

Appendix A

Correspondence and Letters



TEXAS
HISTORICAL
COMMISSION

The State Agency for Historic Preservation

RICK PERRY, GOVERNOR

JOHN L. NAU, III, CHAIRMAN

F. LAWRENCE OAKS, EXECUTIVE DIRECTOR

July 7, 2003

Mr. Allen Rhames
Axiom-Blair Engineering, L.P.
2711 W. Anderson Lane, Suite 210
Austin, Texas 78757

Re: *Project review under Section 106 of the National Historic Preservation Act of 1966
Proposed Changes to Riverside Canal, El Paso County. (Bureau of Reclamation)*

Dear Mr. Rhames:

Thank you for your correspondence describing the above referenced project. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, led by Pam Opiela, has completed its review of the project documentation provided. The proposed improvements to the Riverside Canal will have no adverse effect on this section of the National Register Listed El Paso County Water Improvement District #1 under the following conditions:

1. The section of the canal that you propose to line with concrete will be of the same width (or as close to the same width as possible) as the current historic canal.
2. Proposed new ponds will be located outside the listed boundaries of the Riverside Canal and any other sections of the listed district.
3. As any future improvements to the Riverside Canal are made, a representative section shall be maintained in its original appearance and condition.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Pam Opiela at 512/463-6218.**

Yours truly,

A handwritten signature in cursive script, appearing to read "F. Lawrence Oaks".

for: F. Lawrence Oaks, State Historic Preservation Officer

cc. Will DeBusk, El Paso CHC Chair

P.O. BOX 12276 • AUSTIN, TX 78711-2276 • 512/463-6100 • FAX 512/475-4872 • TDD 1-800/735-2989
www.thc.state.tx.us



Att: Robt. Maxwell

NOTICE OF PUBLIC MEETING

to be held at

**El Paso County Water Improvement District No. 1
294 Candelaria
El Paso, Texas 79907**

A public meeting will be conducted to present the proposed **El Paso County Water Improvement District No. 1 - 2003 Water Conservation Project**. The El Paso County Water Improvement District No. 1 (the District) is proposing a project consisting of canal rehabilitation and the possible modification of the Socorro Effluent Holding Ponds for use as a regulating reservoir, which will temporarily store irrigation water.

The proposed project includes the renovation of selected sections of the District's Riverside Canal with an impervious lining. A significant reduction of seepage and loss of water can be accomplished by the lining of the canals.

A copy of the Project Plan is available for review at the El Paso County Water Improvement District No. 1 between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday or on the Internet at www.axiomblairengineering.com.

**Public Meeting
Wednesday, September 10, 2003 at 5:30 p.m.**

The public meeting on the proposed project will include a briefing of the various aspects of the project and a hearing of public comments.

All those interested in the District are invited to attend this meeting and express their views. Oral and written comments may be presented at this Public Meeting. For further information, contact Deborah Schaefer at 512/394-1011.

Maria A. Trunk
 1100 Kelly Way
 El Paso, TX 79902
 (915) 545-5214
mtandck@elp.rr.com

2 October, 2003

Re: Proposed Modifications to the Riverside Canal,
 El Paso County Water Improvement District No. 1
 El Paso County, Texas

RECEIVED BOR ALBUQUERQUE AREA OFFICE OFFICIAL FILE COPY		
OCT 22 '03		
Class	EMV-1.11	
Prj	GF	
Cntr #	3003988	
Fldr #	34504	
Date	Initial	To
		153

Mr. Robert H. Maxwell
 U.S. Bureau of Reclamation
 555 Broadway NE, Suite 100 (ALB-153)
 Albuquerque, NM 87102

Dear Mr. Maxwell,

Thank you very much for the opportunity to submit comments regarding the proposed concrete lining of a section of the Riverside Canal. I am a resident of El Paso County and a member of the Friends of the Rio Bosque with concerns about the potential impact this project could have on the health and viability of Rio Bosque Wetlands Park. I respectfully request that you consider the details below as you prepare your environmental assessment for the proposal.

From your meetings with local groups, I'm sure you're aware that Rio Bosque Wetlands Park (RBWP) is a natural area that encompasses a former bend of the Rio Grande river in the El Paso/Ciudad Juárez metropolitan area, home to more than 2 million residents. The park is owned by the City of El Paso and managed by the Center for Environmental Resource Management of the University of Texas at El Paso (CERM/UTEP) with the support of many local partners.

As a wetlands mitigation project, the park is being managed with the goal of restoring and enhancing valuable riparian habitat along the Rio Grande while providing public open space and educational opportunities. The beginnings of a young bosque have taken root there, anchoring the diverse mix of native wetland, riparian and upland habitats that project managers seek to recreate. RBWP is unique in El Paso County, the only public park where local residents can experience native riparian flora and fauna in the actual historic path of the Rio Grande.



Success in establishing a viable wetland at RBWP, however, is frustrated by current water management practices. In many years, such as this one, the park receives no water during the growing season, the supply of effluent from the Roberto Bustamante Wastewater Treatment Plant being directed exclusively to the Riverside Canal at the request of El Paso County Water Improvement District No. 1. As you have seen, stopping the flow of water early this year has caused the death of many riparian plants and a dramatic reduction in the numbers and kinds of animals sighted in the park. Continuing subject to such drastic and uncertain fluctuations, it seems unlikely that RBWP will ever fulfill the goals set forth when it was established as a wetlands mitigation project.

The proposed concrete lining of the Riverside Canal now threatens the health of RBWP's upland habitat. A mature stand of native tornillos (*Prosopis pubescens*) is found at the base of the levee road parallel to a long stretch of the canal. These trees, along with an historic, landmark cottonwood (the only one of its age and size left in the park) are rooted in groundwater fed by seepage from the Riverside Canal. Suddenly dropping their water source beyond the reach of their root systems (as the lining project will certainly do) will have a devastating effect on the trees, with cascading impacts on the wildlife that depend on them for habitat.

An additional impact to groundwater levels at RBWP has come with the recent installation of a large pump by El Paso County Water Improvement District No. 1 at the edge of the levee road near the main entrance to the park. Our groundwater measurements at a well located approximately 1000 feet from the pump have shown levels quickly responding to pumping activity (please see accompanying chart). The combination of cutting off the flow of surface water to the park, pumping groundwater and now eliminating seepage from the Riverside Canal entirely jeopardizes efforts to create a meaningful wildlife refuge at RBWP.

Wetlands mitigation can not be transferred to a different location; there is no other place like RBWP in the region. El Paso County is one of the poorest in the nation, with 25% of its population living below the poverty level according to the 2000 US Census. The city of Socorro, located less than a quarter mile from RBWP, has a median household income of \$24,087 (compared to \$39,842 for the state of Texas), a high unemployment rate and low educational level for adult residents. There is a chronic shortage of public open space for the expanding population of El Paso County. RBWP has the potential to offer excellent recreational and educational opportunities to the local populace, but it cannot do so without a basic, secure supply of water. It is a clear case of environmental injustice that a park located in an impoverished area should be denied the minimal resources necessary to allow it to serve the people who need it most.

Mr. Maxwell, I sincerely hope that you can transform this environmental assessment into the first step toward crafting a permanent solution to the water problem at RBWP. I am aware of and fully support El Paso County Water Improvement District No. 1's efforts to conserve and safeguard water. I would like agriculture to continue to thrive in El Paso County; farmland enhances the scenic value of the river valley and contributes to the health of a diverse economy. I believe that a plan can be designed that meets the needs of farmers and RBWP, and I feel confident in your efforts to strike the right balance.

Yours truly,



Maria A. Trunk

Enc.

Cc: John Sproul, CERM, UTEP
Ray Cox, Parks and Recreation Department, City of El Paso

Robert H. Maxwell
Bureau of Reclamation
555 Broadway NE Ste 100 (ALB-153)
Albuquerque, NM 87102



October 6, 2003

Dear Mr. Maxwell,

I have looked at the document entitled Environmental Summary for the EPCWID No. 1 Canal, Structure, Pond and Pumping Improvements Project and would like to make the following comments

The report concludes that the project will have no significant environmental impact. I feel that this conclusion is not correct. This project could have a negative impact on the Rio Bosque Wetlands Park, which is immediately adjacent to the project site. Here are a few reasons why:

- Currently, many cottonwoods and other deep-rooted trees benefit from water seepage from the Riverside Canal; an impervious lining would alter groundwater levels at Rio Bosque and this change could have a serious effect on the park's health.
- The effect of the canal on the water table has been clearly demonstrated by our routine groundwater monitoring measurements. When the Irrigation District turns on their pump on the park side of the levee to recover water lost to seepage, water levels at nearby monitoring wells quickly drop by a few feet.
- There is a single, very old cottonwood tree living on the Park side of the levee. It is a landmark tree for park visitors that is clearly thriving off water from the canal seepage. This tree could be damaged by construction work and is likely to decline from having its water supply cut off.

Because the Environmental Summary does not address any of these issues, I feel it is neither correct nor complete. Specific areas of the text that could discuss the negative environmental impact to the Park, but do not, are listed below:

- In Section 5 Subsection K: "Public Land," the report states, "The project area also abuts Rio Bosque Park.... The park is open, recreational space used by citizens of El Paso." It *should* state that Rio Bosque **Wetlands** Park was constructed under an agreement with the Bureau of Reclamation to mitigate the removal of wetlands in a previous irrigation project. The park is owned by the City of El Paso and managed

by UTEP. As stipulated in the agreement between UTEP and the City of El Paso, management of the Park is to be focused on restoring and enhancing valuable riparian habitat along the Rio Grande in the Chihuahuan Desert while providing public open space and educational opportunities.

- The fact of an adjacent wetlands mitigation project should also be added to Part C: “Vegetation Impacts;” Part E: “Wildlife Habitat;” and Part G: “Wetlands.” Each of these sections of the report should properly consider the possible environmental impact on this adjacent wetland mitigation park that could be caused by lowering its water table.
- With regard to Part S: “Obstruction of Scenic Views”: The view of the canal itself will be degraded if it is changed from a wide flowing river-like structure to a narrow concrete one. This will negatively impact the aesthetic experience of visitors to the Rio Bosque.

The Rio Bosque Wetlands Park is a valuable asset to the community. The EA must consider the negative environmental impacts on the Park that would result from the canal-lining project, and propose ways that those impacts could be mitigated. The Friends of the Rio Bosque will be happy to work with the Bureau and the Water Improvement District to reach a compromise that achieves everyone’s goals.

Sincerely,

Chuck Kooshian
President

Maria A. Trunk
1100 Kelly Way
El Paso, TX 79902
(915) 545-5214
mtandck@elp.rr.com

2 October, 2003

Re: Proposed Modifications to the Riverside Canal,
El Paso County Water Improvement District No. 1
El Paso County, Texas

Mr. Robert H. Maxwell
U.S. Bureau of Reclamation
555 Broadway NE, Suite 100 (ALB-153)
Albuquerque, NM 87102

Dear Mr. Maxwell,

Thank you very much for the opportunity to submit comments regarding the proposed concrete lining of a section of the Riverside Canal. I am a resident of El Paso County and a member of the Friends of the Rio Bosque with concerns about the potential impact this project could have on the health and viability of Rio Bosque Wetlands Park. I respectfully request that you consider the details below as you prepare your environmental assessment for the proposal.

From your meetings with local groups, I'm sure you're aware that Rio Bosque Wetlands Park (RBWP) is a natural area that encompasses a former bend of the Rio Grande river in the El Paso/Ciudad Juárez metropolitan area, home to more than 2 million residents. The park is owned by the City of El Paso and managed by the Center for Environmental Resource Management of the University of Texas at El Paso (CERM/UTEP) with the support of many local partners.

As a wetlands mitigation project, the park is being managed with the goal of restoring and enhancing valuable riparian habitat along the Rio Grande while providing public open space and educational opportunities. The beginnings of a young bosque have taken root there, anchoring the diverse mix of native wetland, riparian and upland habitats that project managers seek to recreate. RBWP is unique in El Paso County, the only public park where local residents can experience native riparian flora and fauna in the actual historic path of the Rio Grande.

Success in establishing a viable wetland at RBWP, however, is frustrated by current water management practices. In many years, such as this one, the park receives no water during the growing season, the supply of effluent from the Roberto Bustamante Wastewater Treatment Plant being directed exclusively to the Riverside Canal at the request of El Paso County Water Improvement District No. 1. As you have seen, stopping the flow of water early this year has caused the death of many riparian plants and a dramatic reduction in the numbers and kinds of animals sighted in the park. Continuing subject to such drastic and uncertain fluctuations, it seems unlikely that RBWP will ever fulfill the goals set forth when it was established as a wetlands mitigation project.

The proposed concrete lining of the Riverside Canal now threatens the health of RBWP's upland habitat. A mature stand of native tornillos (*Prosopis pubescens*) is found at the base of the levee road parallel to a long stretch of the canal. These trees, along with an historic, landmark cottonwood (the only one of its age and size left in the park) are rooted in groundwater fed by seepage from the Riverside Canal. Suddenly dropping their water source beyond the reach of their root systems (as the lining project will certainly do) will have a devastating effect on the trees, with cascading impacts on the wildlife that depend on them for habitat.

An additional impact to groundwater levels at RBWP has come with the recent installation of a large pump by El Paso County Water Improvement District No. 1 at the edge of the levee road near the main entrance to the park. Our groundwater measurements at a well located approximately 1000 feet from the pump have shown levels quickly responding to pumping activity (please see accompanying chart). The combination of cutting off the flow of surface water to the park, pumping groundwater and now eliminating seepage from the Riverside Canal entirely jeopardizes efforts to create a meaningful wildlife refuge at RBWP.

Wetlands mitigation can not be transferred to a different location; there is no other place like RBWP in the region. El Paso County is one of the poorest in the nation, with 25% of its population living below the poverty level according to the 2000 US Census. The city of Socorro, located less than a quarter mile from RBWP, has a median household income of \$24,087 (compared to \$39,842 for the state of Texas), a high unemployment rate and low educational level for adult residents. There is a chronic shortage of public open space for the expanding population of El Paso County. RBWP has the potential to offer excellent recreational and educational opportunities to the local populace, but it cannot do so without a basic, secure supply of water. It is a clear case of environmental injustice that a park located in an impoverished area should be denied the minimal resources necessary to allow it to serve the people who need it most.

Mr. Maxwell, I sincerely hope that you can transform this environmental assessment into the first step toward crafting a permanent solution to the water problem at RBWP. I am aware of and fully support El Paso County Water Improvement District No. 1's efforts to conserve and safeguard water. I would like agriculture to continue to thrive in El Paso County; farmland enhances the scenic value of the river valley and contributes to the health of a diverse economy. I believe that a plan can be designed that meets the needs of farmers and RBWP, and I feel confident in your efforts to strike the right balance.

Yours truly,

Maria A. Trunk

Enc.

Cc: John Sproul, CERM, UTEP
Ray Cox, Parks and Recreation Department, City of El Paso

ORIGINAL

THE UNIVERSITY OF TEXAS AT EL PASO



September 30, 2003

Mr. Robert H. Maxwell
U.S. Bureau of Reclamation
555 Broadway NE, Suite 100 (ALB-153)
Albuquerque, NM 87102

Re: Riverside Canal Modifications,
El Paso County Water Improvement District No. 1
El Paso County, Texas

Center for

RECEIVED BY ALBUQUERQUE AREA OFFICE OFFICIAL COPY		
Management OCT - 3 '03		
Class	ENV-600	Action
Prj	GP	
Cntr #	3003773	
Fidr #	38794	
Date	Initial To	
		153

Dear Mr. Maxwell:

Thank you very much for meeting with us at Rio Bosque Wetlands Park last week to discuss the Park and its relationship to the Riverside Canal. As you know, we are very interested in the planning for the concrete-lining of the canal, and we offer these comments as part of the scoping process for the project.

At Rio Bosque, UTEP is working with a diverse partnership to re-create, over time, approximate examples of the native plant and animal communities characteristic of the Rio Grande and its floodplain in pre-settlement days. These native ecosystems will in turn be the foundation for a range of educational, recreational, tourism and research benefits for the El Paso community.

The water that maintains the wetlands at the Park is treated wastewater from the adjacent Roberto Bustamante Wastewater Treatment Plant. El Paso Water Utilities and El Paso County Water Improvement District No. 1 (El Paso #1) cooperate to deliver this water to the Park when it is not being used for irrigation, and we greatly appreciate their contributing to the success of the project in this way.

Potential Impacts of Lining the Riverside Canal

Currently, seepage from the Riverside Canal influences groundwater levels at Rio Bosque Wetlands Park and thus influences the vegetation found in the Park, particularly in areas near the canal. Lining the canal can be expected to alter groundwater conditions in the Park (Fig. 1) and thus alter the range of vegetation potentially found there. We are concerned about this potential impact and ask that you please address it in the environmental assessment for the canal-lining project.

Burges Hall
500 W. University Ave.
El Paso, Texas
79968-0645
(915) 747-5494
FAX: (915) 747-5145
www.cerm.utep.edu



Mr. Robert Maxwell
September 30, 2003
Page 2

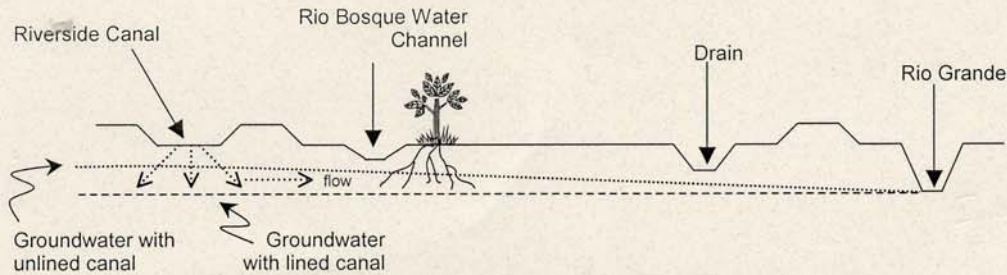


Figure 1. Change in groundwater levels expected at Rio Bosque Wetlands Park during irrigation season with lining of Riverside Canal.

Entrance Bridge

There are two projects we would like to pursue in cooperation with El Paso #1 that are critical to the success of Rio Bosque Wetlands Park. Both would need to be integrated with any modifications planned for the Riverside Canal. The first is an entrance bridge for the Park.

Currently, many members of the public have difficulty finding and getting to the Park. To provide better access, our long-range plans include an entrance bridge that would cross the Riverside Canal at a point just upstream from the Partidor Check Structure. El Paso #1 removed a previous bridge at this location in 1999 due to its unsafe condition and to prepare for concreting the canal. An entrance at this point would provide convenient, easy-to-find access to the Park from Socorro Road, located just 800 feet to the east.

At the public meeting on September 10, we learned one element of the canal-lining project would be a limited-access bridge incorporated into the Partidor Check Structure. If this bridge could be modified to include a pedestrian walkway open to the public, that walkway could serve as the entrance bridge to the Park and would greatly benefit the Park.

Providing Water for the Park during the Irrigation Season

The other project we wish to pursue cooperatively with El Paso #1 involves making a small amount of water available to the Park during the irrigation season. To realize Rio Bosque's full potential as an educational, recreational and ecological resource, we need at least a small amount of water flowing through our main channel during the growing season to maintain examples of wetland and riparian vegetation. Today, this is not possible because during the irrigation season in many years, all treated wastewater from the Bustamante Plant is used for irrigation, and the Park is completely dry.

Mr. Robert Maxwell
September 30, 2003
Page 3

At Rio Bosque Wetlands Park, one of our main goals is to meet ecosystem water needs in a way that is compatible with other regional water-management practices. One way to achieve this goal is to modify Rio Bosque's water system to permit water that has flowed through the Park to be delivered to the Riverside Canal for irrigation use. Under such an arrangement, most of the Bustamante Plant effluent could be discharged directly to the Riverside Canal during the irrigation season, as is the case today, but a small amount, 5-10%, could be routed through Rio Bosque before delivery to the canal.

Some of this water would seep from the Park's main water channel, but the amount would be small relative to the amount conserved due to lining the canal. The seepage test of the Riverside Canal in November 1998 indicated a seepage rate of approximately 3,000 acre-feet/mile/year, or 250 acre-feet/mile/month. Rio Bosque's main channel is approximately 2 miles long, and the section of drain that delivers water from the Bustamante Plant to the Park is approximately 0.4 miles long. Assuming (1) the width of the Riverside Canal is 80 feet, (2) the width of the wetted area in the Park's water channel is 4 feet under low-flow conditions, and (3) seepage rates in the Park's water channel and the upstream drain are similar to that in the canal, then the amount of water that would seep from the Park's water channel and the upstream drain during an 8-month (Feb 15 to Oct 15) irrigation season would be approximately 240 acre-feet:

$$(250 \text{ af/mi/mo}) * (2.4 \text{ mi}) * (8 \text{ mo}) * (4 \text{ ft}/80 \text{ ft}) = 240 \text{ acre-feet}$$

This amount represents 2.6% of the 9,075 acre-feet estimated to be conserved annually by lining the Riverside Canal.

How would Rio Bosque's water system be modified to permit delivery of water to the Canal? Possible approaches include:

- Creating a small holding pond within the Park from which water could be pumped to the canal.
- Building a gate structure at the point where the Playa Drain now passes under the Riverside Canal that would allow water in the drain, once it has reached a suitable elevation, to be delivered to the canal by gravity flow.
- Holding the water within the Park, allowing it to percolate to groundwater, and pumping groundwater to the canal.

We would like to work cooperatively with El Paso #1 to explore the feasibility of these different approaches and to pursue the best approach. We believe such a diversion of a small amount of irrigation water through the Park during the irrigation season would mitigate impacts of lining the Riverside Canal. As with the bridge, if modifications to Rio Bosque's water system were pursued, they would need to be integrated with the planned lining of the canal.

Thank you for your consideration of these ideas. As you prepare the environmental assessment for the canal-lining project, we would like to request an opportunity to review and comment on

MR. ROBERT MAXWELL
September 30, 2003
Page 4

those portions relating to Rio Bosque Wetlands Park. Please feel free to contact me if you have any questions, and please keep us informed as planning for the project proceeds.

Very truly yours,



John Sproul
Program Coordinator/Manager
Rio Bosque Wetlands Park
(915) 747-8663
(915) 747-5145 fax
sproul@utep.edu

cc: Al Blair, Axiom-Blair Engineering
Ray Cox, Parks and Recreation Dept., City of El Paso
Richard Garcia, Parks and Recreation Dept., City of El Paso
Jesus Reyes, Acting General Manager, El Paso #1
John Walton, CERM, UTEP

ORIGINAL

10/08/03

Robert H. Maxwell
 U.S. Bureau of Reclamation
 555 Broadway NE Ste 100 (ALB-153)
 Albuquerque, NM 87102

Dear Mr. Maxwell,

RE: El Paso County Water Improvement District No.1 Proposed Canal Lining Project

Thank you for meeting with the Friends of Rio Bosque and offering us this opportunity to comment on the proposed project. Since then, we have visited with concerned local residents and groups to give them an opportunity to express their concerns. Thank you for your fair and even-handed oversight of this project. We are proud and determined to insure compliance with the National Environmental Protection Act (NEPA).

On behalf of the 240 (two hundred and forty) signatories attached to the ten letters of petition that are attached to this cover letter, I strongly urge you to heed our comments. We unanimously request that the environmental assessment you are preparing for this project include your consideration of the many issues that have arisen regarding this project.

Progress in the Rio Bosque Wetlands Park restoration efforts must not be jeopardized. The proposed canal lining of the Riverside canal will result in unforeseen losses or depreciation in the environmental, social, educational, scientific, cultural, and historic value of the park. The delicate ecological balance of the emerging native river valley ecosystems at this park can be easily disrupted, jeopardizing the potential of a fully restored park and all that this means to the future of El Paso, Texas.

Please recommend implementing one, or more, of the many modern engineering options available for similar earthen canal lining projects. The project engineer should be able to evaluate and employ designs that have minimal impact on the environment.

The best alternative, though, is to move this entire project downstream of the pre-selected site. A comprehensive study should reveal areas where the water table is so high that it is actually causing problems for area farmers. An impermeable canal lining in those problematic areas will have the added advantage of restoring farmland plus meet your other water delivery and conservation goals. Only by exploring and selecting the best options available and considering input from the surrounding community and others, will taxpayer's money and community resources be responsibly handled.

Please provide me with a draft of your environmental assessment report so that I may review and comment on its content prior to your filing deadline.

Sincerely,

David J. Ochoa
 4431 Trowbridge Dr.
 El Paso, TX 79903
 915.873.5374



Cc: L. Ray Cox, Director
 City of El Paso
 Parks & Recreation Dept.
 1 Civic Center Plaza Ste 600
 El Paso TX 79901

Jesus Reyes, General Mgr.
 EPWID#1
 294 Candelaria
 El Paso, TX 79915

RECEIVED BOR ALBUQUERQUE AREA OFFICE OFFICIAL FILE COPY		
OCT 14 '03		
Class	EMV-1.11	Action
Prj	GF	
Cntr #	3003874	
Fldr #	38804	
Date	Initial	To
		153



ORIGINAL

ST. PIUS X COMMUNITY

RECTORY: 1050 N. CLARK STREET



COMUNIDAD DE SAN PIO X

EL PASO, TEXAS 79905-2002 • (915) 772-3226

October 9, 2003

Robert H. Maxwell
U.S. Bureau of Reclamation
555 Broadway NE Ste. 100 (ALB-153)
Albuquerque, NM 87102

RECEIVED FOR ALBUQUERQUE AREA OFFICE OFFICIAL FILE COPY		
OCT 14 '03		
Class	ENV-1-11	
Prj	GF	
Cntr #	3003872	
Flidr #	38804	
Date	Initial	To
		153

Dear Mr. Maxwell,

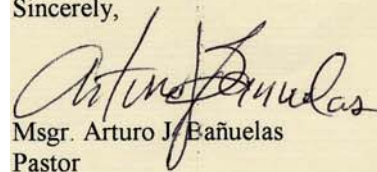
RE: El Paso County Water Improvement District No. 1 Proposed Canal Lining Project

On behalf of our parishioners from the St. Pius X Catholic Church community, and in support of environmental justice efforts by this parish's Sacred Earth Ministry, I request that the environmental assessment you are preparing consider the many issues surrounding this project in accordance with the National Environmental Protection Act (NEPA).

The environment, social, educational, scientific, cultural, and historic benefits of the Rio Bosque Wetlands Park must be preserved at all cost. We request a draft of the environmental assessment report so that we may review and comment on its content prior to your filing deadline. From person concerned about this project we have information that lead us to consider other options. Please consider for your report that there are many modern engineering options for the lining of earthen canals that would have minimal impact on those areas of community and environmental concern. By far, the most intelligent option is to relocate the proposed project to an area downstream of the pre-selected site. There you will find a high water table that is actually detrimental to surrounding farming efforts. There an impermeable canal lining and water savings would be a win-win situation. Exploring and selecting the best options would be the most intelligent use of taxpayer money and community resources.

Thank you for this opportunity to comment on the proposed U.S. Bureau of Reclamation project and for visiting with concerned local residents and groups and giving them an opportunity to express their concerns.

Sincerely,


Msgr. Arturo J. Bañuelas
Pastor





July 2, 2003

- COMMISSIONERS
 KATHARINE ARMSTRONG
 CHAIRMAN, AUSTIN
 ERNEST ANGELO, JR.
 VICE-CHAIRMAN, MIDLAND
 JOHN AVILA, JR.
 FORT WORTH
 JOSEPH B.C. FITZSIMONS
 SAN ANTONIO
 ALVIN L. HENRY
 HOUSTON
 PHILIP MONTGOMERY
 DALLAS
 DONATO D. RAMOS
 LAREDO
 KELLY W. RISING, M.D.
 BEAUMONT
 MARK E. WATSON, JR.
 SAN ANTONIO
 LEE M. BASS
 CHAIRMAN-EMERITUS
 FORT WORTH
 ROBERT L. COOK
 EXECUTIVE DIRECTOR

Ms. Janis Smith
 Axiom-Blair Engineering
 2711 Anderson Lane, Suite 210
 Austin, Texas 78757

Dear Ms. Smith:

This letter is in response to your review request, dated May 7, 2003, for potential impacts to rare, threatened, and endangered species from the proposed concrete lined canals, three check structures, and Socorro ponds within the El Paso Water Improvement District No. 1 in El Paso County.

Given the small proportion of public versus private land in Texas, the TPWD Biological and Conservation Data System (BCD) does not include a representative inventory of rare resources in the state. Although it is based on the best data available to TPWD regarding rare species, the data from the BCD do not provide a definitive statement as to the presence, absence, or condition of special species, natural communities, or other significant features in your project areas. These data cannot substitute for an on-site evaluation by your qualified biologists. The BCD information is intended to assist you in avoiding harm to species that may occur on your sites.

Based on the project description, when suitable habitat is present, the following species could potentially be impacted by the proposed activities:

State Listed Threatened

Chihuahuan Mud Turtle (*Kinosternon hirtipes murrayi*)

Species of Concern

Pecos River Muskrat (*Ondatra zibethicus ripensis*)

As noted in the text the Pecos River Muskrat is known to inhabit the El Paso canal system. Concrete lining of the canal would negatively impact this species, if it is currently burrowing into the earthen sides for its dens. Conversely, allowing the muskrat access into and out of the ponds could potentially provide habitat suitable for floating dens/lodges. A printout for this occurrence record is included for your planning reference. **Please do not include this species occurrence printout in your draft or final documents. Because some species are especially sensitive to collection or harassment, this record is for your reference only.**



Take a kid
 hunting or fishing
 . . .
 Visit a state park
 or historic site

200 SMITH SCHOOL ROAD
 USTIN, TEXAS 78744-3291
 512-389-4800
 www.tpwd.state.tx.us

To manage and conserve the natural and cultural resources of Texas and to provide hunting, fishing and outdoor recreation opportunities for the use and enjoyment of present and future generations.

elnaWID1Canals&SocorroPonds.doc



Ms. Janis Smith, Axiom-Blair Engineering
El Paso WID No 1, Canals, Check Structures, & Socorro Ponds
Page 2

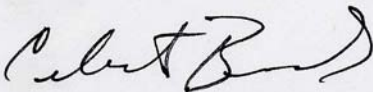
Also, please review the entire county list, as other rare species could be present depending upon habitat availability. If during construction, the project area is found to contain rare species, natural plant communities, or special features, TPWD recommends that precautions be taken to avoid impacts to them.

Excluding bank-clearing activities during the breeding season for migratory bird species will help minimize impacts to this group. The Migratory Bird Treaty Act (MBTA) implicitly prohibits intentional and unintentional take of migratory birds, including their nests and eggs, except when authorized under a US Fish and Wildlife (FWS) permit. Additional information regarding the MBTA may be obtained through the Southwest Regional Office (Region 2) Division of Migratory Birds, FWS, at (505) 248-7882.

This letter does not constitute a review of general fish and wildlife habitat impacts for this project. Should you need such a review, contact Kathy Boydston of the Wildlife Habitat Assessment Program, Wildlife Division (512/389-4571).

Thank you for the opportunity to comment on this project. Please contact me if you have any questions or need additional assistance (512/912-7021).

Sincerely,



Celeste Brancel, Environmental Review Coordinator
Wildlife Habitat Assessment Program, Wildlife Division
Threatened and Endangered Species

Enclosures (3)



United States Department of the Interior

FISH AND WILDLIFE SERVICE

10711 Burnet Road, Suite 200
 Austin, Texas 78758
 (512) 490-0057

JUN 30 2003

Janis J. Smith, EIT
 Axiom-Blair Engineering
 2711 West Anderson Lane #210
 Austin, Texas 78757

Consultation # 02-15-03-I-0364

Dear Ms. Smith:

The U.S. Fish and Wildlife Service (Service) has reviewed the Environmental Summary for the El Paso County Water Improvement District Number One (District), Canal, Structure, Pond, and Pumping Improvements Project. The Project is located in the city of El Paso, west of Socorro, along the Rio Grande River at the U.S./ Mexico border. The project is to be constructed using Texas Water Development Board funds under the Lower Rio Grande Valley Water Resources Conservation and Improvement Act of 2000 (PL-106-576). The District is also seeking a federal grant to share half the cost. The purpose of the project is to decrease water loss in an existing canal system.

The existing irrigation system includes about 16,000 feet of earthen-lined canal and a check structure at the downstream outlet of the canal system. Three new canal sections totaling about 16,000 feet are proposed. The new canals will be concrete lined with side slopes of 1.5:1 and will be about 11 feet deep. Two check structures (Partidor and Franklin) are proposed to deliver water to the canals and feed the Socorro Ponds. The Socorro Ponds will be off-line, earthen storage ponds for water diverted during peak river flows. A third structure, Wasteway One, will be constructed to allow water to return to the Rio Grande River in the event of an emergency or for maintenance needs. Our comments and recommendations follow.

Threatened and Endangered Species

The following federally listed endangered, threatened, and candidate species are known to occur in El Paso County:

Least tern	(E ~)	<i>Sterna antillarum</i>
Northern aplomado falcon	(E)	<i>Falco femoralis septentrionalis</i>
Southwestern willow flycatcher	(E ‡)	<i>Empidonax traillii extimus</i>
Sneed pincushion cactus	(E)	<i>Coryphantha sneedii</i> (= <i>Escobaria</i> = <i>Mammillaria</i>) var. <i>sneedii</i>
Mexican spotted owl	(T ‡)	<i>Strix occidentalis lucida</i>
Black-tailed prairie dog	(C)	<i>Cynomys ludovicianus</i>
Yellow-billed cuckoo	(C)	<i>Coccyzus americanus</i>



JAMES J. SMITH, EIT

2

The Service does not believe that habitat for any of the above species occurs in the project area. Therefore, we do not anticipate impacts to the species by the proposed project.

Wetlands

Wetlands and riparian zones provide valuable fish and wildlife habitat as well as contribute to flood control, water quality enhancement, and groundwater recharge. Wetland and riparian vegetation provides food and cover for wildlife, stabilizes banks, and decreases soil erosion. These areas are inherently dynamic and very sensitive to changes caused by such activities as overgrazing, logging, or major construction. Construction activities near such areas should be carefully designed to minimize impacts. The installation and maintenance of Socorro Ponds should greatly increase the availability of open water habitat which should mitigate the impacts to existing wetlands.

If vegetation clearing is needed in riparian areas, please revegetate these areas with native wetland and riparian vegetation to prevent erosion and loss of habitat. We recommend minimizing the area of soil scarification and initiating incremental reestablishment of herbaceous vegetation at the proposed work sites. Species commonly used for soil stabilization are listed in the Texas Department of Agriculture's (TDA) Native Tree and Plant Directory, available from TDA at P.O. Box 12847, Austin, Texas 78711.

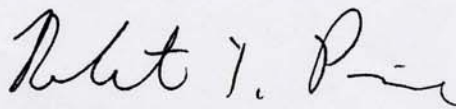
Other Fish and Wildlife Resources

A total of about 340 acres of soil disturbance is anticipated for the construction activities; however, all of the land used for construction has been previously disturbed. No significant long-term impact on the distribution, diversity, and coverage of vegetation is anticipated. Vegetation is expected to be rapidly reintroduced by adjacent undisturbed areas of plants. Since the adjacent areas are described as consisting of scattered grasses and weedy annuals, the Service recommends that the area be planted in native grasses once construction is completed. These grasses may need to be irrigated to become properly established.

Overall, it is anticipated that water withdrawals from the Rio Grande will be lessened by the proposed project. The more efficient system should reduce the current amount of pumping from the river. This will benefit wildlife species along the river. Any construction impacts should be minimal and of relatively short duration.

We appreciate the opportunity to comment on the proposed project and appreciate your support of fish and wildlife habitat management. If you have any further questions or comments please contact Matthew Lechner at (512) 490-0057, extension 234.

Sincerely,



Robert T. Pine
Supervisor