



# Caldera Action

Protecting a unique natural and cultural landscape

Senator Martin Heinrich  
Senator Tom Udall  
US Senate  
Washington DC

February 18, 2020

Sir:

Caldera Action is a non-profit organization focused on protecting the Valles Caldera National Preserve, Bandelier National Monument, and associated lands in the Jemez Mountains. We focus on increasing public access, science, protection, and education in these landscapes.

We are deeply grateful for the work you did to secure the Valles Caldera for the American people and put it in the able management of the National Park Service. However, we have grave doubts about your Bandelier National Park bill.

The bill has three basic points; increasing visitation and economic development through the “national park” brand, hunting and trapping opportunities in the upper reaches of Bandelier, and tribal consultation with Bandelier. We cannot support the current language regarding the rebranding of Bandelier or changes in management to facilitate hunting and trapping. Reluctantly must oppose this bill.

The bill is introduced at a time when the National Park Service (NPS) is facing serious problems with ongoing staff reductions, declining budgets, and decaying infrastructure. Adding more visitation to Bandelier, which has staffing and infrastructure issues, cannot be done without a substantial, concurrent commitment to reverse these trends.

We reject the idea that the fragile, finite and threatened natural and cultural resources of Bandelier National Monument (the park) should be used as a tool for local business development in northern New Mexico. While studies show that naming Bandelier a “national park” rather than the current “national monument” will draw more tourism, the park’s facilities and cultural resources cannot endure prolonged high levels of visitation. We’ve seen the national parks in Utah pushed by the state as tourist attractions resulting in severe overcrowding, understaffing, and damage to the parks themselves. The National Park Service has a legal obligation to protect the parks for future generations.

We are very concerned that the National Park Service is facing serious challenges that need immediate attention. The NPS has suffered a 16% staff decline since 2011, which has made it difficult for the Service to protect lands and resources in places like Bandelier. Despite a large increase in visitation to national park units, law enforcement staffing has declined 20% since 2011. Visitor services staffing has dropped 16% and resource management staffing has dropped 19% since 2012. The National Park Service has not had a Director since 2016. We cannot increase visitation while decreasing the capacity of the managing agency without damage to the resources and the experience of the public.

Currently, most visitors to Bandelier visit the Frijoles Canyon Headquarters and walk the “main loop” trail, which takes most of the 209,000 annual visitors up to see the caves and Pueblo ruins in the canyon. There is one small restroom per gender, a crumbling trail to the features that has not been repaved since 1972, vandalism of the caves, and a National Park Service that is so understaffed that they must rely on volunteers to operate the visitor center along with a bare bones NPS staff.

Furthermore, two restrooms were disabled by post-fire floods in 2011 and may or may not be repaired in the future. Hundreds of busloads of visitors come into the park annually, pushing the trails and facilities to their limits especially during big tourism events in Santa Fe and Albuquerque. The NPS is unable to offer more than minimal services to the visitors. Though the park had higher visitor numbers in the 1990s, the current level of visitation is beyond what the park can reasonably accommodate without park visitors having an experience of crowding and degraded resources rather an experience of beauty and education.

National Park Service staff at NPS units in the Jemez area face serious challenges finding housing due high demand created by expanding weapons programs at Los Alamos and population growth in greater Santa Fe. The NPS is having difficulty bringing on new hires because of a lack of nearby affordable housing.

Thus, we dislike the idea of using Bandelier as a driver of economic development when the park itself will be undermined by increased visitation.

Second, we feel that reducing protections for National Park Service lands to facilitate hunting and trapping sets a dangerous precedent for other National Park units.

We understand that many people have wanted to hunt in Bandelier for years. But we feel that opening 4300 acres in the upper elevations of Bandelier to hunting and trapping will benefit very few people while it will confuse management and reduce the power of the National Park Service to manage its lands and wildlife. Management of fish and wildlife in the new Bandelier National Preserve would cede to the New Mexico State Game and Fish Commission and Department<sup>1</sup>. Confusingly, hunting in these acres would be managed by the Superintendent at the Valles Caldera, not the Superintendent at Bandelier.

All of the Jemez Mountains (except for Santa Clara tribal lands) are open to hunting and trapping, including the Valles Caldera National Preserve. Adding 4300 acres of Bandelier land to that huntable area will benefit only a few hunters and trappers each year. We are concerned that predators could be hunted in what is now protected land. Also, we worry that NPS efforts to reintroduce beaver in Frijoles Canyon could be damaged by trappers killing beaver in the proposed Bandelier National Preserve.

We were assured by your staff that the National Park Service would have the discretion to prevent trapping in Bandelier and the Valles Caldera if they didn't feel it would benefit the parks or the public. This begs the question why Congress would allow trapping and then expect the agency to exercise discretion to block a legally permitted activity? This puts the Park Service in a difficult position.

Finally, we support empowering and honoring local tribes whose presence in this region far predates Europeans. We are concerned that language in the Bandelier National Park bill could cause confusion since it directs the National Park Service to provide consultations and to facilitate traditional activities that the NPS already carries out. Bandelier staff have been cooperating with tribes to facilitate ceremonial and traditional uses of the park since the 1930s when the National Park Service began managing Bandelier. They have close relationships with tribes with direct roots to the park's landscape and consulted with and employed tribal regarding the Bandelier Visitor Center Museum. They currently consult closely with tribes on every substantial action contemplated by park managers.

There are parts of the Bandelier National Park bill that we *do* like, and hope can be inserted into other legislation. We support the protection of Bandelier National Monument from all mineral entry although given the volcanic nature of the landscape, it seems unlikely that industry would take an interest in Bandelier.

We also support the boundary adjustments for the Valles Caldera National Preserve in the Banco Bonito area, including the transfer of the Redondo Campground from the US Forest Service to the National Park Service. Those boundary adjustments would greatly benefit both agencies and we hope you can find a way to accomplish them outside of this proposed legislation.

We urge you to take action to restore the budgets and functional abilities of the National Park Service before we contemplate increased tourism at Bandelier.

We thank you for your strong commitment to our environment and our public lands.

Monique Schoustra, Vice President,  
For the Board of Directors, Caldera Action

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<sup>i</sup> The language relative to hunting and trapping in the legislation states: HUNTING, FISHING, AND TRAPPING.—IN GENERAL.—Except as provided in subparagraph (B), the Secretary shall permit hunting, fishing, and trapping on land and water within the Preserve in accordance with applicable Federal and State law. (Subparagraph B allows the National Park Service to set temporary closures to hunting, trapping and fishing.)