Susana Martinez

Governor

STATE OF NEW MEXICO DEPARTMENT OF CULTURAL AFFAIRS HISTORIC PRESERVATION DIVISION

BATAAN MEMORIAL BUILDING 407 GALISTEO STREET, SUITE 236 SANTA FE, NEW MEXICO 87501 PHONE (505) 827-6320 FAX (505) 827-6338

April 27, 2015

D. Jason Lott Superintendent Bandelier National Monument 15 Entrance Road Los Alamos, NM 87544-9508

Re: Re-open Upper Alcove House Trail (PEPC 49492)

Dear Superintendent Lott:

I am writing in response to your letter, received at the State Historic Preservation Office (SHPO) on March 27, 2015, regarding the proposal to re-open the Upper Alcove House Trail. In general, this office agrees that the proposal is an adverse effect; however, I would like additional information on the Area of Potential Effect before formally concurring with your determination.

The Area of Potential Effect (APE) as described in your letter is very broad, which makes it difficult to fully assess effects and determine what might be appropriate mitigation measures. Please specify whether the APE is limited to the area shown on the map and which historic properties will be directly or indirectly impacted by the proposed project. You may need to define one APE for direct effects and another APE for indirect effects, taking into consideration other archaeological sites within the area that may be impacted by visitors that go off trail and potential effects to the historic districts.

I understand that the No Action Alternative is Alternative #1; however, there are several trails (Trails 3, 4, and 5) indicated on the map that was provided. Are all of these trails currently being used? Please explain the number of trails that are in-use under the No-Action Alternative.

Alternative #2 is described as coming within several cavates, LA 77730 and LA 77731, yet the description of the sites states that LA 77731 is the Upper Alcove House Trail and LA 77730 is comprised of check dams and terraces. Please clarify, and if LA 77731 is the actual CCC trail, please describe the current condition of the trail. It might also be helpful to know if there are other CCC trails in use at Bandelier and whether these trails have any maintenance issues. It would also be productive to note how many check dams and terraces comprise LA 77730 and approximately where they are located with respect to the trail.

From the map it appears that Alternative 2 would run by several cavates in Cavate Group C, since it is higher on the slope. How many cavates are present along alternative #2, approximately how far away are they from the trail, and what is known of their current conditions?

Although the portion of the trail under Alternative #3 passes though the site boundaries of the Group A, Group B and Group C cavates, it appears that there would be less impacts to the cavates since it is lower on the slope. I agree that there may be impacts to the undisturbed soil of the talus slope in this area; however, additional information would be useful to understand potential effects. Are there artifacts visible on the surface in this area? How much new trail would need to be constructed? Is it just the portion labelled Alternative 3?

Lastly, your letter states that adverse effects will occur to archaeological resources. Do you forsee any impacts to the existing historic districts resulting from re-opening the Upper Alcove House Trail? The answer to this question may help you refine the APE and list of potential mitigation measures.

I look forward to receiving additional information on this project. Until we get additional information, it is hard to say which alternative may have the least effect to historic properties and which mitigation measures may be appropriate. I will also be happy to walk the proposed trails with you to get a better sense of the project.

Please do not hesitate to contact me if you have any questions on these comments or if you would like to set up a site visit. I can be reached by telephone at (505) 827-4064 or by email at michelle.ensey@state.nm.us.

Sincerely,

Michelle M. Ensey Archaeologist

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