

APPENDIX J

COMMENTS AND RESPONSES

The public comment period for the draft CMP/EIS ended on January 15, 2003. Comments were contributed by mail, by email through the website, www.elcaminoreal.org, and through a series of public meetings held between November 6, 2002, and January 6, 2003. During the comment period, 47 comments were received by letter or email; an additional four comments were received after January 15, 2003, but were accepted as late comments. Public meetings, consisting of a two- to- three- hour informational "open house," were held in seven communities in New Mexico and Texas, between November 6, 2002, and January 6, 2003. A total of 40 people attended these open house events.

During the comment period, Camino Real Administration received 10 additional requests for information about El Camino Real de Tierra Adentro National Historic Trail, including requests for information on the auto tour route and the availability of classroom teaching resources. These requests are not included here as comments on the adequacy of the draft plan.

All letters and emails submitted through the mail or through the website, and all comments contributed during the open house events were reviewed and considered in preparation of the proposed Comprehensive Management Plan and Final Environmental Impact Statement (FEIS). Comments which addressed the adequacy of the draft CMP/EIS received a response. Comment contributors are listed in **Table 17**. Each commentor contributing a unique set of comments was assigned a unique comment number. Each comment may contain a number of salient points; these are identified through the assignment of subletter "a," "b," and so on. Eighteen identical comments were submitted by different individuals and combinations of individuals representing a number of small businesses and private concerns. In **Table 17**, these comments are given a single comment number, and each contributor is noted in the table.

The comments received from the public during the comment period were summarized and abstracted for presentation here. Each of the comments, summarized by salient point, are addressed in turn in our responses. Comment letters received from local, State, and other Federal agencies are printed in their entirety in Chapter 5, pages 128- 155. Copies of all comment letters and emails are available for viewing at the NPS Old Santa Fe Trail Building, Camino Real Administration Office, 1100 Old Santa Fe, Trail, Santa Fe, New Mexico.

Commentors may track their comments by identifying their comment numbers, including subletters, in **Table 17**, and finding the appropriate comment and response in the text section following **Table 17**.

As noted previously, the Preferred Alternative presented in the draft has been brought forward, with minor modifications, as the Proposed Plan. We have continued to use the term "Preferred Alternative" in our responses here, as well as elsewhere in this document to stay as consistent with the language used in the draft as possible.

TABLE 17
COMMENTS AND RESPONSES

Comment No.	Date	Name and Organization
1a-b	1/23/2003	Homer Milford , New Mexico Energy, Minerals and Natural Resources Dept., Santa Fe, NM
2a	1/7/2003	Robert D. Lawrence , Chief, Office of Planning and Coordination, United States Environmental Protection Agency, Dallas, Texas
3a-dd	1/11/2003	Joy Poole , Director, El Camino Real International Heritage Center, New Mexico State Monuments
4a-e	2/11/2003	Jan Biella and Elizabeth Oster , New Mexico State Historic Preservation Division, Santa Fe, NM
5	12/4/2002	Joy E. Nicholopoulos , Field Supervisor, U.S. Fish and Wildlife Service, New Mexico Ecological Services Field Office, Albuquerque, NM
6	7/31/2002	Robert, Marina, and Jennifer Barr Ardovino , Ardovino's Desert Crossing
7	10/8/2002	Mike Vandeman
8	10/25/2002	Alice Alexander , Tribal Historic Preservation Officer, Pawnee Nation of Oklahoma
9	11/6/2002	Richard Whipple , Algodones, NM
10	11/6/2002	Scott O'Mack
11	11/12/2002	John Chapman , Albuquerque, NM
12	11/17/2002	Thomas P. Lowry , Woodbridge, VA
13	11/22/2002	Harry D. Early , Governor, Pueblo of Laguna, Laguna, NM
14	11/22/2002	Gary Williams , Coordinator, Pass of the North El Paso Community Foundation, El Paso, TX
15	11/25/2002	Michael L. Olsen , Colorado Springs, CO
16a-c	12/11/2002	Julie Kay Smithson , London, OH
17	12/14/2002	Peggy Bogart , Las Cruces, NM
18	1/6/2003	Mary Ann Connelly , Taos, NM
19	1/6/2003	Lloyd Rivera , President, Camino Real North, Taos, NM
20	1/7/2003	Jim and Linda Kimmons , Taos, NM
21a-m	1/7/2003	Beth L. Ortiz , Business Manager, El Llano Company, Española, NM
	1/7/2003	Richard P. Cook , President, Española Transit Mix Company, Española, NM

Comment No.	Date	Name and Organization
21a-m	1/7/2003	Six employees of Organ Sand and Gravel Co. , Organ Sand and Gravel, LLC, Organ, NM
	1/7/2003	John R. Yates , Organ Sand and Gravel, LLC, Organ, NM
	1/7/2003	Louis Gonzales , Shamrock Mining LLC, Reno, NV
	1/9/2003	Richard P. Cook , President, Associated Asphalt and Minerals, Santa Fe, NM
	1/9/2003	Scott Wilson , Vice-President, R&R Roadrunner Parking Inc., Albuquerque, NM
	1/9/2003	Rex P. Wilson , President, C & W Land Development Enterprises, Inc., Albuquerque, NM
	1/9/2003	Steve Bradham , Vice-President, Home Building Systems, LLC, Albuquerque, NM
	1/10/2003	Kelly Armstrong , President, Copar Pumice Company, Española, NM
	1/10/2003	Richard P. Cook , President, Española Mercantile Company, Española, NM
	1/10/2003	Richard P. Cook , President, La Cienega Estates Corp., Española, NM
	1/10/2003	Donna M. Concannon , Ojo Caliente, NM
	1/10/2003	Kelly Armstrong , Secretary/Treasurer, Cook's Home Center, Inc., Española, NM
	1/11/2003	Andrew Ceballes , Project Manager, RICO Paving Company, Española, NM
	1/12/2003	Richard P. Cook , Española, NM
	1/12/2003	Shirley A. Cook , Española, NM
	1/12/2003	Richard C. and Beth L. Ortiz , Santa Cruz, NM
22a-c	1/10/2003	Jose J. Varela Lopez , Santa Fe, NM
23a-b	1/10/2003	David T. Kirkpatrick , Las Cruces, NM
24a	1/10/2003	A. P. Vigil , Hatch, NM
25	1/10/2003	Jay Wier , Las Cruces, NM
26	1/11/2003	Louann C. Jordan , El Rancho de las Golondrinas, Santa Fe, NM
27a-ff	1/13/2003	Peter Mackeness , El Camino Real del Norte, Taos, NM
28	1/14/2003	Lonnie Marquez , Chairman, El Camino Real International Heritage Foundation
29a-q	1/14/2003	Teresa A. Conner and David W. Pierce , Albuquerque, NM
30a-l	1/14/2003	Tamara Lichtenstein , Secretary, Agua Fria Village Association, Santa Fe, NM
31a-o	1/15/2003	Teresa A. Conner , Land and Environmental Manager, LaFarge North America/LaFarge Southwest, Inc., Albuquerque, NM

Comment No.	Date	Name and Organization
32a-b	1/16/2003 Email	William Henry Mee , Agua Fria Village, Santa Fe, NM
33a-c	1/7/2003 Email	Judy Keeler , Secretary, Bootheel Heritage Association, Animas, NM
34	1/22/2003 Hand Delivery	Tamara Lichtenstein , Secretary, and Ramon Romero, Agua Fria Village Association, Santa Fe, NM
35a-c	3/4/2003 Postmark	Adolph Greenberg , Ethnographer, Miami University, Oxford, OH

COMMENTS AND RESPONSES - STATE AND FEDERAL AGENCIES

COMMENT 1a:

Chapter 3, p. 72: second paragraph - Fra Cristobal instead of Organ Mountains?

RESPONSE:

We have changed the text to read Fra Cristobal Mountains here.

COMMENT 1b:

Chapter 3. - Gives information on the Jornada to consider.

RESPONSE:

Thank you for this information. The history presented is an overview and not exhaustive. We will keep your comments on file for future reference.

COMMENT 1c:

Chapter 3. - Include founding of El Paso in historical narrative.

RESPONSE:

The historical information is an overview of the region's history only. We will keep your comment on file to use as we implement the plan and as further research takes place. The city and county of El Paso, Texas are very interested in participating in the trail plan and they have also noted strong interest in the Camino Real on the part of Juarez, Mexico which is the historic settlement of El Paso referred to in the comment.

COMMENT 1d:

Chapter 3, page 78. The railroad follows the Camino Real from La Bajada to El Paso.

RESPONSE:

The text has been changed to reflect this.

COMMENT 2:

The Environmental Protection Agency (EPA) classifies your Draft Environmental Impact Statement (EIS) and proposed action as "LO," i.e., EPA has "Lack of Objections" to the preferred alternative.

RESPONSE:

Noted.

COMMENT 3a:

Planning document appears to be a boiler plate format which might be acceptable for a historic trail that is 1) located totally within the United States, or 2) isn't a viable, living, or still traveled trail.

RESPONSE:

We have to follow various laws and regulations in the formulation of the Comprehensive management Plan/Environmental Impact Statement (CMP/EIS). However we have re-written parts of it to make it easier to read. It should be noted that we can only do a plan for the section of the trail designated as a national historic trail and that is the section of El Camino Real that is in the United States. While we have consulted with the National Institute for Anthropology and History (INAH) in Mexico about the plan, we will not be doing a plan for the section of the trail that lies in Mexico. That rightfully is for the Nation of Mexico. And while we do recognize that the trail is still being used today, our mandate is the National Trails System Act legislation and the Camino Real de Tierra Adentro legislation (See Appendixes A and B). Many of our partners, including the Camino Real International Heritage Center will be able to address such topics as you raise as they develop their educational and interpretive programs.

COMMENT 3b:

Urge consideration of technological potential for digital libraries for resource sharing and international research; "push the envelope" in terms of pertinent and germane cultural issues and in terms of technology capabilities.

RESPONSE:

This is a thoughtful suggestion for the future. Many items can be stored in a digital library format; however we will be mindful of copyright restrictions that will preclude more recent items.

COMMENT 3c:

The document is difficult to fully decipher in places and follow from written executive summary through the matrix. One of the acronyms (RMP) was undefined and there were references to federal perspectives and procedures that an ordinary citizen cannot fully comprehend.

RESPONSE:

Noted. We have rearranged and rewritten parts of the document and have added terms to the Glossary. The draft Glossary did include the acronym "RMP" (Resource Management Plan).

COMMENT 3d:

The New Mexico State Monuments position with regard to the relationship between the International Heritage Center and the National Historic Trail is that the Center was created as New Mexico's newest state monument for the sole purpose of serving as the official interpretive center for the trail in New Mexico. The State Monuments Division recommends that the draft management plan also acknowledge its (the Center's) role and function as the official interpretive center for the national historic trail through a cooperative agreement, certification, or amendment to the national trails act.

RESPONSE:

Noted. The plan names the Camino Real International Heritage Center as a focal point for the trail.

COMMENT 3e:

Executive summary, pg. V: tie five issues identified to the environmental table in comparisons of alternatives and impacts

RESPONSE:

The five issues are addressed throughout the table and the document.

COMMENT 3f:

Address opportunities for visitor services under Issues on page 8. Also, should have included historical issues such as migration and commerce- - people from Mexico are still following the trail of their ancestors in search of opportunities and the commercial trade in existence today between the two countries; issues should also acknowledge the trail as a living trail today.

RESPONSE:

The planning issues were identified during the initial scoping of the plan. "Visitor services, education, and/or recreation" is an issue under "How will trail management be integrated with tribal and other government agency and community plans?"

COMMENT 3g:

What appears to be missing is a contemporary goal that addresses economic development, international collaboration, and migration. Unlike all the other national historic trails, El Camino Real is a living, vibrant trail. It is still a trail of commerce, of migration, and a trail of evangelism (or cultural exchange). Collaborations with Department of Commerce and Immigration and Naturalization Service (INS) might be advisable. Add "internationally" to the second goal, and add a goal of supporting and/or promoting economic development and commercial opportunities as related to El Camino Real. Omissions of commerce and migration are troublesome given the historical importance of trade and commerce and the continuance of international commerce and trade today via North American Free Trade Agreement (NAFTA) today, and the fact that historically El Camino Real was a migration route and I- 25 serves today as a route of immigration. These are changing and evolving human issues but are viable characteristics of the trail and qualify for government protection.

RESPONSE:

While we recognize your suggestion as a worthy goal, we are limited by the National Trails System Act and the Camino Real legislation, neither of which identify economic development as a purpose of the legislation. However we recognize that many of our partners will be able to more effectively carry out the goals you outline above as an integral part of their already existing mission.

COMMENT 3h:

Page x: revise last sentence regarding local history to incorporate local history into a national and international historical and contemporary context. The last sentence could be expanded to include such things as car and computer games, bilingual tv.

RESPONSE:

We have changed wording to replace "documents" with "a variety of media." We do not see the existing wording as limiting, but as inclusive of local history and local history in a national and international historical context.

COMMENT 3i:

Pages 14- 15: include digital library capabilities or identify them as a mechanism for delivery in Alternative C [editor's note: Preferred Alternative]- - Library of Congress, New Mexico State Library and Archives, INAH and Mexican archives can collaborate with NPS/BLM.

RESPONSE:

We will work with a number of entities to achieve a digital library working within the constraints of copyright law. Many items can be stored in a digital library format. However, we will be mindful of copyright restrictions that may preclude more recent items.

COMMENT 3j:

pages xiii- xiv: Many of the cultural facilities of New Mexico may not meet certification standards without financial assistance through the cost- share program; El Camino Real International Heritage Center exhibits plans should be passed before the Long Distance Trails office to identify potential shortcomings that may affect their certification potential, especially regarding Americans with Disabilities Act (ADA) compliance.

RESPONSE:

We will work with entities that want to be certified, so that we can achieve the goal together through a variety of means, including, but not limited to the Challenge Cost- share program. Camino Real Administration will work with El Camino Real International Heritage Center to insure that the Center meets certification requirements.

COMMENT 3k:

The economic analysis identifies primarily low- paying, service industry jobs under the impacts of the preferred alternative. The Hispanic and North American Indian communities will want better, higher wage jobs for their children. What about socio- economics for middle income residents in the US and Mexico? Cottage industries involving artisans and regional arts and crafts could also be identified and promoted in New Mexico, Texas, and Mexico. Place the entry- level tourism jobs currently identified in the preferred alternative into Alternative B, and outline higher paying administrative and managerial tourism jobs in the preferred alternative- - tourism is the #2 industry in New Mexico. Economic development, NAFTA, or El Camino Real Trade could provide moderate income producing jobs.

RESPONSE:

The economic model used to estimate job creation impacts does not calculate the number of jobs created by type, but only as a total number of new jobs based on algorithms utilizing economic baseline data and assumed economic activity generation multipliers. Because of this, the plan cannot be adjusted to shift job types among alternatives. The net economic benefits, which are the net new jobs created, combined new sales generated, and total increased income and sales tax revenue generated by implementation of the preferred alternative, were calculated using the National Park Service developed "Money Generation Model" which is available on the NPS website. The model is useful in that it can quickly estimate the economic consequences of planning alternatives using area- specific baseline data and tailored assumptions on the input parameters. Baseline economic activity data were provided by the Sonoran Institute in association with the Bureau of Land Management in its 2002 publication "Economic Profile System" which provides a variety of latest available economic activity data for use in producing custom socioeconomic profiles for the United States in a consistent format for all geographic areas. Other locally variable input data such as average length of stay for tourists, average daily

tourist expenditures, state and local tax rates, and percent of non- local use were developed from publicly- available state and county economic and tourist data, and interviews with recreation and tourism officials.

The basic rationale for the economic model is that a certain input in terms of new money spent, new numbers of tourists attending a park, and other inputs have a multiplier effect on the local economy as those inputs directly and indirectly propagate through the local economy inducing subsequent economic activity to both serve the visitors, and to provide products and services to the local community supporting the increased park or recreation activity.

COMMENT 3i:

Is the National Endowment for the Arts helping to define trails, as indicated on page 5, fourth paragraph?

RESPONSE:

The National Endowment for the Arts is a signatory to a Memorandum of Understanding (MOU) for the Administration and Management of National Historic and National Scenic Trails dated January 19, 2001. The MOU encourages long- term interagency coordination and cooperation to further the spirit and intent of the National Trails System Act by preserving and strengthening the visitor satisfaction, administration, management, protection, cultural enhancement, cooperation, partnerships, and funding of those lands and resources associated with the National Trails. A copy of that MOU is on file in the Camino Real Administration Office.

COMMENT 3m:

Is it possible to sign MOU's with the Department of Commerce, Economic Development extolling the merits of NAFTA and recognizing the historical commercial importance of El Camino Real and its potential for today?

RESPONSE:

It would not be appropriate for the Camino Real Administration to sign such an MOU. Many of our partners have existing missions which would allow them to enter into such MOU's, however.

COMMENT 3n:

Page 6, 6th bullet: insert "in hard copy or digitally" before "to learn more about"; don't understand 11th bulleted point.

RESPONSE:

We do not see the existing language as excluding any form of learning in any manner. We recognize there are many ways to learn and fear that by trying to list them all, we would inadvertently omit some. This visitor experience goal means that trail visitors will have the opportunity to meet and interact with local people whose lives have been affected by the trail.

COMMENT 3o:

Page 7: add "electronic access capabilities" to end of discussion of interpretation and education

RESPONSE:

We support this option but see no wording that would limit or exclude this option.

COMMENT 3p:

Page 8: Issues to be resolved. Wording for first two paragraphs seems negative and pessimistic. Instead of perceiving them as problems to be resolved, consider them as issues for consideration and strive for a win-win situation within the limitations of the federal government/NPS/BLM.

RESPONSE:

We agree with you about the wording, but we are following definitions set by our agency guidance. We agree with your interpretation and essentially have tried to provide that philosophy throughout the document.

COMMENT 3q:

One of the planning issues should be: What opportunities are available to provide visitor services, education, or recreation.

RESPONSE:

The planning issues were identified during the initial scoping of the plan. "Visitor services, education, and/or recreation" is an issue under "How will trail management be integrated with tribal and other government agency and community plans?"

COMMENT 3r:

These issues should be added to the discussion of this trail: Borderland trail security; economic development, trade, and NAFTA; and immigration and migration

RESPONSE:

The issues identified are indeed important but outside of the scope of the National Trails System Act and the Act establishing El Camino Real de Tierra Adentro National Historic Trail.

COMMENT 3s:

Add "From what historical perspective do Native American tribes (sovereign governments) view the trail" to the two issues of "How will trail management be integrated with tribal and other government agency and community plans?" and "How do we incorporate international interest in the trail?"

RESPONSE:

The planning issues were identified during the scoping phase of the plan. However we do believe that the issues you propose are addressed explicitly in the plan in Chapter 2, Preferred Alternative, Description, and Preferred Alternative, State-level and Tribal Partners and Local-level Partners, and in Chapter 4, Environmental Consequences, North American Indians.

COMMENT 3t:

Discussion of state- level partners should identify state libraries, state archives, state monuments, and state historian divisions as well as historic preservation division of state government

RESPONSE:

The wording in this paragraph has been changed to indicate that a number of state agencies can participate in the plan.

COMMENT 3u:

Tribal governments omitted from discussion of partners on page 15.

RESPONSE:

The paragraph now reads "State- level and Tribal Partners." Tribal governments are now recognized in the text.

COMMENT 3v:

Consider creating a digital library on Camino Real as a partnered effort between three countries and numerous libraries and pertinent agencies.

RESPONSE:

Noted. This suggestion will be explored in the future through partnerships.

COMMENT 3w:

Auto Tour route can follow Highway 1 from about mile marker 90 northward towards Socorro.

RESPONSE:

The auto tour route does follow State Highway No. 1 from just north of Truth or Consequences to Socorro.

COMMENT 3x:

What are the certification criteria? Are the criteria for high potential sites listed or is each site situational and situational criteria have yet to be determined? Will rectifying "incomplete historic documentation" require original and possibly sponsored research?

RESPONSE:

National historic trails identify high- potential historic sites and segments. The general characteristics of high- potential sites and segments are set out in Chapter 2, Continuing Management Guidance. In general, these sites and segments provide an opportunity to interpret the historic significance of the trail, and are characterized by the presence of visible historic remnants, scenic quality, and relative freedom from intrusion. Those portions of the trail that are under federal ownership are recognized as official protection components of the NHT. Privately- owned high- potential historic sites and segments can also be recognized through the site certification process. In addition, as indicated in Chapter 2, in the section on Site Certification, interpretive facilities such as El Camino Real International Heritage Center can also be considered as candidates for certification. The certification program is one of the most important ways in which federal administering agencies can foster partnerships with non- federal landowners through-

out the trail corridor. Certification agreements are written and agreed upon by the private landowner and the Camino Real Administration Office to preserve, interpret, and provide for public access to high-potential historic sites and segments. The certification program is an entirely voluntary one; although property owners can benefit from the availability of challenge cost-share funds, agency expertise, and the increased awareness of their resources by the public, property owners are not obliged to enter into certification agreements. A sample certification agreement is in Appendix I. Text has been added to Chapter 2, Site Certification, to clarify the certification program.

COMMENT 3y:

Page 36: can the reference to the location in the Jornada be tied to one of the maps, or the appropriate Field Office for BLM identified? Is this the trail north of the Jornada between the future El Camino Real International Heritage Center and Fort Craig or is it some other property in the Jornada?

RESPONSE:

Because the proposed projects are still in the conceptual stage, locations have not been fixed or identified on the maps. We have identified which BLM Field Office area they are located in. The trail referred to is along the historic Camino Real and not a trail between El Camino Real International Heritage Center and Fort Craig.

COMMENT 3z:

Page 39: Although the emphasis will be on the southern part of the trail, the whole trail will be interpreted by the Center. Suggest revising the last sentence of this section to read: "The heritage Center is another example of a joint government project and is therefore a separate project from the NHT. It would serve as an officially recognized or designated interpretive center (focal point for trail related interpretation and education) with emphasis on the southern portion of the trail."

RESPONSE:

We have updated the language in this paragraph to indicate that the Heritage Center has been built and will be open to interpret the trail soon. The language of the text has been altered to recognize that construction is nearly complete at the Camino Real International Heritage Center. The text now reads: "Camino Real Administration would not construct or operate facilities. The BLM and the Museum of New Mexico State Monuments Division are developing a new interpretive facility south of Socorro, New Mexico, the Camino Real International Heritage Center, that will offer interpretive media and educational programs about the trail. The Heritage Center is a separate project from the NHT but will serve as a focal point for trail-related interpretation and education, with emphasis on the southern portion of the trail."

COMMENT 3aa:

Page 40: Insert section on Digital Libraries here or with resources or web sites.

RESPONSE:

We see no language here that would limit the use of digital libraries or web sites. Many items can be stored in a digital library format however we will be mindful of copyright restrictions that will preclude more recent items. We will work with a number of entities to achieve a digital library working within the constraints of copyright law.

COMMENT 3bb:

Heritage Tourism: Include National Heritage Area as another potential example after heritage tourism programs.

RESPONSE:

Noted.

COMMENT 3cc:

Page 43- - Include Digital Libraries under Inventory and Research, and again on Page 44 under Interpretive Media

RESPONSE:

We see no language here that would limit the use of digital libraries or web sites. Many items can be stored in a digital library format however we will be mindful of copyright restrictions that will preclude more recent items. We will work with a number of entities to achieve a digital library working within the constraints of copyright law.

COMMENT 3dd:

No mention of prehistoric trade, especially the importance of salt and other trade goods as documented in published archaeological literature; also no mention of missionaries, women, and Indians who are affiliated with the trail.

RESPONSE:

The discussion concerning Ethnographic Resources and Archeological and Historic Resources is an overview only and not a comprehensive review of the subject headings. For a more comprehensive view see the sources in the selected bibliography.

COMMENT 4a:

Supports Preferred Alternative.

RESPONSE:

Noted.

COMMENT 4b:

We strongly recommend that you consider creating a plan and/or programmatic document that will serve to coordinate all of the necessary procedures for cultural resources management planning, including (but not limited to) compliance with Section 106 of the National Historic Preservation Act (NHPA) and, where applicable, Texas and New Mexico state laws.

RESPONSE:

Both BLM and NPS now have programmatic agreements or their equivalent, in place with the appropriate federal agencies charged with compliance with the National Historic Preservation Act (NHPA) that detail how these agencies will carry out their NHPA responsibilities. While we do not anticipate developing additional programmatic agreements, we will work with Texas and New Mexico State Historic Preservation Officers to create a plan, which may be in the form of a Memorandum of Understanding, for accomplishing the coordination of all necessary procedures.

COMMENT 4c:

Add State Cultural Preservation Laws to text.

RESPONSE:

Camino Real Administration will comply as appropriate with the state laws; your list of State Cultural Preservation Laws has been added to our files.

COMMENT 4d:

Change wording in Chapter 4, Environmental Consequences - to wording suggested in letter for "North American Indians" on pages 102, 112, and under "Comparison of Impacts."

RESPONSE:

Wording in this section now includes the following: Tribal consultation will be ongoing throughout the development and management of El Camino Real facilities, and any concerns identified by tribes will be taken into consideration. The goals of such consultation will be to avoid or mitigate any impacts or effects that may be identified.

COMMENT 4e:

Change Wording on page 102, Preferred Alternative - Cultural Resources (Archeological/Historical) to the wording suggested in letter.

RESPONSE:

Text in this section now reads: The impacts from both Alternatives B and the Preferred Alternative may have a neutral or positive impact upon the North American Indian tribes associated with El Camino Real.

During implementation of the Preferred Alternative, additional consultation with affected tribes may lead to positive impacts by providing them with the opportunity to present their stories from the tribal point of view in exhibits and documents. Tribes that participate in the voluntary certification of sites and segments would be eligible for technical assistance and challenge cost- share monies for preservation, interpretive exhibits, and signage.

Where developments take place (roadside pullouts and interpretive wayside exhibits as proposed in the Preferred Alternative), a site- specific analysis would take place to ensure that resources are not disturbed, or if resources would be impacted, proposed mitigation measures would take place in consultation with the tribes.

COMMENT 5a:

US Fish and Wildlife Service Cons. # 2- 22- 03- I- 050. We look forward to reviewing the pre-construction environmental assessments for projects resulting from the trail.

RESPONSE:

Noted.

COMMENT 5b:

We strongly encourage the possible wildlife improvement projects in the Jornada del Muerto and Santa Fe River Canyon areas because improved natural habitats would attract native wildlife species that originally occurred along the trail.

RESPONSE:

Noted.

COMMENTS AND RESPONSES - PUBLIC COMMENTS

COMMENT 6:

Carlos Caraveo, geologist/archaeologist, Sunland Park, informed our family of his theory that the original crossing of Don Juan de Oñate could not have been near the present-day Hart's Mill/La Hacienda Restaurant site, but must have been to the west of Mt. Cristo Rey. His documentation consisted of historic maps, recent satellite images, early settlers recounts, which suggested that the pre-Caballo and Elephant Butte Dam Rio Grande would not have been traversable in early Spring, and therefore the most likely route would have taken Oñate and his party to the west of the Sierra de Los Muleros, today's Mt. Cristo Rey. His satellite images showed a trail, visible in the 1980s. Documentation materials enclosed with this comment. Also, we would like to suggest some additional recognition opportunities: a memorial plaque on the Sunset Patio at Ardivino's Desert Crossing and a miniature, walkable map of Camino Real on an acre of land below the Sunset Patio, with landscape design and gardener assistance provided.

RESPONSE:

We would be glad to consider any documented research or publications detailing the theory of an alternate location of the crossing. We will keep your implementation suggestions for the future on file.

COMMENT 7:

Protect wildlife and wildlife habitat by restricting mountain bikes, bicycles, in-line skates, scooters, and strollers to paved roads and designated paved bike paths; do not allow bikes and other vehicles on non-paved trails, including Camino Real.

RESPONSE:

Camino Real Administration will work to protect wildlife and wildlife habitat where such habitat occurs in association with Camino Real National Historic Trail (NHT) resources (identified high-potential sites and route segments and associated viewsheds). Under Alternative A, the 'no-action' alternative, the public would have the same access to trail resources on federally-managed lands as they now enjoy; under Alternative B and the Preferred Alternative, trail resources will be managed to ensure adequate protection and to enhance interpretation and education opportunities. Trail resources will be protected through identification and documentation; through a trail promotion effort to increase public awareness; through the efforts of the Trail Association; through cooperative management agreements and the certification program for resources on non-federally-managed lands; and, potentially, through the efforts of

volunteers and site steward- type programs. Projects that may impact trail resources will be reviewed on a case- by- case basis for potential adverse impacts and will be designed to avoid or mitigate these impacts.

COMMENT 8:

Very old Pawnee Nation oral history says we migrated from Mexico, we have no idea where we actually traveled through. We only know we come from the south and have some rather loose ties to the Aztec people, we don't know when we came from "the South," nor do we know the areas we traveled. The Pawnee Nation has no known burial sites, ancient village, sacred, or religious sites in Texas or New Mexico.

RESPONSE:

Thank you. Noted.

COMMENT 9:

Will auto tour route follow original road or 4th St. through Albuquerque? Original Camino Real was on west side of river; didn't cross to east until Angostura ("the narrows"). May want to mark stage coach stop on Las Colonias in Algodones and place "original trail" signage on Las Colonias. Make sure signage is clear about when following original route and when deviating for auto tour.

RESPONSE:

The auto tour route follows route 313 to Corrales Road to Rio Grande Blvd, to Route 47 in Albuquerque.

COMMENT 10:

The description of Valverde in Appendix E cites many references that do not appear in the bibliography.

RESPONSE:

The bibliography in the plan will be retitled "A Selected Bibliography." The full bibliography of over 40 pages will be posted on the website <elcaminoreal.org>.

COMMENT 11:

The route designation does not fit with my research.

RESPONSE:

If you would care to share your research with us, we will add it to our project files at the Camino Real Administration office, National Park Service Long Distance Trails Group, Santa Fe. The definition and routing of El Camino Real de Tierra Adentro National Historic Trail were set in the National Historic Trail Feasibility Study for El Camino Real de Tierra Adentro, completed by a study team of the National Park Service in 1997 (National Park Service, National Historic Trail Feasibility Study/Environmental Assessment, El Camino Real de Tierra Adentro. U.S. Department of the Interior, National Park Service, March 1997. On file at the National Trails System Office - Santa Fe). Legislation (Appendix A) establishing El Camino Real de Tierra Adentro as a National Historic Trail in Section 3, paragraph 2 (A) states the lim-

its of the trail as running from the Rio Grande near El Paso, Texas to San Juan Pueblo, New Mexico as generally depicted on the maps" in the 1997 feasibility study.

While the period of significance as recognized by the legislation establishing El Camino Real NHT is 1598- 1882, there is nothing to preclude interpretation of the Camino Real both before and after that period.

COMMENT 12:

The Comprehensive Management Plan/Environmental Impact Statement (CMP/EIS) draft is impressive; it represents terrific amount of work and I would not know how to improve on what you have done. Consider the 370 Civil War court- martials as a potential publication about the trail.

RESPONSE:

Thank you for your comment. We will keep in mind your work on the court- martials and share this information with appropriate sites.

COMMENT 13:

Suggest that you meet with the Pueblo of Laguna NAGPRA Committee at your convenience.

RESPONSE:

We met with the Pueblo of Laguna NAGPRA Committee on January 29, 2003.

COMMENT 14:

Suggestions for future implementation.

RESPONSE:

Noted; will keep on file.

COMMENT 15:

Stress the role of the Rio Grande in interpretation and along the auto tour route. Provide access to the river.

RESPONSE:

Thank you. This is an excellent suggestion that we will keep on file to implement as we move into the operational phase of the trail. At some point in the future a long- range interpretive plan will be done that will identify subjects like this.

COMMENT 16a:

There is no discussion of the relationship between short- term uses of man's environment and the maintenance and enhancement of long- term productivity. The document lacks sufficient discussion of impacts on physical, biological, social and economic aspects of the human environment.

RESPONSE:

The existing environmental conditions are described in Chapter 3, Existing Environment, which is based on currently available information, and which provides a basis from which to estimate impacts associated with continuing current management practices and/or implementing the limited number of projects on federally- managed lands described in the Preferred Alternative. Aspects of the environment, including the human environment, described here include the following topics: North American Indians, Archeological/ Historical Resources, Energy and Minerals, Livestock- grazing, Land and Realty Uses, Recreation/Visitor Experience/Interpretation, Scenery, Socio- economics/Social Values/Environmental Justice, Vegetation/Soils/Noxious Weeds/Water, and Wildlife. The relationship between short- term activities, or "short- term uses of man's environment" and long- term productivity are examined in Chapter 4, Environmental Consequences. Several types of impacts are discussed, including direct impacts, indirect impacts, cumulative impacts, irreversible and irretrievable commitment of resources, and unavoidable adverse impacts. The impacts of continuing the current management practices as well as implementing a limited number of projects on federally- managed lands are summarized in the Executive Summary, Comparison of Impacts, and detailed in Chapter 4.

COMMENT 16b:

The plan should include a thorough and complete economic impact analysis.

RESPONSE:

The economic analysis included in the document is appropriate for the actions presented.

COMMENT 16c:

I support Alternative A: No Action. Opening a trail along an international border rife with drug trafficking and other crime such as murder and robbery, is not in the best interest of the American people.

RESPONSE:

Noted.

COMMENT 17:

The draft plan has no discussion of relationship between short- term uses of man's environment and the maintenance and enhancement of long- term productivity. It lacks sufficient discussion of impacts on physical, biological, social and economic aspects of the human environment. The plan should include a thorough and complete economic impact analysis. No Off Highway Vehicle (OHV) roads or trails should be closed on any public lands; along Camino Real, no need to close roads and trails to OHV travel to accommodate estimated 900- 5500 trail visitors per year. No private lands should be integrated into this trail.

REPONSE:

The existing environmental conditions are described in Chapter 3, Existing Environment, which is based on currently available information, and which provides a basis from which to estimate impacts associated with continuing current management practices and/or implementing the limited number of projects on federally- managed lands described in the Preferred Alternative. Aspects of the environment, including the human environment, described here include the following topics: North American Indians, Archeological/Historical Resources,

Energy and Minerals, Livestock- grazing, Land and Realty Uses, Recreation/Visitor Experience/Interpretation, Scenery, Socio- economics/Social Values/Environmental Justice, Vegetation/Soils/Noxious Weeds/Water, and Wildlife. The relationship between short- term activities, or "short- term uses of man's environment" and long- term productivity are examined in Chapter 4, Environmental Consequences. Several types of impacts are discussed, including direct impacts, indirect impacts, cumulative impacts, irreversible and irretrievable commitment of resources, and unavoidable adverse impacts. The impacts of continuing the current management practices as well as implementing a limited number of projects on federally- managed lands are summarized in the Executive Summary, Comparison of Impacts, and detailed in Chapter 4.

No OHV roads or trails are currently marked for closure; however, routes or areas on Bureau of Land Management (BLM) administered lands may be closed to unauthorized vehicles where protected archeological and historic sites and trail route segments would be negatively impacted by vehicular traffic.

There will be little or nor federal acquisition of private lands under this plan. Acquisition would be on a willing- seller basis. Private land and resource owners may opt to take part in the high- potential site and route segment certification program if they wish, but this program is entirely voluntary for private property owners.

COMMENT 18:

The Camino Real extends beyond the limits of Oñate's journey to Taos and beyond. Extend the designated trail to Taos, and extend interpretation for educational purposes to include heritage from ancient hunters and trappers through Indians, Hispanic, and Anglo.

RESPONSE:

The definition and routing of El Camino Real de Tierra Adentro National Historic Trail were set in the National Historic Trail Feasibility Study for El Camino Real de Tierra Adentro, completed by a study team of the National Park Service in 1997 (National Park Service, National Historic Trail Feasibility Study/Environmental Assessment, El Camino Real de Tierra Adentro. U.S. Department of the Interior, National Park Service, March 1997. On- file at the National Trails System Office - Santa Fe). Legislation (Appendix A) establishing El Camino Real de Tierra Adentro as a National Historic Trail in Section 3, paragraph 2 (A) states the limits of the trail as running from the Rio Grande near El Paso, Texas to San Juan Pueblo, New Mexico as generally depicted on the maps" in the 1997 feasibility study.

While the period of significance as recognized by the legislation establishing El Camino Real NHT is 1598- 1882, there is nothing to preclude interpretation of the Camino Real both before and after that period.

COMMENT 19:

Taos hosted a 2- day reception for the with Camino Real Colloquium- - does this indicate, then, that Taos is part of the federal designation- - Mexico City to San Juan Pueblo to Taos? If not, it should be. Also, we were not informed about the 2- day activities in Taos that included 8 key planners. Why?

RESPONSE:

While related by subject matter, the colloquium and the National Historic Trail are two different projects. We regret that you were not contacted for the events in Taos, however, the colloquium is a separate project, coordinated by the National Park Service (NPS), the Bureau of Land Management (BLM), the Mexican National Institute for Anthropology and History (INAH), and others, including community members from Taos, and outreach for that on-going, annual project is handled separately from that which we have been doing as part of the trail planning effort.

The question of whether the trail continued to Taos or not was first raised during the feasibility study 1995- 1997. After public input and consideration of those comments, it was decided that the definition that a Camino Real went from Spanish Capital to Spanish Capital was the most correct for purposes of the National Historic Trail. Research was conducted in numerous archives in New Mexico, Mexico, and Spain to come up with that definition. There has been no first- hand or primary evidence that has surfaced to date to indicate differently.

COMMENT 20:

Would like to see more research conducted on issue of trail extension to Taos; do not appear to have considered evidence for trail ending in Taos.

RESPONSE:

The question of whether the trail continued to Taos or not was first raised during the feasibility study 1995- 1997. After public input and consideration of those comments, it was decided that the definition that a Camino Real went from Spanish Capital to Spanish Capital was the most correct for purposes of the National Historic Trail. Research was conducted in numerous archives in New Mexico, Mexico, and Spain to come up with that definition. There has been no first- hand or primary evidence that has surfaced to date to indicate differently.

COMMENT 21a:

The scope of the Environmental Impact Statement (EIS) does not take into account existing rights, such as mining, oil and gas claims, and how those rights would be affected by the designation of this trail. The "goals" of the EIS do not take into consideration active mining, oil, gas claims and grazing leases. Are "takings" being considered on private land and private interest holdings- - will trail's designation prohibit development of an interest in an area and if so, will the owner of that interest be compensated for the loss? Although the plan states that "grandfathered and existing rights will be recognized, no discussion is made as to how those rights will be preserved. The preferred alternative does not discuss how "existing rights" will be recognized and preserved or what impact preferred alternative will have on existing rights. How will "existing rights" be honored? How will Alternative B affect "existing rights"? There is no discussion of energy and mineral resources development and development rights under "purpose/need for action" or relationship to legislation /BLM/NPS policies, plans and programs"; the potential for mineral development along the trail has not been equally considered or valued.

RESPONSE:

Under all alternatives, surface disturbing operations authorized under an existing Federal material sale contract, mineral lease, and the surface management regulations under the Mining Law would be allowed to continue under the terms and conditions of the authorizing instrument. That is, existing operations, including mining and energy development, will continue as

authorized before designation of the trail (see Chapter 4, Environmental Consequences: Preferred Alternative: Energy and Minerals). Similarly, existing livestock- grazing operations on public lands will continue with no reductions and limited additional restrictions. Operations on an existing contract, lease, or mining claim causing new surface disturbance within the proposed VRM Class II areas will be subject to the VRM classification objectives; new range improvement and/or construction projects in areas where the VRM classification has been changed will need to be mitigated to meet visual resource management guidelines (see Chapter 4, Environmental Consequences: Preferred Alternative: Energy and Minerals and Livestock-grazing). The impacts to mining, energy development, and grazing through implementation of Alternative B are summarized in the Executive Summary and detailed in Chapter 4, Environmental Consequences: Alternative B: Energy and Minerals and Livestock- grazing,). These impacts would be identical to those detailed for Alternative A, the "no- action" alternative that continues current management practices. The proposed Comprehensive Management Plan/Environmental Impact Statement has been developed to establish objectives, policies, processes, and management actions needed to fulfill the preservation and public use goals for El Camino Real de Tierra Adentro NHT within the multi- use mission of the BLM. The potential for mineral development along the trail is described in Chapters 3, Existing Environment and 4, Environmental Consequences.

COMMENT 21b:

Initial scoping failed to identify how to treat existing rights, such as mining, oil and gas claims, as an issue.

RESPONSE:

This was not an issue raised during the scoping meetings. Nonetheless, the plan states that existing rights will be protected.

Under all alternatives, surface disturbing operations authorized under an existing Federal material sale contract, mineral lease, and the surface management regulations under the Mining Law would be allowed to continue under the terms and conditions of the authorizing instrument. That is, existing operations, including mining and energy development, will continue as authorized before designation of the trail (see Chapter 4, Environmental Consequences: Preferred Alternative: Energy and Minerals). Similarly, existing livestock- grazing operations on public lands will continue with no reductions and limited additional restrictions. Operations on an existing contract, lease, or mining claim causing new surface disturbance within the proposed VRM Class II areas will be subject to the VRM classification objectives; new range improvement and/or construction projects in areas where the VRM classification has been changed will need to be mitigated to meet visual resource management guidelines (see Chapter 4, Environmental Consequences: Preferred Alternative: Energy and Minerals and Livestock-grazing). The impacts to mining, energy development, and grazing through implementation of Alternative B are summarized in the Executive Summary and detailed in Chapter 4, Environmental Consequences: Alternative B: Energy and Minerals and Livestock- grazing. These impacts would be identical to those detailed for Alternative A, the "no- action" alternative that continues current management practices. The proposed Comprehensive Management Plan/Environmental Impact Statement has been developed to establish objectives, policies, processes, and management actions needed to fulfill the preservation and public use goals for El Camino Real de Tierra Adentro NHT within the multi- use mission of the BLM. The potential for mineral development along the trail is described in Chapters 3, Existing Environment and 4, Environmental Consequences.

COMMENT 21c:

Support Alternative A or B. Alternative A attempts to balance all interests associated with the El Camino Real Trail. The preferred alternative considers only the interests of those who do not favor energy or mineral development in the area. Alternative B balances all interests along Camino Real trail, not just those of cultural resource specialists. Under these Alternatives (A and B), the auto tour route will be accessible to anyone in any type of vehicle unlike preferred alternative that develops Point of Rocks and other remote pull outs and visitor areas that would only be accessible by those few who drove high clearance vehicles without trailer. Preferred Alternative incurs significant administration costs and is designed to preclude mineral and oil/gas development, especially the sand and gravel operations that create good jobs and provide materials that benefit all New Mexicans.

RESPONSE:

Alternative A is the No Action alternative required to be considered in all environmental documentation. Alternative B proposes some resource protection actions that would limit or discourage public visitation and impact on high potential historic sites and route segments. Energy or mineral development would be affected along less than 2.5% of the length of the trail. The auto tour route follows paved all- weather roads and does not go through the Upham - Point of Rocks area. The proposed developments there would be accessible via the gravel county road which normally a sedan pulling a trailer could negotiate. The kiosks proposed at each end of the county road would describe the road surface and indicate when road conditions may be unsuitable for some classes of vehicles.

COMMENT 21d:

Because the majority of the trail passes through private lands, it appears that the integrity of the trail as the El Camino Real trail could easily be compromised because the NPS and BLM have management control over less than a third of trail length. The "Resource Protection" section refers to energy and mineral development as being an incompatible use, but mineral development and the preservation of historic and cultural resources have been in balance in the development of other historic sites. A very large portion of cultural/historic research and data collection is funded by mineral developers, in the state of Nevada and other development areas

RESPONSE:

Much cooperation will need to take place between the public and private sector to preserve and interpret the trail. The plan does not call energy and mineral development "incompatible" but does identify protection measures, including changes to the Visual Resource Management (VRM) classifications applied to several sections of the trail under federal management. These new classification assignments will require new, surface- disturbing projects in these sections to meet the VRM guidelines. These VRM classification changes are intended to protect the historic character of some landscapes crossed by the National Historic Trail.

COMMENT 21e:

Future development of Interstate 25 and several state highways along the El Camino Trail will require material from gravel pits and there is no consideration in the EIS for highway development.

RESPONSE:

The development of gravel pits is not precluded under any of the proposed alternatives presented in the plan. The single most abundant and valuable mineral resource along the trail cor-

ridor- aggregate- occurs along the entire length of the trail. Each new proposed activity on federally- managed land, including sand and gravel operations, will be reviewed on a case- by- case basis; additional VRM Class II restrictions will affect less than 2.5% of the length of the trail in New Mexico and are not expected to have any appreciable effect on access to sand and gravel resources for highway construction and development.

COMMENT 21f:

Certification: Protection of properties on private lands will be achieved through certification- - what does this term mean and what restrictions will be placed on private lands by certification?

RESPONSE:

National Historic Trails identify high- potential historic sites and segments. Those portions of the trail that are under federal ownership are recognized as official protection components of the NHT. Privately- owned high- potential historic sites and segments can also be recognized through the site certification process. The certification program is one of the most important ways in which federal administering agencies can foster partnerships with non- federal landowners throughout the trail corridor. Certification agreements are written and agreed upon by the private landowner and the Camino Real Administration Office to preserve, interpret, and provide for public access to high- potential historic sites and segments. The certification program is an entirely voluntary one; although property owners can benefit from the availability of challenge cost- share funds, agency expertise, and the increased awareness of their resources by the public, property owners are not obliged to enter into certification agreements. A sample certification agreement is in Appendix I. Text in Chapter 2, under the heading of Site Certification, has been amended to clarify the certification process and program.

COMMENT 21g:

The EIS does not address impact on air quality from fugitive emissions from increased visitor travel on dirt roads along trail corridor. The development of the preferred alternative will significantly increase fugitive emissions along the dirt road from the Upham exit to the proposed Point of Rocks Visitor Center and will increase the potential for soil erosion and sediment production, contrary to the "high- priority goals" identified under Existing Environment, Water/Air Quality. Have impacts to the air quality along the auto tour route been considered? What type of modeling has BLM used to examine these impacts? If visitation increases from 900 to 5,500 visits annually, what will be the impact from traffic fugitive emissions from dirt roads along the trail route? The document includes no consideration of erosion from trails and biking along the trail, and no discussion about the impact to ground water or surface water or noxious weed introduction due to increased use. The EIS says more detailed environmental analysis for specific trail projects will follow in appropriate environmental documents- - shouldn't that information be included here for each individual trail project proposed?

RESPONSE:

Although the Camino Real trail corridor crosses nine counties in Texas and New Mexico, travel along this corridor will occur primarily on existing, paved, all- weather roads, including Interstate 25, and a variety of smaller highways and roadways in both states. Trail- related travel along unpaved roads that parallel the trail, or that actually follow the trail itself will occur in Dona Ana and Sierra Counties, as visitors follow the trail through the Jornada del Muerto on county- maintained roads. While visitors will not be encouraged to take these roads, which are not part of the proposed auto tour route, vehicular travel along these unpaved roads may reach an estimated maximum of 5,500 visits (some 2,750 individual car trips) per year. Doña Ana

County, which has fewer than 15 miles of unpaved road that provides good access to the historic trail, has significant concerns about particulate air pollution as seasonal dust storms often bring the air close to or within air quality violations. Sierra County, which has about 40 miles of publicly- accessible, county- maintained gravel road paralleling the historic trail, does not have significant air quality concerns. Water quality concerns would primarily relate to erosion and sedimentation. Currently, the only water quality impaired streams identified by the New Mexico Environment Department (NMED) in the area are Caballo and Elephant Butte Reservoirs which have impaired warm water fishery uses. Probable causes include grazing, agriculture, atmospheric deposition and recreation and tourism activities other than boating.

Designation and development of the trail may result in increased vehicular traffic along unpaved, county maintained roads which could result in increased airborne PM₁₀ particulate matter (dust), especially during dry periods. Dust abatement measures will be developed for the roads if PM₁₀ particulate matter levels become problematic. The construction of pullout parking areas and hiking trails would remove vegetation and expose soils for a brief period of time, and so impact air and water quality for a brief time. These areas will be covered with gravel at the completion of the construction, and therefore will not contribute to long- term airborne PM₁₀ levels in the areas. Water quality issues may be addressed with pavement, drainage control practices, timely revegetation of disturbed areas, or other best management practices, as appropriate. Dust abatement measures will be developed for the unpaved county- maintained roads if PM₁₀ particulate matter levels become problematic.

The impacts of specific projects proposed for BLM publicly administered lands will be evaluated and addressed through Environmental Assessments (EAs) and Best Management Practices (BMPs) at the beginning of implementation for these projects. The project planning and EA/BMP development will consider and conform with existing agreements between BLM and appropriate state and county agencies for addressing non- point source water pollution issues, air quality, weed control efforts, and other natural resources, historic, and cultural resources. This response has been incorporated into the planning document in Chapters 3, Existing Environment, and 4, Environmental Consequences.

COMMENT 21h:

Public scoping for EIS began with notice of availability in Federal Register on October 18, 2002, and comment period comments are not reflected in this document.

RESPONSE:

Public scoping began with the Notice of Intent published in the Federal Register, May 18, 2001, Vol. 66, No. 97, page 27682- 27684. Published therein was notice of the times and locations of public meetings. A press release detailing the public meetings was also sent out to the news media in New Mexico and West Texas. The location of those meetings and additional public meetings are noted in Chapter 5, Table 13. Issues and concerns identified during the public scoping period in 2001 are reflected in the draft document and this document in Chapter 1, Purpose/Process/Issues. Comments received after the release of the draft document on October 18, 2002 are reflected in the final document. See especially Chapter 5, Consultation/Coordination, which includes comments on the draft received during the public comment period between October 18, 2002 and January 15, 2003 (as well as four comments received after January 15, 2003), as well as our responses to those comments.

COMMENT 21i:

No cost comparisons are given in "comparison of alternatives" - - what is impact to the taxpayer? "Acquisition or exchange by willing sellers where lands could be effectively managed" language in "Resource Protection" section of "Comparison of Alternatives" suggests BLM intends to acquire lands through purchase- - what would be the costs? No costs are identified with administering the trail; preferred alternative identifies a significant amount of administration- - what are the costs?

RESPONSE:

At present, Federal funding requests associated with El Camino Real are focussed on preservation, protection, interpretation, and education efforts for federally- managed trail components and resources and the development of partnerships with non- federal resource owners and managers to effect preservation, protection, interpretation, and education programs for non- federally- managed trail components. No funding requests are anticipated for land acquisition or purchase at this time, and no costs for land acquisition can be identified at present. Administration costs for El Camino Real de Tierra Adentro are addressed in Chapter 2, Alternatives: Preferred Alternative: Description: Preferred Alternative: Administration: Annual Operating Costs. Based on 2002 dollars, the estimated annual operating costs, at fully operational levels, would be approximately \$475,000. These funds would provide for co- administrators from NPS and BLM, as well as administrative support and interdisciplinary support, including interpretation and resource management. This budget would support the certification program, cooperative agreements, technical assistance, partner support, travel, Challenge Cost- Share projects, and special projects such as mapping and media production. Trail marking, brochure development and printing, newsletters, and other publication materials would also be supported. The Camino Real Administration is not expected to reach fully operational levels for a number of years and Camino Real Administration budgets for any given year will be subject to the same funding constraints that impact every Federal program.

COMMENT 21j:

The plan has no discussion of resources values of the energy and minerals in the area. Document states "Restrictions on lease development could result in an operation not drilling at the most geologically desirable location or time period." This statement suggests the planners do not understand the development of mineral resources: there is no reason to drill in areas that are less than geologically favorable. In addition, this statement seems designed to preclude any geologic investigations. Reductions in mineral material activity along Camino Real within the new VRM Class II designations does a disservice to the mining heritage of the area- - the El Camino Real trail brought miners and prospectors to the area and that heritage will be minimized or eliminated from Camino Real under these management practices. What type of mineral resources will be unavailable and what is their cost? What is the economic impact of reclassifying 60,000 acres to VRM Class II? The document has no discussion of the loss of royalties to BLM from mineral resource management; no discussion concerning loss of mineral tax base- - mineral resource extraction would produce better paying jobs in the area than hospitality- based.

RESPONSE:

Existing mineral resources activities on federally- managed lands near the projects proposed in this document are detailed in Chapter 3, Table II. As the table indicates, only 4 mineral operations, 3 of which are aggregate operations, are located near the proposed turnouts, short interpretive trails, and wayside exhibit features described in Chapter 2 under Preferred Alternative: Visitor Experience: Recreation. Most of the active operations, which are primarily aggregate

operations, are concentrated in the urban areas of El Paso, Las Cruces, Albuquerque, and Santa Fe (see Table 10 for a complete listing of current Federal mineral resource activities in the counties through which El Camino NHT runs). Only 1 of 66 active mining claims (1.5%) and only 3 of 15 active aggregate operations in Doña Ana and Sierra Counties fall within the proposed VRM II classification area. Forty-eight deposits of sand, gravel, cinder, scoria, and stone are currently being worked in the trail corridor (on federally-managed lands and on other lands). Most of these aggregate operations are much closer to urban areas, between El Paso, Texas, and Las Cruces, New Mexico, and between Belen, New Mexico, and Santa Fe, New Mexico. Surface disturbing operations authorized under an existing Federal material sale contract, mineral lease, and the surface management regulations under the Mining Law would be allowed to continue under the terms and conditions of the authorizing instrument. Operations on an existing contract, lease, or mining claim causing new surface disturbance within the proposed VRM Class II area would be subject to the VRM objectives. VRM Class II objectives may require alternation of new Federal mineral development activities but would not necessarily preclude such activities. Changing a VRM classification is not a withdrawal of lands from mineral development, so such an action would not preclude geologic investigations.

COMMENT 21k:

What is the impact of designation of VRM Class II on private lands or existing rights? What is the economic impact of re-classifying 60,000 acres to VRM Class II? How will conversion of lands from VRM Class III and Class IV to Class II impact private land holdings and development on private lands in the area?

RESPONSE:

Amending the White Sands, Mimbres, and Taos Resource Management Plan (RMP) Visual Resource Management (VRM) classifications will result in an increase of 99,774 federally-managed acres in VRM Class II. The areas proposed for re-classification consist of approximately 8.5 linear miles of trail corridor, or slightly under 2.5% of the total length of the route of El Camino Real within New Mexico. Because there is such a high level of uncertainty as to what economic effect, if any, adoption of the preferred alternative and consequent changes in VRM classification will have on mineral development or other economic activities on these federally-managed lands, no meaningful economic analysis is possible. The VRM classes and their objectives are described in Appendix H. Class II management objectives are to retain the existing character of the landscape by keeping the level of change to the landscape low. Management activities (including resource extraction or range improvements, for example) may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape. With regard to "existing rights," operations on an existing grazing allotment, contract, lease, or mining claim causing new surface disturbance within the proposed Class II area would be subject to the VRM objectives. Operations that do not cause new surface disturbance would continue as before.

Visual Resource Management classifications apply only to federally-managed lands. None of the three alternatives would impose restrictions on private land development nor would private landowners be precluded from developing their land as authorized under local development codes.

COMMENT 21i:

Auto tour route: Visitors reading the travel condition advisory planned for the Upham exit pullout will be advised that travel on the county road is not recommended for trailers over 15 feet, motor homes, or low-clearance vehicles, therefore visitors are limited to those who will be traveling in four-wheel drive pickup trucks. It appears from this description that the trail is being developed for "special interests" and not the general public, because the average visitor will be traveling by car (a low clearance vehicle), in a motor home, or will be towing a travel trailer; the development of the auto tour route described in Alternative B would give most benefit to the common visitor.

RESPONSE:

The auto tour route follows paved all-weather roads. In the Upham location it follows Interstate - 25. The kiosk and travel information at Upham would warn those venturing off the auto tour route of the conditions of the county gravel road. Usually this road could be followed to the proposed interpretive sites in cars and low clearance vehicles. The warnings would be appropriate for wet weather travel on the road.

COMMENT 21m:

In "Relationship to Legislation/BLM and NPS Policies...", need to add mineral resources to discussion of management plans for various resources and programs

RESPONSE:

The plan integrates continuing management guidance for the management of public lands and resources as directed by federal laws, regulations, policy and guidelines, Executive Orders, and planning documents developed to focus on specific areas, resources, or uses, including mineral resources.

COMMENT 22a:

The Camino Real is important and NHT designation is appropriate.

RESPONSE:

Noted.

COMMENT 22b:

The proposed auto tour route in the La Cieneguilla and La Cienega areas is not advisable due to narrow, winding roads and because the current local traffic already exceeds the optimal level of service; increased traffic would exacerbate the safety of all motorists in these traditional communities. Signage and interpretive materials along I-25 and the frontage road in this area will provide more appropriate opportunities for explaining the history and significance of the traditional communities and how they were founded and evolved as a result of the Camino Real de Tierra Adentro. Also, increased visitation through promotion of the tour route and increased signage may lead to increased vandalism of rich archaeological sites in this area, which contains a wealth of petroglyphs. The presence of both federal land and identified petroglyphs have raised problems with trespass and vandalism already.

RESPONSE:

The auto tour route has been re-routed to the Interstate - 25 frontage road via NM 599 in the vicinity of La Cieneguilla and La Cienega to meet these concerns.

COMMENT 22c:

The Visual Resource Management (VRM) boundary in La Cieneguilla encloses private lands within the area of proposed restricted actions to preserve viewsheds. Private lands should not be included within the boundaries; the boundary as drawn suggests that private landowners will be precluded from developing their land as authorized under local development codes.

RESPONSE:

Visual Resource Management classifications apply only to federally- managed lands. None of the three alternatives would impose restrictions on private land development nor would private landowners be precluded from developing their land as authorized under local development codes. Map 5, Public Lands in the Santa Fe River Canyon Proposed for VRM Class II (Preferred Alternative) shows the proposed VRM Class II boundary as an irregular, relatively narrow polygon confined within the Santa Fe River canyon from just east of the community of La Bajada to just west of Cieneguilla. Private lands which fall within this polygon, but which are not affected by the VRM classifications applied to BLM- managed lands, are shown in light shading and BLM- managed lands are shown with a darker shading (Section 30, for example, is primarily private land; Section 31, immediately to the south, is primarily BLM- managed land).

COMMENT 23a:

Support the preferred alternative. The document is well organized and provides the information needed to comment on the proposed plan and the alternatives. The preferred alternative provides the educational opportunities to the public to learn about the El Camino Real. Yet, the plan still provides the necessary management to protect this valuable national resource.

RESPONSE:

Noted.

COMMENT 23b:

In the summer of 1996, I conducted a revisit survey of the El Camino between Upham and Aleman as part of the environmental studies for the proposed Southwest Regional Spaceport. The survey resulted in correcting the location of a crossing that was incorrectly plotted on the USGS map. The presence of earthen ramps and cut banks confirmed the correct location. We were able to follow the trail since it was clearly marked except for where it crossed low grassy flat areas. The report is titled Southwest Regional Spaceport: Archaeological Survey of the Proposed Upham Area Site, Human Systems Research, Inc. Staff, 1997, Human Systems Research Report Nos. 9510 and 9517. Maps and updated site forms are presented in the Appendix volumes

RESPONSE:

Thank you. This is an excellent resource and will be added to our bibliography. We also note that Mike Marshall recorded the same feature in his 1991 survey.

COMMENT 24:

Supports Alternative B, with option to rebuild AT&SF RR station at Engle as a monument to Railroaders and ranches who later used the Camino Real.

RESPONSE:

Noted; your suggestion has been added to our file of future implementation plans.

COMMENT 25:

Supports Alternative B.

RESPONSE:

Noted.

COMMENT 26:

El Alamo in wrong location on Map 3G; also Santa Fe County Road 56 mislabeled as 285 84.

RESPONSE:

Corrections have been made to Map 3G.

COMMENT 27a:

Trail route is from Vera Cruz, Mexico to Taos, NM ending in 3 places there.

RESPONSE:

The question of whether the trail continued to Taos or not was first raised during the feasibility study conducted in 1995- 1997. After public input and consideration of those comments, it was decided that the definition that a Camino Real went from Spanish capital to Spanish capital was the most correct for purposes of the National Historic Trail. This definition is supported by research conducted in numerous archives in New Mexico, Mexico. There has been no first-hand or primary evidence that has surfaced to date to indicate differently.

The definition and routing of El Camino Real de Tierra Adentro National Historic Trail were set in the National Historic Trail Feasibility Study for El Camino Real de Tierra Adentro, completed by a study team of the National Park Service in 1997 (National Park Service, National Historic Trail Feasibility Study/Environmental Assessment, El Camino Real de Tierra Adentro. U.S. Department of the Interior, National Park Service, March 1997. On file at the National Trails System Office - Santa Fe). Legislation (Appendix A) establishing El Camino Real de Tierra Adentro as a National Historic Trail in Section 3, paragraph 2 (A) states the limits of the trail as running from the Rio Grande near El Paso, Texas to San Juan Pueblo, New Mexico as generally depicted on the maps in the 1997 feasibility study.

While the period of significance as recognized by the legislation establishing El Camino Real NHT is 1598- 1882, there is nothing to preclude interpretation of the Camino Real both before and after that period.

COMMENT 27b:

Definition of "Camino Real" as used in the document is incorrect. Who determined definition?

RESPONSE:

The definition and routing of El Camino Real de Tierra Adentro National Historic Trail were set in the National Historic Trail Feasibility Study for El Camino Real de Tierra Adentro, completed by a study team of the National Park Service in 1997 (National Park Service, National Historic Trail Feasibility Study/Environmental Assessment, El Camino Real de Tierra Adentro. U.S. Department of the Interior, National Park Service, March 1997. On file at the National Trails System Office - Santa Fe). Legislation (Appendix A) establishing El Camino Real de Tierra Adentro as a National Historic Trail in Section 3, paragraph 2 (A) states the limits of the

trail as running from the Rio Grande near El Paso, Texas to San Juan Pueblo, New Mexico as generally depicted on the maps in the 1997 feasibility study.

While the period of significance as recognized by the legislation establishing El Camino Real NHT is 1598- 1882, there is nothing to preclude interpretation of the Camino Real both before and after that period.

COMMENT 27c:

Suggests locations for Interpretive centers in Mexico and the U.S.

RESPONSE:

Noted.

COMMENT 27d:

Install vandal- proof signs and markers.

RESPONSE:

Noted; this suggestion will be retained in our files for reference as interpretive plans and signing plans are implemented.

COMMENT 27e:

The definition of Trail Significance of 1598- 1882 is arbitrary and should be expanded.

RESPONSE:

The definition and routing of El Camino Real de Tierra Adentro National Historic Trail were set in the National Historic Trail Feasibility Study for El Camino Real de Tierra Adentro, completed by a study team of the National Park Service in 1997 (National Park Service, National Historic Trail Feasibility Study/Environmental Assessment, El Camino Real de Tierra Adentro. U.S. Department of the Interior, National Park Service, March 1997. On file at the National Trails System Office - Santa Fe). Legislation (Appendix A) establishing El Camino Real de Tierra Adentro as a National Historic Trail in Section 3, paragraph 2 (A) states the limits of the trail as running from the Rio Grande near El Paso, Texas to San Juan Pueblo, New Mexico as generally depicted on the maps in the 1997 feasibility study.

While the period of significance as recognized by the legislation establishing El Camino Real NHT is 1598- 1882, there is nothing to preclude interpretation of the Camino Real both before and after that period.

The historic research conducted by the Spanish Colonial Research Center and others points to the period of 1598- 1882 as the most significant for the trail. The date starts with Oñate's blazing the Camino Real through El Paso del Norte into New Mexico and ends with the completion of the railroad along the trail corridor. Earlier Indian trade routes did not follow exactly the Camino Real and the railroad changed the character of travel along the trail.

COMMENT 27f:

Why does plan only include Chihuahua in Mexico?

RESPONSE:

See Chapter 3, Existing Environment, State of Chihuahua, Mexico. The National Historic Trail ends at the U. S. - Mexico border. The discussion of Chihuahua was included because it is the closest Mexican state that may be impacted by trail actions in the U. S.

COMMENT 27g:

Why is the Oñate Center in Alcalde, NM not included in the plan.

RESPONSE:

The Oñate Center is mentioned on page 86 and has the potential for certification as an interpretive site if they wish to participate.

COMMENT 27h :

Why has only one International Heritage Center been planned, not more?

RESPONSE:

The planning for the International Heritage Center predates the designation of the National Historic Trail. It is a separate but closely related project between the Bureau of Land Management and New Mexico State Monuments. The preferred alternative as discussed on page 37 under Interpretation/Education proposes support for development of new facilities such as visitor center or museums by the private sector. This plan does not propose any new facilities. Instead, this plan calls for support and strengthening of existing programs.

COMMENT 27i:

Hold monthly meetings within communities to inform all publics.

RESPONSE:

Noted. This suggestion has been added to our files for reference during the development of implementation plans.

COMMENT 27j:

Can private for- profit organizations become involved?

RESPONSE:

Yes, for- profit organizations can become involved.

COMMENT 27k:

Why are BLM & NPS involved in time of down- sizing?

RESPONSE:

Legislation (P.L. 106- 307, Appendix A) established El Camino Real de Tierra Adentro as a National Historic Trail. The Secretary of Interior (See Appendix C) directed the Bureau of Land Management and the National Park Service to plan for and administer the trail.

COMMENT 27i:

Not enough emphasis is placed on the positive economic aspects of the historic trail corridor.

RESPONSE:

Although National Historic Trail designation has raised visitation to particular trails, the economic benefits of trail designation have yet to be quantified either in general, or for individual trails. As described in Chapter 4, Environmental Consequences/Preferred Alternative/Socio-economics/Social Values/Environmental Justice, El Camino Real NHT can expect some increases in visitation as a result of the greater public awareness of this trail following designation. Increases in visitation are closely tied to the quality of public awareness and promotional programs; special events are particularly effective in raising awareness and visitation. Because these effects have not been quantified for other trails, however, and no good models exist for quantifying these effects for the Camino Real, the economic benefits that may accompany adoption of the Preferred Alternative or Alternative B cannot be estimated with any exactitude at this time.

COMMENT 27m:

Why is there emphasis on the BLM Taos Field Office if the trail (NHT) does not cross Taos County?

RESPONSE:

The BLM Taos Field Office covers Santa Fe and Rio Arriba counties. Each of these counties contain Trail resources.

COMMENT 27n:

Why isn't there an emphasis placed on Camino Real northern arterials?

RESPONSE:

The National Historic Trail as defined herein and designated in the enabling legislation ends at San Juan Pueblo.

COMMENT 27o:

Why isn't there greater participation by Pueblo peoples?

RESPONSE:

A concerted effort has been made to meet with and involve tribal people in this planning process and the National Historic Trail. Several tribes have met with us and expressed interest and we will work with them and others who wish to participate now, or in the future.

COMMENT 27p:

What is the anticipated timeframe for the management plan?

RESPONSE:

Management plans typically guide management for 15 to 20 years.

COMMENT 27q :

How many staff and how much money is budgeted to date?

RESPONSE:

This is a difficult question because a number of agencies, offices, and personnel have worked on the plan and various aspects of the Camino Real over a period exceeding ten years. The preparation plan/project agreement for this planning effort identified a total cost of \$1,014,000 to complete the trail CMP/EIS. It is anticipated that the final cost will be below this figure.

COMMENT 27r:

Where in the management plan is there a priority schedule?

RESPONSE:

Implementation schedules are typically identified in yearly work plans. Priorities will also depend very much on partners as they wish to develop their trail resources.

COMMENT 27s:

Give credit and source for photos and illustrations.

RESPONSE:

Sources for photos and the historic illustrations are on file and available from the Camino Real Administration Office.

COMMENT 27t:

Is there a detailed budget plan?

RESPONSE:

Implementation schedules are typically identified in yearly work plans. Priorities will also depend very much on partners as they wish to develop their trail resources.

The budget estimate of \$475,000 noted in Chapter 2, Description: Preferred Alternative supposes full funding at an optimal operation. Once funded at a base level, budgets will be formulated each year in conjunction with the work plan.

COMMENT 27u:

Include in the glossary, Camino, Camino Real, pueblo, swale, trace, alignment, corridor, Bosque, carreta, SHPO, etc.?

RESPONSE:

These definitions have been added to the glossary.

COMMENT 27v:

The Bibliography is incomplete.

RESPONSE:

The title of the Bibliography has been changed to "Selected Bibliography" to more accurately reflect its contents. A forty- page bibliography is on file in the Camino Real Administration office and will be added to the website, elcaminoreal.org

COMMENT 27w:

Why were interested private groups left out of the planning process?

RESPONSE:

No one was intentionally left out of the process. A Notice of Intent advising the public of the development of the draft management plan and environmental impact statement was published in the Federal Register, May 18, 2001, Vol. 66, No. 97, page 27682- 27684. Published therein was notice of the times and locations of public scoping meetings. Press releases detailing the schedule for public scoping meetings were also sent out to the news media in New Mexico and West Texas; the news media was also notified of additional meetings (see Chapter 5, Table 13 for a complete list). In addition to the public notification process, the Camino Real planning team also developed a mailing list with over 1300 names which was used to invite public participation and to distribute a newsletter and other mailings regarding the planning process. The public meeting schedule was also posted on our website, elcaminoreal.org. We regret that you did not see any of the public notices or news media publicity on the public meetings.

COMMENT 27x:

What are the clearly defined roles of the NPS and BLM as separate entities?

RESPONSE:

Since the BLM and the NPS are directed to jointly manage the trail, there are no separate roles for each agency. We are committed to joint administration of the trail.

COMMENT 27y:

Can the management plan be modified and can there be changes in content and form?

RESPONSE:

If the management plan were to be changed or modified in any significant way, another round of public involvement meetings and planning process would have to take place. However the plan is general enough to accommodate minor changes.

COMMENT 27z:

Because of the various jurisdictions isn't management of the trail rather complex, and are overlapping jurisdictions a problem?

RESPONSE:

Trail sites, segments, and other trail lands and programs will continue to be managed by the present managers. This plan proposes that the Camino Real Administration Office would administer the Trail Program, not manage the trail per se.

COMMENT 27aa:

Why isn't the Embudo La Raza Center, Historian Estevan Arellano, and the newspaper "El Camiante" not involved in the CMP?

RESPONSE:

These entities can choose to participate in the plan at any time. Mr. Arellano hosted a session and tour in the Camino Real Colloquium in October of 2002.

COMMENT 27bb:

Why are there no references to the book "La Vereda" or to the two books on the Old Spanish Trail by Ron Kessler?

RESPONSE:

The title of the Bibliography has been changed to "Selected Bibliography" to more accurately reflect its contents. A forty page bibliography is on file in the Camino Real Administration office and will be added to the website, elcaminoreal.org

The bibliography is only a selected bibliography and even the expanded bibliography only contains material that is primarily concerned with El Camino Real de Tierra Adentro.

COMMENT 27cc:

Why are the alternate branches from Santa Fe to San Juan Pueblo not described or shown on maps?

RESPONSE:

Although there were later variations of routes from Santa Fe to San Juan Pueblo (location of San Gabriel the Spanish capital), the route that existed from 1598 to 1609 when the capital was moved to Santa Fe, is the one shown on the maps. Once the capital moved to Santa Fe, the route to San Gabriel, no longer a Spanish capital, ceased to be a "Camino Real."

COMMENT 27dd:

Three different kinds of Auto Tour Routes needed. (1) Modern federal and State highways that parallel the historic trail. (2) State and local county roads that lie directly on top of or parallel the historic trail. (3) Remote sections of road on federal, state, and private lands that lie atop the actual trail.

RESPONSE:

See Chapter 2, Description: Preferred Alternative: Auto tour route. The auto tour route will be developed to "promote the trail, and to provide a 'user- friendly' avenue for visitors to find trail- related resources. This activity will occur on all- weather roads for two- wheel drive use year- round." The idea is to provide an introduction to trail resources, not auto access to all trail resources.

COMMENT 27ee:

Why are the grid lines on the Route maps crooked?:

RESPONSE:

The "grid lines" on the route maps accurately reflect the surveyed section boundaries.

COMMENT 27ff:

The Trail Logo is too small.

RESPONSE:

Noted.

COMMENT 28:

A resolution passed by El Camino Real International Heritage Center Foundation Board requests that the National Park Service/Bureau of Land management (NPS/BLM) draft management plan for the trail designate the El Camino Real International Heritage Center as the Official Center for the interpretation and enhancement of El Camino Real National Historic Trail. Full text of resolution on file, National Park Service El Camino Real National Historic Trail files.

RESPONSE:

El Camino Real International Heritage Center is being developed through a partnership between the New Mexico Bureau of Land Management and the New Mexico State Monuments Division of the Museum of New Mexico. The Center is recognized in this document as a focal point for providing visitor services, especially interpretation of trail-related themes and educational programs related to interpretive themes. El Camino Real de Tierra Adentro was added to the National Trails System by P.L. 106-307 on October 13, 2000. The enabling legislation directs the BLM and the NPS to administer the national historic trail (NHT) according to the intent of Congress as expressed in the establishing legislation. The Center, while a major project for the BLM in partnership with the state of New Mexico, is not specifically mentioned in the legislation that added El Camino Real de Tierra Adentro to the National Trails System, and it is beyond the scope of this document to name the Center an "Official Center." The complementary missions of the NHT and the Center will ensure that these two elements of the federal involvement in Camino Real will have a close working relationship.

COMMENT 29a:

Although the CMP/EIS indicates public meetings were held, no one had seen notice of these meetings. Please review notification process.

RESPONSE:

A Notice of Intent advising the public of the development of the draft management plan and environmental impact statement was published in the Federal Register, May 18, 2001, Vol. 66, No. 97, page 27682-27684. Published therein was notice of the times and locations of public scoping meetings. Press releases detailing the schedule for public scoping meetings were also sent out to the news media in New Mexico and West Texas; the news media was also notified of additional meetings (see Chapter 5, Table 13 for a complete list). In addition to the public

notification process, the Camino Real planning team also developed a mailing list with over 1300 names which was used to invite public participation and to distribute a newsletter and other mailings regarding the planning process. The public meeting schedule was also posted on our website, elcaminoreal.org. We regret that you did not see any of the public notices or news media publicity on the public meetings.

COMMENT 29b:

No benefit in preserving the entire length of trail; to do so would lock up a significant amount of aggregate resources that are concentrated along the Rio Grande valley.

RESPONSE:

While the goal of the National Historic trail is to preserve, interpret, and provide for public access to the significant Camino Real resources, in reality that will be accomplished by cooperation with the private sector and many landowners. The trail proposal restricts no use on private lands and only affects extraction of aggregate resources on a small percentage of public lands.

Only about 25% of the trail falls on lands managed by federal agencies, including the BLM, the U.S. Fish and Wildlife Service, the U.S. Forest Service, and the U.S. Army Corps of Engineers, and most of these lands are far from the urban corridors between El Paso and Las Cruces and Belen and Albuquerque, where aggregate operations are currently concentrated. The BLM management will be guided in part by visual resource management objectives (VRM classifications) and by other continuing management guidance as described in this document; other federal lands will be managed in accordance with the guidelines established by the individual agencies. Furthermore, the proposed management plan affects potential aggregate resource operations adversely only on BLM- managed lands and only in those two areas where VRM classifications will change- some 8 miles along the trail in the Jornada del Muerto, where aggregate operations are relatively rare, and less than a mile along the Santa Fe River Canyon near the small community of La Cieneguilla, where no aggregate operations are currently working. The remaining three- quarters of the trail, around 300 miles, crosses private lands, Indian lands, or state lands; no changes in aggregate operations will be effected on these lands as a result of this management plan. Preserving and protecting trail resources along the majority of the trail will be pursued through partnerships and cooperative agreements with non- federal landowners and managers.

COMMENT 29c:

This proposal would lock up and eliminate use of significant amount of natural resources, used to build the infrastructure of the state. This is unjustified as proposed.

RESPONSE:

None of the identified alternatives would eliminate the extraction or use of natural resources used to build the infrastructure of the state. The proposed changes in VRM classification do not constitute a withdrawal from mineral development activities, so this would not "lock up" mineral resources. VRM Class II objectives may require alteration of new Federal mineral development activities but would not necessarily preclude such activities. This VRM classification is limited to fewer than 10 linear miles of the trail corridor, or less than 2.5% of its length. The classification should have little effect on the single most abundant, and valuable, mineral resource along the corridor- aggregate- that occurs along its entire length.

COMMENT 29d:

A large portion of the proposed trail is in private or Indian ownership. It is unlikely a majority of landowners would want to give or sell portions of their land for this purpose.

RESPONSE:

Private landowners and Indian tribes would have the opportunity to enter into certification agreements with the Camino Real Administration Office. This voluntary program provides the opportunity to preserve and share important Camino Real historic resources while retaining full ownership.

COMMENT 29e:

On page 4, trail mileages total 653 miles, while on page 3, Camino Real length is given as 404; these differences not explained until table 1, pg. 48.

RESPONSE:

Text clarifying trail mileage has been added to the planning document. It reads "Trail mileage totals 654.5 miles. This includes the 404 mile length of the trail, and variant or alternate routes that parallel other trail segments."

COMMENT 29f:

Chapter 1, pg. 10: Planning Criteria: Include "concerns of those involved in mining activities or potential mining activities" in enumerating Planning Criteria.

RESPONSE:

Concerns of those involved in mining activities or potential mining activities are addressed in the sixth planning criterion identified in Chapter 1: "Development and management of each segment of the National Trails System shall be designed to harmonize with and complement any established multiple-use plans for the specific area, in order to ensure continued maximum benefits from the land (Section 7 (a) (2)), [National Trails System Act, Appendix B.]"

COMMENT 29g:

Chapter 1, pg. 10- 11: With all other planning efforts underway related to Camino Real, we object to another effort and duplicate efforts.

RESPONSE:

The planning efforts described are a variety of public and private ventures showing the popularity of celebrating the Camino Real in one manner or another. The National Historic Trail designation will assist in coordinating and providing information on but not duplicating these various activities.

COMMENT 29h:

Chapter 1, pg. 17: Certification should be better explained, why would a landowner wish to do. Who would pay for certification what rules or regulations are used and who does the certification?

RESPONSE:

Many landowners are proud of and willing to preserve and share their qualifying Camino Real properties with the public. A certification agreement allows a wide variety of technical information to be shared with the certified property owner, allows the eligibility of challenge-cost share funding for projects on the certified property, and provides for a strong dialog between the landowner and the Camino Real Administration. Responsibility for costs associated with certification will be agreed upon during the certification process.

COMMENT 29i:

Chapter 3, Existing Environment: Geology, page 78: The Rio Grande valley is normally referred to as a rift valley, not a basin and range province.

RESPONSE:

The first paragraph of the Geology section has been amended to read: "The entire length of El Camino Real in New Mexico lies within the Rio Grande Rift. The Rio Grande Valley is the surface expression of the rift. The Rio Grande Rift zone lies within the larger physiographic feature known as the Basin and Range Province, bounded on the west by the Colorado Plateau, on the east by the Great Plains, and on the north by the Southern Rocky Mountains. The province occupies the southwestern and central parts of the state, extending northward to Taos County. The Province is over 200 miles wide in the south, narrowing northward to several miles wide in Taos County. It includes fault block mountains and plateaus; volcanoes and lava flows; and broad, flat alluvial plains. The Rio Grande Rift, a series of north-south parallel faults, occupies the western part of the province." More specific information regarding energy and mineral resources is detailed in Chapter 3, Existing Environment: Resource Uses: Energy/Minerals.

COMMENT 29j:

Discussion of potential economic deposits in Chapter 3, pg. 89- 90 (Existing Environment: Resource Uses: Energy/Minerals) indicates significant number of mining/mineral operations within project area. These types of activities cannot be relocated.

RESPONSE:

The discussion in Chapter 3 includes all known mineral operations along the entire 400-mile long, 10-mile wide corridor considered in this analysis. Some forty-eight (48) deposits of sand, gravel, cinder, scoria, or stone are currently being worked along the corridor. Considering the large area involved, this level of activity probably cannot be considered to be a large, or significant number of operations. Most of the active operations (primarily aggregate operations) are concentrated in the vicinity of El Paso, Las Cruces, Albuquerque, and Santa Fe. Outside these urban areas, there are only a few active mineral operations in the trail corridor.

COMMENT 29k:

The third paragraph, Chapter 4, page 103- 104 states "Restrictions on lease development could result in an operator not drilling at the most geologically desirable location..." In the exploration for energy and mineral resources the point is to drill in "the most geologically desirable location." If you are not allowed to do that then there is no point in conducting the drilling. One cannot pick and choose where energy and mineral resources are located. They are where they are, and they cannot be moved. This implies that the intent is to preclude all drilling activities within the VRM Class II areas.

RESPONSE:

Chapter 4 details the environmental consequences of adopting one of the proposed alternatives. Under the Preferred Alternative, some BLM- managed lands would be reclassified from VRM Class III or IV to VRM Class II. VRM Class II objectives may require alteration of new Federal mineral development activities but would not necessarily preclude such activities. In certain cases, a drill rig may be positioned to minimize its impact on the viewshed; instead of drilling directly down, the drill may be angled to intersect the deposit of interest. The goal of such a practice would be to hide the drill rig behind some feature so it is not visible from the trail. While this may not be feasible in all cases, these are the kind of options that would be explored in sections of the trail with restrictive Visual Resource Management classifications.

Amending the White Sands, Mimbres, and Taos Resource Management Plan (RMP) Visual Resource Management (VRM) classifications will result in an increase of 99,774 federally-managed acres in VRM Class II. The areas proposed for re- classification consist of approximately 8.5 linear miles of trail corridor, or slightly under 2.5% of the total length of the route of El Camino Real within New Mexico. The VRM classes and their objectives are described in Appendix H. Class II management objectives are to retain the existing character of the landscape by keeping the level of change to the landscape low. Management activities (including resource extraction or range improvements, for example) may be seen, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

COMMENT 29I:

Mineral materials qualities are specified by market; expense is determined in part by hauling distance. Increased costs, through increased hauling expense, will be passed along to the consumer.

RESPONSE:

Comment is an information statement or opinion; no response needed.

COMMENT 29m:

Chapter 4, pg. 107: Give justification for claim that expenditure of \$535,000 per year for administration and implementation activities will generate a net benefit of \$1.19 million dollars and 36 jobs per year. There should be a discussion of what contributes to "net benefit."

RESPONSE:

Net economic benefits, which are the net new jobs created, combined new sales generated, and total increased income and sales tax revenue generated by implementation of the Preferred Alternative, were calculated using the NPS- developed "Money Generation Model" which is available on the NPS website. The model is useful in that it can quickly estimate the economic consequences of planning alternatives using area- specific baseline data and tailored assumptions on the input parameters. Baseline economic activity data were provided by the Sonoran Institute in association with the Bureau of Land Management in its 2002 publication "Economic Profile System" which provides a variety of latest available economic activity data for use in producing custom socioeconomic profiles for the United States in a consistent format for all geographic areas. Other locally variable input data such as average length of stay for tourists, average daily tourist expenditures, state and local tax rates, and percent of non- local use were developed from publicly- available state and county economic and tourist data, and interviews with recreation and tourism officials.

The basic rationale for the economic model is that a certain input in terms of new money spent, new numbers of tourists attending a park, and other inputs have a multiplier effect on the local economy as those inputs directly and indirectly propagate through the local economy inducing subsequent economic activity to both serve the visitors, and to provide products and services to the local community supporting the increased park or recreation activity.

COMMENT 29n:

Chapter 4, pg. 107, 4th paragraph: Visitation question has not been fully analyzed and needs work to be of any value.

RESPONSE:

The visitation discussion is based on an estimate, which is based in turn on the general experiences other designated national historic trails. Because there is no single way to quantify visitation, which can include visiting any one of a trail's certified sites, or driving the auto tour route, or some combination of these visitation strategies, visitation estimates are still not available for trails that have been in operation for over ten years.

COMMENT 29o:

Chapter 4, pg. 107, 5th paragraph: Types of jobs to be generated by this proposal are minimum wage at best and are a meager contribution to the economic improvement of any area; would not "enhance the economic stability of communities in the ESA"; 36 jobs would be scattered among a number of counties, so any contribution to a specific county would be unnoticeable. We are only talking about a few low-paying jobs here; these will not help these areas avoid "future social costs from continued economic problems."

RESPONSE:

This comment cannot be definitively responded to since it states an opinion. It is true that the total number of jobs to be created in the overall labor market is relatively small, and that most of them will probably be lower paying service industry jobs. However, in discussions with local leaders during preparation of the analysis, they stressed that such jobs were important in that they provide entry-level employment opportunities for persons, particularly in rural areas with very limited job markets that they would not otherwise have. Thus, the new jobs would in fact contribute to a small but measurable degree to economic stability of the communities (again, this effect would be most pronounced in the smaller job markets) and avoidance of future social costs by providing employment opportunities where they are badly needed. The text in paragraph 5 is clear on that point.

COMMENT 29p:

The discussion in Chapter 4, pg. 116: "Unavoidable Adverse Impacts" fails to include loss of potential natural resources due to their removal from access on public lands and the potential economic benefit derived therefrom.

RESPONSE:

The impact of the Preferred Alternative on Energy and Minerals resources is discussed in Chapter 3, Existing Environment: Resource Uses: Energy/Minerals and Chapter 4, Environmental Consequences: Preferred Alternative: Energy and Minerals. Potential economic deposits of sand and gravel, cinder, scoria, and stone occur throughout the trail corridor. Mining of a particular deposit depends upon its proximity to a viable market, usually an urban

area or a highway construction project. Forty- eight of these deposits are currently being mined. Other minerals currently being extracted along the corridor include gypsum, perlite, and pumice. There is no current, active mining of hardrock and related minerals within the corridor. This plan proposes no withdrawals and no mining operations are precluded.

COMMENT 29q:

Prefer Alternative A.

RESPONSE:

Noted.

COMMENT 30a:

Agua Fria Village Association has been instrumental in protecting the Camino Real historic route as it passes through Agua Fria Village in a number of ways, including discouraging "improvement" projects by the New Mexico State Highway and Transportation Department in the early 1990s; petitioning for transfer of jurisdiction of the length of the trail through the village and its outlying lands (approximately four miles along Agua Fria Road, previously Highway 599, and now County Route 66); working with Santa Fe County to install safety devices (stop signs) and complete a drainage, pavement, and sewer project through the villages while preserving the traditional narrow width of the historic route and improving pedestrian facilities along the route. The Agua Fria Village Association consider that preservation and improvement of adequate pedestrian access, compliant with Americans with Disabilities Act (ADA) requirements, was crucial to maintaining the trail's historic pre- combustion- engine- era use and function for generations to come. In addition, the Association is working with other groups to protect and improve the environment of the Santa Fe River throughout the village and to establish walking trails along sections of the river, including Santa Fe River Park at San Isidro Crossing, where the original cold springs were located and where the community well exists today.

RESPONSE:

The Agua Fria Village Association is to be commended for its efforts in protecting the historic Camino Real. We look forward to working with you in the future.

COMMENT 30b:

Several sites within the Village of Agua Fria are known to be of historic, archaeological or traditional cultural importance, including the Wofford residence, east of Agua Fria School, and the Bruce Cooper House, on the Camino del Alamo branch of Camino Real approximately one block from the Lopez Lane/Agua Fria intersection. This latter property is currently for sale and might well serve as an interpretive or study center. See attached report by Jane Whitmore.

RESPONSE:

The report by Jane Whitmore, The Traditional Village of Agua Fria, dated May 12, 1983 is on file in the Camino Real Administration Office. It describes and documents a number of structures in Agua Fria. Should any of the owners of the structures wish to explore certification, this document will provide excellent baseline information.

COMMENT 30c:

The Bruce Cooper House, on the Camino del Alamo branch of Camino Real approximately one block from the Lopez Lane/Agua Fria intersection, is currently for sale and might well serve as an interpretive or study center.

RESPONSE:

Page 39 of the draft describes how Interpretive Facilities will be dealt with. We would be pleased to work with the community should they decide to develop a center here.

COMMENT 30d:

The Camino del Alamo, with the eastern section called La Junta del Alamo, merits protection as it is the northernmost remaining section of this branch of the trail and has not been excavated, paved, or studied for its archaeological resources. This section of the trail merits further study. Why did the trail branch here? Were both branches used simultaneously or at different times of the year or in different years altogether, or did the choice of route depend on travellers' plans to visit other sites along a given route? What landmark might have existed here to mark the trail's divide?

RESPONSE:

We agree this section merits further study. The questions you raise would be generally applicable to other portions of the trail.

COMMENT 30e:

At the juncture of Camino del Alamo with La Junta del Alamo is a small triangle of land, approximately 1/5 acre, claimed by a non-resident owner of adjacent undeveloped land. I would like to see this piece protected and identified as the juncture of two branches of the Camino Real trail network, marked by an appropriate sign and perhaps by appropriate public artwork.

RESPONSE:

With study, this could be a high-potential historic site and therefore eligible for certification.

COMMENT 30f:

The large, mostly unexcavated LAII archaeological site located mainly on land owned jointly by the Archdiocese of Santa Fe and San Isidro Parish is an extremely important local resource.

RESPONSE:

This site could be a high-potential historic site and eligible for certification.

COMMENTg:

Additional archaeological resources have been identified in a preliminary study across the river from LAII on the former Lamereaux family tree farm. A state archaeologist has stated that significant archaeological resources are likely to be found on the farm site, including human burials. We are concerned that the resources on this site will not receive adequate protection or oversight should the property be purchased for intensive development. The lower portion of the property may be considered of great importance to the story of local Pueblo habitation

along the river and the trail, while the area of LAII, on the south side of the river, contains resources pertaining to both Pueblo and Spanish use and habitation. Existing structures on the farm, while in need of repair, have great potential for a variety of public and private uses. This property is on the market and a group of local residents is exploring the possibility of purchase for preservation and appropriate types of continued use. This property is adjacent to the County open space parcel purchased.

RESPONSE:

There are a variety of protection strategies for properties and we will be glad to with you those we are aware of and place you in touch with preservation groups.

COMMENT 30h:

The existing adobe church of San Isidro has been recognized and posted with one of the state's Camino Real historic signs, as has Agua Fria School, which contains a WPA- era adobe building.

RESPONSE:

Noted. These are possible high- potential historic sites.

COMMENT 30i:

On the north side of the Santa Fe River overlooking Agua Fria Village are the village park, cemetery, fire station, and a La Familia clinic; State Senator Nancy Rodriguez has obtained funds to build a community center in the same area. This area is under threat of annexation by the city of Santa Fe and the local residents hope that the County will amend the boundaries of the Agua Fria Traditional Historic Village to re- incorporate these village assets into its existing zoning boundaries

RESPONSE:

Noted.

COMMENT 30j:

The Acequia Madre, which travels through the city of Santa Fe, ends up in Agua Fria Village along the north boundary of a housing development that is being constructed adjacent to the Agua Fria School. The acequia is enclosed between fences between the private development and the school playground. It is a cultural and historic resource crucial to the existence of the Spanish community of Agua Fria established along the Camino Real trail centuries ago, and as such it requires continued protection and maintenance. It would be desirable to obtain funds to create a short, publicly accessible path with appropriate information signage along the acequia's north edge, using land currently within the school playground. This project should be carried out with the school's and private development's cooperation and participation, and keep in mind these entities' security needs to limit hours of access as appropriate, perhaps by creating a small, perpetually accessible information center adjacent to the limited access trail. The design and development of this project could be carried out with the participation of the school's student population, with appropriate professional direction.

RESPONSE:

We would be glad to work with the community and the school to preserve this piece of Acequia.

COMMENT 30k:

Documents were supplied for Camino Real Administration Office files.

RESPONSE:

These documents are on file in the Camino Real Administration Office.

COMMENT 30i:

On page 186, the trail is described as forking west of Agua Fria, when in fact it forked west of the church and springs, but within the Agua Fria landholding and farming area.

RESPONSE:

The narrative describes the journey of Zebulon Montgomery Pike on the road south of Santa Fe. We appreciate your work in this area and realize that more research needs to be conducted on the various routes in this area.

COMMENT 31a:

Although the CMP/EIS indicates public meetings were held, for many in our industry (construction materials including sand and gravel) this plan came as a complete surprise. No one had seen notice of these meetings and it was simply an accident that we found out the draft document had been issued. Please review notification process.

RESPONSE:

A Notice of Intent advising the public of the development of the draft management plan and environmental impact statement was published in the Federal Register, May 18, 2001, Vol. 66, No. 97, page 27682- 27684. Published therein was notice of the times and locations of public scoping meetings. Press releases detailing the schedule for public scoping meetings were also sent out to the news media in New Mexico and West Texas; the news media was also notified of additional meetings (see Chapter 5, Table 13 for a complete list). In addition to the public notification process, the Camino Real planning team also developed a mailing list with over 1300 names which was used to invite public participation and to distribute a newsletter and other mailings regarding the planning process. The public meeting schedule was also posted on our website, elcaminoreal.org. We regret that you did not see any of the public notices or news media publicity on the public meetings.

COMMENT 31b:

No benefit in preserving the entire length of trail; to do so would lock up a significant amount of aggregate resources that are concentrated along the Rio Grande valley.

RESPONSE:

Amending the White Sands, Mimbres, and Taos Resource Management Plan (RMP) Visual Resource Management (VRM) classifications will result in an increase of 99,774 federally-managed acres in VRM Class II. The areas proposed for re- classification consist of approximately 8.5 linear miles of trail corridor, or slightly under 2.5% of the total length of the route of El Camino Real within New Mexico. The VRM classes and their objectives are described in Appendix H. The reclassifications should have little effect on aggregate, the single most abundant and valuable mineral resource along the corridor. Visual Resource Management classifications apply only to federally- managed lands. None of the three alternatives would impose

restrictions on private land development nor would private landowners be precluded from developing their land as authorized under local development codes.

COMMENT 31c:

On page 4, trail mileage totals 653 miles, while on page 3, Camino Real length is given as 404; these differences not explained until table 1, pg. 48.

RESPONSE:

Text clarifying trail mileage has been added to the planning document. It reads "Trail mileage totals 654.5 miles. This includes the 404 mile length of the trail, and variant or alternate routes that parallel other trail segments."

COMMENT 31d:

Chapter 1, pg. 10: Planning Criteria: Include "concerns of those involved in mining activities or potential mining activities" in enumerating Planning Criteria, Chapter 1, pg. 10

RESPONSE:

Planning criteria were set during the scoping process; mining activities were addressed and taken into account at that time and are also discussed in the plan.

COMMENT 31e:

Chapter 1, pg. 10- 11: With all other planning efforts underway related to Camino Real, why initiate another effort and duplicate efforts?

RESPONSE:

The planning efforts described are a variety of public and private ventures showing the popularity of celebrating the Camino Real in one manner or another. The National Historic Trail designation will assist in coordinating and providing information on but not duplicating these various activities.

COMMENT 31f:

Chapter 1, pg. 17: What does certification really do? What criteria, rules or regulations are utilized in the certification process? Who does the certification?

RESPONSE:

National Historic Trails identify high- potential historic sites and segments. Those portions of the trail that are under federal ownership are recognized as official protection components of the NHT. Privately- owned high- potential historic sites and segments can also be recognized through the site certification process. The certification program is one of the most important ways in which federal administering agencies can foster partnerships with non- federal landowners throughout the trail corridor. Certification agreements are written and agreed upon by the private landowner and the Camino Real Administration Office to preserve, interpret, and provide for public access to high- potential historic sites and segments. The certification program is an entirely voluntary one; although property owners can benefit from the availability of challenge cost- share funds, agency expertise, and the increased awareness of their resources by the public, property owners are not obliged to enter into certification agree-

ments. A sample certification agreement is in Appendix I. The text under the "Preferred Alternative: Description" - Site Certification has been expanded to clarify the certification process and program.

COMMENT 31g:

Chapter 3, Existing Environment: Geology, page 78: The Rio Grande valley is normally referred to as a rift valley, not a basin and range province; expand this discussion and give more specific information regarding resources throughout valley.

RESPONSE:

The first paragraph of the Geology section has been amended to read: "The entire length of El Camino Real in New Mexico lies within the Rio Grande Rift. The Rio Grande Valley is the surface expression of the rift. The Rio Grande Rift zone lies within the larger physiographic feature known as the Basin and Range Province, bounded on the west by the Colorado Plateau, on the east by the Great Plains, and on the north by the Southern Rocky Mountains. The province occupies the southwestern and central parts of the state, extending northward to Taos County. The Province is over 200 miles wide in the south, narrowing northward to several miles wide in Taos County. It includes fault block mountains and plateaus; volcanoes and lava flows; and broad, flat alluvial plains. The Rio Grande Rift, a series of north-south parallel faults, occupies the western part of the province." More specific information regarding energy and mineral resources is detailed in Chapter 3, Existing Environment: Resource Uses: Energy/Minerals.

COMMENT 31h:

Chapter 3, pg. 89- 90: discussion indicates significant number of mining/mineral operations within project area. With so much activity, is project viable?

RESPONSE:

Yes development of mining/mineral activities can be compatible with the National Historic Trail.

COMMENT 31i:

Chapter 4, page 103- 104: Third paragraph states "Restrictions on lease development could result in an operator not drilling at the most geologically desirable location..." In the exploration for energy and mineral resources the point is to drill in "the most geologically desirable location." If you are not allowed to do that then there is no point in conducting the drilling. One cannot pick and choose where energy and mineral resources are located. They are where they are, and they cannot be moved.

RESPONSE:

What is referred to here is the usage of techniques such as slant drilling or directional drilling. In certain cases, a drill rig may be positioned to minimize it's impact on the viewshed; instead of drilling directly down, the drill may be angled to intersect the deposit of interest. The goal of such a practice would be to hide the drill rig behind some feature so it is not visible from the trail, and still be able to drill. While this may not be feasible in all cases, these are the kind of options that would be explored in sections of the trail with restrictive Visual Resource Management classifications.

COMMENT 31j:

Mineral materials qualities are specified by market; expense is determined in part by hauling distance. Increased costs, through increased hauling expense, will be passed along to the consumer through direct costs or increased taxes.

RESPONSE:

Comment is an information statement or opinion; no response needed.

COMMENT 31k:

Chapter 4, pg. 107: Give justification for claim that expenditure of \$535,000 per year for administration and implementation activities will generate a net benefit of \$1.19 million dollars and 36 jobs per year.

RESPONSE:

Net economic benefits, which are the net new jobs created, combined new sales generated, and total increased income and sales tax revenue generated by implementation of the Preferred Alternative, were calculated using the NPS- developed "Money Generation Model" which is available on the NPS website. The model is useful in that it can quickly estimate the economic consequences of planning alternatives using area- specific baseline data and tailored assumptions on the input parameters. Baseline economic activity data were provided by the Sonoran Institute in association with the Bureau of Land Management in its 2002 publication "Economic Profile System" which provides a variety of latest available economic activity data for use in producing custom socioeconomic profiles for the United States in a consistent format for all geographic areas. Other locally variable input data such as average length of stay for tourists, average daily tourist expenditures, state and local tax rates, and percent of non- local use were developed from publicly- available state and county economic and tourist data, and interviews with recreation and tourism officials.

The basic rationale for the economic model is that a certain input in terms of new money spent, new numbers of tourists attending a park, and other inputs have a multiplier effect on the local economy as those inputs directly and indirectly propagate through the local economy inducing subsequent economic activity to both serve the visitors, and to provide products and services to the local community supporting the increased park or recreation activity.

COMMENT 31l:

You are assuming that because other national historic trails experienced an increase in visitation, the Camino Real will as well. This analysis needs statistical backup.

RESPONSE:

In general, the other trails that have been designated as National Historic Trails have experienced an increase in visitation; further, this increase in visitation has been correlated, at least anecdotally, with the quality of trail promotion programs instituted by the various trails. These increases have not been quantified systematically, however, and no statistical models can be applied at this point to predict the magnitude of economic benefit that will result from the increased visitation expected for Camino Real NHT.

COMMENT 31m:

Chapter 4, pg. 107, 5th paragraph: Types of jobs to be generated by this proposal are minimum wage at best and are a meager contribution to the economic improvement of any area; would not "enhance the economic stability of communities in the Economic Study Area (ESA);" 36 jobs would be scattered among a number of counties, so any contribution to a specific county would be unnoticeable. We are only talking about a few low- paying jobs here; these will not help these areas avoid "future social costs from continued economic problems."

RESPONSE:

This comment cannot be definitively responded to since it states an opinion. It is true that the total number of jobs to be created in the overall labor market is relatively small, and that most of them will probably be lower paying service industry jobs. However, in discussions with local leaders during preparation of the analysis, they stressed that such jobs were important in that they provide entry- level employment opportunities for persons, particularly in rural areas with very limited job markets that they would not otherwise have. Thus, the new jobs would in fact contribute to a small but measurable degree to economic stability of the communities (again, this effect would be most pronounced in the smaller job markets) and avoidance of future social costs by providing employment opportunities where they are badly needed. The text in paragraph 5 is clear on that point.

COMMENT 31n:

The discussion in Chapter 4, pg. 116: "Unavoidable Adverse Impacts" fails to include loss of potential natural resources due to their removal from access on public lands and the potential economic benefit derived therefrom.

RESPONSE:

The impact of the Preferred Alternative on Energy and Minerals resources is discussed in Chapter 3, Existing Environment: Resource Uses: Energy/Minerals and Chapter 4, Environmental Consequences: Preferred Alternative: Energy and Minerals. Potential economic deposits of sand and gravel, cinder, scoria, and stone occur throughout the trail corridor. Mining of a particular deposit depends upon its proximity to a viable market, usually an urban area or a highway construction project. Forty- eight of these deposits are currently being mined. Other minerals currently being extracted along the corridor include gypsum, perlite, and pumice. There is no current, active mining of hardrock and related minerals within the corridor. This plan proposes no withdrawals and no mining operations are precluded.

COMMENT 31o:

Prefer Alternative A

RESPONSE:

Noted.

COMMENT 32a:

Provides history on Agua Fria Village.

RESPONSE:

Thank you. This information will be kept on file for reference at the Camino Real Administration Office.

COMMENT 32b:

Gives proposal for an Agua Fria Village Museum.

RESPONSE:

We would be glad to work with the village of Agua Fria as they develop a museum. Challenge Cost- Share funds may be available for this project or portions thereof.

COMMENT 33a:

Recommend adoption of Alternative A.

RESPONSE:

Noted.

COMMENT 33b:

The Draft EIS does not comply with the National Environmental Policy Act. It provides no information on the relationship between local short- term uses of man's environment and the maintenance and enhancement of long- term productivity.

RESPONSE:

The existing environmental conditions are described in Chapter 3, Existing Environment, which is based on currently available information, and which provides a basis from which to estimate impacts associated with continuing current management practices and/or implementing the limited number of projects on federally- managed lands described in the Preferred Alternative. Aspects of the environment, including the human environment, described here include the following topics: North American Indians, Archeological/Historical Resources, Energy and Minerals, Livestock- grazing, Land and Realty Uses, Recreation/Visitor Experience/Interpretation, Scenery, Socio- economics/Social Values/ Environmental Justice, Vegetation/Soils/Noxious Weeds/Water, and Wildlife. The relationship between short- term activities, or "short- term uses of man's environment" and long- term productivity are examined in Chapter 4, Environmental Consequences. Several types of impacts are discussed, including direct impacts, indirect impacts, cumulative impacts, irreversible and irretrievable commitment of resources, and unavoidable adverse impacts. The impacts of continuing the current management practices as well as implementing a limited number of projects on federally- managed lands are summarized in the Executive Summary, Comparison of Impacts, and detailed in Chapter 4.

COMMENT 33c:

The draft provides no information on the impacts of proposed actions on the physical, biological, social and economic aspects of the human environment. This should include a thorough and complete economic analysis.

RESPONSE:

The existing environmental conditions are described in Chapter 3, Existing Environment, which is based on currently available information, and which provides a basis from which to estimate impacts associated with continuing current management practices and/or implementing the limited number of projects on federally- managed lands described in the Preferred Alternative. Aspects of the environment, including the human environment, described here

include the following topics: North American Indians, Archeological/ Historical Resources, Energy and Minerals, Livestock- grazing, Land and Realty Uses, Recreation/Visitor Experience/Interpretation, Scenery, Socio- economics/Social Values/Environmental Justice, Vegetation/Soils/Noxious Weeds/Water, and Wildlife. The relationship between short- term activities, or "short- term uses of man's environment" and long- term productivity are examined in Chapter 4, Environmental Consequences. Several types of impacts are discussed, including direct impacts, indirect impacts, cumulative impacts, irreversible and irretrievable commitment of resources, and unavoidable adverse impacts. The impacts of continuing the current management practices as well as implementing a limited number of projects on federally- managed lands are summarized in the Executive Summary, Comparison of Impacts, and detailed in Chapter 4.

The economic analysis included in the document is appropriate for the actions presented. Economic impacts of the current management practices and the limited projects proposed for federally- managed lands are summarized in the Executive Summary and detailed in Chapter 4.

COMMENT 34:

Additional clarifications to letter from Lichtenstein of 1/14/2003: The list of documents supplied with the earlier letter were compiled by Hazel Romero, wife of Agua Fria Village Association President, Ramon Romero. Mrs. Romero works at the Fray Angelico Chavez History Library and her research resulted in the documentation attached to the previous letter. In addition, she created a slide show about Agua Fria which was shown at the History Library in the late 1990s. Mr. and Mrs. Romero have been instrumental in keeping a core of committed local volunteers active on behalf of Agua Fria as a neighborhood, a community, and a living historical entity. Mr. Romero is including additional documentation with this letter: a copy of "Preserving the Community of Agua Fria," by Hazel Romero, *La Herencia*, Vol. XXXIV, summer, 2000, pp. 36- 37; and a copy of an aerial map of the central part of Agua Fria Village. Mr. Romero would like to credit the El Camino Real Committee of the Agua Fria Village Association (Hazel Romero, William Mee, and Tamara Lichtenstein) with gathering the documentation submitted from the Association's files.

RESPONSE:

Noted. The documents (except the aerial photo retained by Mr. Romero) are on file in the Camino Real Administration Office.

COMMENT 35a:

Ysleta de Sur Pueblo's substantial ethnographic resources and presence in the area are not mentioned except for perfunctory statements on pages 84 and 98.

RESPONSE:

Four sites connected with Ysleta del Sur are described in Chapter 3, Existing Environment, Historic Sites/Parks/Cultural Facilities: The El Paso Missions and Mission Trail are described in general, and the sites of San Elizario, established in 1789 to protect settlements in the lower Rio Grande valley, the Socorro Mission, and the Ysleta del Sur Mission, are described in relation to the establishment of communities, including both Native Americans and Spanish colonists, south of El Paso, Texas, following the Pueblo Revolt of 1680. Ysleta del Sur Pueblo is recognized again under the heading of North American Indian Pueblos in Chapter 3 as well. The Puebloan cultures of the United States are described and their history outlined in brief as a group in Chapter 3 under the heading Puebloan Cultures. We have added text to the list of

Puebloan communities now found in the region, described in the draft on page 67, and included as the last paragraph of the section on Puebloan Cultures, Chapter 3, in the final document, to indicate that the Pueblo of Ysleta del Sur, Texas, is one of the Puebloan communities in the region today. None of the other Pueblo communities are described in any additional detail in the document; Chapter 3 is intended to serve as an overview of the existing environment and is in no way a definitive history or description of any particular community.

COMMENT 35b:

No representatives who were responsible for developing the "Resource Values" section of the report contacted the Pueblo. In order to identify ethnographic resources (defined in the draft plan as "any cultural or natural resource ascribed value by an existing community") in a given area such as the paseo del norte, an ethnographer would have to contact a living human community. That this was not done is a violation of the spirit and intent of government-to-government consultations. On page 57, the goal of the draft report is stated as: "aid in consultation with existing tribes to determine their views regarding the affects El Camino Real has had on their history, and what impacts, if any, the present plan's proposal may have on existing ethnographic resources on or off of federal lands." Developing this report in the absence of substantive consultation with the Tigua community has led to the presentation of pages of unfocused secondary sources providing narrative on the Apaches, a tribe whose "occupancy" or "claim" to the area has not been substantiated. Moreover, the Indian Claims Commission (Docket 22- C) disallowed the Mescalero Apache claims in much of west Texas.

RESPONSE:

The Ethnographic Resources section of the document presented in Chapter 3 is an overview of the Native American presence along the Camino Real spanning pre-Spanish contact through the present day. This section of the document was developed through the use of existing published sources; no ethnographic fieldwork was carried out to develop new information through interview, archival research, reviews of unpublished materials, or other efforts. The material presented here is intended to serve as background information; it does not represent the result of ethnographic fieldwork conducted for the purpose of generating new information on the Native American communities of the area. Any construction or interpretation projects that may be developed by or in partnership with El Camino Real Administration will be subject to all applicable environmental and cultural preservation legislation and regulation, and consultation with tribes will be carried out as appropriate at that time.

COMMENT 35c:

Further consultation with the Tribal Council will be necessary in order to identify what alternatives in the plan the Tribe would support. Until the report acknowledges the Tribe's historical occupancy of the west Texas area, support for the plan will be difficult. I have directed the tribal attorneys to provide your office with copies of the Tribal Archives which contain ample documentation of Ysleta del Sur's occupancy, use, and ancestral possession of the west Texas section of the El Camino Real. Please contact us for further commentary and to set up consultation meetings.

RESPONSE:

A total of 31 tribes and tribal organizations, including Ysleta del Sur, were contacted concerning this planning process. Contacts began with letters soliciting participation in community meetings and scoping meetings; Ysleta del Sur was represented by Rick Quezada at the meeting, Ysleta del Sur, Texas, in July 24, 2001. Tribes and interested parties, including Dr. Adolph

Greenberg, were again contacted through the circulation of a newsletter on the planning process, and through the dissemination of the draft plan by mail to individuals and tribes in October, 2002. The draft plan was followed up with another letter, again sent to both Dr. Greenberg and to the Pueblo of Ysleta del Sur in November, 2002. In all cases where the tribe or Dr. Greenberg was contacted, Camino Real Administration invited the tribe to set up a meeting so that the draft plan could be discussed in a face- to- face meeting with tribal representatives. Neither the tribe nor Dr. Greenberg responded to these communications until January, 2003, shortly before the end of the public comment period on January 15, 2003. At that time, Dr. Greenberg was asked if he would like to submit more detailed information on Ysleta del Sur and its relation to El Camino Real for inclusion with the final document. Dr. Greenberg indicated that he would need additional time, and requested an extension of the comment period for Ysleta del Sur until the end of February. At the end of February, Dr. Greenberg submitted the comments noted above, acting as Tribal Ethnographer, Miami University. Camino Real Administration met with Mr. Rick Quezada, War Captain for cultural affairs, Ysleta del Sur in Texas on March 14, 2003; Mr. Quezada indicated that the tribe was interested in the Camino Real de Tierra Adentro National Historic Trail, would like to be included in any project development that might relate to Ysleta del Sur, and expected to continue consultation on a project- by- project basis as trail administration and development proceeds.
