

NPSNM Comments to the National Park Service on its Draft Management Zoning Plan for Valles Caldera National Preserve – May 5, 2021

(As required by the online submission site, our general comment is first, followed by responses to specific questions from NPS.)

Thank you for this opportunity to comment on the VCNP Management Zoning Plan. NPSNM is a non-profit organization with more than 700 members in seven chapters around the state and in El Paso, Texas. Our mission is to educate the public about native plants by promoting knowledge of plant identification, ecology, and uses; foster plant conservation and the preservation of natural habitats; support botanical research; and encourage the appropriate use of native plants to conserve water, land, and wildlife.

The VCNP Management Zoning Plan will guide future planning for specific resource areas, so as to balance visitor services and recreational opportunities with stewardship of the Preserve's natural and cultural values. Our comments address the draft zoning approach as presented in the April 9, 2021 newsletter posted online, and at the April 20, 2021 virtual public meeting. The proposal is to establish and define three management zones – Visitor Engagement (VEZ), Self-Guided (SGZ) and Backcountry/Self-Reliance (BSRZ) – and map which parts of the Preserve to designate for each zone. The three zones differ along a spectrum of development compared to preservation.

In terms of values directly related to native plants, VCNP includes the History Grove of old growth trees, the vast wet meadows forming the headwaters of the Jemez River, and a great interpretive opportunity as an epicenter for the use of tree rings to advance fire science. But its ultimate value is the landscape-scale juxtaposition, in one mostly intact property, with geologic, cultural/historic, wildlife, and recreational potential. Threats to landscape integrity include climate change and large, high-intensity fire, neither of which is likely to be affected by the management zoning.

One major threat which will be affected by the zone maps is fragmentation, especially by the mechanisms of roads and motor vehicle traffic. NPSNM agrees in concept with the zone planning approach. Of the three potential zone maps shown in the newsletter, we prefer Option C, in combination with some elements from each of the other Options. Option C would minimize habitat fragmentation by eliminating motor vehicle loop routes throughout most of the Preserve.

Option C as presented postulates that all public access beyond the VEZ would require the use of shuttle vehicles. However, in order to optimize visitor access, we believe that a limited number of vehicles besides the shuttles could be allowed on existing roads in the SGZ, such as hunters, fishers and their guides, and individuals with camping permits. It would also be beneficial to designate the Cabin District as VEZ, as in Option A, so that administrative offices, education facilities, and possibly overnight rental facilities could be placed where easily accessible but not visible from Route 4. Depending on the specific uses, expanded areas of SGZ away from the roads, as in Option B, might be accommodated without contributing excessively to fragmentation of the landscape. Our membership also feels strongly that when designating off-road trails

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for various forms of recreational use, the Park Service should strive to minimize conflict between pedestrians, equestrians and bicycle riders.

The existing gravel roads that would be closed to public traffic under Option C could be maintained to a lesser degree for use by managers, researchers and emergency service vehicles, and by visitors on foot, bicycle, ski or horseback who might choose to enjoy the scenery without venturing onto single-track trails. Drainage improvement work should continue on all roads, open or closed, to increase hydraulic connectivity. Removal of unnecessary fencing should continue, to allow for improved wildlife mobility.

Topic Questions:

Question 1:

What do you value about Valles Caldera? *Juxtaposition in one mostly intact property of vast wetlands with geologic, cultural/historic, wildlife, and recreational potential.*

Question 2:

Do you have any ideas or feedback on our zone concepts or desired conditions? *NPSNM agrees in concept with the zone planning approach.*

Question 3:

Is there a mapping option you prefer? If so, what makes you prefer this option over others? *Of the three potential zone maps shown in the newsletter, we prefer Option C, in combination with some elements from each of the other Options. Option C would minimize habitat fragmentation by eliminating motor vehicle loop routes throughout most of the Preserve.*

Question 4:

Are there elements of other options that you like or dislike?

It might also be beneficial to designate the Cabin District as VEZ, as in Option A, so that administrative offices and education facilities could be placed where accessible but not visible from Route 4. Depending on the specific uses, expanded areas of SGZ away from the roads, as shown in Option B, could optimize recreational potential without excessive landscape fragmentation.

Question 5:

Do you have other thoughts or ideas for how different parts of the park might be experienced and/or preserved? *Drainage improvements should continue on all major roads, open or closed, to increase hydraulic connectivity. The main gravel roads that would be closed to public traffic under Option C could be maintained to a lesser degree for use by visitors on foot, bicycle, ski or horseback who might choose to enjoy the scenery without venturing onto single-track trails.*