reducing noise and dust. When combined with past impacts from the management eras of the Valles Caldera Trust and the National Park Service and paired with the ongoing and reasonably foreseeable future actions, the

selected action will result in an overall positive impact on visitor use and experience compared to current conditions.

The selected action will have beneficial impacts by creating a more welcoming, purpose-built environment near NM-4 and providing additional amenities that better engage and help visitors enjoy the park and its resources, including those with disabilities. The new visitor services area will concentrate visitor use closer to NM-4 and away from the cabin district, be more easily accessible year-round, and create additional visitor services and opportunities that enhance the visitor experience. Expanding the backcountry vehicle route also benefits visitor use and experience by allowing visitors to access more of the park in private vehicles, including improved access to the naturally and culturally significant Sulphur Springs area.

Note that changes to zoning, desired conditions, and visitor capacity are administrative actions, and any resultant changes to visitor behavior that may impact visitor use and experience cannot be reasonably and accurately predicted. In and of themselves, these administrative changes constitute a neutral impact. The park's monitoring program would identify any future impacts resulting from changes in visitor behavior and would inform appropriate changes to management if needed. Changes to park plans and operations based on these administrative actions would be subject to further compliance review.

The selected action includes closures to bikes that are intended to diversify the spectrum of recreational opportunities available in the park and reduce the likelihood of conflicts between different user groups. Currently, there are very few trails that are open to just hikers or hikers and equestrians. Under the selected action, these opportunities would be expanded to improve the quality of the experience for a spectrum of users. This change also prevents potential future conflicts between user groups that can occur when bikes, hikers, and equestrians share the same trail. Despite the closures, many trails remain open to bikes. The trails maintained for biking use and the additional trails created for biking use under the plan do not result in a meaningful loss of biking opportunities, and they were selected among other reasons to ensure biking trail connections running north-south and east-west through and across the park. With these measures, impacts are not expected to be significant to visitor use and experience.

1.6.2 Wildlife

The selected action will have broad beneficial and adverse impacts on wildlife. While habitat degradation and wildlife disturbance have previously occurred in the park, modern and intensive visitor use of the proposed areas for development in the plan has not previously occurred. As a result, some species and habitats which have adjusted to human use will only be minimally impacted (e.g., high-mobility or opportunistic species such as ravens, magpies, and elk), while impacts will be greater and additive to species that are averse to human activities or unable to adjust (e.g., low-mobility species or habitat specialists such as amphibians).

Management activities in the selected action and ongoing visitor uses will increase human activity and habitat fragmentation in the proposed project areas. The proposed road realignment and development will increase vehicular traffic and has the potential to alter

movement and habitat use of terrestrial wildlife species. The visitor services area would experience more intensive human uses, including park operations. However, wildlife behavioral responses would remain largely unchanged in this immediate area under the selected action. Wildlife that inhabit areas within and near proposed project areas tend to avoid people, vehicles, and park operations (NPS 2022a). Over the last several years, the area has experienced intensive visitor use in the forms of vehicular and pedestrian activities, NPS management activities and programs, and use as a staging area for government-owned equipment. The use and activities conducted in these areas have resulted in modified wildlife behavior including both spatial and temporal avoidance, tolerance, attraction, sensitization, and habituation.

The proposed road realignment and development will increase vehicular traffic and have the potential to alter movement and habitat use of terrestrial wildlife species. These actions may increase the risk of vehicle-to-animal collisions, potentially resulting in injury or death. Vehicle use along the VC01 main park entrance road has modified the behavior of elk, for example, as many animals avoid the sights, sounds, and dust generated by vehicles traveling along roadways within the park (NPS 2022a). By contrast, realigning VC01 will have a beneficial effect on prairie dog colonies along the road corridor and entrance station area due to the elimination of vehicle conflicts in those areas. Predator species that hunt prairie dogs, such as coyote, badger, and long-tailed weasel, may be benefitted by the realigned road section as well.

However, as noted, wildlife behavioral response to the current entrance station area, which has been in operation since before NPS management and currently functions as the primary visitor service area for the park, will likely remain largely unchanged in this immediate area under the selected action.

Visitor-related impacts on wildlife will continue to occur. Park managers will continue to implement existing practices for protection and management of faunal species under the selected action. The National Park Service will also prepare construction-level designs and pursue a tiered compliance approach to meet regulatory requirements. This is a common approach for developing planning and compliance documents, as referenced in section 3.2 of the US Department of the Interior (DOI 2025) *Handbook of National Environmental Policy Act Implementing Procedures*.

Note that changes to zoning, desired conditions, and visitor capacity are administrative actions, and any resultant changes to visitor behavior that may impact wildlife cannot be reasonably and accurately predicted. In and of themselves, these administrative changes constitute a neutral impact. The park's monitoring program would identify any future impacts resulting from changes in visitor behavior and would inform appropriate changes to management if needed. Changes to park plans and operations based on these administrative actions would be subject to further compliance review. With these measures, impacts on wildlife are not expected to be significant.

1.6.3 Federally Listed Species

The selected action will have a range of beneficial and adverse impacts on the federally listed species addressed in the EA: the New Mexico meadow jumping mouse, the Mexican spotted owl, and the Jemez Mountains salamander. The park will continue to monitor and conduct surveys for the presence of these federally listed species in suitable habitat within each of the future project planning areas.

Ground-disturbing activities from the selected action will not occur in known New Mexico meadow jumping mouse habitat. However, if the jumping mouse is present in these areas, activities such as widening and improving roads—e.g., North Valle Grande Road (VC02) and Sulphur Creek Road (VC08)—constructing new parking lots, picnic areas, and trails (including the proposed boardwalk along NM-4), could adversely impact the species. Future consultation with US Fish and Wildlife Service (USFWS) species leads during plan implementation will identify conservation and protection measures. Construction activities would not occur when jumping mice are surface-active (June to October). With these considerations in mind, adverse impacts are expected to be minimal to none for the New Mexico meadow jumping mouse.

Similarly, visitor services facilities, including a contact station, restrooms, and staff administrative space that would move to a site near NM-4, and a road spur connecting the entrance road (VC01) to the visitor services area will occur away from known jumping mouse habitat. The proposed outdoor plaza, parking lot, and trailhead will be constructed in the same vicinity and outside of known habitat. The potential realignment and paving of the entrance road (VC01), the inclusion of utilities upgrades in the road's right-of-way, and changing uses of legacy logging and mining roads could temporarily disturb vegetation and wildlife habitat during construction and could result in a long-term loss of suitable jumping mouse habitat near the East Fork Jemez River, causing displacement of individual jumping mice into adjacent habitat.

Construction of the proposed entrance road (VC01) alignment could impact Mexican spotted owls in the Valle Grande vicinity; however, this new corridor is not within known Mexican spotted owl habitat. The proposed route would place facilities, related construction noise impacts, and ultimately visitors slightly closer to potential owl habitat relative to the current route. Human recreation could also disturb suitable habitat elements, including downed woody debris, if visitors leave existing public roads and trails. This includes the use of legacy logging roads to facilitate motorized and nonmotorized recreation (e.g., hiking, bicycling, horseback riding). With the new visitor services area functioning as the future primary starting point for recreational visitors under the selected action, the increase in visitor numbers and noise levels could potentially affect Mexican spotted owls as well, although noise levels are unlikely to exceed those known to disturb nesting owls.

Motorized use in Sulphur Canyon would increase under the selected action and daytime noise levels might disturb Mexican spotted owls. However, it is unlikely this disturbance would cause displacement because Mexican spotted owls are nocturnal, and additional vehicles, traffic, and increases in daytime visitor use would pose low levels of disturbance for

them. Potential road closures during the nesting season would be implemented if needed to further limit human noise and disturbance from visitor uses.

For the Jemez Mountains salamander, additional vehicles, traffic, and increases in daytime visitor use would pose low levels of disturbance. Potential road closures during the mating season would further limit disturbance from visitor uses.

At this time, precise details of implementation for the proposals under the selected action are not known, including the exact location and scope of activities required for implementing visitor services area construction, road realignment, etc. Future project design for these activities will include compliance activities to identify potential impacts on each of the federally listed species analyzed in the EA. During this future implementation phase, the park would review existing survey data, previous park planning projects, and recent conversations with USFWS staff to analyze potential impacts and would seek USFWS concurrence for any Endangered Species Act (ESA) determinations.

Changes to zoning, desired conditions, and visitor capacity are administrative actions, and any resultant changes to visitor behavior that may impact federally listed species cannot be reasonably and accurately predicted. In and of themselves, these administrative changes constitute a neutral impact. The park's monitoring program would identify any future impacts resulting from changes in visitor behavior and would inform appropriate changes to management if needed. Changes to park plans and operations based on these administrative actions would be subject to further compliance review.

Under the selected action, potential impacts on federally listed species and critical habitat could occur. However, ongoing monitoring and survey efforts for federally listed species will provide data to support adaptive management to avoid or reduce impacts. The park would continue to prioritize monitoring and surveying for the presence of the New Mexico meadow jumping mouse, Mexican spotted owl, and Jemez Mountains salamander in suitable habitats. For all federally listed species, park managers may authorize seasonal public access restrictions, in consultation with USFWS, if listed species are detected. With implementation of these survey and monitoring measures and because the National Park Service would eventually seek USFWS concurrence for ESA determinations when more project details are developed, the impacts on federally listed species and designated critical habitat are not expected to be significant.

1.6.4 Floodplains

The selected action will lead to increased ground disturbance from the proposed park entrance road realignment through the low portion of the Valle Grande floodplain and less so from the widened cabin district road, which is located within the regulatory floodplain but is not nearly as prone to flood hazards and impacts.

Because design details and site-specific data to fully quantify the potential impacts on floodplains from proposed facilities are not currently available, environmental analysis to inform the high-level planning decisions is largely qualitative. Once site-specific designs are developed for the entry road realignment and visitor services area, the National Park Service will prepare additional compliance documentation, as appropriate, including any

requirements consistent with Director's Order 77-2: *Floodplain Management* (e.g., a floodplain statement of findings) to meet regulatory and procedural requirements before these facilities could be developed.

Note that changes to zoning, desired conditions, and visitor capacity are administrative actions, and any resultant changes to visitor behavior that may impact floodplains cannot be reasonably and accurately predicted. In and of themselves, these administrative changes constitute a neutral impact. The park's monitoring program would identify any future impacts resulting from changes in visitor behavior and would inform appropriate changes to management if needed. Changes to park plans and operations based on these administrative actions would be subject to further compliance review.

While the selected action could compact new areas of floodplain soils and create new impervious surfaces, floodplain functions in this area would also benefit from restoration and grade-engineering improvements. Compliance with applicable standards, regulations, and policies to minimize impacts on floodplain resources and the loss of property or human life will continue under the selected action. With these measures, impacts are not expected to be significant because the selected action will have relatively small effects on floodplain functions and values.

1.6.5 Wetlands

The selected action will result in increased ground disturbance from the proposed park entrance road realignment through the low portion of Valle Grande, which intersects and travels through wetlands on the East Fork Jemez River. Realigning and paving the park entrance road will adversely impact wetlands due to the road's proposed alignment that must cross jurisdictional wetlands and will require additional compliance and mitigation per Clean Water Act and federal administering agency requirements (i.e., NPS Director's Order 77-1: *Wetland Protection* and any potential wetland statement of findings requirements).

Developing new facilities in the visitor services area (e.g., visitor contact station, outdoor plaza, parking lot, spur road, and drop-off area) could compact hydric soils and vegetation and likely create new impervious surfaces. Additional soil compaction will result from proposed development activities in the Valle Grande District and cabin district, including paved pullouts on NM-4 and constructing new parking areas at the cabin district and near History Grove.

Proposed improvements to Sulphur Creek Road (VC08) from the western park boundary to Sulphur Springs, as well as the proposed parking lot at Sulphur Springs, could adversely impact wetlands and would also require additional compliance and mitigation.

Note that changes to zoning, desired conditions, and visitor capacity are administrative actions, and any resultant changes to visitor behavior that may impact wetlands cannot be reasonably and accurately predicted. In and of themselves, these administrative changes constitute a neutral impact. The park's monitoring program would identify any future impacts resulting from changes in visitor behavior and would inform appropriate changes to management if needed. Changes to park plans and operations based on these administrative actions would be subject to further compliance review.

While the selected action will likely disturb wetlands, because design details and site-specific data to fully quantify impacts from proposed facilities are not currently available, environmental analysis to inform the high-level planning decisions is largely qualitative. Once site-specific designs are developed for the entry road realignment and visitor services area, the National Park Service will prepare additional compliance documentation, including a wetland statement of findings, as appropriate, to meet regulatory and procedural requirements before these facilities would be developed. As discussed in the EA on p. 62, through the establishment of required mitigation measures for constructing facilities, the design of the proposed facilities and infrastructure improvements will allow, to the extent possible, for natural wetland functions and natural and beneficial wetland values to continue. With these measures, impacts on wetlands are not expected to be significant.

1.6.6 Archeological Resources

The selected action will increase disturbance to the Archaic archeological landscape in the cabin district and entrance road area. Proposed road realignments—especially the entrance road (VC01)—may disturb archeologically sensitive areas. However, the severity of impacts depends on the precise location of the road realignment. The new route will likely place visitors closer to known sensitive sites; however, impacts on sites would be decreased by measures to deter or redirect foot traffic.

Construction of a new visitor services area and an associated access road has the potential to adversely impact archeological resources by causing ground disturbance in areas that are relatively undisturbed.¹ Previous surface surveys of these general areas found low densities of artifacts and archeological sites that appear limited in extent. Potential exists for unexpected discoveries during future follow-up surveys and monitoring activities.

Removal of the visitor contact facility and parking lot near Cerro La Jara under the selected action may result in beneficial impacts on known sensitive archeological resources in the area since the removal of vehicle access may cause a decrease in visitation to the trailheads and visitor-resource encounters.

The selected action will also remove visitor services from the cabin district, which may decrease the intensity of visitor use there, although it is not possible to predict with certainty. Increased use intensity generally leads to more disturbance because it increases visitor encounters with archeological sites and artifacts, which in turn increases incidents of accidental and intentional disturbance through trampling and artifact dislocation or removal. This effect will be reduced by encouraging visitors to remain on designated walkways or trails.

1. The term “adverse” has different meanings under NEPA and the National Historic Preservation Act (NHPA). In this archeological resources impact analysis, the term adverse impact is used in the sense defined under NEPA (even when used in the past tense: construction of the facilities operations center resulted in adverse impacts as defined by both NEPA and NHPA, but only the NEPA conclusions are relevant here). All assessment of effects for the plan under NHPA section 106 are deferred to the future implementation phase.

Changes to zoning, desired conditions, and visitor capacity are administrative changes that constitute a neutral impact on archeological resources.

Improving Sulphur Creek Road (VC08) and broadening public access would increase visitor use intensity and therefore cause adverse impacts on archeological resources, potentially including certain sensitive sites that are visible from the road. Other adverse impacts on archeological resources under the selected action can be mitigated through careful site selection for new features and controls on visitor circulation patterns.

Proposals for the Valle Grande District in general under the selected action will contribute to an overall adverse impact by continuing the pattern of disturbance to the Archaic landscape and village sites in the cabin district with new construction of small features and increased visitor activity.

However, while most of these activities under the selected action are likely to increase ground disturbance and may place visitors in closer proximity to areas with sensitive archeology, actual impacts on sites are not expected to be significant since careful site selection during future project design can avoid or minimize impacts, and since the park can implement standard measures to deter visitors from encountering sensitive sites such as visitor education content and resource protection messaging. Archeological monitoring will detect resource condition trends and inform adaptive management or preemptive measures.

During future project design and implementation, the park will consult with the state historic preservation officer and other stakeholders per 36 CFR 800 to avoid or minimize effects on historic properties and ensure the selected action will not have significant impacts on archeological resources.

1.6.7 Ethnographic Landscape

The selected action will have the potential for adverse impacts on the ethnographic landscape similar to those to archeological resources. Increased ground disturbance in the cabin district and ground disturbance from road realignments, especially the entrance road (VC01) through sensitive areas, are the same as those to archeological resources, due to potential impacts on Indigenous archeology. Proposed actions for the Valle Grande District will contribute to an overall adverse impact by continuing the pattern of disturbance to the Archaic landscape and village sites in the cabin district with new construction of small features and increased visitor activity. However, as noted above in 1.6.6 Archeological Resources, impacts on known sites are not expected to be significant, as project-level design would incorporate avoidance and minimization measures.

Anticipated impacts from constructing the entrance road (VC01) and Sulphur Creek Road (VC08) realignments and improvements and removing infrastructure at Cerro La Jara are the same as those to archeological resources. Changes to zoning, desired conditions, and visitor capacity constitute a neutral impact.

In addition to impacts on tangible resources, increases in visitation could also lead to adverse impacts on intangible qualities of ethnographic landscapes and sacred sites through noise, visual intrusions, and potentially incompatible activities. Any such impacts are expected to be

transient and limited in scale. Because visitor behavior across the landscape cannot be predicted with precision as visitor numbers increase, monitoring of sensitive areas in consultation with associated Tribal Nations is justified and sufficient to detect and address potential impacts on intangible qualities.

For three years, park staff consulted with associated Tribal Nations over the management strategies and development concepts in the plan, including intensive consultation over management of the sensitive Banco Bonito area. Current concerns over impacts on tangible ethnographic resources or their intangible qualities have been addressed, and discussions will continue as plan proposals move toward implementation. Future consultation during project design and implementation will afford associated Tribal Nations the opportunity to help the park identify and avoid or minimize site-specific impacts. The park would also continue to consult with Tribal Nations outside of the formal National Historic Preservation Act compliance process per Executive Order 13175 and Director's Order 71C: *Consultation with Indian and Alaska Native Tribes* to discuss in general the management of ethnographic resources and ongoing impact mitigation if needed. Monitoring of known ethnographically sensitive areas will detect resource condition trends and inform adaptive management or preemptive measures. Such measures may include collaboration among park cultural resource and interpretation specialists to develop visitor education content and resource protection messaging.

1.6.8 Historic Ranching Structures and Landscapes

The selected action will decrease the levels of visitor services and park operations in the cabin district and may decrease the intensity of visitor use there. While beneficial impacts of decreased usage cannot be reasonably predicted, the selected action will stabilize and preserve multiple historic buildings and structures, which benefits historic ranching resources. Similarly, removal of the visitor contact facility and entrance gate at Cerro La Jara will improve important views across Valle Grande. Changes to zoning, desired conditions, and visitor capacity constitute a neutral impact.

The selected action will further degrade the character of the Baca Ranch historic landscape district and the park's broader ranching landscape by creating new nonconforming visual intrusions on top of existing ones and through possible removal of historic buildings, trees, and ranching features. Construction of new features, such as picnic areas and small parking areas in the cabin district, represents intrusions to character-defining historic views. Similarly, the selected action will create a new road surface with modern vehicular traffic along South Mountain, representing a new visual intrusion in the historic view there.

Most of the historic entrance road (VC01) alignment will remain intact under the selected action as an unpaved multiuse trail, which is consistent with its historic character (the removal of modern vehicle traffic from this road is a beneficial impact). The new paved entrance road (VC01) alignment would remove a major road junction from the cabin district (i.e., the old entrance road [VC01]/North Valle Grande Road [VC02] junction), constituting a beneficial impact.

During future project design and implementation, the park will consult with the state historic preservation officer and other stakeholders per 36 CFR 800 to avoid or minimize effects on historic properties and ensure the selected action will not have significant impacts on historic ranching structures and landscapes.

1.6.9 Degree to Which the Proposed Action Affects Public Health and Safety

The selected action will prioritize public health and safety by improving and enhancing the park's circulation network and providing facilities to meet basic visitor needs, including health, safety, and accessibility. The existing road network was not designed or engineered for public recreational use. The entrance road presents particular challenges for staff and visitors, as it traverses wetland areas and is subject to frequent seasonal flooding and groundwater upwelling during the spring season. This may create unsafe travel conditions and result in periodic closures. Existing parking areas and roadside pullouts are inadequate and do not adequately or safely accommodate visitor use associated with nearby trails. The selected action proposes a new, purpose-built, paved entrance road that will enhance visitor safety. The selected action will also provide potable water, restrooms, and parking to replace substandard facilities and better accommodate current and anticipated visitor use. The selected action would further improve accessibility by providing visitor services and infrastructure designed to meet applicable requirements for individuals with disabilities.

No significant impacts on public health and safety or unique characteristics of the region were identified. The selected action would not result in highly uncertain, controversial, or unique risks, nor would it contribute to significant cumulative effects or establish a precedent for future actions.

1.6.10 Degree to Which the Proposed Action Affects Economic Activity

The selected action is expected to support and modestly enhance economic activity throughout the Valles Caldera region through improved visitor access and recreation infrastructure. Substantial pressure for outdoor recreation opportunities and leisure activities remains strong in northern New Mexico, including from nearby population centers such as Santa Fe and Albuquerque. Valles Caldera National Preserve is accessible to both of those population centers and is increasingly seen as an attractive recreation destination as a unit of the national park system, offering high-elevation landscapes that may provide seasonal relief in a warming climate. The park's annual recreation visitation trends are steadily increasing from year to year, by an annual average of 3.5% from 2021 to 2025, and that gradual yet steady pace may be expected to continue with the usual fluctuations. The selected action proposes numerous improvements to visitor use infrastructure that will facilitate greater visitor access and recreational opportunity, which will in turn support increased visitation and thereby contribute more robustly to the regional tourism and recreation economy.

1.6.11 Degree to Which the Proposed Action Affects the Quality of Life of the American People

The selected action will enhance quality of life by improving visitor experience, public access, circulation, and basic, necessary visitor services. This includes purpose-built interpretive programming infrastructure at the visitor services area and along the improved entrance road that will enhance public education and knowledge of park and regional cultural, historic, and natural resources. As discussed above in 1.3.3 Rationale, the selected action will make accessibility improvements for people with disabilities, further supporting the degree to which the plan benefits the quality of life of the American people.

1.7 PUBLIC INVOLVEMENT AND AGENCY CONSULTATION

1.7.1 Pre-NEPA Civic Engagement

The National Park Service used a project-specific Planning, Environment, and Public Comment (PEPC) website (https://parkplanning.nps.gov/VALL_GMP) to share information with the public throughout the planning process. Early in the planning process, from May 8 through June 9, 2023, the National Park Service held a comment period to receive feedback on preliminary ideas and concepts. A public comment summary report on this civic engagement period can be found on the project's PEPC site.

1.7.2 Plan and Environmental Assessment Public Comment Period

After considering civic engagement feedback on initial management concepts, the National Park Service developed preliminary proposed actions that could meet the plan's purpose and need. The project team continued throughout the process to seek internal subject matter expertise; consult with Tribal Nations, agencies, partners, and stakeholders; and receive feedback from the general public through in-person and virtual meetings.

Valles Caldera National Preserve initiated a 30-day public comment period on August 1, 2025, for two documents: the plan and the EA. During the comment period, the National Park Service held a virtual public meeting on August 13, 2025, that was attended by 32 individuals. The meeting was recorded and posted on YouTube with a link from the project website. The park also hosted a general management plan information table at eight community events during the month of August and engaged with approximately 440 individuals during those events.

The National Park Service sought feedback from elected officials; Tribal Nations; federal, state and local agencies; media; nonprofit organizations; private individuals; and other interested stakeholders. The project analyzed the comments received to develop themes and identify substantive comments. The National Park Service has responded to comments in attachment A and made changes to the documents as identified in attachment B.

1.7.3 Agency and Tribal Consultation

Tribal Nations

The park formally initiated consultation with 38 Tribal Nations via letter on October 12, 2022, and continued consulting with 37 associated Tribal Nations throughout the planning

process. (The Wichita and Affiliated Tribes notified the park that they should be removed from the park's list of associated Tribal Nations. See chapter 4 of the EA for the full list of consulting Tribes.)

This consultation included several rounds of written correspondence with Tribal Nations as well as several meetings during which the plan was discussed, including the following.

- December 8, 2022: virtual meeting
- April 10 and May 8, 2023: consultation letters
- March 20, 2024: consultation letter
- April 4, 2024: virtual meeting
- February 10, 2025: consultation letter including link to preliminary draft GMP/DCP
- August 1, 2025: consultation letter including copies of the plan and EA and an invitation to a virtual public meeting on August 13 as well as any of several in-person events later that month.

These rounds of consultation over the years represented an ongoing conversation with associated Tribes both as a group and individually and included in-person meetings and site visits upon request. Various Tribal Nations over the years engaged with the park in correspondence, meetings, and site visits. The planning team took tribal perspectives into account through the several rounds of document drafting and revision.

The park conducted additional rounds of consultation with the Pueblo of Jemez in response to a October 16, 2024, settlement agreement between the Pueblo of Jemez and the United States (related to Pueblo of Jemez v. United States, United States District Court for the District of New Mexico, Case No. 1:12-cv-00800, United States Court of Appeals for the Tenth Circuit Nos. 13-2181 and 20-2145). This included the following.

- March and June 2025: meetings to discuss written comments the Pueblo of Jemez sent on March 7 and April 11, 2025
- April 2025: a full-day field visit
- September 24, 2025: written response to comments the Pueblo of Jemez sent on August 31, 2025
- December 2025 and January 2026: meetings to discuss changes to the plan especially with respect to zoning and desired conditions in Banco Bonito

New Mexico State Historic Preservation Officer

On July 27, 2023, the park contacted the New Mexico state historic preservation officer (SHPO) regarding the initiation of the general management planning process. This correspondence prompted a response and an in-person meeting and site visit at the park on September 19, 2023.

In 2025, when the planning process was appropriately advanced, the National Park Service assessed the GMP/DCP's potential to cause effects on historic properties and determined that proposals in the plan are conceptual, subject to available funding and future site-specific design that takes into account new data (e.g., from archeological surveys) and may take many years to implement. Therefore, in accordance with section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations at 36 CFR 800, the National Park Service determined that this plan in and of itself has *no potential to cause effects* (36 CFR 800.3[a][1]); and that future consultation will occur under section 106 as the park seeks to implement proposals in the plan.

The park mailed a letter dated July 30, 2025, to the SHPO with a copy of the plan and EA and acknowledging these determinations. The SHPO responded on August 25, 2025 with a digital stamp on the original letter, noting "Thank you for sending a copy of the [plan] and EA for information purposes. We look forward to future consultation during the design and implementation phase for specific projects."

US Fish and Wildlife Service

Starting in spring 2024, park staff requested technical guidance from the USFWS in review of the park's species list in the USFWS Information for Planning and Consultation database. As described earlier in the FONSI, the project team focused on potential impacts on the New Mexico meadow jumping mouse, Mexican spotted owl, and Jemez Mountains salamander. The National Park Service will eventually consult with USFWS and seek concurrence for ESA determinations when project details are developed.

US Army Corps of Engineers

Once site-specific designs are developed for the entry road realignment, visitor services area, and other projects with the potential to impact floodplains or wetlands, the National Park Service will prepare additional compliance documentation as appropriate, including statements of findings, to meet regulatory, policy, and procedural requirements before these facilities could be developed. Clean Water Act permitting and consultation with the US Army Corps of Engineers will be required for implementation-level planning, design, and construction related actions.

1.8 FINDING OF NO SIGNIFICANT IMPACT

Based on the information presented in the plan and the analysis in the EA, the National Park Service has determined that the selected action will not result in significant effects on the human environment. Therefore, preparation of an environmental impact statement is not required.

This determination is based on consideration of applicable DOI NEPA regulations and the 2026 DOI *Handbook of National Environmental Policy Act Implementing Procedures* on the criteria for significance regarding the potentially affected environment and degrees of effects of the impacts described in the EA (which is hereby incorporated by reference) and as summarized above.

ATTACHMENT A: PUBLIC COMMENT RESPONSE REPORT FOR THE GENERAL MANAGEMENT PLAN / DEVELOPMENT CONCEPT PLAN AND ENVIRONMENTAL ASSESSMENT

INTRODUCTION

Valles Caldera National Preserve initiated a 30-day public comment period on August 1, 2025, for two documents: (1) Valles Caldera National Preserve Draft General Management Plan and Valle Grande District Development Concept Plan (“the plan”), and (2) Valles Caldera National Preserve Environmental Assessment for the General Management Plan and Valle Grande District Development Concept Plan (EA). Public feedback was analyzed for themes and substantive comments.

The project team considered substantive comments to be those that (1) question, with reasonable basis, the accuracy of the information in the National Environmental Policy Act (NEPA) document; (2) question, with reasonable basis, the adequacy of the environmental analysis; (3) present reasonable alternatives other than those presented in the NEPA document; or (4) cause changes or revisions in the proposal.

During the public comment period, the National Park Service (NPS) received 187 correspondences. Each correspondence was reviewed, and specific comments within each unique correspondence were identified. Standard NPS practice is to respond to substantive comments submitted during the public review period for environmental assessments. However, NPS staff recognized that many of the nonsubstantive comments warranted a response due to their relevance, the frequency with which they appeared in the correspondences, or their importance to the plan and park management. Where needed, changes to the plan were made in the final, published document and changes to the EA were made via errata (see attachment B). Page numbers referenced in this attachment refer to the July 2025 versions of the plan and EA that were posted for public comment.

COMMENTS AND RESPONSES

Concern Statement: Commenters requested that the National Park Service integrate wilderness and wild and scenic river assessments into the general management planning process rather than treating them separately.

Response: A wilderness eligibility assessment and a wild and scenic river assessment were initiated in 2022 and 2023, respectively. The National Park Service paused these assessments in 2025 due to leadership transitions. The National Park Service is interested in reinitiating these assessments in the future, consistent with NPS policy.

Concern Statement: Many commentors stated that a “New Sulphur Springs to Valle Grande Road” (five miles of new road) would fragment wildlife habitat with minimal recreation benefits and that a “New Redondo Meadow Road and Trailhead” would increase impacts on culturally significant southwest areas important to Jemez Pueblo and critical elk habitat. They further stated that the plan divides large wilderness-quality areas into “self-guided zoning corridors.”

The opening of corridors to mechanized use reduces primitive recreation opportunities and wildlife habitat connectivity. Some commenters indicated they would like the plan to consolidate individual wilderness units into larger, contiguous protected areas.

Response: Consolidating or otherwise redrawing eligible wilderness boundaries is outside the scope of this planning effort. The roads and trailhead referenced in this comment (Sulphur Springs to Valle Grande [VC08, VC09, and VC02], Redondo Creek Road [VC02] and trailhead) are not new; they already exist. In general, the existing legacy logging road system has already caused habitat fragmentation. The Redondo Creek Road (VC02) and Sulphur Creek Road (VC08) corridors are already used for administrative purposes, permittee access under a research or special use permit, and Tribal access for traditional cultural purposes, so these road corridors are already open to mechanized use. The proposed expansion of the backcountry vehicle route to include Sulphur Creek Road means that road would be subject to the quota of 35 vehicles per day. At Redondo Meadow, the National Park Service proposes to “plan for and design visitor amenities, such as vehicle access, parking, restrooms, interpretive wayside exhibits, and a trailhead.” This proposal would formalize the existing road and trailhead, which is already a popular visitor attraction. Currently no formal parking exists at Redondo Meadow, and visitors access the trailhead by parking outside the park boundary on National Forest System lands, causing resource impacts and congestion and blocking gates. The plan proposes a formal parking area, likely gravel, that would alleviate these impacts. But the plan does not make a final decision on the details of development and does not guarantee development will occur. If a visitor amenities project at Redondo Meadow were requested and approved in the future, a new compliance effort (e.g., NEPA, the National Historic Preservation Act [NHPA], and the Endangered Species Act [ESA]) would be undertaken as appropriate to assess and minimize environmental impacts. The National Park Service appreciates the commentors’ thoughts on recreation benefits but disagrees that the benefits are minimal. The agency feels the analysis in the EA demonstrates the proposed zoning and widening/improving of these two existing roads would have important recreational benefits with minimal environmental impacts.

Concern Statement: Commenters noted the analysis does not address impacts on wildlife and environmental degradation due to inclusion of proposed inroads.

Response: The EA analyzes potential adverse and beneficial environmental impacts from proposed road development in several places, including for wildlife. For example, the EA addresses potential impacts on federally listed species from the proposed entrance road realignment on pp. 33–51. The floodplains and wetlands impact topics, on EA pp. 53–58 and pp. 58–63, respectively, discuss potential impacts on wildlife and other park resources from proposed road improvements as well. For example, p. 47 discusses how such development would impact habitat of the federally listed New Mexico meadow jumping mouse:

The potential realignment and paving of the entrance road (VC01), the inclusion of utilities upgrades in the road’s right-of-way, and changing uses of legacy logging and mining roads could have short-term destructive impacts on vegetation and wildlife habitat during construction and long-term adverse impacts on the jumping mouse (if present) where the

proposed roadway corridor would converge upon and ultimately displace the amount of suitable habitat near the East Fork Jemez River.

Conversely, removing vehicle use from the existing park entrance road could have long-term benefits for natural habitat restoration along the corridor as well.

Concern Statement: Commenters mentioned that trespassing cattle impact riparian areas and watersheds and that this issue must be addressed before planning for increased visitation. They noted that within all "Management Zones," there have been several instances of cattle incursion, causing excessive erosion and water contamination.

Response: Management of trespassing cattle is outside the scope of this plan. As noted on p. 45 of the EA, it is reasonably foreseeable that the park would continue to implement a sustainable approach to managing grazing. As most trespass cattle enter the park from neighboring Santa Fe National Forest grazing allotments, NPS managers coordinate with US Forest Service (USFS) managers and USFS grazing permittees to keep cattle off park lands. NPS and USFS managers have agreed to a series of actions to further mitigate impacts from trespass livestock, including assisting with physical fence maintenance and construction, implementing a virtual fence pilot project with interested USFS grazing permittees, and utilizing range riders to round up and corral trespass livestock that are observed in the park. In addition, the park's landscape restoration and stewardship approach are likely to remain active, which would further minimize impacts from trespass cattle.

Concern Statement: A commenter noted the plan uses credible data sources and presents the findings in a logical structure. They believed to strengthen the adequacy of the analysis, it would help to clearly outline any assumptions made, identify data limitations, and explain how uncertainties were considered in the decision-making process. The commenter also noted that the alternatives presented in the plan and EA could be explained more effectively by using clear visuals such as comparison tables or summary infographics to highlight the differences in impacts, costs, and feasibility. Additionally, simplifying technical language and including brief, plain-language summaries for each alternative would make the content more accessible and ensure stakeholders understand the trade-offs involved.

Response: The National Park Service believes these concerns were addressed through the planning process and/or within the EA. The National Park Service used best available data, cited sources as appropriate, and adequately discussed situations in which further compliance analysis would be needed once more information about project implementation becomes available. The EA includes side-by-side comparison tables that articulate the intent of each alternative and the differences between the actions proposed under each. Impacts on a given park resource type are concisely summarized at the end of each impact topic analysis in conclusion paragraphs, allowing the reader to understand the trade-offs between alternatives. The feasibility and cost of the proposals under each alternative were discussed and are not required in NEPA documents, as they are unrelated to environmental impacts.

Concern Statement: A commenter noted that p. 10 of the plan mentions the public's frustration with the lack of a formalized trail system. The plan proposes to improve and expand trails and

trailheads. However, the plan does not address the fact that visitor experience (and safety) would be improved by proper signage at trailheads and on trails and good maps. The commenter further mentioned the park brochure shows the main trails but not the connecting roads on the trail. They believe there is a significant probability of visitors getting confused or lost. The commentor further pointed out that plan p. B-7 recognizes the need to "communicate" trail information but makes no commitment to providing the needed signage and maps.

Response: The National Park Service understands and appreciates the concern for clear signage and maps to improve wayfinding and safety. These issues are beyond the scope of a general management plan and can be considered in future trailhead design, map development, and other trail-related communication. The plan commits to improved communication of trail data on p. B-7 and on p. 38 mentions that "a future planning effort, such as a trail management plan, could define appropriate infrastructure elements at trailheads." These wayfinding concerns can be addressed in the future and do not necessarily require a planning document.

Concern Statement: One commenter noted a lack of details regarding preservation of existing sacred sites and lands. They stated that some of the five miles of Sulphur Creek Road that would be opened to the public would cross into and harm Pueblo lands.

Response: Chapter 3 of the plan articulates numerous strategies for engaging with Tribal Nations, including for the preservation of cultural sites. Potential impacts on the ethnographic landscape including sacred sites are discussed in chapter 3 of the EA in as much detail as is possible at this time given the information available. As noted in the EA, further impact analysis and consultation with Tribal Nations would be required in the future during planning for implementation of the actions proposed in this plan. The five miles of Sulphur Creek Road referenced in this comment is an existing road segment that would be added to the backcountry vehicle route and is not on Pueblo lands.

Concern Statement: One commentor was concerned about "the proposed paved road between La Jara and South Mountain." In regard to possible flooding of the current road, the commenter questioned whether it would be less expensive to elevate the road in low-lying areas rather than build a new road. The commenter further questioned the costs and benefits of a new road and its justification.

Response: A paved road between Cerro La Jara and South Mountain is not proposed in the plan. It is assumed that the comment intended to reference the proposal to realign and pave the entrance road. The National Park Service weighed numerous considerations in deliberating about potential actions for this plan. The cost and feasibility of the proposed entrance road realignment were considered, as were visitor access, visitor safety, visitor experience, cultural resource impacts, natural resource impacts, and other considerations including whether actions support the plan's purpose and need. The National Park Service has concluded that the proposed entrance road realignment is the selected action in light of all considerations, including but not limited to cost.

Concern Statement: A commenter felt the environmental analysis was fatally flawed because it fails to adequately address the drainage impacts of sheep and cattle grazing over recent centuries. They also mentioned the analysis does not take into account the extirpation of

beavers and their ecological role in the environment, and they noted historic road development to permit logging and mining exploration was not analyzed.

Response: Impacts of sheep and cattle grazing on the park’s hydrology and riparian resources are discussed in several sections of the EA. For example, on EA p. 38 grazing pressure is described as a “key stressor” on the vegetative habitat, food, and water sources of the federally endangered New Mexico meadow jumping mouse. Similarly, lack of water from drought, exacerbated by climate change, as well as severe wildfires and postfire scouring floods impact the environment as well. The EA notes the dynamic nature of the area’s predominately early-stage riparian habitat (pp. 38–39). Restoration of degraded habitats along streams, ditches, and canals plays an important role in the viability of wildlife populations by improving or creating additional habitat to support wildlife populations.

Related to beaver extirpation, impacts on the park’s riparian environments from legacy grazing, mining, and logging are discussed in the plan and EA. The plan’s purpose and need acknowledges that park lands have been heavily influenced by mid-20th-century logging and geothermal exploration. Environmental analysis in the federally listed species impact topic discussion on EA p. 47 notes that changing uses of legacy logging and mining roads could have short-term destructive impacts on vegetation and wildlife habitat during future construction of proposed improvements.

Concern Statement: A commenter noted the assessment does not sufficiently analyze cumulative impacts from past, ongoing, and foreseeable future actions. While it references the Front Country Infrastructure Improvement Project and a utilities upgrade, it does not fully account for how these projects, combined with the proposed development, may affect sensitive resources over time. The commenter mentioned this is especially important given the potential for increased visitation, expanded infrastructure, and climate-driven changes in park use.

Response: The EA analyzes how impacts from the proposed alternatives would interact with impacts from past and ongoing activities, and it also considers reasonably foreseeable impacts per section 1.2 of the DOI *Handbook of National Environmental Policy Act Implementing Procedures* (July 2025). As the commenter noted, the “Current and Expected Future Condition” narrative for each impact topic discusses past, ongoing, and reasonably foreseeable actions. Subsequent analyses of each alternative then apply these past and ongoing impacts to the analysis for each alternative. For example, the analysis for Historic Ranching Structures and Landscapes states, “When added to past impacts from the management eras of the Valles Caldera Trust and the National Park Service, potential impacts from continuing management actions. . . and impacts from recent plan implementation (e.g., the FCIIP), the proposed actions under the new appropriate facilities alternative would further degrade the character of the Baca Ranch historic landscape district and the park’s broader ranching landscape by creating new visual intrusions on top of existing ones and through the possible removal of historic buildings and ranching features (e.g., the corral at Cerro La Jara).” Similar language is found in the analyses of other impact topics. Therefore, the National Park Service believes the EA sufficiently accounts for past, ongoing, and reasonably foreseeable impacts.

Concern Statement: A commenter noted the EA includes determinations under the ESA for the Mexican spotted owl and Jemez Mountains salamander, but it lacks sufficient detail to support these conclusions. For the New Mexico meadow jumping mouse, the EA acknowledges that it cannot make a determination due to insufficient design detail. The commenter noted that despite this, the plan moves forward with actions that could affect known habitat. They stated that without a clear understanding of how these species may be impacted, the EA does not meet the standard of informed environmental review.

Response: Proposals in the plan are conceptual and may take many years to implement. As such, the project team began seeking technical guidance in June 2024 from species leads with the US Fish and Wildlife Service New Mexico Ecological Services Field Office (USFWS) to inform upcoming planning, management, and consultation needs to comply with section 7 of the ESA. Through existing survey data, previous park planning projects, and more recent conversations with USFWS staff, the National Park Service would eventually seek USFWS concurrence for ESA determinations when more project details are developed. The current plan does not include a sufficient level of design detail or site-specific data to quantify potential impacts and make ESA determinations at this time, and so the ESA determinations identified by the commenter have been removed (see attachment B).

A biological evaluation would be prepared for specific plan actions that may affect listed species in the future. When this plan's conceptual proposals are developed as proposed actions, park staff would seek technical guidance from species leads with USFWS for developing appropriate conservation strategies. The park would prepare construction-level designs and pursue compliance and consultation to meet ESA and other regulatory requirements for those efforts. In addition, continued monitoring and survey efforts for federally listed species are identified as part of the selected action.

While the plan includes high-level programmatic analyses of the effects of the conceptual actions, the park would conduct new impact assessments and regulatory compliance for projects identified in the plan during design and construction phases. For example, for the road realignment in the selected action, compliance would be conducted during the design phase and would include a biological evaluation, consultation with USFWS, and assessment of other environmental impacts. Impacts on federally listed species could be mitigated at that time through thoughtful site selection, infrastructure design, and visitor circulation patterns. The analysis in this EA is important for evaluating the range of potential impacts on sensitive resources, but a definitive analysis of impacts is not possible until further project-specific planning is undertaken. A tiered NEPA approach with deferred site-specific ESA compliance is not uncommon for broad planning efforts such as general management plans, as referenced in section 3.2 of the DOI *Handbook of National Environmental Policy Act Implementing Procedures*. Changes to the plan and EA were made based on this comment; the plan was updated prior to final publication, and changes to the EA are documented in attachment B.

Concern Statement: Regarding cultural resources, a commenter noted the EA identifies sensitive archeological and ethnographic resources, including sacred landscapes and Archaic-

period sites, but defers meaningful analysis and consultation to future phases. The commenter noted the document should include more detail on how these areas will be protected and how Tribal consultation will guide future decisions.

Response: The park consulted with all associated Tribal Nations throughout the planning process (see FONSI section 1.6.6 for a summary of consultations), including large meetings with multiple Tribal Nations, meetings with representatives from individual Tribal Nations, and site visits, to ensure that Tribal perspectives and concerns were heard and incorporated into the planning process. Chapter 3 of the plan discusses numerous strategies for engaging with Tribal Nations, including for the preservation of cultural sites. Potential impacts on the ethnographic landscape, including archeological resources and sacred sites, are discussed in chapter 3 of the EA in as much detail as is possible at this time given the information available. Once planning begins for implementation of various proposals in the plan, the park would conduct the section 106 review process, including consultation with Tribal Nations, in order to identify impacts on resources and measures to avoid, minimize, or mitigate those impacts. The analysis in the EA is important for evaluating the range of potential impacts on these sensitive resources, but a definitive site-specific analysis of impacts is not possible until further project-specific planning is undertaken. A tiered NEPA approach with deferred site-specific section 106 compliance is not uncommon for broad planning efforts such as general management plans, as referenced in section 3.2 of the DOI *Handbook of National Environmental Policy Act Implementing Procedures*.

Concern Statement: A commenter mentioned that hydrological modeling analyses, wetlands and floodplain delineations, and detailed mitigation strategies were not in the assessment. They believed given the scale of proposed infrastructure the current level of analysis is inadequate. They suggested the National Park Service conduct more robust data collection and planning to ensure wetlands and floodplains are not compromised.

Response: Wetland delineations, detailed hydrological modeling, and quantitative-based mitigation strategies would be completed to meet regulatory and procedural requirements before proposed infrastructure could be developed. In addition, the EA states on p. 62 that through the establishment of required mitigation measures for constructing facilities under the selected action, the design of the proposed facilities and infrastructure improvements will allow, to the extent possible, natural wetland functions and natural and beneficial wetland values to continue. Site designs would incorporate protective mitigation measures to avoid wetland impacts wherever practical, minimize unavoidable impacts, and possibly compensate for remaining, unavoidable impacts, if necessary, to fulfill robust conditions specified in NPS Director's Order 77-1: *Wetland Protection for NPS Wetlands*. While the selected action will likely disturb wetlands, design details and site-specific data to fully quantify impacts from proposed facilities are not currently available.

As noted on pp. 55–56 of the plan, once site-specific designs are developed (e.g., for the entry road realignment and visitor services area), the National Park Service would prepare additional documentation as appropriate, including a wetland statement of findings, to meet regulatory and procedural requirements before these facilities could be developed. A tiered NEPA approach with deferred site-specific regulatory compliance is not uncommon

for broad planning efforts such as general management plans, as referenced in section 3.2 of the DOI *Handbook of National Environmental Policy Act Implementing Procedures*.

Concern Statement: A commenter mentioned it would be helpful to clarify what thresholds or criteria will trigger future NEPA or NHPA compliance and how cumulative impacts will be tracked across phased actions.

Response: During the implementation phase for any proposed action in the plan, the National Park Service will determine whether further NEPA compliance is necessary, per the DOI *Handbook of National Environmental Policy Act Implementing Procedures* (e.g., sections 1.1 and 1.2 regarding determining when NEPA applies and the appropriate level of NEPA review, and section 3.2 regarding programmatic compliance and tiering).

The EA states that “all undertakings, as defined in 36 CFR 800.16(y), tiering from this plan will comply with the implementing regulations of section 106 of the National Historic Preservation Act (NHPA) in 36 CFR 800 or the Nationwide National Park Service Programmatic Agreement, as determined by the agency official, as defined in 36 CFR 800.2(a).” The park must wait until the design and implementation phases of these tiered projects to conduct section 106 (as opposed to conducting a review now) because currently there is insufficient detail to assess the effects of these future projects on historic properties. Future project designs will reveal enough details to assess effects as required by section 106 review.

Cumulative adverse effects will be analyzed during the section 106 process, per 36 CFR 800, for any undertaking proposed in this plan. As for NEPA, reasonably foreseeable effects were addressed in the EA and will also be considered during planning for site-specific projects tiering from this plan when the park determines the appropriate NEPA pathway for the project, per section 1.2 of the DOI *Handbook of National Environmental Policy Act Implementing Procedures* (July 2025). The plan also establishes (or reconfirms) monitoring programs for sensitive cultural and natural resources that detect condition trends over time.

Concern Statement: A commenter noted the plan introduces visitor capacity thresholds but does not clearly explain the basis for these numbers. They believed there should be more transparency around how these figures were derived, whether through modeling, comparative analysis, or infrastructure limitations. They also mentioned it would be helpful to explain how monitoring data could be used to adaptively manage visitor use and trigger mitigation if thresholds are approached or exceeded.

Response: The rationales for the thresholds are described in appendix B of the plan. For example, on plan pp. B-5–B-6, the rationale for the “number of parties encountered per day on trails” is described. It includes a “comparative analysis” of similar thresholds at other national parks and how those are used to quantify the description of the desired conditions for the two relevant zones at Valles Caldera. Appendix B also includes a description of how visitor use monitoring would occur for each of the indicators and how that data would be used to inform whether and how related management strategies would be taken.

Similarly, rationales for visitor capacities are described in appendix C of the plan. This appendix describes the analytical process used to identify visitor capacities in a general way, then follows that process for the two visitor capacity analysis areas.

Concern Statement: A commenter noted the EA acknowledges legacy impacts from logging and fire but does not analyze how new infrastructure could affect runoff, sedimentation, or nutrient loading. The commenter mentioned how water quality is essential for riparian habitat health, recreational fishing, and potential future potable water infrastructure. They noted monitoring data already exist (e.g., nitrate levels and turbidity), and the EA could have used these to assess baseline conditions and potential impacts.

Response: The issues the commenter raises were dismissed from detailed analysis on EA p. A-1 and p. A-2 because some areas in the park, such as the cabin district, have been occupied by people since the late 19th century, which has resulted in habitat degradation and vegetation modification, manipulation, and loss; this has affected the ways in which wildlife species use the park for natural processes.

Similarly, the park entrance station area has been used as a livestock staging area since at least the mid-20th century and as a visitor contact center for Valles Caldera since the land transferred into federal ownership (under the Valles Caldera Trust from 2000 to 2015). Over the last 12 years, the park has experienced more intensive visitor use in the forms of vehicle and pedestrian activities, NPS management activities and programs, and staging areas for government-owned equipment. The use and activities conducted in these areas have resulted in modified wildlife behavior, including both spatial and temporal avoidance, tolerance, attraction, sensitization, and habituation.

The EA mentions that maintaining good water quality is essential for providing healthy, safe, and beneficial visitor experiences, especially since the park has no current system for dispensing potable water outside of filling water tanks. Water quality checks would be performed both upstream and downstream of the septic system to provide a baseline comparison. The park may also check water quality at points along creeks, the East Fork Jemez River, or potential problem spots identified by staff.

The EA indicates that while proposed development activities would expand impermeable surfaces and possibly add to runoff of contaminants, upon completion of future design and construction plans, infrastructure improvements may positively contribute to hydrologic flow by improving nearby wetland functions and habitat. Construction implementation will include best management practices for reducing runoff, sedimentation, and nutrient loading. Therefore, water quality was dismissed from further analysis.

Additionally, the plan notes on p. 3 how ecological restoration efforts in particular would provide mitigation opportunities for potential impacts from infrastructure development. As noted in concern statement responses for wetland and floodplain impact topics (see EA pp. 53–58 and pp. 58–63, respectively), delineations, detailed hydrological modeling, and quantitative-based mitigation strategies would be completed to meet regulatory and procedural requirements before proposed infrastructure could be developed. Because design details and site-specific data to fully quantify the potential impacts on floodplains from proposed facilities are not currently available, current analysis is largely qualitative.

In addition, p. 45 of the EA indicates the park would continue to implement a sustainable approach to managing grazing, which would address some concerns related to nitrate levels and turbidity in park waters. The park's landscape restoration and stewardship approach are expected to remain active, which would further minimize impacts from infrastructure development on the landscape, including runoff, sedimentation, and nutrient loading.

The EA indicates on p. 61 that aquatic resource compliance for NPS undertakings in wetlands is governed by Executive Order 11990 and requirements of NPS Director's Order 77-1: *Wetland Protection for NPS Wetlands*, which the park must adhere to. Potential construction projects must also meet the permitting requirements of section 404 of the Clean Water Act (33 USC 1344) for "Waters of the United States." Methods for delineating NPS wetlands are defined in NPS Procedural Manual 77-1: "Wetland Protection," and methods for delineating waters of the United States are defined in the US Army Corps of Engineers Wetlands Delineation Manual (1987) and the Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys and Coast Region (Version 2.0) (2010).

The EA indicates future compliance for implementing the action alternatives (see EA p. 55 and p. 62) would need to incorporate details and site-specific data to fully quantify impacts on water resources from proposed facilities. Once site-specific designs are developed for the entry road realignment and visitor services area, for example, the National Park Service will prepare additional compliance documentation as appropriate. Such compliance would include, as appropriate, a floodplain and wetland statement of findings to meet regulatory and procedural requirements before these facilities could be developed (noted on p. 62 of the EA). Baseline monitoring data (e.g., nitrate levels, turbidity) would be used to prepare future compliance documents and meet regulatory requirements. A tiered NEPA approach with deferred site-specific regulatory compliance is not uncommon for broad planning efforts such as general management plans, as referenced in section 3.2 of the DOI *Handbook of National Environmental Policy Act Implementing Procedures*.

Concern Statement: A commenter mentioned the EA's reliance on the Federally Listed Species section to address wildlife impacts is overly narrow. They noted federally listed species represent only a fraction of the park's faunal diversity. Many nonlisted species, including keystone, indicator, and culturally significant wildlife, may be vulnerable to increased human activity, habitat fragmentation, or altered fire regimes. The dismissal also lacks quantitative data and spatial analysis. The commenter noted there is no reference to wildlife population trends, movement corridors, or habitat suitability modeling and that without such evidence, conclusions about habituation, tolerance, or resilience remain speculative.

Response: While NEPA analysis for federally listed species was carried forward for analysis in the EA, faunal diversity, including nonlisted species and keystone, indicator, and culturally significant wildlife, as well as faunal habitat, are analyzed throughout the document; this includes, for example, elk on EA p. 73, raptors on EA p. 39, and wolves on EA p. 33. Impacts from increased human activity and habitat fragmentation are included throughout the document; for example, EA p. A-1 notes that while wildlife might be broadly affected by ongoing visitor uses, proposed management actions would continue to occur. Park managers would continue to implement existing practices for protection and

management of faunal species under all plan alternatives. Nonetheless, the National Park Service has prepared errata for EA to supplement the dismissal of nonfederally listed wildlife (see attachment B).

As the commenter correctly noted, plan actions that may affect listed species under section 7 of the ESA of 1973 (16 USC 153 et seq.), as amended, are analyzed on EA pp. 33–51. Broad discussions and analysis related to wildlife and wildlife habitat are included in that section specifically to meet the plan’s purpose and need to provide a framework for managers to best protect the park’s resources. Park managers strive to document and reference population trends, movement corridors, and habitat suitability based on best available science and professional judgment.

In addition, park staff will continue to seek technical guidance from USFWS staff and other wildlife management partners throughout implementation of the planning effort. As mentioned in response to previous concern statements, while the plan includes high-level programmatic analyses of the effects of the conceptual actions, the park would conduct new impact assessments and regulatory compliance for projects identified in the plan during design and construction phases. A tiered NEPA approach with deferred site-specific ESA compliance is not uncommon for broad planning efforts such as general management plans, as referenced in section 3.2 of the DOI *Handbook of National Environmental Policy Act Implementing Procedures*.

Concern Statement: A commenter noted map 2 (“Management Zones”) on p. 17 of the plan has a large black area in the Banco Bonito area. They would like it to be identified. This black area, they suspected, is related to Jemez Pueblo's use of this area (top of plan p. 3 and appendixes E, F, and G), but it is not identified as one of the three "zones" in the park on plan pp. 18–27. The commenter noted this zone, the reasons for it, and the activities allowed in it need to be explained more fully.

Response: The area in question on the map is labeled “Area under further consideration in consultation with the Pueblo of Jemez,” which was placeholder language. The park subsequently completed consultation with the Pueblo of Jemez over management of this area and updated the zoning in the final plan based on the outcomes. In addition to the three management zones previously identified in the plan, two new zones within Banco Bonito were added. Consultation over management of Banco Bonito was undertaken pursuant to the 2024 settlement agreement (see appendix E of the plan) between the United States and the Pueblo of Jemez.

Concern Statement: A commenter noted that plan p. 35, last paragraph, ln. 3–4, read "Backcountry roads will be improved and maintained to ensure access by low-clearance vehicles." They asked whether "backcountry roads" here refers to all roads currently in use, all roads noted on map 2 as "public roads" (in black), or only the road marked on map 3 as an "existing public road" with a gray, dashed line.

Response: “Backcountry roads” in this sentence applies to the backcountry vehicle route open to visitor vehicle travel with a pass, as identified elsewhere in the document and in the accompanying EA. Road segments of Central Caldera Road (VC02) and Sulphur Creek Road (VC08) are specifically named for improvement, and other segments may be

improved at the discretion of the park to meet desired conditions for visitor use and safety. To improve clarity, changes were made to the text of the final, published plan based on this comment.

Concern Statement: A commenter noted that plan p. 37 seems to make clear that many existing roads (VC03, VC06, VC07, VC11, VC12) will be closed, and many others currently open to the public (VC08, VC09, etc.) will be available only via a special pass, but the plan does not give any rationale behind those closures. On p. 37, related to the proposed closure of many roads in the preserve, the plan is not consistent about the roads' future uses. On p. 37, the plan states the roads will be "reserved for administrative and emergency use, at the discretion of the superintendent," but map 2 suggests they will all be "proposed trails," and map 6 ("Trail Use") suggests the roads have already been totally closed and are not "existing trails."

Response: Currently, the first group of routes noted by the commenter (VC03, VC06, VC07, VC11, VC12) are all closed to public motor vehicle use. The plan does not change the status of these routes in regard to public motor vehicle use. Instead, the plan clarifies that these routes will continue to be open to hiking, equestrian use, and in most cases biking. The exception to this is VC11, which is currently open to hiking, equestrian use, and biking, but would close to bike use under the plan. See map 6 ("Trail Use"), as revised, for designated use types under the plan.

The majority of VC08 (i.e., south of Valle San Antonio) is currently designated as a trail open to hiking, biking, and equestrian use. Under the plan, this route would become a road open to public motor vehicle use. This road would be subject to the backcountry vehicle pass system (with the exception of a short segment between the park's west boundary and the Sulphur Springs parking area).

Central Caldera Road (VC09) is currently open to public motor vehicle use in the summer under the backcountry vehicle pass system. The use of this road does not change under the plan.

In general, the changes noted above represent no significant change to use types allowed on the backcountry routes. In general, the only changes are closure of VC11 to bikes and opening of VC08 to public motor vehicle use (under the backcountry vehicle pass system). These changes were made to expand visitor opportunities while protecting park resources, consistent with the purpose and need for the plan and the NPS Organic Act.

Text on plan p. 37 was reviewed and is consistent with what is shown on the maps. Elsewhere, changes to the text of the plan and EA based on this comment are warranted to improve clarity; the plan was updated prior to final publication, and changes to the EA are documented in attachment B.

Concern Statement: A commenter noted that the statement on plan p. 3, para. 2, ln. 1, "Starting in 1860 and up until 2000, the Cabeza de Baca family owned much of the caldera," is incorrect. As the preserve's web page (<https://www.nps.gov/vall/learn/historyculture/index.htm>) notes, Cabeza de Baca owned the area from 1860 to 1899, followed by the Oteros (1899–1917), the Bonds (1917–1963), and the Dunigans (1963–2000). The commenter also noted that plan p. 3, para. 2, ln. 4, which states the cabin district is on the north side of Valle Grande, is incorrect; it is

on the west side. The commenter further noted that the two sentences in plan p. 3, para. 3, ln. 2–4, are incorrect and should instead read “various parties, beginning in the 1880s, attempted to develop Sulphur Springs into a health spa. Shortly after 1900 the Otero family tried, without success, to commercially develop the area's sulfur resources. Sulphur Springs, meanwhile, continued to operate as a health resort until the 1960s.” The commenter recommended consulting the Valles Caldera National Preserve Historic Resource Study (2022), pp. 159–177, for more information.

Response: The National Park Service addressed the two typographical errors in the final, published version of the plan. The sentence about the health spa was rewritten for clarity but remained concise, consistent with the intent of the paragraph.

Concern Statement: A commenter noted that on p. 49, para. 4 of the EA, the first sentence states Mexican spotted owl surveys have not been conducted in Sulphur Canyon, but a Mexican spotted owl pair was documented in Sulphur Springs in 2022. The second sentence states there have been ongoing surveys. The commenter suggests clarifying where these surveys have been performed.

Response: Sulphur Springs is a specific location in Sulphur Canyon within Valles Caldera. In conjunction with a parkwide owl community study conducted from 2020 through 2024 (Hawks Aloft, Inc. 2025), Mexican spotted owl surveys were conducted following USFWS protocols at two locations in Sulphur Canyon, including Sulphur Springs. In May 2021, this study documented a juvenile Mexican spotted owl pair at Sulphur Springs (NPS 2022b; Hawks Aloft, Inc. 2025). During a survey in June 2021, a Mexican spotted owl was documented in Sulphur Canyon approximately 0.75 mi northeast of Sulphur Springs (Hawks Aloft, Inc. 2025), but the observer thought it likely that this owl was the male from the pair previously documented at Sulphur Springs. No additional Mexican spotted owls were detected in Sulphur Canyon during surveys conducted in 2023 and 2024 (Hawks Aloft, Inc. 2025). Changes to the plan and EA were made based on this comment; the plan was updated prior to final publication, and changes to the EA are documented in attachment B.

Concern Statement: A commenter mentioned that on p. 53, para. 3 of the EA, it is stated that “Valles Caldera is largely a monsoon-dominated watershed, meaning that peak flows occur with the summer monsoon rather than from spring snowmelt.” According to the US Geological Survey stream gage on the Jemez River, peak flow along this river, which is downstream of Valles Caldera National Preserve, is in May, which precedes the summer monsoon season.

Response: Information in the park description on p. 2 of the plan adds additional context to the paragraph on p. 53 of the EA. The description on p. 2 of the plan indicates that “the Jemez Mountains range receives an average of 11 to 35 in. of precipitation per year, which are primarily from winter snow and summer monsoonal rains.” Changes to the text of the EA based on this comment are warranted to improve clarity. These changes are captured in attachment B.

Concern Statement: Regarding the culvert/road crossing on the Valles Caldera National Preserve entrance road that cuts through the East Fork Jemez River, one commenter noted the flooding that periodically occurs at this point is an indicator that the current waterway crossing design at least partially fragments this aquatic and associated riparian habitat and would need to

be replaced with a sufficiently large bridge or bottomless culvert. The commenter questioned the accuracy of the conclusion on EA p. 55, para. 2, which states "Based on these factors and the assessment from the park hydrologist, the no-action alternative would not affect the natural resources and functions of floodplains."

Response: The National Park Service has deleted the sentence noted by the commenter because descriptions on EA p. 53 and p. 55 address the adverse impacts on floodplain resources and values from development and the interplay of human activities, ecological succession, geology, climate, and other natural processes occurring in the park. This analysis also describes other potential short- and long-term beneficial and adverse impacts on floodplains from other activities under no action, such as fire management, the Front Country Infrastructure Improvement Project, burying utilities along the western edge of the Valle Grande, and other restoration efforts. Changes to the text of the EA based on this comment are captured in attachment B.

Concern Statement: A commenter suggested the National Park Service clarify on EA p. 56, para. 2 and 4, what actions will be taken to prevent channelization of slope wetlands in the cabin and Valle Grande districts.

Response: Specific actions to prevent or mitigate potential channelization of slopes in the cabin and Valle Grande districts need to incorporate site-specific data to fully quantify impacts on water resources from proposed facilities. While quantitative data are not currently available to adequately address impacts, site-specific designs would be required to meet regulatory and procedural requirements before proposed facilities in the plan could be developed, as noted on p. 62 of the EA. The National Park Service would prepare additional compliance documentation, such as a floodplain and wetland statement of findings, as appropriate to comply with such requirements. A tiered NEPA approach with deferred site-specific ESA compliance is not uncommon for broad planning efforts such as general management plans, as referenced in section 3.2 of the DOI *Handbook of National Environmental Policy Act Implementing Procedures*.

Page 56, para. 3, of the EA also indicates the formulation of appropriate mitigation measures would be required for project implementation prior to constructing facilities to account for potential impacts such as slopeside erosion. These measures would decrease and possibly negate adverse impacts. Similarly, the design of the proposed facilities and infrastructure improvements would allow, to the extent possible, natural surface-water flows and natural and beneficial floodplain values to continue.

Concern Statement: A commenter expressed concern about limited mountain bike access and noted that the map on p. 47 of the plan appears to exclude bicycle access on the following routes that were previously open to mountain bikes: South Mountain, San Antonio Mountain, VC10 to VC11/North West Rim, VC09/West Rim, VC09/East Rim, VC14/Valles Toledo, VC12, and VC13. The commenter discussed the benefits of increased mountain bike access and drew comparisons with other national park units.

Response: This comment is mostly correct, with two exceptions. The South Mountain, San Antonio Mountain, Northwest Rim (VC10, VC11), Indios Creek (VC13), and North Valle Toledo (VC14) trails would indeed close to biking under the plan. However, the South

Valle Toledo (VC09) and Garita (VC12) trails would remain open to biking under the plan. To clarify which trails would experience changes to allowed use type under the plan and what those changes are, tables indicating routes' current uses, proposed uses under the two action alternatives, and the change in use have been added to the plan and EA.

The closures to bikes are intended to diversify the spectrum of recreational opportunities available in the park and reduce the likelihood of conflicts between different user groups. Currently, very few trails are open to just hikers or hikers and equestrians. Experiences, public comments, and visitor studies conducted in other national park units demonstrate that hikers and equestrians enjoy having the option to experience trails that are not shared with bikes. This change in trail designated use type expands those opportunities. It also prevents potential future conflicts between user groups that can occur when bikers, hikers, and equestrians share the same trail. In fact, many trail management planning efforts in the National Park Service have been initiated over the years in response to these conflicts, which can become more acute as use to an area increases, as is anticipated at Valles Caldera.

Despite the closures, many trails remain open to bikes. See map 6 and table 5 in the final, published version of the plan for a complete list. The closures are also offset by three planned trail reroutes that expand biking opportunities in the park. The multiuse trail along Valle Grande adds a new biking opportunity for cyclists entering the Valle Grande area in which they do not share the road with motor vehicles. A minor trail relocation on the Rincón trail (VC04) reestablishes access into the park for cyclists from the eastern boundary. Perhaps most importantly, the minor relocation of the South Valle Toledo trail creates many more loop opportunities and route possibilities for cyclists. In sum, the trails maintained for biking use and additional trails created for biking use under the plan do not result in a significant loss of biking opportunities in the park.

To improve clarity, changes to the plan and EA were made based on this comment; the plan was updated prior to final publication, and changes to the EA are documented in attachment B.

Concern Statement: A commenter noted that on map 4, for example, trailhead icons are shown at places where currently there is no access, and no labels are provided to indicate which trails those trailheads service.

Response: The trailheads provide access to the adjacent trails shown on map 4. For example, the remote access point currently located on the east boundary of the park would become a trailhead as shown on the map. It would connect to the proposed extension to the Rincón Trail (VC04) as shown on the map.

Additionally, as stated in the plan on p. 38, “a future planning effort, such as a trail management plan, could define appropriate infrastructure elements at trailheads. The park could also identify trail hubs (those servicing multiple trails) and consider connectivity to regional trails. Some existing trailheads may be consolidated.”

Concern Statement: A commenter mentioned that Superintendent Silva-Bañuelos stated in his presentation that except for the main entrance road, roads in the preserve will not be paved, but

this is not mentioned on plan p. 10. Instead, it is addressed on plan p. 36, but possible future confusion might be avoided if it was also mentioned on plan p. 10.

Response: The narrative on p. 10 of the plan related to roads is a part of the “Planning Issues and Opportunities” section. It is intended to describe the current condition of the park, not the proposals of the plan. The language on p. 36 of the plan is part of the description of parkwide and general management actions, and it correctly describes that “the park’s road system would remain unpaved unless a new need is identified, with the exception of the entrance road.”

Concern Statement: A commenter noted the EA is fuller of semantics and verbiage than evidence from scientific studies to inform decision-making. An example they noted on EA p. 63 reads "Changes to visitor capacity proposed in this alternative is an administrative action, and any related changes to visitor behavior that may impact wetlands cannot be reasonably and accurately predicted. In and of themselves, these administrative changes constitute a neutral impact." The commenter questioned what this sentence really means and how that could be the case. They also questioned the significance of the phrase "changes to visitor capacity is an administrative action" and how that speaks to what a real increase in visitors may mean to the environment of the park.

Response: As described in the plan, visitor capacity is the “maximum amounts and types of visitor use that an area can accommodate while achieving and maintaining (desired conditions).” The sentences in question intend to say that the act of identifying the visitor capacities does not in itself have an impact on wetlands. It is worth noting that the act of identifying visitor capacities is different from actions taken to implement visitor capacities. Hypothetical actions to implement visitor capacities such as changing the backcountry vehicle pass system, paving roads, and adding trailheads may very well have impacts, and those impacts are evaluated separately in this EA or in future compliance as appropriate. It is also worth noting that visitor capacities are a maximum, not a goal.

Concern Statement: A commenter noted that plan p. 2 refers to 37 Tribal Nations associated with the preserve, even though the number of associated Tribal Nations has previously been identified as 38. They further noted the plan does not explain why there are 37 Tribal Nations now and that the preserve has not done an ethnographic overview and assessment to make such a determination.

Response: Until early 2025, the number of federally recognized Tribes associated with the park was 38. On February 11, 2025, in response to an invitation to consult over the draft plan, the Tribal Historic Preservation Officer (THPO) for the Wichita and Affiliated Tribes contacted the park via email and stated that the counties in which the park is located “are not within our area of interest.” The preserve superintendent followed up and asked the THPO if the Wichita and Affiliated Tribes should be removed from the park’s official list of associated Tribes, and the THPO confirmed that the Tribe should be removed. Therefore, the current number of federally recognized Tribes associated with the park is now 37.

ATTACHMENT B: ERRATA INDICATING TEXT CHANGES TO THE GMP/DCP AND ENVIRONMENTAL ASSESSMENT

INTRODUCTION

Errata (corrections and minor revisions) for the environmental assessment (EA) are provided below. The National Park Service updated and revised the GMP/DCP based on public comments and tribal consultation, so that errata are incorporated into the final, published plan. In contrast, the text of the published EA has not been updated; the errata are instead documented in this attachment.

In the entries below, original text from the EA is included to provide context and to allow for comparison to the text change. Additions to text are italicized-underlined, and deleted text is shown by ~~strikeout~~. Page numbers referenced in this attachment refer to the July 2025 version of the EA that was posted for public comment.

ERRATA TO THE ENVIRONMENTAL ASSESSMENT

Chapter 1: Purpose and Need

Page 1:

Access to the park and circulation within the park do not adequately connect visitors with park resources and experiences. Access and circulation are fragmented and have been heavily influenced by mid-20th-century logging and geothermal exploration. Existing roads and trails were not designed or built to facilitate park visitor use. The park remains largely undeveloped, and access is limited to 35 vehicles at a time (via pass permit) beyond the cabin district, 3.5 miles into the park. Few established trails or formal parking areas exist beyond that initial entry point, and many visitors are unable to experience the fundamental resources and values of the park.

Chapter 2: Alternatives

Page 12, “Table 1. Alternatives Comparison Matrix”:

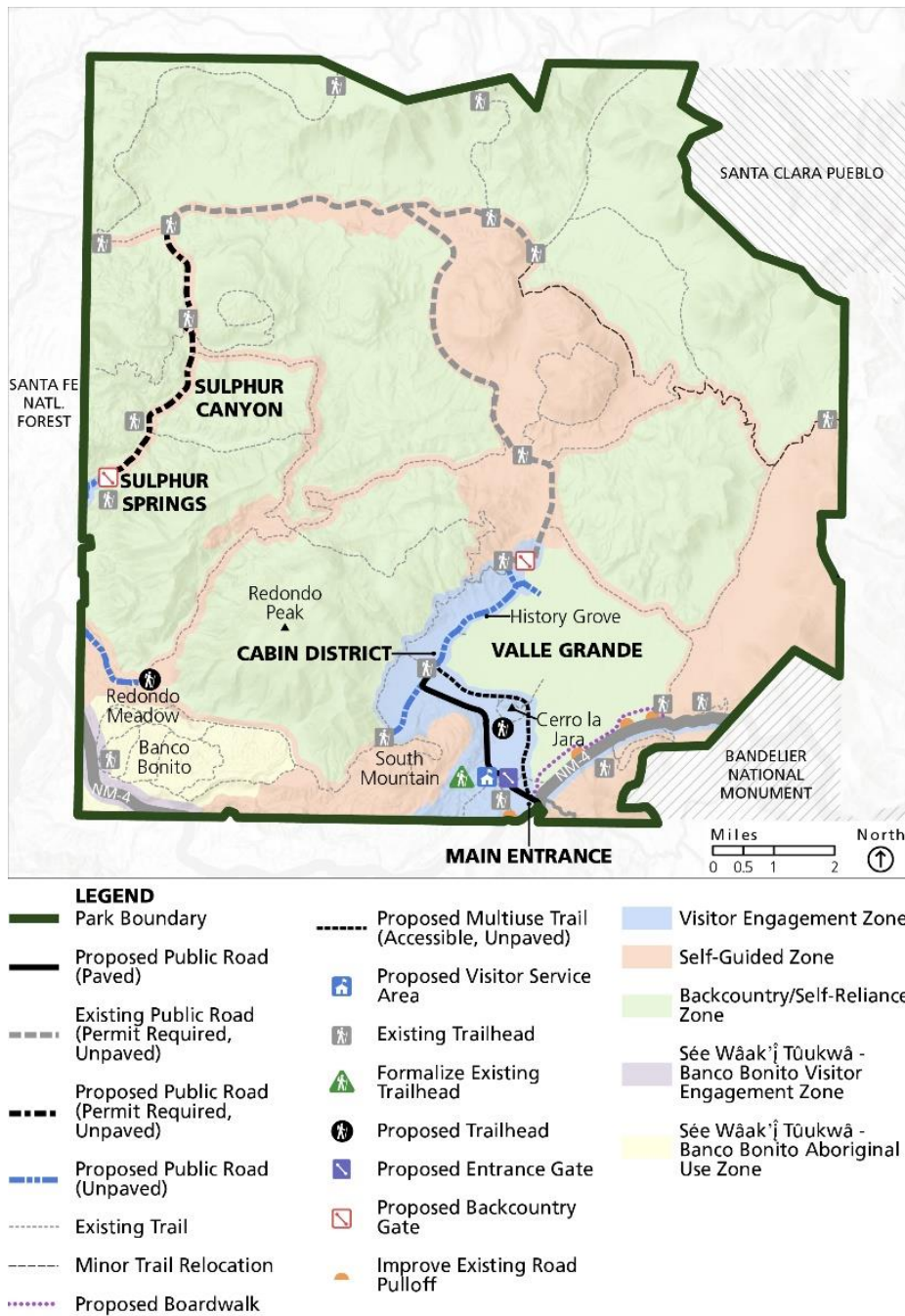
Visitors would require a backcountry vehicle pass for vehicular access to ~~backcountry stretches of North Valle Grande and Central Caldera roads (VC02), Sulphur Creek Road (VC08), and Valle San Antonio and Valle Toledo roads (VC09).~~

The frontcountry segment of Sulphur Creek Road (VC08) from the park entrance to Sulphur Springs, would be enhanced as an single-lane improved ~~gravel~~ road with two-

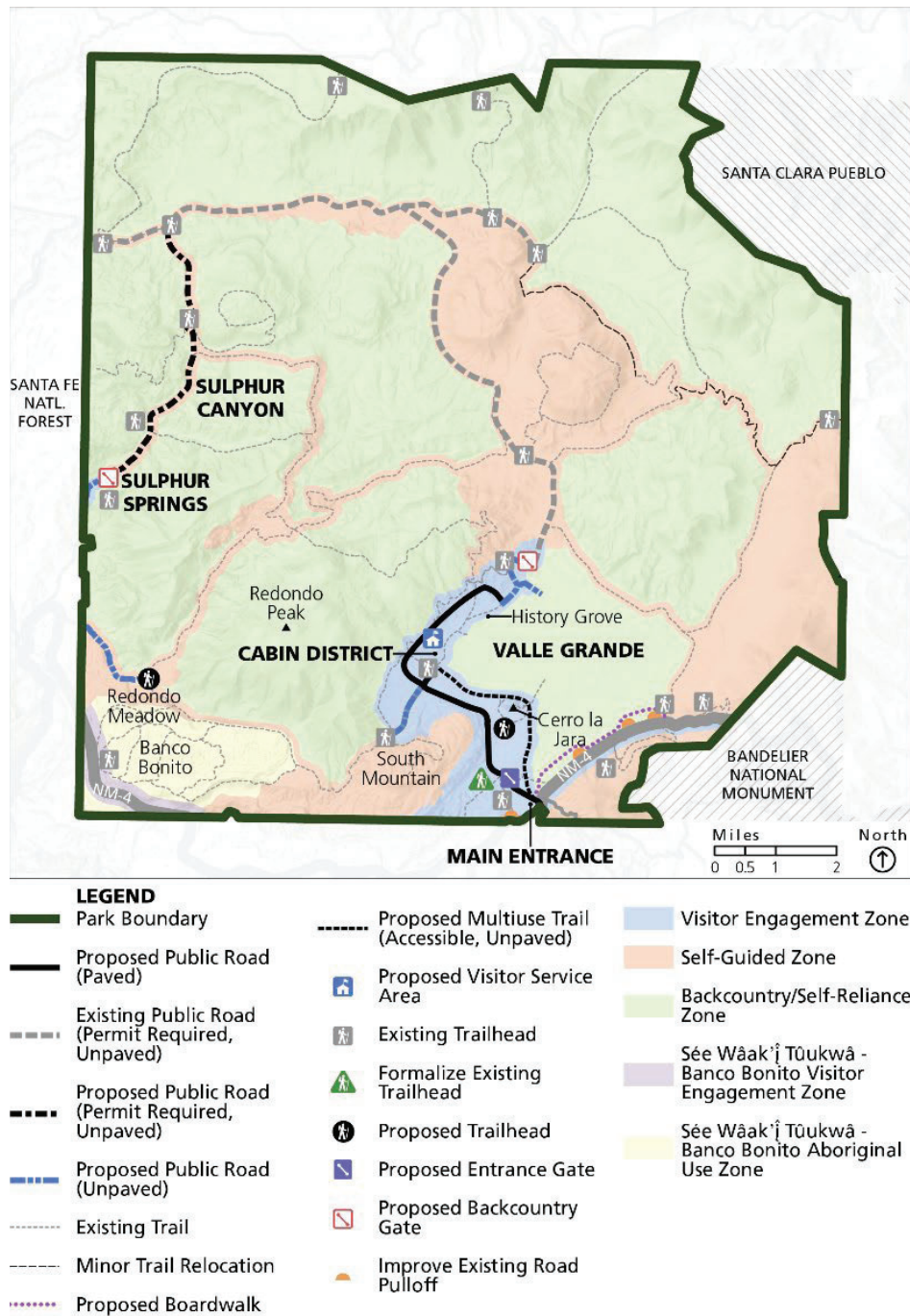
way traffic. A parking lot would be constructed at Sulphur Springs. The backcountry segment of Sulphur Creek Road (VC08) would be improved but not paved.

Page 14, “Table 1. Alternatives Comparison Matrix”:

In this table, under Area/Topic “Management Zones,” add language for the “*Sée Wâak’î , Tûukwâ*—Banco Bonito Visitor Engagement Management Zone” and the “*Sée Wâak’î , Tûukwâ*—Banco Bonito Aboriginal Use Management Zone” under the descriptions of the other three zones. For each of these zones, use the same language found under “Management Zone Summary” as written in the Errata to the General Management Plan / Development Concept Plan, above, for page 20.



Page 21, replace Map 6:



Page 23, insert new table:

Insert the following table at p. 23 (after “Map 7. Adaptive Reuse Alternative—Cabin District”). This will cause the current text on p. 23 to shift down and the current table 2 (p. 34) to become table 3.

Table 2. Road and Trail Use Types Under the Alternatives

Route	No Action (Current Condition)	New Appropriate Facilities Alternative	Change to Use Type and Access	Adaptive Reuse Alternative	Change to Use Type and Access
VC01 Entrance Road	Road: open year-round to all uses	Paved public road and multiuse trail	Splits into two routes—road and multiuse trail	Paved public road and multiuse trail	Splits into two routes—road and multiuse trail
VC02 Redondo Creek Trail	Trail: hike/bike/equestrian	Road: public road, not subject to backcountry vehicle pass system and Trail: hike/bike/equestrian	Adds public motor vehicle use west of Redondo Meadow	Road: public road, not subject to backcountry vehicle pass system and Trail: hike/bike/equestrian	Adds public motor vehicle use west of Redondo Meadow
VC02 North Valle Grande Road	Road: open summer only (backcountry vehicle pass system)	Road: public road	No longer subject to backcountry vehicle pass system	Road is rerouted but paved farther in	No longer subject to backcountry vehicle pass system; access to History Grove is on paved road
VC02 Central Caldera Road	Road: open summer only (backcountry vehicle pass system)	Road: open summer only (backcountry vehicle pass system)	None	Road: open summer only (backcountry vehicle pass system)	None
VC03 Redondo Creek and Jaramillo Creek trails	Trail: hike/bike/equestrian	Trail: hike/bike/equestrian	None	Trail: hike/bike/equestrian	None
VC04 East Valle Grande and Rincón trails (VC0401/VC04)	Trail: hike/bike/equestrian	Trail: hike/bike/equestrian	Minor trail relocation results in reopening access to the east boundary	Trail: hike/bike/equestrian	Minor trail relocation results in reopening access to the east boundary
VC06 Valle Seco Trail	Trail: hike/bike/equestrian	Trail: hike/bike/equestrian	None	Trail: hike/bike/equestrian	None
VC07 Banco Bonito Trail	Trail: hike/bike/equestrian	Trail: hike/bike/equestrian	None	Trail: hike/bike/equestrian	None

Route	No Action (Current Condition)	New Appropriate Facilities Alternative	Change to Use Type and Access	Adaptive Reuse Alternative	Change to Use Type and Access
VC08 Sulphur Creek Trail	Trail: hike/bike/equestrian	Public road (backcountry vehicle pass system)	Opens trail to road; expands backcountry vehicle route	Public road (backcountry vehicle pass system)	Opens trail to road; expands backcountry vehicle route
VC08 Valle San Antonio Road	Road: open summer only (backcountry vehicle pass system)	Road: open summer only (backcountry vehicle pass system)	None	Road: open summer only (backcountry vehicle pass system)	None
VC09 Valle San Antonio and Valle Toledo Roads	Road: open summer only (backcountry vehicle pass system)	Road: open summer only (backcountry vehicle pass system)	None	Road: open summer only (backcountry vehicle pass system)	None
VC10/VC11 Northwest Rim Trail	Trail: hike/bike/equestrian	Trail: hike/equestrian	Bikes no longer allowed	Trail: hike/equestrian	Bikes no longer allowed
VC12 Garita Trail	Trail: hike/bike/equestrian	Trail: hike/bike/equestrian	None	Trail: hike/bike/equestrian	None
VC13 Indios Creek Trail	Trail: hike/bike/equestrian	Trail: hike/equestrian	Bikes no longer allowed	Trail: hike/equestrian	Bikes no longer allowed
VC14 North Valle Toledo Trail	Trail: hike/bike/equestrian	Trail: hike/equestrian	Bikes no longer allowed	Trail: hike/equestrian	Bikes no longer allowed
South Mountain Trail	Trail: hike/bike/equestrian	Trail: hike/equestrian	Bikes no longer allowed	Trail: hike/equestrian	Bikes no longer allowed
Banco Bonito interior trails	Trail: hike/bike/equestrian	Trail: hike/bike/equestrian	None	Trail: hike/bike/equestrian	None
Alamo Canyon Trail	Trail: hike/bike/equestrian	Trail: hike/equestrian	Bikes no longer allowed	Trail: hike/equestrian	Bikes no longer allowed

Route	No Action (Current Condition)	New Appropriate Facilities Alternative	Change to Use Type and Access	Adaptive Reuse Alternative	Change to Use Type and Access
Cerro Seco Trail	Trail: hike/bike/equestrian	Trail: hike/equestrian	Bikes no longer allowed	Trail: hike/equestrian	Bikes no longer allowed
San Antonio Mountain Trail	Trail: hike/bike/equestrian	Trail: hike/equestrian	Bikes no longer allowed	Trail: hike/equestrian	Bikes no longer allowed
Cerros Del Abrigo Trail	Trail: hike/bike/equestrian	Trail: hike/bike/equestrian	None	Trail: hike/bike/equestrian	None
Redondo Foothills Trail	Trail: hike/bike/equestrian	Trail: hike/bike/equestrian	None	Trail: hike/bike/equestrian	None
Rabbit Mountain trails	Trail: hike only	Trail: hike only	None	Trail: hike only	None
Valle Grande Exploration Trail	Trail: hike only	Trail: hike only	None	Trail: hike only	None
Cerro La Jara Loop Trail	Trail: hike only	Trail: hike only	None	Trail: hike only	None
South Valle Grande Trail	Trail: hike only	Trail: hike only	None	Trail: hike only	None
Proposed boardwalk	Trail: hike only	Trail: hike only	None	Trail: hike only	None
Relocated South Valle Toledo Trail	Closed	Trail: hike/bike/equestrian	Connects experiences and creates many more loop opportunities	Trail: hike/bike/equestrian	Connects experiences and creates many more loop opportunities

Chapter 3: Affected Environment and Environmental Consequences

Page 28:

The park saw 30,434 visitors in 2020, 76,578 visitors in 2021, a 17% decrease to 63,738 visitors in 2022, a rebound back rise to 76,090 in 2023, and an 8% further increase to 82,111 in 2024, and a further 4% increase to 84,952 in 2025 (note, as of March 9, 2026, visitation data for 2025 is considered provisional, but it is not expected to change substantially). Based on this sample size these limited data, it is difficult to determine draw definitive conclusions about how visitation is trending. However, preliminary indications are that visitation is steadily increasing from year to year, by an annual average of 3.5% from 2021 to 2025, and that gradual, yet steady, pace may be expected to continue with the usual fluctuations.

Page 30:

These modifications to trails and pullouts would result in beneficial impacts to the visitor experience by creating additional opportunities for visitors with physical limitations. This alternative includes closures to bikes that are intended to diversify the spectrum of recreational opportunities available in the park and reduce the likelihood of conflicts between different user groups. Currently, there are very few trails that are open to just hikers or hikers and equestrians. Under this alternative, these opportunities would be expanded to improve the quality of the experience for a spectrum of users. This change also prevents potential future conflicts between user groups that can occur when bikes, hikers, and equestrians share the same trail. Approximately 31 miles of trail that were previously open to biking will be restricted to hiking and equestrian use only. Despite the closures, many trails remain open to bikes. The closures are also offset by three planned trail reroutes that expand biking opportunities in the park. The multiuse trail along Valle Grande adds a new biking opportunity for cyclists entering the Valle Grande area where they do not share the road with motor vehicles. A minor trail relocation on the Rincón Trail (VC04) reestablishes access into the park for cyclists from the eastern boundary. Perhaps most importantly, the minor relocation of the South Valle Toledo Trail creates many more loop opportunities and route possibilities for cyclists. In sum, the trails maintained for biking use and the additional trails created for biking use under the plan do not result in a meaningful loss of biking opportunities and were selected among other reasons to ensure biking trail connections running north-south and east-west through and across the park. In fact, the separation of use types, resulting in a diversification of recreational opportunities available, combined with the expanded opportunities resulting from the trail reroutes, results in a net benefit to visitor use and experience of Valles Caldera.

Pages 30–31:

The stabilization of six historic structures would enhance the visitor experience, as these structures would be maintained for future generations to enjoy. Additionally, the addition of an ABAAS-compliant parking lot near History Grove would provide

beneficial impact to the visitor experience because it increases opportunities for visitors of all abilities in the area.

Two other changes to allowed use types on roads would impact visitors' use and experience of the park. The year-round opening of and elimination of the need to obtain a backcountry vehicle pass for VC02-North Valle Grande Road would make access to this portion of the park, which includes the history grove, easier on a year-round basis. Meanwhile, the conversion of the VC08-Sulphur Creek Road from a trail open to hike/bike/equestrian use into a road also open to public motor vehicle use would expand the backcountry vehicle route and make it possible for visitors to complete a loop in their vehicle between the Valle Grande area and the Sulphur Springs area. This greatly enhances access for vehicle-based visitors beyond the out-and-back opportunities available under the no-action alternative.

Pages 44–45:

Over time, it became common for recreational visitors not participating in fishing or hunting to obtain backcountry vehicle passes~~permits~~ to drive farther into the park for sightseeing, additional hiking, biking, or equestrian opportunities. After years of management in this manner, the Valles Caldera Trust decided that public vehicle access was appropriate to occur along roads in Valles Caldera at the same levels while continuing to protect resources, including federally listed species. When Valles Caldera National Preserve transitioned to NPS management in 2015 and 2016, the practice of issuing backcountry vehicle passes~~permits~~ continued (NPS 2022a).

Pages 46–47:

~~Under section 7 of the Endangered Species Act (ESA), the new appropriate facilities alternative would have a “may affect but is not likely to adversely affect” determination for the Mexican spotted owl and Jemez Mountains salamander. Currently, there is not a sufficient level of design detail or site-specific data to quantify potential impacts and make a determination under Section 7 of the ESA for the New Mexico meadow jumping mouse. Environmental analysis per NEPA requirements and section 7 requirements for the ESA determination are provided below for each species based on best available science, technical guidance, and proposed actions for the alternative.~~

Page 48:

~~Jemez Mountains salamander: Future construction and uses of the proposed facilities in the new appropriate facilities alternative within the Valle Grande District would result in a “may affect, not likely to adversely affect” Section 7 determination for Jemez Mountains salamanders. Similar to the Mexican spotted owl, Jemez Mountains salamanders are nocturnal, so additional vehicles, traffic, and increases in daytime visitor use would pose low levels of disturbance for them.~~

Page 49:

Mexican spotted owl: Motorized use in Sulphur Canyon would increase under this alternative, and daytime noise levels here might disturb the owls...

~~While official spotted owl surveys have not been conducted in Sulphur Canyon, a juvenile Mexican spotted owl pair were documented in Sulphur Springs in 2022 (NPS 2022b). No detections have been recorded since then despite ongoing surveys.~~ *Sulphur Springs is a specific location in Sulphur Canyon within Valles Caldera. In conjunction with a parkwide owl community study conducted during years 2020–2024 (Hawks Aloft, Inc. 2025), Mexican spotted owl surveys were conducted following USFWS protocols at two locations in Sulphur Canyon, including Sulphur Springs. In May 2021, this study documented a juvenile Mexican spotted owl pair at Sulphur Springs (Hawks Aloft, Inc. 2025). During a survey in June 2021, another Mexican spotted owl was documented in Sulphur Canyon approximately 0.75 miles northeast of Sulphur Springs (Hawks Aloft, Inc. 2025), but the observer thought it likely that this owl was the male from the pair previously documented at Sulphur Springs. No additional Mexican spotted owls were detected in Sulphur Canyon during surveys conducted in 2023 and 2024 (Hawks Aloft, Inc. 2025).*

Page 50:

Jemez Mountains Salamander: While the salamander’s critical habitat map includes Sulphur Springs, the area is not considered primary salamander habitat (USFWS 2024). ~~This alternative would have a “may affect, not likely to adversely affect” determination for the Jemez Mountains salamander.~~ Backcountry vehicle ~~passes~~permits would encourage visitors to stay on park roads, which would limit, but not eliminate, salamander exposure to potentially disruptive human activities.

Page 51:

~~Overall, the new appropriate facilities and adaptive reuse alternatives would have a “may affect, not likely to adversely affect” Section 7 determination for the Mexican spotted owl and Jemez Mountains salamander. There is not currently a sufficient level of design detail or site-specific data to quantify potential impacts and make a determination under section 7 of the Endangered Species Act for the New Mexico meadow jumping mouse, Mexican spotted owl, and Jemez Mountains salamander.~~

Page 52:

Mexican spotted owl: ~~The “may affect, not likely to adversely affect” determination for spotted owls in the new appropriate facilities and adaptive reuse alternatives is based on the low probability of suitable habitat in proposed development areas, as well as negative detection results from surveys conducted from 2020 to 2024.~~ *In both action alternatives, there is a low probability of suitable habitat in proposed development areas as well as negative detection results from surveys conducted from 2020 to 2024.*

Page 52:

Jemez Mountains salamander: ~~Implementation of the new appropriate facilities and adaptive reuse alternatives would result in a “may affect, not likely to adversely affect” determination for the Jemez Mountains salamander, based on the small footprint of proposed management actions in suitable salamander habitat. *In both action alternatives, there would be a small development footprint within suitable salamander habitat.*~~

Page 53:

~~Valles Caldera is largely a monsoon-dominated watershed, meaning that peak flows occur with the summer monsoon rather than from spring snowmelt. *The Valles Caldera watershed receives most of its annual precipitation from winter snow and summer monsoonal rains.*~~ Current hydrologic data collected by the National Park Service confirms the trends that are reported on a regional scale: peak snowmelt is happening earlier, high flow events are more significant and more sporadic, and overall stream discharge is slowly decreasing (NPS 2024).

Page 55:

Note that development in the floodplain adversely impacts its function, for example, by inhibiting the floodplain’s ability to distribute sediment. Current management practices, such as the use of sandbags and other purposeful diversions to direct water away from park facilities, such as the current entrance station at Cerro La Jara, would continue to have negligible impacts on floodplain functions. ~~Based on these factors and the assessment from the park hydrologist, the no-action alternative would not affect the natural resources and functions of floodplains.~~

Page 75:

When added to past impacts from the management eras of the Valles Caldera Trust and the National Park Service, potential impacts from continuing management actions (e.g., a sustainable approach to managing uses such as grazing; landscape restoration and stewardship approach), and impacts from recent plan implementation (e.g., the FCIIP), the proposed actions under the new appropriate facilities alternative would further degrade the character of the Baca Ranch historic landscape district and the park’s broader ranching landscape by creating new visual intrusions on top of existing ones and through the possible removal of historic buildings and ranching features ~~(e.g., the corral at Cerro La Jara).~~

ERRATA IN THE ENVIRONMENTAL ASSESSMENT RELATED TO THE RETENTION AND ANALYSIS OF THE WILDLIFE IMPACT TOPIC

Chapter 3: Affected Environment and Environmental Consequences

Page 27:

These actions were consistent with Council on Environmental Quality (CEQ) guidance, section 4.2.E of the 2015 NPS NEPA Handbook, and NPS Director's Order 75A: *Civic Engagement and Public Involvement*. As a result, the National Park Service carried forward the following impact topics for detailed analysis:

- Visitor use and experience
- Wildlife
- Federally listed species

Page 33:

Insert the following “Wildlife” impact analysis before the “Federally Listed Species” impact topic. This entire impact topic is new text, but for ease of reading it will not be italicized-underlined like other text additions in the errata.

WILDLIFE

Current and Expected Future Condition of Federally Listed Species if No Action Is Taken

Some areas in the park, such as the cabin district, have been modified, manipulated, impacted, and occupied by people since the late 19th century, which has resulted in habitat alteration—and in some cases, degradation and loss. While there is a long record of human occupation and use of the park, major changes in use types, intensities, and associated impacts of Euro-American land uses that were introduced in the middle to late 19th century have affected the ways in which wildlife species use the park for natural processes. Since the National Park Service became the federal land manager at Valles Caldera, human use of these habitable areas has resulted in relatively continuous low-intensity use, with periods of moderate- to high-intensity land use activities (e.g., during construction periods for new facilities).

The entrance station area has been used as a livestock staging area since at least the mid-20th century and as a visitor contact center for Valles Caldera since the land transferred into federal ownership (under the Valles Caldera Trust from 2000 to 2015). Relative to prior uses, projected future uses, such as camping, hiking, scientific study and research, regulated hunting, and other types of public enjoyment and use are less impactful to wildlife. Over the last 12 years, the park has experienced more intensive visitor use in the forms of vehicle and pedestrian activities, NPS management activities and programs, and staging areas for government-owned equipment. The use and activities conducted in these areas have affected

wildlife behavior in various ways for different species, including both spatial and temporal avoidance, tolerance, attraction, sensitization, and habituation (NPS 2022a).

Similarly, wildfires such as the Las Conchas (2011) and Thompson Ridge (2013) fires removed much of the park's understory and overstory and downed woody debris. While understory vegetation was greatly affected by these intense wildfires, postfire resurgence of herbaceous vegetation and shrubs has resulted in an overall improvement in habitat conditions for many wildlife species, depending on their habitat needs and population attributes (NPS 2022a).

Various nonlisted species, depending on their particular ecological characteristics and population attributes may be vulnerable to increased human activity, habitat fragmentation, or altered fire regimes. Some of these threats may be intensified by the current and projected effects of climate change, such as increasing drought and wildfire and related shifts in forest type and extent. High-intensity fires have a variety of impacts on wildlife habitat: changes in vegetative structure and composition, vegetation type conversions, habitat fragmentation, and the creation of edge effects.

Nonetheless, abundant water resources and broadscale habitat diversity support a variety of wildlife in the park. Landscape and ecosystem connectivity are also important for wildlife. Sufficient connectivity among Valles Caldera's lower montane, upper montane, riparian, and valley bottom habitats allows for movement and dispersal of species, populations, and genes among patches of habitat (NPS 2024).

The park supports 51 species of mammals, such as elk (*Cervus canadensis*), mule deer (*Odocoileus hemionus*), coyote (*Canis latrans*), mountain lion (*Puma concolor*), black bear (*Ursus americanus*), American badger (*Taxidea taxus*), Gunnison's prairie dog (*Cynomys gunnisoni*), and many rodent species. Six reptile species such as the greater short-horned lizard (*Phrynosoma hernandesi*) and western terrestrial garter snake (*Thamnophis elegans*) and three amphibian species—the tiger salamander (*Ambystoma tigrinum*), federally endangered Jemez Mountains salamander (*Plethodon neomexicanus*), and boreal chorus frog (*Pseudacris maculata*)—inhabit the park. Six species of fish are present, including native longnose dace (*Rhinichthys cataractae*), Rio Grande sucker (*Catostomus plebeius*), Rio Grande chub (*Gila pandora*), and fathead minnow (*Pimephales promelas*), and nonnative brown trout (*Salmo trutta*) and rainbow trout (*Oncorhynchus mykiss*). Nearly 200 species of birds utilize Valles Caldera, and approximately 117 of those species breed within the park. Invertebrate diversity is high, with hundreds of species documented (NPS 2024).

Similar to impacts analyzed for federally listed species (see EA pp. 33–51), post-settlement land use including historic overgrazing by sheep and cattle, fire suppression efforts of the 20th century, and clear-cut logging practices of the mid-1900s contributed to substantial changes in vegetation that affected wildlife habitat and available resources.

Landscape-level habitat availability characteristics have been greatly altered by wildfires of the 21st century. In 2011, 51% of all forested areas within the park were burned during the Las Conchas Fire (NPS 2022a), with about 8,300 acres burning at high severity within the park. Patches of high burn severity have little to no conifer regeneration and may be

converting to grassland or shrublands, contributing to major habitat changes that may be detrimental for some species but beneficial for others. Postfire flooding in 2011 temporarily increased nitrate, phosphate, turbidity, and conductivity that contributed to fish mortality, particularly of nonnative trout (NPS 2024).

Past, ongoing, and reasonably foreseeable actions and trends within the park affect wildlife and include road and trail construction, facility improvements and construction, ecological restoration, pests, and climate change. Trends include a lack of water from drought, which is exacerbated by climate change. There is some indication that climate change is causing more intense and sporadic rain events in the Jemez Mountains. While precipitation is stable, the increased temperatures have changed winter storm systems and melted snowpack earlier and more rapidly in a given year (NPS 2024). Severe wildfires, also exacerbated by climate change, and scouring floods following wildfire events are foreseeable trends that adversely impact many wildlife species at the park. Similarly, related shifts in forest type and extent will continue to stress and otherwise adversely impact wildlife.

Recently completed trail construction includes an accessible trail through the cabin district. Recently completed road and parking lot construction involves rerouting the road near the entrance station and construction of two new gravel parking lots southwest of the ranger station. Increased vehicular traffic along these roads has the potential to alter movement and habitat use of terrestrial wildlife species. Multiple building and facility improvements and construction are planned, including the demolition of movie sets, restoration of historic cabins and outbuildings, improving accessibility to the ranger station and entrance station, and fence removal. These actions would have subsurface soil impacts resulting from soil compaction. Stress or mortality of some wildlife is inevitable under these improvements. Ecological restoration projects such as wetland restoration, forest thinning, and restoration of Sulphur Springs are planned or ongoing, which would continue to improve long-term habitat health. Approximately 700 acres of wetlands have been restored, with 250 acres planned in the future (NPS 2024).

Effects of the Action Alternatives

New Appropriate Facilities Alternative

While habitat degradation and wildlife disturbance have previously occurred in the park, modern and intensive visitor use of the proposed areas for development in the plan has not previously occurred. As a result, some species and habitats that have adjusted to human use will only be minimally impacted (e.g., high-mobility or opportunistic species such as crows, magpies, and elk), while impacts will be greater and additive to species that are averse to human activities or unable to adjust (e.g., low-mobility species or habitat specialists such as the Jemez Mountains salamander).

The visitor services area would experience more intensive human uses, including park operations. However, wildlife behavioral responses would remain largely unchanged in this immediate area under the selected action. In general, wildlife that inhabit the general area appear to be somewhat skittish and avoidant of humans, vehicles, and park operations, including a variety of park projects since the park came into federal ownership in the year 2000 (NPS 2022a). Over the last several years, the area has experienced intensive visitor use in

the forms of vehicular and pedestrian activities, NPS management activities and programs, and as a staging area for government owned equipment. The use and activities conducted in these areas have resulted in modified wildlife behavior including both spatial and temporal avoidance, tolerance, attraction, sensitization, and habituation.

The proposed road realignment and development will increase vehicular traffic and has the potential to alter movement and habitat use of terrestrial wildlife species. These actions may increase the risk of vehicle-to-animal collisions, potentially resulting in injury or death. Vehicle use along the VC01 main park entrance road has modified the behavior of elk, for example, as many animals avoid the sights, sounds, and dust generated by vehicles traveling along roadways within the park. (NPS 2022a). By contrast, realigning VC01 will have a beneficial effect on prairie dog colonies along the road corridor and entrance station area due to the elimination of vehicle conflicts in those areas. Similar beneficial impacts on predator species that hunt prairie dogs, such as coyote, badger, and long-tailed weasel may be benefitted by the realigned road section as well. As noted, wildlife behavioral response to the current entrance station area, which has been in operation since before NPS management, and currently functions as the primary visitor service area for the park, will likely remain largely unchanged in this immediate area under the selected action.

Impacts from increased human activity and habitat fragmentation are mentioned in the EA as well. For example, EA p. 13 notes that while wildlife might be broadly affected by ongoing visitor uses, proposed management actions would continue to occur. Park managers would continue to implement existing practices for protection and management of faunal species under all plan alternatives. Impacts from the selected action are discussed in the EA for elk on p. 73, raptors on p. 39, and wolves on p. 33.

Broad discussions and analysis related to wildlife and wildlife habitat are also included in the federally listed species impact topic. Plan actions that may affect listed species under section 7 of the Endangered Species Act are analyzed on pp. 33–51. Park managers continue to document and reference population trends, movement corridors, and habitat suitability based on best available science and professional judgement.

Proposals in the plan are conceptual and may take many years to implement. Park managers would prepare construction-level designs and pursue a tiered compliance approach to meet regulatory requirements. This is a common approach for developing planning and compliance documents, as referenced in section 3.2 of the DOI *Handbook of National Environmental Policy Act Implementing Procedures*.

Wildlife could be broadly affected by ongoing visitor uses and management actions proposed in this plan. Park managers would continue to implement existing practices for protection and management of faunal species under all plan alternatives.

Adaptive Reuse Alternative

Adverse impacts on wildlife under the adaptive reuse alternative would be less than under the new appropriate facilities alternative, mainly because visitor services in the adaptive reuse alternative would remain focused in the cabin district and have slightly fewer potential impacts on wildlife compared to the selected action based on type and intensity of proposed

development. The North Valle Grande Road (VC02) realignment in the adaptive reuse alternative, for example, would increase visitation and contribute a small amount of habitat loss and related fragmentation to this area, but no special habitat or unique wildlife species occurrences exist here. However, increased noise levels in the cabin district during future construction phases and the longer-term changes in human use on nearby recreational trails would disrupt natural behavior and interactions for certain species of migratory birds (NPS 2022a). The park would continue to monitor and conduct surveys for the presence of wildlife (as indicated in the federally listed species impact topic as well).

When combined with past impacts from the management eras of the Valles Caldera Trust and the National Park Service and paired with the actions common to all alternatives and ongoing and reasonably foreseeable future actions, the adaptive reuse alternative would result in an overall negligible impact by developing additional land area and increasing overall human use and activities near, but not within, important wildlife habitat. Although this alternative would have some temporary impacts from noise during the construction of new facilities, roads, and other infrastructure, these actions would not occur during sensitive periods like breeding, calving, and nesting to further limit disturbance to wildlife in this management alternative.

Conclusion

Monitoring and survey efforts would continue for wildlife under the new appropriate facilities and adaptive reuse alternatives. The park would continue to prioritize monitoring and surveying for the presence of wildlife throughout the park to avoid, minimize, or mitigate wildlife impacts as part of its best resource management practices and protocols.

For certain wildlife species, park managers might authorize seasonal public access restrictions, in consultation with the USFWS, if federally listed species are detected. Additionally, the park would expand acoustic monitoring to document potential impacts on the acoustic environment and soundscape, particularly for bats, migratory birds, and the Mexican spotted owl (see the federally listed species impact topic for more information).

For all wildlife indicated in this assessment, changes to zoning, desired conditions, and visitor capacity proposed in this alternative are administrative actions, and any related changes to visitor behavior that may impact wildlife cannot be reasonably and accurately predicted. In and of themselves, these administrative changes constitute a neutral impact. The park's monitoring program would identify any future impacts resulting from changes in visitor behavior and would inform appropriate management actions, if needed, related to wildlife management. Changes to park plans and operations based on these administrative actions would be subject to further compliance review.

Increased recreational activities in both alternatives have the potential to result in increased impacts on wildlife or degradation of habitat if visitors depart existing backcountry roads and authorized trails. This includes use of legacy logging roads to facilitate motorized and nonmotorized recreation (e.g., hiking, bicycling, horseback riding). In these areas, visitors would be encouraged to remain on existing trails through educational activities provided at the ranger station and with maps, trail kiosks, trail markers, and published trail guides. Citizen scientists and NPS staff would monitor roads and trails for signs of social trail

development and other undesired resource impacts. Management steps to remedy resource damage would be necessary if impacts are observed. Trail maintenance best management practices would be integrated into any future maintenance efforts to reduce the potential harm to at-risk wildlife species or their habitat.

In the near term, the park will continue to monitor and conduct surveys for wildlife throughout the Valle Grande District. Potential road closures during the nesting season could further limit disturbance to owl species, for example, from visitor uses.

Monitoring and survey efforts would continue for wildlife under each action alternative. In particular, park managers would prioritize monitoring and survey efforts for the presence of federally listed species, including the New Mexico meadow jumping mouse, Mexican spotted owl, and Jemez Mountains salamander in suitable habitats. However, the park would expand management efforts to survey and monitor other wildlife species, such as Rocky Mountain elk, as needed, depending on the level of management activity required and potential impact to wildlife and other park resources.

Appendix A: Impact Topics Not Carried Forward in the Environmental Assessment

Page A-1:

~~Wildlife. According to NPS management policies (NPS 2006), the National Park Service strives to maintain all components and processes of naturally evolving park unit ecosystems, including the natural abundance, diversity, and ecological integrity of animals. Some areas in the park, such as the cabin district, have been occupied by people since the late 19th century, which has resulted in habitat degradation and vegetation modification, manipulation, and loss; it has affected the ways in which wildlife species use the park for natural processes. Since the National Park Service became the federal land manager at Valles Caldera, human use of these habitable areas has resulted in relatively continuous low intensity use, with periods of moderate to high intensity activities (e.g., during construction periods for new facilities).~~

~~The entrance station area has been used as a livestock staging area since at least the mid-20th century and as a visitor contact center for Valles Caldera since the land transferred into federal ownership (under the Valles Caldera Trust from 2000 to 2015). Over the last 12 years, the park has experienced more intensive visitor use in the forms of vehicle and pedestrian activities, NPS management activities and programs, and staging areas for government-owned equipment. The use and activities conducted in these areas have resulted in modified wildlife behavior, including both spatial and temporal avoidance, tolerance, attraction, sensitization, and habituation (NPS 2022).~~

~~Similarly, wildfires such as the Las Conchas (2011) and Thompson Ridge (2013) fires removed much of the park's understory and overstory and downed woody debris. While ground-level habitat features sustained heavy impacts during the fires, the removal of much of the herbaceous understory vegetation in areas like the cabin~~

~~district provided an overall improvement in foraging habitat in subsequent years (NPS 2022).~~

~~While wildlife might be broadly affected by ongoing visitor uses, management actions proposed in this plan, and potential wildfire impacts (ranging from beneficial to catastrophic), park managers would continue to implement existing practices for protection and management of faunal species under all plan alternatives. Analysis of potential impacts to threatened and endangered species that occur in the park are discussed in the “Federally Listed Species” impact topic section of this plan. Visitor-related impacts on wildlife would continue to occur under all alternatives, including the no-action alternative. For these reasons, impacts on wildlife were dismissed from further analysis.~~

Air Quality. Visitor activities discussed in the plan, including vehicle traffic and idling vehicles in and around the park, would continue to emit air pollutants. . .

Appendix B: References

Pages B-1–B-3:

Insert the following entry into the references appendix:

US Department of the Interior

2025 *Handbook of National Environmental Policy Act Implementing Procedures.* Departmental Manual 516 DM 1. Washington, D.C.: US Department of the Interior, Office of Environmental Policy and Compliance (Interim Final Rule effective July 3, 2025). Available at <https://www.doi.gov/media/document/doi-nepa-handbook>

ATTACHMENT C: DETERMINATION OF NONIMPAIRMENT

The NPS Organic Act of 1916 directs the National Park Service to “conserve the scenery, natural, and historic objects, and wildlife in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (54 USC 100101). NPS *Management Policies 2006*, section 1.4.4, explains the prohibition on impairment of park resources and values:

While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.

An action constitutes impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values.” To determine impairment, the National Park Service must evaluate the particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts (NPS 2006, section 1.4.5). An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or
- identified in the park’s general management plan or other relevant NPS planning documents as being of significance” (NPS 2006, section 1.4.5).

The Valles Caldera National Preserve EA evaluated two action alternatives for managing visitor use and analyzing how to best provide access, circulation, visitor services, and facilities, and how to protect park resources. Those alternatives include the selected action (new appropriate facilities alternative) and the adaptive reuse alternative. The National Park Service prepared this nonimpairment determination for the selected action, which is described in the FONSI.

The purpose of Valles Caldera National Preserve, along with park significance statements and a description of the park’s fundamental resources and values, are described in the *Foundation Document for Valles Caldera National Preserve* (NPS 2018). The park’s purpose is

“... to protect, preserve, and restore ecosystems and cultural landscapes within an outstanding example of a volcanic caldera for the purpose of education, scientific research, public enjoyment and use, and cultural continuity” (NPS 2018, p. 5).

The park’s significance statements and fundamental resources and values highlight resources that may be impacted by visitor uses and related access to the park. The park’s fundamental resources and values include the following (NPS 2018, pp. 6–9):

- the caldera
- Valle Grande and volcanic vistas
- traditional cultural landscapes and tribal connections
- prehistoric and historic legacy
- high-elevation ecosystem
- a landscape in recovery

Resources that were carried forward for detailed analysis in the plan and for which a nonimpairment determination has been made include wildlife, federally listed species, floodplains, wetlands, archeological resources, ethnographic landscape, and historic ranching structures and landscapes. Nonimpairment determinations do not include a discussion of impacts on wilderness, visitor use and experience, socioeconomics, public health and safety, environmental justice, land use, and park operations, as these resources do not constitute impacts on park resources and values identified through the NPS Organic Act or General Authorities Act that are subject to the nonimpairment standard. Any impacts on other resources that would be subject to a nonimpairment determination (see NPS 2006, section 1.4.6) are so minor that they were not carried forward for analysis in the plan (see appendix A in the EA) and would not result in impairment.

Wildlife

Wildlife will be broadly affected by ongoing visitor uses and management actions proposed in this plan. Increased recreational activities have the potential to result in increased impacts in suitable habitat with disturbance or degradation of habitat if visitors depart existing backcountry roads and authorized trails. This includes use of legacy logging roads to facilitate motorized and nonmotorized recreation (e.g., hiking, bicycling, horseback riding). In these areas, visitors would be encouraged to remain on existing trails through educational activities provided at the ranger station and with maps, trail kiosks, trail markers, and published trail guides. Citizen scientists and NPS staff would monitor roads and trails for signs of social trail development and other undesired resource impacts. Management steps to remedy resource damage would be necessary if impacts are observed. Trail maintenance best management practices would be integrated into any future maintenance efforts to reduce the potential harm to wildlife or their habitat.

The proposed road realignment and visitor services area development will likely draw more vehicular traffic and may alter movement and habitat use of terrestrial wildlife species both

during and after construction. Impacts from increased human activity and habitat fragmentation will continue to occur. Park managers will continue to implement existing practices for protection and management of faunal species under the selected action. In addition, the National Park Service will prepare construction-level designs and pursue a tiered compliance approach to meet legal, regulatory, and policy requirements, including the protection of wildlife within the project areas. The selected action will not impair wildlife because corresponding best management practices and careful design will ensure wildlife are still present in the park for the enjoyment of future generations.

Federally Listed Species

Based on an assessment of known habitat types in the project area and previous NPS survey efforts, the EA lists 10 threatened, endangered, or candidate species with the potential to occur in the proposed action area (see table 2 on EA pp. 34–36). Of the listed, proposed, and candidate species, the New Mexico meadow jumping mouse, Mexican spotted owl, and Jemez Mountains salamander are evaluated in detail in the EA (see EA pp. 36–52). Species with no potential or suitable habitat in the project area and species with distributional and/or elevation ranges outside the project location were dismissed from further review.

In addition to indicating the presence or absence of federally listed species in the park and whether suitable habitat is present for each, table 2 in the EA includes rationales for excluding seven listed species from further analysis in the plan.

The selected action will not result in impairment of federally listed species because it poses low levels of disturbance for the New Mexico meadow jumping mouse, Mexican spotted owl, and Jemez Mountains salamander, as summarized below.

For the New Mexico meadow jumping mouse, habitat in the park is limited to small patch sizes that lack sufficient connectivity for viable and healthy populations. Several of the proposed ground-disturbing activities under the selected action, such as widening and improving roads (e.g., North Valle Grande Road [VC02] and Sulphur Creek Road [VC08]), constructing new parking lots, picnic areas, and trails (including the proposed boardwalk along NM-4), and demolishing structures would not occur in known habitat, so the potential for impacts is low.

The potential realignment and paving of the entrance road (VC01), inclusion of utilities upgrades in the road's right-of-way, and changing uses of legacy logging and mining roads would reduce suitable habitat for the jumping mouse (if present) near the East Fork Jemez River. However, removing vehicle use from the existing park entrance road could have long-term benefits for natural habitat restoration along the corridor as well. Converting the former gravel park entrance road to an ABAAS-compliant trail in the new visitor services area could require short-term trampling, soil compaction, and construction-related impacts on jumping mouse habitat near the East Fork Jemez River. However, this conversion would likely alleviate long-term erosion and compaction impacts from existing automobile and truck use in the vicinity of the Jemez River, particularly during spring thaw and other wet, muddy conditions when vehicles use the road.

Increased recreational activities would result in minor, localized disturbance to wildlife habitat, primarily where visitors depart existing backcountry roads and authorized trails. This includes use of legacy logging roads to facilitate motorized and nonmotorized recreation (e.g., hiking, bicycling, horseback riding). These impacts would be long-term but limited in extent because visitors in these areas would be encouraged to remain on existing trails. Educational materials and activities provided at the ranger station (i.e., maps, trail kiosks, trail markers, and published trail guides) will be used to improve wayfinding and limit resource impacts. Citizen scientists and NPS staff will monitor roads and trails for signs of social trail development and other undesired resource impacts. Management steps to remedy resource damage will be necessary if impacts are observed. Trail maintenance best management practices will be integrated into any future maintenance efforts to reduce the potential harm to at-risk species or their habitat.

There is a low probability of suitable habitat for Mexican spotted owl in proposed development areas under the selected action. Additionally, negative detection results from surveys conducted from 2020 to 2024 in the park indicate a low potential for impacting individual Mexican spotted owls. However, the increase in visitor density and noise levels under the selected action could potentially affect owls. Constructing the proposed entrance road (VC01) alignment could impact Mexican spotted owls in the Valle Grande vicinity; however, this new corridor is not within known owl habitat. The proposed route would place facilities, related construction noise impacts, and ultimately visitors slightly closer to known owl habitat. Similarly, motorized use in Sulphur Canyon would increase under the selected action, and daytime noise levels here might disturb owls. However, it is unlikely this disturbance would cause displacement because spotted owls are nocturnal and additional vehicles, traffic, and increases in daytime visitor use would pose low levels of disturbance for them.

Human recreation could also disturb suitable habitat elements, including downed woody debris, if visitors leave existing public roads and trails. This includes the use of legacy logging roads to facilitate motorized and nonmotorized recreation (e.g., hiking, bicycling, horseback riding). Mitigation measures to continue future survey efforts in potential habitat within the park ensure that any occurrences are reported to the USFWS, and appropriate management actions are taken. Potential road closures during the nesting season could further limit disturbance to owls from visitor uses.

Jemez Mountains salamanders are nocturnal, so additional vehicles, traffic, and increases in daytime visitor use under the selected action pose low levels of disturbance for them. Some visitors may casually park their vehicles to explore landscape features off the Sulphur Creek Road (VC08) corridor, which could inadvertently damage coniferous logs, woody debris, rocks, moss mats, and rotted tree root channels that provide food and cover for this species, for example. However, potential road closures during the mating season could limit disturbance from visitor uses under the selected action.

Although the selected action will have some temporary impacts from noise during the construction of new facilities, roads, and other infrastructure, these actions would not occur during sensitive periods, such as mating season, to further limit disturbance to federally listed

species under the selected action. Therefore, federally listed species will remain unimpaired for the enjoyment of future generations.

Floodplains

The proposed road and facility development in the Valle Grande District and cabin district could result in compacted floodplain soils and would create new impervious surfaces.

Potential benefits to floodplains include removing the existing entrance road from its current location and restoring some level of natural grade to the new visitor services area.

Improvements associated with the Front Country Infrastructure Improvement Project, such as footings for footbridges, will impact floodplain functions and values, including permanent loss of soil resources within the footprint of these developments. Compaction, decreased water permeability, and localized changes in water drainage may also occur. Future efforts may include restoring floodplain processes and functions, particularly in the lower portions of the park's watersheds by management methods to stabilize and reduce erosion in upland areas (i.e., lands above the park's valleys).

The formulation of appropriate mitigation measures would be required for project implementation prior to constructing facilities. These measures would decrease and possibly avoid adverse impacts. Similarly, the design of the proposed facilities and infrastructure improvements would allow, to the extent possible, natural surface water flows and natural and beneficial floodplain values to continue. Therefore, the selected action will not result in impairment, as floodplains will continue to be available for the enjoyment of future generations.

Wetlands

Impacts on wetlands would be minor to moderate in intensity and localized based on similar analysis as for floodplains. Wetlands information is based on preliminary, rough estimates of ground disturbance for proposed development activities under the selected action. The selected action would increase the level of ground disturbance from the proposed park entrance road realignment through the low portion of the Valle Grande, which would intersect and travel through wetlands on the East Fork Jemez River. Potential impacts on wetlands from widening the cabin district road under the selected action would increase the amount of ground disturbance as well.

Specifically, realigning and paving the park entrance road would result in localized adverse impacts on wetlands. Impacts would include disturbing wetlands within the proposed road alignment that must cross through (or over, or within, depending on design) jurisdictional wetlands and require additional compliance and mitigation per Clean Water Act and federal administering agency requirements (i.e., NPS Director's Order 71: *Wetland Statements of Findings*). Developing new facilities in the visitor services area (e.g., visitor contact station, outdoor plaza, parking lot, spur road, and drop-off area) would compact hydric soils and vegetation and create new impervious surfaces. Additional soil compaction would occur from proposed development activities in the Valle Grande District and cabin district,

including paved pullouts on NM-4 and constructing new parking areas at the cabin district lodge and near History Grove.

Because design details and site-specific data to fully quantify the potential impacts on wetlands from proposed facilities are not currently available, environmental analysis is largely qualitative at this time. Once site-specific designs are developed for the entry road realignment and visitor services area, the National Park Service will prepare additional compliance documentation as appropriate, including a wetland statement of findings, to meet regulatory and procedural requirements before these facilities could be developed.

Through the development of mitigation measures that would be required for project implementation and construction of facilities under the selected action, the design of the proposed facilities and infrastructure improvements would allow, to the extent possible, for natural wetland functions and natural and beneficial wetland values to continue. Even without mitigation, impacts would be limited in extent and would not substantially alter wetlands at a landscape level. Impairment will not occur under these conditions, which will be stipulated in the wetlands statement of findings. Additionally, there are several degraded wetland areas in the park to consider as potential restoration candidates when the conceptual facilities under the selected action progress toward viable construction projects. Similarly, burying utilities along the western edge of Valle Grande from NM-4 to the cabin district will include removal of utility poles and temporarily impact soil resources and possibly wetlands during the construction period. These actions are expected to have long-term beneficial impacts on the park's natural resources, including wetlands, due to the closure of powerline access roads. Other long-term benefits to park ecosystems include reducing hazardous fuels and creating defensible space zones in developed areas.

In addition to preparing construction-level design plans, a professional delineation of sites in this plan that may contain wetlands (e.g., proposed entrance road realignment and new facilities in the visitor services area) would be included in the wetland statement of findings to meet regulatory and procedural requirements before these facilities could be developed. Similar to the requirement for preparing a floodplains statement of findings, site designs would need to incorporate protective mitigation measures to avoid wetland impacts wherever practical. Per NPS Director's Order 77-1: *Wetland Protection*, future design and construction work would need to compensate if necessary for remaining, unavoidable impacts to fulfill robust conditions specified in the director's order. With further analysis to properly develop and document mitigations in a statement of findings and future construction requirements, the selected action will not impair wetlands because they will be present for the enjoyment of future generations.

Archeological Resources

The cabin district is an Archaic period landscape with concentrations of sensitive archeological sites. It is currently the park's primary visitor use and operations hub. Under the selected action, most visitor services will move to a new area in the vicinity of NM-4, and the cabin district's primary function will shift to preservation and interpretation. Previous surface surveys of the general location for the new visitor services area revealed relatively low artifact density and archeological sites that appear limited in extent. Both sites are expected

to see an increase in visitor use under the selected action. The new entrance road is also likely to place visitors in closer proximity to known sensitive sites, which may not increase impacts if the general locations of those sites are not disclosed and if measures are taken to deter or redirect foot traffic. The same is expected for improvements to Sulphur Creek Road that bring more visitors in closer proximity to archeological resources around Sulphur Springs. Overall the impacts of visitor encounters on archeological resources will be minimized through implementation of standard measures such as signage encouraging use of designated walkways, visitor education content, and resource protection messaging. The park's archeological monitoring program will detect any undesirable changes to resource condition and inform adaptive management.

Ground-disturbing activities under the selected action may also impact sensitive archeological resources, especially in the cabin district and along the new entrance road alignment. When added to past impacts from the management eras of the Valles Caldera Trust and the National Park Service, potential impacts from continued management actions (e.g., the sustainable approach to managing uses such as grazing, landscape restoration and stewardship approach, and a fire management plan), and reasonably foreseeable or ongoing impacts from plan implementation, the proposals in the selected action will contribute to an overall adverse impact by continuing the pattern of disturbance to the Archaic landscape and village sites in the cabin district. These impacts will be limited in scale to construction of relatively small-scale features. Ground disturbance at the new visitor services area and along the new entrance road alignment will be more extensive, but—as in all cases involving ground disturbance during plan implementation—impacts will be minimized through careful site and route selection during the design phase for these future projects.

Although ground-disturbing activities always hold the potential to disturb sensitive sites, and visitor use encounters always hold the potential to impact archeological resources, visitor encounters will be minimized and mitigated through signage, visitor education, and resource protection messaging, and ground disturbance impacts will be reduced through careful site and route selection informed by archeological survey. Archeological monitoring will detect adverse changes to resource condition and inform adaptive management. Because disturbance to archeological deposits will be limited in scale, there will be no impairment from the selection action.

Ethnographic Landscape

While the park lacks sufficient ethnographic research to formally identify ethnographic resources, managers have tribal consultation records that positively identify certain cultural and natural resources of traditional significance.

All archeological resources of Indigenous origin are potentially ethnographic resources, pending direct, first-person verification through ethnographic research or consultation, as are certain natural resources including landscape features and viewsheds. For this reason, the analysis in the above section for archeological resources applies here as well. Natural resources that are of ethnographic significance may also be impacted by visitor encounters and ground disturbance, as described earlier.

In addition to tangible resources such as archeological and natural resources, the selected action may also result in impacts on intangible qualities of ethnographic landscapes through, for example, inappropriate noise, behavior, or visual intrusions in culturally sensitive areas. The park will identify sensitive areas through consultation and establish protocols to monitor for impacts, which could be reduced through adaptive measures or through preemptive measures such as collaboration between park cultural resource and interpretation specialists on visitor education content and resource protection messaging.

Although ground-disturbing activities always hold the potential to disturb sensitive sites and natural resources, and visitor use encounters always hold the potential to impact tangible and intangible ethnographic resources, visitor impacts will be minimized and mitigated through signage, visitor education, and resource protection messaging, and ground disturbance impacts will be reduced through careful site and route selection informed by consultation with associated Tribal Nations. Monitoring will detect adverse changes to resource condition and inform adaptive management. Because disturbance to tangible ethnographic resources will be limited in scale and impacts on intangible qualities are expected to be transient and limited in scale, there will be no impairment from the selection action.

Historic Ranching Structures and Landscapes

When added to past impacts from the management eras of the Valles Caldera Trust and the National Park Service, potential impacts from continuing management actions (e.g., a sustainable approach to managing uses such as grazing, landscape restoration, and stewardship approach), and impacts from recent plan implementation (e.g., the FCIIP), the selected action would further degrade the character of the Baca Ranch historic landscape district and the park's broader ranching landscape by creating new visual intrusions on top of existing ones and through the possible removal of historic buildings and ranching features (e.g., the corral at Cerro La Jara). However, these new visual intrusions are small in scale (e.g., small parking and picnic areas), and the removal of visitor services from the cabin district and changing the primary functions of the area to preservation and interpretation will have a beneficial impact on the historic landscape and its contributing resources. This includes reducing vehicular traffic on the historic North Valle Grande Road (VC02) and retaining its character as an unpaved road with slight alterations (widening). The realignment of the entrance road (VC01) will improve a historic view from the cabin district across Valle Grande toward Cerro La Jara but will add a new visual intrusion (the new road) in the historic view in the direction of South Mountain. Removal of the visitor contact facility and entrance gate at Cerro La Jara will improve important views across Valle Grande.

Future project design in the cabin district will weigh the necessity of structure and/or tree removal and assess the impacts. None of the proposals in the selected action will compromise the overall integrity of the historic ranching district, especially given the beneficial impacts of a renewed preservation focus in the area. No decisions have been made about the removal of historic buildings or which, if any, would need to be removed, but doing so would not constitute impairment since it would not compromise the ability of the public to enjoy and understand the park's historic ranching legacy as represented by the overall ranching landscape. The selected action therefore will not result in impairment of historic ranching structures and landscapes.

Summary

The National Park Service has determined that the implementation of the selected action will not constitute an impairment of the resources or values of the park. This conclusion is based on consideration of the park's purpose, significance, fundamental resources and values; thorough analysis of the environmental impacts described in the plan, EA, and appendixes; comments provided by the public and others; relevant scientific studies and resource reports; and the professional judgment of the decision-maker guided by the direction in NPS *Management Policies 2006*.

REFERENCES USED IN THE FONSI AND ATTACHMENTS

Hawks Aloft, Inc.

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