

Albuquerque F.O.
Peterson <i>EP 6-19</i>
* Medlin <i>6/24/84</i>
Souder
Couret
* Hanson <i>6/20</i>
Ault
Roehm
Montoya
Lovato
File <i>4 TorC</i>
Destroy

June 20, 1984

District Engineer
 Corps of Engineers, U.S. Army
 P. O. Box 1580
 Albuquerque, New Mexico 87103

Dear Sir:

This Planning Aid Letter (PAL) presents comments on your October 1983 document entitled "Reconnaissance Report, Rio Grande Floodway, Truth or Consequences Unit, New Mexico." Our involvement in this project began in fiscal year 1980. Previous PAL's were prepared in 1980, 1981 and 1982. This letter does not constitute our report as required by Section 2(b) of the Fish and Wildlife Coordination Act.

We understand that the reconnaissance phase of project planning requires formulation and evaluation of all possible alternatives. All alternatives and combination of alternatives should receive equal consideration. Information should be gathered and presented in the Reconnaissance Report. We believe that additional alternatives to solve the flooding problem in Truth or Consequences and Williamsburg should be presented in the report.

The document addresses four alternatives to solve the flooding problem in the Cities of Truth or Consequences and Williamsburg; 1) flood plain management, 2) flood proofings, 3) levee construction and channel modifications and 4) dam construction. Watershed treatment should be considered as another viable alternative. We have suggested this alternative in previous PAL's; September 29, 1980 and September 8, 1982.

Watershed treatment would reduce erosion, increase vegetation production and reduce peak runoff flows. Reducing erosion would increase water quality in the Rio Grande which would benefit the fishery. Additional vegetation would provide more food and cover for wildlife. Reduced peak runoff would allow wildlife populations to become better established.

The Bureau of Land Management has projected benefits from a watershed treatment and management plan for the Rio Puerco Resource Area (Final Environmental Statement, Rio Puerco Livestock Grazing Management Program, 1977). The plan would decrease soil losses by 180 to 540 tons per square mile, double forage production and decrease peak surface runoff by 25 percent.

In Section 73 of the 1974 Water Resource Development Act (P.L. 93-251), Congress established the following policy: "...consideration shall be given to nonstructural alternatives in any Federal surveys, plans, or designs for flood protection." A mix of nonstructural and structural alternatives should also be developed. On page 18 of the Corp's own publication titled Reference Handbook, For Use With The Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies, the following statement is made:

"....Thus, the goal of water resource planning is to formulate the mix or package of structural and nonstructural measures that makes the most satisfactory contribution to the Federal objective, in consideration of other Federal, local and international concerns."

The description of the alternatives contains an abundance of information on dam construction but contains very little information on the other alternatives. Therefore, it is difficult to fairly evaluate all the alternatives and select a desired plan. Additional information should be developed for the other alternatives presented and watershed treatment should be added as an alternative. Each alternative that the CE considers should be evaluated for: 1) completeness, 2) efficiency, 3) effectiveness, and 4) acceptability. In addition, four accounts are to be evaluated for each alternative, 1) national economic development, 2) environmental quality, 3) regional economic development and 4) other social effects (Digest of Water Resources Policies and Authorities, U.S. Army Corps of Engineers, June 30, 1983).

We look forward to an opportunity to review more project information. If a field review of alternatives becomes necessary we are prepared to work with members of your staff.

Sincerely yours,

Joel A. Medlin
Acting Field Supervisor

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Project Office, Bureau of Reclamation, Truth or Consequences, New Mexico
District Manager, Bureau of Land Management, Las Cruces, New Mexico
Regional Director, FWS, Habitat Resources, Albuquerque, New Mexico