APPENDICES
TO THE FINAL EIS FOR RIVER MANAGEMENT ALTERNATIVES
RIO GRANDE CANALIZATION PROJECT JUNE 2004

Appendix J. Cross-Reference Index of Comment Tracking Number and EIS Section

Comment	EIS Sections	Author	Summary Comment	Summary Response
A1-01	4.1.6-a	U.S. Department of the Interior	States that, due to high salinity, flushing with high flows can benefit soils and floodway.	Noted.
A1-02	2.2.4-b	U.S. Department of the Interior	Suggests providing more information regarding siltation around in-stream fish habitat structures.	Performance of the in-stream structures, evaluated over a 3-year period by the USFWS Albuquerque Field Office, was documented in annual monitoring reports (see USFWS 2000a in Section 6 of the Draft EIS).
A1-03	Errata	U.S. Department of the Interior	Indicates that "Reservation" needs to be replaced with "Refuge" in Bosque del Apache Wildlife Refuge.	Text corrections are listed in Subchapter I.G of the Final EIS.
A1-04	2.13-c4	U.S. Department of the Interior	The Targeted River Restoration alternative would provide the greater environmental benefit - supports concept of high flows.	Noted. Benefits are evaluated in Sections 4.4 throughout 4.7 of the Draft EIS.
A1-05	2.9.2-a	U.S. Department of the Interior	Suggests collaborative water conservation programs for the RGCP, identifying mitigation for potential impacts on fish and wildlife (i.e. canal lining).	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
A1-06	2.3.2-a	U.S. Department of the Interior	Supports development of effective grazing guidelines, compliance, and monitoring programs.	Noted.
A1-07	2.3.2-a	U.S. Department of the Interior	Recommends that point project areas be excluded from grazing, and best management practices used for maintenance activities.	The USIBWC concurs. Grazing will not be conducted in point project areas, and best management practices will be required as listed in the mitigation section (Section 4.14).
A1-08	4.5.6-a	U.S. Department of the Interior	Supports meander development to create habitat for the southwestern willow flycatcher, yellow-billed cuckoo, and other rare species.	Noted. A Biological Assessment was submitted to USFWS (see Appendix Q), and a letter of concurrence with findings was received from the agency (see Appendix P of the Final EIS).
A1-09	3.1.3-a	U.S. Department of the Interior	Add leading zero to monitoring station #08364000, and research additional water-quality information.	An updated Section 3.1 is provided in Subchapter I.D of the Final EIS.
A1-10	2.9.2-a	U.S. Department of the Interior	Recommends that USIBWC work with irrigation districts to convert water intensive crops to crops requiring less water.	Crop substitution is a management decision by the farmers and districts: adoption of environmental measures would not be beneficial to the agricultural community under this scenario.
A1-11	2.2.4-b	U.S. Department of the Interior	Recommends, when possible, leaving debris in channel to diversity and improve aquatic habitat.	This recommendation is in conflict with the USIBWC's water delivery and flood control mission.
A1-12	2.2.3-b	U.S. Department of the Interior	Recommends, when possible, use of vegetation and soft armor to minimize use of permanent erosion-protection structures.	Noted. Whenever feasible, this approach has been used in agreement with USACE 1996 recommendations (see Appendix B).

Comment	EIS Sections	Author	Summary Comment	Summary Response
A1-13	4.6.1-a	U.S. Department of the Interior	Recommends that project related effects to the yellow-billed cuckoo be addressed in the Final EIS	Information on T&E species in the RGCP was requested from the USFWS, TPWD, and NMGF. The yellow-billed cuckoo is considered a species of concern, but not T&E (see Biological Assessment in Appendix Q).
A1-14	2.3.2-a	U.S. Department of the Interior	Supports reduction of grazing in riparian areas and construction of grazing exclusion fences from wetlands and river banks.	Noted.
A1-15	4.14-a	U.S. Department of the Interior	Supports implementation of mitigation measures identified on Table 4.14-3.	Noted.
A2-1	1.5-d 4.0 -c	U.S. EPA	The Draft EIS is rated as "LO" indicating that the EPA has "Lack of Objections" to the lead agency's proposed action.	Noted. The USIBWC appreciates EPA's review and assigned rating.
A3-1	2.13-c4	Texas Parks & Wildlife Dept.	Supports Alternative 4 - Targeted River Restoration Alternative.	Noted. Benefits are evaluated in Sections 4.4 throughout 4.7.
A3-2	4.1.6-a	Texas Parks & Wildlife Dept.	Alternative 4 promotes improved water quality by reducing erosion and nutrient input from grazing and agriculture.	Noted.
A3-3	4.7.6-a	Texas Parks & Wildlife Dept.	Reestablishing meanders has the potential to establish aquatic macrophytes and improve instream habitat.	Noted.
A3-4	4.1.6-a	Texas Parks & Wildlife Dept.	Water conservation irrigation practices improve water quality by reducing water demand and contamination while beneficial for fish and wildlife.	Noted.
A3-5	4.7.6-a	Texas Parks & Wildlife Dept.	Alternative 4 would promote useable habitat and spawning for the Rio Grande silvery minnow.	Noted.
A3-6	4.5.6-a	Texas Parks & Wildlife Dept.	Alternative 4 would create habitat for the Southwestern willow flycatcher.	Noted. A Biological Assessment was submitted to USFWS (an electronic version is provided in Appendix Q).
A3-7	4.1.5-a	Texas Parks & Wildlife Dept.	Environmental measures would promote removal of water consumptive invasive species that would augment water supplies.	Noted.
A4-1	2.13-c4	New Mexico Forestry Dept	Strongly consider adoption of Targeted River Restoration.	Noted. The Integrated USIBWC Land Management was selected as the preferred alternative on the basis of opportunities and constraints for restoration along the RGCP.
A5-1	3.10.3-a	New Mexico Dept. Cultural Affairs	Request copy of the Archaeological report conducted for the project.	The report was sent to New Mexico Department of Cultural Affairs on March 4, 2004, and a follow up letter from the state agency was received on May 10, 2004 (see Appendix M).

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A5-2	3.10.2-a	New Mexico Dept. Cultural Affairs	Additional tribes should be consulted - Comanche Indian Tribe, Kiowa Tribe, Navajo Tribe, and Hopi Tribe.	Continued Native American consultation will be conducted as part of a programmatic agreement, as suggested by the New Mexico Department of Cultural Affairs.
A5-3	3.10.3-a	New Mexico Dept. Cultural Affairs	States that effects evaluation will be made after review of 2001 Cultural Resources report.	The report was sent to New Mexico Department of Cultural Affairs on March 4, 2004, and a follow up letter from the state agency was received on May 10, 2004 (see Appendix M).
A5-4	4.14-a	New Mexico Dept. Cultural Affairs	Mitigation measures are inadequate to resolve adverse effects.	A programmatic agreement with the New Mexico and Texas State Preservation Offices will be accomplished as part of the Implementation Strategy.
A5-5	4.14-a 3.10.3-a	New Mexico Dept. Cultural Affairs	Insufficient information for consultation under Section 106 of the National Historic Preservation Act; consider a Programmatic Agreement.	A programmatic agreement with the New Mexico and Texas State Preservation Offices will be accomplished as part of the Implementation Strategy.
A5b-1	4.14-a 3.10.2-a	New Mexico Dept. Cultural Affairs	Need to specify effects of the project on sites listed in Table 9.1 of the 2001 Cultural Resources Report.	Effects are evaluated in Tables 4.10-3 and 4.10-4 of the Draft EIS. Specific site locations were not listed since they are considered sensitive archaeological information.
A5b-2	3.10.3-a 4.14-a	New Mexico Dept. Cultural Affairs	Need to systematically survey areas identified as having the greatest potential for surface cultural remains (Figures 9.1 to 9.15 of the 2001 Cultural Resources Report).	These surveys will be conducted as part of a programmatic agreement recommended by the state agency.
A5b-3	4.14-a	New Mexico Dept. Cultural Affairs	Emphasis should be placed on implementing archaeological monitor and/or discovery protocols, as outlined in the Draft EIS, to mitigate potential impacts.	These actions will be conducted as part of a programmatic agreement according the state agency's recommendations.
A5b-4	4.14-a	New Mexico Dept. Cultural Affairs	Need for consultation with the Comanche Indian Tribe, Kiowa Tribe, Navajo Nation, and Hopi Tribe.	Continued Native American consultation will be conducted as part of a programmatic agreement, as suggested by the state agency.
A5b-5	3.10.3-a	New Mexico Dept. Cultural Affairs	Need for the Record of Decision to include a programmatic agreement for Section 106 consultation.	The USIBWC agrees with the recommendation. The Record of Decision will state the need for a programmatic agreement.
A6-01	5.1.4-a	New Mexico Dept. of Agriculture	Concern that a public hearing was not held in New Mexico.	Since extensive stakeholder consultation has taken place over the four years of EIS development, a single hearing at the USIBWC offices was considered adequate.
A6-02	2.3.2-a	New Mexico Dept. of Agriculture	Need a better explanation of changes to grazing leases.	Two steps are discussed in Section 2.3.2 of the Draft EIS for grazing regime changes: development of a management plan, and preparation of an allocation management plan for each lease.
A6-03	2.9.3-b	New Mexico Dept. of Agriculture	Concern about lands already targeted for voluntary conservation easements.	In almost all instances, targeted areas are remnant bosques or fallow lands adjacent to the ROW that currently are not in agricultural production
A6-04	4.1.1-b	New Mexico Dept. of Agriculture	Draft EIS does not discuss impacts associated with groundwater use to establish riparian vegetation.	Ground water use is not anticipated other than a small-scale supplemental use.

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A6-05	2.11-d		New Mexico Dept. of Agriculture	Need to look more closely at water conservation financing costs: need for land preparation, limitations of canal water use in drip irrigation, and changes in surface water-groundwater interaction (refer to the King and Maitland report).	Costs are expected to vary widely among locations and acquisition methods. A high-end estimate from the 2003 King and Maitland report (Table 30) was used as a conservative value for comparison of the alternatives. Estimates will be refined as water rights are negotiated.
A6-06	4.8.1-a		New Mexico Dept. of Agriculture	Evaluation of NEPA requirements in regard to conflicts with local land use policies, etc.	Because changes to river management were largely restricted to USIBWC jurisdictional lands, few conflicts with local land use were anticipated. Compatibility with land use plans was emphasized in the recreational aspects of the RGCP.
A6-07	4.8.5-b		New Mexico Dept. of Agriculture	Draft EIS does not discuss effects regarding retired land from agricultural production.	To minimize farmland retirement, the implementation strategy to secure water is funding of water conservation programs. If farmland retirement were required, land would be converted into conservation easements, to the extent possible.
A6-08	4.9.1-a		New Mexico Dept. of Agriculture	EIFS system was not properly documented and is not readily available - violation according to NEPA.	A new Appendix N was included in the Final EIS to provide additional EIFS support documentation for levee construction and potential farmland retirement.
A6-09	4.9.1-b		New Mexico Dept. of Agriculture	Socioeconomic impacts should be discussed for each county affected.	An updated Section 4.9, describing potential socioeconomic effects individually for Doña Ana and El Paso Counties, is provided in Subchapter I.E of the Final EIS.
A6-10	2.11-a	4.9.1-a	New Mexico Dept. of Agriculture	Recommends that detailed cost estimates should be included in appendices.	Detailed data were provided in Appendix I of the Draft EIS (March 2001 Alternatives Formulation Report, Section 9). This information is also provided in the Final EIS (Appendix Q).
A7-1	2.9.2-b		NM Interstate Stream Commission	No alternative should compromise Interstate Compact obligations.	Agreed. All alternatives are based on the premise that there will be no net increase in water depletion in agreement with Compact obligations.
A7-2	2.13-a	2.9.2-b	NM Interstate Stream Commission	Supports all action alternatives providing no net increase in water depletion occurs.	Noted. No net increase in water depletion is anticipated.
A8-1	2.13-c4	2.13-c3	New Mexico Dept. Game & Fish	Recommends Targeted River Restoration but supports Integrated Land Management as an alternative.	Noted. The Integrated USIBWC Land Management was selected as the preferred alternative on the basis of opportunities and constraints for restoration.
A9-01	2.13-c4		NM Environment Department	Supports the purpose of the Targeted Restoration Alternative.	Noted. The Integrated USIBWC Land Management was selected as the preferred alternative on the basis of opportunities and constraints for restoration.
A9-02	3.1.3-a		NM Environment Department	Clarification on Water Quality Segments along RGCP.	An updated Section 3.1 is provided in Subchapter I.D of the Final EIS.
A9-03	3.1.3-a		NM Environment Department	Updates CWA Section 303(d) list for New Mexico and refers to web site.	An updated Section 3.1 is provided in Subchapter I.D of the Final EIS.

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A9-04	4.15.1-a	NM Environment Department	Request cumulative impacts evaluation of the El Paso-Las Cruces Regional Sustainable Water Project.	An expanded evaluation of potential cumulative effects of this project is presented in Subchapter I.E of the Final EIS (Section 4.15.1).
A9-05	2.5.2-a	NM Environment Department	Proposed actions under Alternative 4 may not provide sufficient stream flows to maintain river functions and restoration measures.	Partial river restoration, as allowed by the opportunities and constraints, was the adopted objective, not a comprehensive river restoration envisioned by the commentator.
A9-06	App F-a	NM Environment Department	Suggests consideration of multiple reservoir releases and river restoration options.	While multiple release regimes could have been evaluated, the maximum theoretical release was used as a conservative approach to assess potential effects on water use and extent of improved riparian areas. This approach represents best-case scenario for restoration, and most conservative scenario for potential effects of vegetation development on flood containment capacity.
A9-07	2.5.3-a	NM Environment Department	Suggests consideration of riverbed management techniques and in-stream habitat creation.	Use of in-stream habitat structures was not retained in the alternatives reformulation due to their limited environmental benefit and potential to reduce efficiency in water deliveries.
A9-08	4.4.1-a	NM Environment Department	Suggests a more holistic approach to riparian restoration that promotes a larger variety of plant species.	While the cottonwood-willow association was described as the core riparian vegetation, environmental measures will support development of a variety of plant species, including native grasses (see description of reference communities in Section 4.4.1)
A9-09	4.1 -b	NM Environment Department	States the need for an EPA's General Construction Permit to control storm water discharges.	Permit needs are stated in Table 1.4-1.
A9-10	4.14-b	NM Environment Department	States the requirement to obtain a CWA Section 404 permit from USACE for dredging.	Permit needs are stated in Table 1.4-1.
A9-11	4.14-b	NM Environment Department	States the requirement to avoid disposal of refuse into the river.	Permit needs are stated in Table 1.4-1.
A9-12	4.14-b	NM Environment Department	States the need to protect native riparian vegetation and wetlands.	Mitigation measures are listed in Table 4.14-3. Use of those measures was supported by the Department of the Interior (see comment A1-15).
O10-1	3.5.1-a	El Paso Zoo	Requests information on field survey methodologies.	A spring survey and a fall survey were conducted to characterize terrestrial vegetation and wildlife habitat along the RGCP. Detailed information is provided in the January 2004 Biological Assessment (a copy in electronic format is provided in Appendix Q).
O1-1	2.2.3-a	Doña Ana Co. Farm & Livestock Bureau	Discontinued dredging/mowing is against USIBWC legal obligations.	The channel and other RGCP features are constantly monitored and surveyed to ensure that no critical conditions are developing. The USIBWC continues sediment removal from the pilot channel according to identified needs and within the short window of opportunity afforded by the non-irrigation season.

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O1-2	1.3.3-b	Doña Ana Co. Farm & Livestock Bureau	Farmers interests have become secondary to those of environmental groups.	In formulating RGCP management alternatives, the USIBWC balanced the need for environmental stewardship along with its mission of flood control and water delivery. The interests of all stakeholders along the RGCP were taken into consideration.
O1-3	2.2.3-a	Doña Ana Co. Farm & Livestock Bureau	Continue dredging as USIBWC has been mandated.	The USIBWC continues sediment removal according to identified needs and within the short window of opportunity afforded by the non-irrigation season.
O1-4	2.3.1-d	Doña Ana Co. Farm & Livestock Bureau	Maintenance of banks within levees will avoid additional flood control.	This assumption is incorrect: increased vegetation as evaluated in the Draft EIS would not significantly reduce the RGCP current flood containtment capacity, as illustrated in Table 4.2-1.
O1-5	2.9.2-c	Doña Ana Co. Farm & Livestock Bureau	No planting of trees that use substantial amounts of water.	A high priority was given to sponsoring on-farm water conservation programs as a strategy that allows implementation of environmental measures while addressing drought conditions.
O2-1	1.3.3-a	New Mexico Pecan Growers	Benefits to the entire valley and practical use of limited water and money resources must be considered in improving the river environmental conditions.	Flood control and water deliveries are the core RGCP actions conducted by the USIBWC. Alternatives development took into account constraints and opportunities for continued flood control and water delivery (see Tables 1.3-2 and Table 1.3-3).
O2-2	1.3.3-a	New Mexico Pecan Growers	USIBWC should commit resources only to improve water delivery, conserve water, improve flood control, and preserve farmland.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
O2-3	3.8.1-a 4.5.1-a	New Mexico Pecan Growers	States that agriculture is undervalued in government projects and describes six pecan orchards' benefits to the local economy, the environment, and wildlife.	The value of agriculture is fully recognized. Farmland adjacent to the RGCP does provide additional environmental benefits as indicated by the commentator, and thus the goal adopted in the formulation of alternatives to minimize farmland retirement.
O2-4	2.13-c2	New Mexico Pecan Growers	States that Flood Control Alternative is the only one justified based on costs (if combined with sediment buildup control and water conservation measures).	Noted. Cost was a criterion taken into consideration in the selection of the Integrated USIBWC Land Management as the preferred alternative.
O3-1	2.5.2-a 1.3.4-a	American Rivers	Evaluated alternatives may not achieve restoration of the physical and biological integrity of the Rio Grande.	Partial river restoration, as allowed by the opportunities and constraints (Subsection 1.3.4) was the adopted objective, not a comprehensive river restoration envisioned by the commentator.
O3-2	1.3.4-a	American Rivers	River restoration recommendations are listed including restoration of meanders and streamside habitats; water rights acquisition for restoration projects; land purchase for flood easements; a halt to grazing and vegetation mowing; and evaluation of flood control needs.	The USIBWC incorporated these recommendations in the management alternatives to the extent that they were compatible with the RGCP flood control and water delivery mission. Flood easements are an option whose need has not yet been identified; unmanaged vegetation growth is counterproductive as it would lead to salt cedar invasion.
O3-3	1.3.4-a	American Rivers	USIBWC has a historic opportunity for river improvement.	Noted.

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O4-1	2.13-a	El Paso Water Utilities/PSB	Selected management alternative must maintain reliable water delivery, not impact water quality, and remain "water rights neutral" to current users.	Noted; environmental enhancements could only occur with no net increase in water depletions.
O4-2	2.9.1-a	El Paso Water Utilities/PSB	Coordination with Paso del Norte Watershed Council should be conducted "in accordance with the objectives of the Council, and within the limits of available manpower and resources."	Noted. Text of the proposed implementation strategy was modified in the Final EIS as recommended (Subchapter I.G).
O4-3	2.9.2-b	El Paso Water Utilities/PSB	Accurate, reliable, and defensible water accounting methods must we established for water rights acquisition.	Fully agree. Addressing legal, regulatory and institutional issues will be the initial focus of a modified river management alternative, as discussed in Section 2.10 of the Draft EIS.
O4-4	2.13-c3	El Paso Water Utilities/PSB	Supports selection of the Integrated USIBWC Land Management alternative.	Noted. The Integrated USIBWC Land Management was selected as the preferred alternative on the basis of multiple criteria.
O4-5	4.1.6-b	El Paso Water Utilities/PSB	An extremely inefficient use of Rio Grande Project water would result from the Targeted River Restoration Alternative.	Noted. This issue was taken into consideration in selecting the Integrated USIBWC Land Management as the preferred alternative for the RGCP.
O4-6	2.13-c4	El Paso Water Utilities/PSB	Opposes the Targeted Restoration alternative as uncertain and risky to water supply relative to the other alternatives.	Noted. The Integrated USIBWC Land Management was selected as the preferred alternative on the basis of opportunities and constraints, and compliance with the RGCP mission.
O4-7	4.1.6-b	El Paso Water Utilities/PSB	Pumping is proposed as a more efficient overbank flow method that upstream releases if Targeted Restoration alternative were adopted by USIBWC.	Noted. Controlled water releases are not a component of the selected alternative. The USIBWC appreciates the input, and will consider pumping as a method to be used in conjunction with shavedown and planting areas.
O4-8	3.10.3-a	El Paso Water Utilities/PSB	Suggests that formal determination of eligibility of the prehistoric and historic sites should be pursued from the SHPO.	The eligibility will be determined as part of a programmatic agreement recommended by the New Mexico Department of Cultural Affairs.
O5-1	1.3.4-a 2.13-c4	NM Natural History	Qualified support for the Targeted River Restoration alternative (considered not far reaching enough).	A wide range of environmental measures were incorporated into the river management alternatives under consideration.
O5-2	1.3.4-b	NM Natural History Institute	Releases from the Caballo should re-shape the channel.	Uncontrolled channel changes are contrary to water delivery mission, and were excluded in the formulation of alternatives.
O5-3	2.7.2-a	NM Natural History Institute	Minimum flows should be specified to support aquatic and marsh wildlife.	In-stream flows were excluded from analysis in the reformulation of alternatives as a measure unrelated to the RGCP operation and outside USIBWC jurisdiction. Those flows are regulated by upstream reservoirs, and flow patterns are dictated by agricultural use.
O5-4	2.13-c4	NM Natural History Institute	Recommends salt cedar removal, cottonwoods restoration, and elimination of streamside grazing for vegetation manipulation.	Noted. The first two measures are core actions incorporated into the selected alternative. Currently grazing is conducted primarily in uplands. A 2002 USIBWC Directive is in place for control and monitoring of existing leases (Section 2.3.2).

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O5-5	2.9.3-a		NM Natural History Institute	Favors purchase of land and water rights to increase floodplain habitat.	Noted. Land purchases are viable to the extent that such acquisitions are justified for improvement of RGCP operation.
O6-1	1.3.4-a	2.13-c4	SW Consolidated Sportsmen	Supports a restoration alternative with additional measures that fulfill SWEC agreement.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
O6-2	1.3.4-a		SW Consolidated Sportsmen	Six restoration recommendations are listed.	Noted. See response to comment O6-1.
O6-3	1.3.4-a		SW Consolidated Sportsmen	Endorses SWEC vision.	Noted.
O6-4	2.13-c4		SW Consolidated Sportsmen	Supports Targeted River Restoration Alternative.	Noted.
O7-01a	1.3.4-a	2.13-c4	Alliance for the Rio Grande Heritage	General Comment A: Prefers the Targeted River Restoration Alternative, however, implementation is not feasible.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
O7-01b	5.1.4-c		Alliance for the Rio Grande Heritage	General Comment B: Delay Final EIS, revise Draft EIS, when the proposed "cooperative hydraulic study" is complete.	Impacts were evaluated for decision on a preferred river management alternative. Additional hydraulic modeling is an implementation issue whose findings will be used in the future to refine the flood control strategy along the RGCP.
O7-01c	2.3.1-a		Alliance for the Rio Grande Heritage	General Comment C: Hydraulic study is needed to provide justification for additional flood control improvements (Alternative 2).	The USIBWC plans to perform two-dimensional modeling, in combination with results of the levee structural condition study, to aid in levee rehabilitation planning.
O7-02a	2.7.3-a	2.11-c	Alliance for the Rio Grande Heritage	Alternatives Formulation: Draft EIS does not evaluate all the alternatives - no substantial treatment of Alternative 2 - no cost estimates for No Action.	Flood control is extensively documented, including findings of the comprehensive 1996 USACE study and assessment of vegetation growth (Appendix E). Cost estimates represent increases relative to current operation (No Action Alternative).
O7-02b	2.3.1-b		Alliance for the Rio Grande Heritage	Alternatives Formulation: Discussion of Flood Control Alternative is unclear.	A clarification on this issue was provided in Appendix H the Draft EIS, response to question #19 of the WWF (September 12, 2003 letter).
O7-02c	2.3.1-b		Alliance for the Rio Grande Heritage	Alternatives Formulation: Is Flood Control Alternative a proposed action?	See Appendix H the Draft EIS, response to question #19 of the WWF (September 12, 2003 letter).
O7-02d	2.3.1-a		Alliance for the Rio Grande Heritage	Alternatives Formulation: A full flood control capacity investigation is needed before proposing flood control improvements.	The USIBWC plans to perform two-dimensional modeling, in combination with results of the levee structural condition study, to aid in levee rehabilitation planning.
O7-02e	2.3.1-a		Alliance for the Rio Grande Heritage	Alternatives Formulation: Two-dimensional flooding is needed to identify needs for increasing levee heights.	While use of a two-dimensional model was not warranted for environmental effects evaluation, that type of model will be used to narrow the degree of potential levee deficiencies.

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O7-02f	2.11-b	Alliance for the Rio Grande Heritage	Alternatives Formulation: Need, extent, and costs of levee improvements are speculative - should remove from all the alternatives.	Levee costs were not a basis for alternative selection since those costs apply to all action alternatives. Levee costs represent best available estimates as documented in detail in the March 2001 Alternatives Formulation Report (see Appendix Q).
O7-02g	App F-a	Alliance for the Rio Grande Heritage	Alternatives Formulation: Further investigation of controlled release is needed for determine if the Targeted River Restoration Alternative is viable.	The effects evaluation addressed the theoretical maximum floodable area, which represents best-case scenario for restoration, and the most conservative scenario for potential effects of vegetation development on flood containment capacity. Further analysis would be warranted only if controlled water releases were actually implemented, following resolution of multiple associated legal, regulatory, funding, and water rights issues.
O7-02h	App F-a	Alliance for the Rio Grande Heritage	Alternatives Formulation: Draft EIS does not address sustainability of restoration projects based on water releases from Caballo Dam.	The EIS properly evaluated potential effects of water releases. Further evaluation of controlled water releases is unwarranted as previously discussed in the response to comment O7-02g.
O7-02i	App F-b	Alliance for the Rio Grande Heritage	Alternatives Formulation: Magnitude and duration of releases are unclear.	Further evaluation of controlled water releases is unwarranted as previously discussed in the response to comment O7-02g.
O7-02j	1.3.4-a	Alliance for the Rio Grande Heritage	Alternatives Formulation: Other reasonable alternatives exist, therefore Draft EIS is out of compliance.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
O7-03a	App F-b	Alliance for the Rio Grande Heritage	Proposed New Alternative: Select a design restoration hydrograph and peak discharge from Caballo Reservoir.	Further evaluation of controlled water releases is unwarranted as previously discussed in the response to comment O7-02g.
O7-03b	1.3.4-b	Alliance for the Rio Grande Heritage	Proposed New Alternative: Use two-dimensional flood routing model.	While use of a two-dimensional model was not warranted for environmental effects evaluation, this type of model will be used in the future to narrow the degree of potential levee deficiencies.
O7-03c	1.1.2-b	Alliance for the Rio Grande Heritage	Proposed New Alternative: Implement restoration projects at evenly distributed locations is recommended.	Projects where located where best opportunities for riparian vegetation development were identified on the basis of topography, adjacent land use, flood control, and feasibility.
O7-03d	2.9.1-b	Alliance for the Rio Grande Heritage	Proposed New Alternative: Recommends establishing a long-term funding to purchase water rights and land to support restoration.	The USIBWC is evaluating acquisition of water rights through the New Mexico Office of the State Engineer.
O7-03e	2.7.2-a	Alliance for the Rio Grande Heritage	Proposed New Alternative: Maintain minimum winter flows to sustain native fish species.	In-stream flows were excluded from analysis in the reformulation of alternatives as a measure unrelated to the RGCP operation and outside USIBWC jurisdiction. Those flows are regulated by upstream reservoirs, and flow patterns are dictated by agricultural use.

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O7-03f	1.3.4-d	Alliance for the Rio Grande Heritage	Proposed New Alternative: Phase out mowing and grazing and establish non-native invasive species program.	The alternatives did include reduction in mowed areas and establishment of native grasslands and riparian vegetation, taking into account constraints such as the need to retain mowing for flood containment and salt cedar control.
O7-03g	4.15.2-a	Alliance for the Rio Grande Heritage	Proposed New Alternative: Use two-dimensional model to conduct an integrated analysis of impacts.	Future use of a two-dimensional model to refine levee system improvements is inconsequential in the effects evaluation of environmental measures under consideration.
O7-03h	2.9.3-a	Alliance for the Rio Grande Heritage	Proposed New Alternative: Work with local governments to discourage development near the river.	A need for additional flood easements beyond the ROW has not been identified. The bulk of potential levee deficiencies are located in areas already urbanized.
O7-04a	2.11-d	Alliance for the Rio Grande Heritage	Water Rights Costs: Capital cost estimates are inflated due to sole use of on-farm water conservation estimates.	Costs are expected to vary widely among locations and acquisition methods, and will be evaluated in greater detail as the implementation program progresses. Use of a conservative value was preferred for comparison of alternatives in the Draft EIS.
O7-04b	2.11-d	Alliance for the Rio Grande Heritage	Lower costs would result from purchase of water-righted lands.	See response to Comment O7-04a.
O7-04c	2.11-d	Alliance for the Rio Grande Heritage	Water Rights Costs: Lower costs would result from water rights purchase (banking).	See response to Comment O7-04a.
O7-04d	2.11-d	Alliance for the Rio Grande Heritage	Water Rights Costs: Draft EIS table should be amended to present alternative bases for estimating cost (suggested table changes were provided).	See response to Comment O7-04a.
O7-05a	4.0 -b	Alliance for the Rio Grande Heritage	Affected Environment: Unclear from Draft EIS what the "project area" or "potentially affected area" is.	The potential area of influence for changes in RGCP management alternatives (not for RGCP construction in 1943) was defined in Section 4 by individual resources.
O7-05b	4.0 -b	Alliance for the Rio Grande Heritage	Affected Environment: Indirect impacts extend beyond the boundaries of the RGCP - impacts should focus on location of impacts not activities.	The area of influence extends beyond the ROW for a number of resource areas as discussed in detail in Section 4 of the Draft EIS.
O7-05c	4.0 -b	Alliance for the Rio Grande Heritage	Affected Environment: Project area defined in Draft EIS does not address the lateral extent - need to define the ROW controlled by USIBWC.	The extent of the ROW is shown, in its entirety, in Appendix Q of the Final EIS (August 2003 Reformulation of Alternatives Report, Appendix G, color infrared photographs of the RGCP).
O7-05d	4.7.1-a	Alliance for the Rio Grande Heritage	Affected Environment: Draft EIS skews baseline data in discussion of Aquatic Biota - condition for native fish species need to be addressed.	Habitat suitability for both endemic and non-native species was included in the water velocity/depth analysis (Table 3-5). In both cases, the limiting condition for fish reproduction was scarcity of low-velocity waters during the spring irrigation season.
O7-06a	4.0 -a	Alliance for the Rio Grande Heritage	Environmental Consequences: Draft EIS fails to take a "hard look" at environmental consequences.	The Draft EIS addressed all significant direct, indirect, and cumulative effects of the No Action and the three action alternatives. This discussion included both adverse and beneficial, as well as significant, adverse effects if such effects were predicted.

Comment	EIS Sections	Author	Summary Comment	Summary Response
O7-06b	4.0 -a	Alliance for the Rio Grande Heritage	Environmental Consequences: Draft EIS makes "conclusory remarks" in the environmental consequences analysis.	See response to comment O7-06a.
O7-06c	4.15.2-a	Alliance for the Rio Grande Heritage	Environmental Consequences: Impacts from restoration projects and flood control measures are interrelated and not analyzed.	Changes to the levee system, such as those resulting from the structural condition study, are not anticipated to offer significant opportunities for restoration beyond those already analyzed and incorporated into the Targeted River Restoration Alternative.
O7-06d	1.5-d	Alliance for the Rio Grande Heritage	Environmental Consequences: Draft EIS can not avoid environmental impacts analysis by stating it will be conducted in site-specific EA - violation of NEPA.	The level of analysis was sufficient to evaluate the environmental effects of alternatives and measures. The USEPA, the CEQ-delegated review agency, rated the Draft EIS in the "Lack of Objections" category indicating that no revisions are required in the Final EIS (see comment A2-1).
O7-07a	1.3.3-c	Alliance for the Rio Grande Heritage	Indirect and Cumulative Impacts: analysis is incomplete because of narrow project description.	Alternatives were developed taking into consideration significant issues, as well as opportunities and constraints based on the RGCP water delivery and flood control mission, and potential for riparian corridor development and aquatic habitat diversification.
O7-07b	2.8-a	Alliance for the Rio Grande Heritage	Indirect and Cumulative Impacts: discussion omits the Rio Grande Project.	The DEIS evaluates potential effects on modified management alternatives relative to baseline conditions. The Rio Grande Project, in operation for several decades, is part of that baseline.
O7-07c	2.8-a	Alliance for the Rio Grande Heritage	Indirect and Cumulative Impacts: Draft EIS omits impacts of construction and operation of RGCP on the river ecosystem.	The DEIS evaluates potential effects on modified management alternatives relative to baseline conditions, not RGCP construction over 60 years ago. Current project operation constitutes baseline conditions.
O7-07d	4.7.1-a	Alliance for the Rio Grande Heritage	Indirect Impacts: Concern regarding impacts from project on native fish (six species are listed as extirpated).	Existing habitat conditions are the baseline, as the EIS compares effects of current management practices to potential modifications of those practices to enhance environmental conditions. The loss of native fish species along the RGCP is widely attributed to changes in flow regime and diversion structures, not to canalization.
O7-08a	1.1.3-e	Alliance for the Rio Grande Heritage	Compliance with 1999 MOU: Statutory basis for flood control mandate is not identified.	The RGCP was authorized by the Act of August 29, 1935, 49 Stat. 961, and the Act of June 4, 1936, 49 Stat. 1463, to facilitate equitable division of the waters of the Rio Grande, and to protect lands along the project from floods (see also 22 U.S.C. Section 277s-29).
O7-08b	4.15.2-a	Alliance for the Rio Grande Heritage	Compliance with 1999 MOU: Cumulative impacts are not adequately evaluated.	Relevant cumulative impacts associated with the change in RGCP management were evaluated. An updated version of Section 4.15 is presented in Subchapter I.E of the Final EIS.

Comment	EIS Sections	Author	Summary Comment	Summary Response
O7-09a	2.3.1-a	Alliance for the Rio Grande Heritage	Conclusion A: Draft EIS can not answer questions without use of the two-dimensional model; therefore violates NEPA by not using all necessary data.	Use of a two-dimensional model was not warranted for environmental effects evaluation under NEPA. It is anticipated, however, that the additional hydraulic modeling will be useful to narrow the degree of potential levee deficiencies.
O7-09b	5.1.4-c	Alliance for the Rio Grande Heritage	Conclusion B: Need to delay issuance of Final EIS until two-dimensional modeling has been completed.	Impacts were evaluated for decision on a preferred river management alternative. The use of a 2-dimensional model, as well as other site specific information, may be used to enhance our planning of environmental measures, flood control and other activities associated with implementing the preferred alternative.
O7-10a	App F-b	Alliance for the Rio Grande Heritage	Draft EIS Development (Appendix A Introduction): Incomplete analysis of controlled water releases, flood routing, and cumulative impacts.	The effects evaluation addressed the theoretical maximum floodable area, which represents best-case scenario for restoration, and the most conservative scenario for potential effects of vegetation development on flood containment capacity. Further analysis would be warranted if controlled water releases were actually implemented, following resolution of multiple associated legal, regulatory, funding, and water rights issues. Controlled water releases are not part of the management alternative selected for the RGCP.
O7-10b	4.0 -a	Alliance for the Rio Grande Heritage	Draft EIS Development (Appendix A Introduction): Uncertainty in levee analysis and water availability.	The basis for evaluation of the levee system and water availability is discussed in detail in the August 2003 Reformulation of Alternatives Report (see Appendix Q).
O7-10c	1.3.3-c	Alliance for the Rio Grande Heritage	Draft EIS Development (Appendix A Introduction): Alternative scope is too narrow.	Alternatives were developed taking into consideration significant issues, as well as opportunities and constraints based on the RGCP water delivery and flood control mission, and potential for riparian corridor development and aquatic habitat diversification.
O7-11a	App F-b	Alliance for the Rio Grande Heritage	Analysis of Controlled Water Releases: Inadequate reservoir stage and storage analysis.	As a conservative approach, maximum stage and storage were used in the evaluation. Further evaluation of controlled water releases is unwarranted as previously discussed in the response to comment O7-10a.
O7-11b	App F-b	Alliance for the Rio Grande Heritage	Analysis of Controlled Water Releases: Inadequate pulse flow frequency.	A single pulse frequency was analyzed to estimate potential water use. Further evaluation of controlled water releases is unwarranted as previously discussed in the response to comment O7-10a.
O7-11c	App F-b	Alliance for the Rio Grande Heritage	Analysis of Controlled Water Releases: Inadequate pulse flow volume.	Maximum theoretical release volume was used for evaluation of potential impacts. Further evaluation of controlled water releases is unwarranted as previously discussed in the response to comment O7-10a.
O7-11d	App F-b	Alliance for the Rio Grande Heritage	Analysis of Controlled Water Releases: Arbitrary assessment of inundation area.	The potential inundation area reflects the assumptions adopted for the water release analysis. Further evaluation of controlled water releases is unwarranted as previously discussed in the response to comment O7-10a.

Comment	EIS Sections	Author	Summary Comment	Summary Response
O7-11e	App F-b	Alliance for the Rio Grande Heritage	Analysis of Controlled Water Releases: Suggested alternative approach for river restoration design.	Further evaluation of controlled water releases is unwarranted as previously discussed in the response to comment O7-10a. Controlled water releases are not part of the management alternative selected for the RGCP.
O7-11f	App F-b	Alliance for the Rio Grande Heritage	Analysis of Controlled Water Releases: Summary	The EIS properly evaluated potential effects of water releases. The evaluation addressed the theoretical maximum floodable area, which represents best-case scenario for restoration, and the most conservative scenario for potential effects of vegetation development on flood containment capacity. Further analysis would be warranted only if controlled water releases were actually implemented.
O7-12a	2.3.1-a	Alliance for the Rio Grande Heritage	Need for Two-Dimensional Model: Limitations of HEC-RAS model.	The USIBWC is fully aware of the conservative nature of levee deficiency estimates provided by the HEC-RAS model. The agency plans to use two-dimensional modeling, in combination with results of the levee structural condition study, to refine levee rehabilitation estimates.
O7-12b	2.3.1-a	Alliance for the Rio Grande Heritage	Need for Two-Dimensional Model: Short duration of tributary flood hydrographs.	See response to comment O7-12a.
O7-12c	2.3.1-a	Alliance for the Rio Grande Heritage	Need for Two-Dimensional Model: Underestimated channel and floodplain roughness.	See response to comment O7-12a.
O7-12d	2.3.1-a	Alliance for the Rio Grande Heritage	Need for Two-Dimensional Model: Use of uniform water surface elevations.	See response to comment O7-12a.
O7-12e	2.3.1-a	Alliance for the Rio Grande Heritage	Need for Two-Dimensional Model: Need to use best available analysis tools.	See response to comment O7-12a. HEC-RAS is the model widely used and accepted by FEMA, USACE, and other flood control agencies to obtain conservative estimates of flood risk.
O7-13a	4.15.2-a	Alliance for the Rio Grande Heritage	Cumulative Impacts were nor fully analyzed for restoration and levee improvements.	The potential interaction between a revised flood control strategy and restoration potential along the RGCP was discussed in detail in Subsection 2.7.3 of the Draft EIS.
O7-13b	4.15.1-a	Alliance for the Rio Grande Heritage	Need to analyze findings of Upper Rio Grande Basin Water Operations Model (URGWOM).	No cumulative impacts are anticipated because the URGWOM will not evaluate flow regulation below Elephant Butte Reservoir, only optimization of flood routing as indicated in Section 2.8.1.
O7-14a	2.7.1-a	Alliance for the Rio Grande Heritage	Alternatives Formulation Conclusion: Without channel maintenance the river would look better and still efficiently deliver water.	Disagree. Partial decommissioning of the RGCP by discontinuing maintenance is not a viable option that was excluded from further analysis due, among other factors, to the reduced efficiency in water delivery (Section 2.7.3).

Comment	EIS Sections	Author	Summary Comment	Summary Response
O7-14b	1.3.4-c	Alliance for the Rio Grande Heritage	Alternatives Formulation Conclusion: Sediment deposition at arroyos provides opportunity for channel migration.	Uncontrolled changes in channel configuration by allowing sediment accumulation would be contrary to the RGCP water delivery mission. Controlled changes, such as limited bank lowering and partial meander reopening,were incorporated into the RGCP management alternatives evaluated in the EIS.
O7-14c	1.3.4-c	Alliance for the Rio Grande Heritage	Alternatives Formulation Conclusion: Sediment deposition is not a problem.	Uncontrolled changes in channel configuration by allowing sediment accumulation would be contrary to the RGCP water delivery mission.
O7-14d	1.3.4-c	Alliance for the Rio Grande Heritage	Alternatives Formulation Conclusion: Losses in delivery efficiency could be offset by water rights purchase.	That premise was used in evaluation of controlled channel modifications as part of the alternatives (see Table 1.3-5, Aquatic Habitat Diversification, constraint #1)
O8-01a	1.1.3-b	Elephant Butte Irrigation District	Overview EBID Letter: Two alternatives examined in Draft EIS include environmental measures that are outside USIBWC's authority.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area [see Congress Act of June 4, 1936 (49 Stat. 1463), Act of August 29, 1935 (49 Stat. 961), and 22 U.S.C. Sections 277b, 277c and 277d-29]
O8-01b	2.13-b	Elephant Butte Irrigation District	Overview EBID Letter: Draft EIS does not identify a preferred alternative.	The Draft EIS indicated that a preferred alternative would be selected after public comments and included in the Final EIS as allowed by CEQ 1502.14 and CEQ 40 Q&A, Q 4b, March 16, 1981.
O8-01c	2.2.2-a	Elephant Butte Irrigation District	Overview EBID Letter: A true No Action alternative is appropriate for USIBWC.	The No Action described and analyzed in the Draft EIS conforms to the accepted definition by CEQ 40 Q&A, Q3, March 16,1981. It is defined as "No change from current management direction or level of management intensity."
O8-02a	2.9.2-c	Elephant Butte Irrigation District	Alternatives Development: New water uses can only occur through transfer of water from existing use.	Potential transfers are evaluated in Section 4.8 of the Draft EIS. Under any scenario, the USIBWC will quantify potential water use, and acquire water rights as needed to support environmental measures.
O8-02b	1.3.3-a	Elephant Butte Irrigation District	Alternatives Development: No action should be taken which would compromise the existing flood control system.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
O8-02c	2.3.1-c	Elephant Butte Irrigation District	Alternatives Development: The Flood Control Improvement Alternative proposes unnecessary flood control enhancement.	This assumption is incorrect: increased vegetation as evaluated in the Draft EIS would not significantly reduce the RGCP current flood containtment capacity, as illustrated in Table 4.2-1.
O8-02d	1.1.3-b 2.3.1-d	Elephant Butte Irrigation District	Alternatives Development: 3rd alternative - unnecessary flood control enhancement and substantial riparian growth; 4th alternative - encourages riparian growth, etc.	The basis for alternative reformulation is discussed in Appendix I of the Draft EIS. Flood control improvements are not driven by environmental measures under consideration.

Comment	EIS Sections	Author	Summary Comment	Summary Response
O8-03a	1.1.3-a	Elephant Butte Irrigation District	USIBWC Authority: All alternatives analyzed in the Draft EIS are illegal and outside USIBWC scope of responsibility.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area [see Congress Act of June 4, 1936 (49 Stat. 1463), Act of August 29, 1935 (49 Stat. 961), and 22 U.S.C. Sections 277b, 277c and 277d-29]
O8-03b	1.1.3-b	Elephant Butte Irrigation District	USIBWC Authority: Agency fails to document their authority to engage in activities for "environmental" benefits.	See response to comment O8-03a.
O8-03c	1.3.3-a	Elephant Butte Irrigation District	USIBWC Authority: Restoration detracts from water efficiency and flood control functions.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
O8-03d	1.1.3-d	Elephant Butte Irrigation District	USIBWC Authority: No existing treaties authorize reductions in water supply.	The statement is in agreement with criteria adopted by the USIBWC in the formulation of alternatives. Environmental enhancements could only occur with no net increase in river flow depletions.
O8-03e	1.1.3-a	Elephant Butte Irrigation District	USIBWC Authority: NEPA mandates a procedure, it does not add to agency's responsibilities.	The USIBWC is a government agency required to follow the laws of the United States, including NEPA. It is this Act, and Council on Environmental Quality regulations, that dictate the authority of USIBWC's environmental compliance.
O8-03f	1.1.3-b	Elephant Butte Irrigation District	USIBWC Authority: NEPA does not apply to projects outside the agency's mandate.	Section 103 of NEPA requires all Federal agencies to fulfill the procedural requirements of NEPA.
O8-03g	1.3.3-b	Elephant Butte Irrigation District	USIBWC Authority: Project mission is skewed to undertake "environmentally-friendly" decisions: SWEC threat to sue USIBWC under ESA is groundless.	In formulating river management alternatives, the USIBWC balanced the need for environmental stewardship along with its mission of flood control and water delivery. The interests of not only environmental groups but of all stakeholders along the RGCP were considered.
O8-03h	1.1.2-a	Elephant Butte Irrigation District	USIBWC Authority: No legal obligation to introduce T&E species.	Presence or absence of threatened or endangered species were not grounds for implementation of measures to improve habitat.
O8-03i	1.1.2-a	Elephant Butte Irrigation District	USIBWC Authority: EBID opposes any action that creates habitat for T&E species that would endanger water supply.	The USIBWC does not have a primary goal of introducing T&E species under the proposed action. Actions taken by USIBWC could result in conditions conducive to natural introduction of T&E species.
O8-03j	1.1.3-b	Elephant Butte Irrigation District	USIBWC Authority: No legal mandate to protect, create, or enhance riparian or species habitat within the RGCP.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area (see response to comment O8-03a).

Comment	EIS Sections	Author	Summary Comment	Summary Response
O8-04a	2.9.2-a	Elephant Butte Irrigation District	Water Rights Acquisition: EBID does not consider sponsoring on-farm conservation measures or water banking as feasible measures.	Water banking was adopted in the 2003 New Mexico State Water Plan for efficient and timely transfer of water from one user to another within recently created special water districts. The plan also identifies water conservation programs as a high priority initiative.
O8-04b	2.9.2-b	Elephant Butte Irrigation District	Water Rights Acquisition: Acquisition of water rights within EBID or transfers under New Mexico law are not appropriate.	Provisions for water transfer are specified in the 2003 New Mexico State Water Plan. Addressing legal, regulatory and institutional issues will be the initial phase of implementing a modified river management alternative, as discussed in Section 2.10.
O8-04c	2.9.2-b	Elephant Butte Irrigation District	Water Rights Acquisition: Legal impediments regarding water rights and transfers will occur.	Addressing legal, regulatory and institutional issues will be the initial phase of implementing a modified management alternative.
O8-05a	1.3.1-b	Elephant Butte Irrigation District	NEPA/CEQ Compliance: Draft EIS violates NEPA - No environmental assessment was made on the MOU with the SWEC.	No-mow zones and planting areas considered in the MOU qualify as categorical exclusions under NEPA.
O8-05b	1.3.1-b	Elephant Butte Irrigation District	NEPA/CEQ Compliance: Categorical Exclusions are not part of State Department NEPA regulations.	The 1981 USIBWC Operational Procedures for implementing NEPA, Section 102 [Federal Register 46, No. 170: 44083-44093] established 13 Categorical Exclusions in compliance with CEQ 1507.3 and 1508.4.
O8-05c	1.1.3-b	Elephant Butte Irrigation District	NEPA/CEQ Compliance: USIBWC is not required to evaluate environmental measures outside their authority.	Section 103 of NEPA requires all Federal agencies to fulfill the procedural requirements of NEPA, including the consideration of long term river management alternatives.
O8-05d	2.13-b	Elephant Butte Irrigation District	NEPA/CEQ Compliance: USIBWC fails to identify a preferred alternative.	The Draft EIS indicated that a preferred alternative would be selected after public comment and included in the Final EIS as allowed by CEQ 1502.14, CEQ 40 Q&A, Q 4b, March 16, 1981.
O8-06	4.0 -a	Elephant Butte Irrigation District	Environmental Consequences: The Draft EIS omitted significant environmental effects.	The Draft EIS addressed direct, indirect, and cumulative effects of the No Action and the three action alternatives. This discussion included both adverse and beneficial effects, as well as significant effects if such effects were predicted.
O8-07a	4.15.1-a	Elephant Butte Irrigation District	Cumulative Impacts: Draft EIS fails to discuss potential conflicts with 2003 New Mexico Water Plan.	The plan was released in December 23, 2003, following publication of the Draft EIS. A review of the plan's potential implications on the modified RGCP management alternatives has been added to Subsection 4.15.1, Subchapter I.E of the Final EIS.
O8-07b	4.15.1-a	Elephant Butte Irrigation District	Cumulative Impacts: Draft EIS misconstrues the impacts of El Paso-Las Cruces Regional Sustainable Water Project.	A quantitative evaluation of potential cumulative effects of the El Paso-Las Cruces Regional Sustainable Water Project is presented in Subchapter I.E of the Final EIS.
O8-08	4.1.3-b	Elephant Butte Irrigation District	A Takings Implications Assessment was not prepared for water use.	Such assessment is not applicable as test no-mow zones and limited planting areas are not irrigated.

Comment	EIS Sections	Author	Summary Comment	Summary Response
O8-09a	2.13-c1 4.2.5-a	Elephant Butte Irrigation District	Alternatives Cost: All the alternatives evaluated are too costly except for the No Action Alternative.	Cost was a criterion taken into consideration in the selection of the Integrated USIBWC Land Management as the preferred alternative.
O8-09b	4.2.5-a	Elephant Butte Irrigation District	Alternatives Cost: Vegetation in the floodplain endangers diversion structures.	The USIBWC will comply with requirements of Directive Volume IV, Chapter 315, July 27, 2000. Maintenance forces continually monitor the river channel for fallen trees that need to be removed.
O8-09c	2.11-c	Elephant Butte Irrigation District	Alternatives Cost: Draft EIS does not provide the ability to compare benefits versus costs of alternative implementation.	Multiple economic and non-monetary considerations were analyzed depending on the resource area. CEQ regulations in 40 CFR V, 1502.23 indicate that "[t]he weighing of the merits and drawbacks of the various alternatives need not to be displayed in a monetary cost-benefit analysis, and should not be when there are important qualitative considerations."
O8-10a	4.1.1-a	Elephant Butte Irrigation District	Water Use Estimates: Draft EIS understates water use in various alternatives and, thus, effects on water removal from productive to nonproductive applications.	While other water use data are available, the USBR's AWARDS System and ET Toolbox were used in the effects evaluation as a single, reliable, and widely accepted data source for water use rates in the Rio Grande.
O8-10b	4.9.1-b	Elephant Butte Irrigation District	Water Use Estimates: Draft EIS figures on the effect of retired irrigated farmland and crop value reduced from removal of water rights to productive uses are questioned.	Crop production values were obtained from the NM Department of Agriculture as indicated in Section 4.9.1. Pecans farms were not included in the calculations as they would not be candidates for retirement.
O8-10c	4.9.1-a	Elephant Butte Irrigation District	Water Use Estimates: Analysis fails to show repercussions in the local economy and is a serious flaw in the Draft EIS. Only annual figures are presented.	The Economic Impact Forecast System accounts for indirect and cumulative effects on the economy. Annual figures are the correct input for comparison since multi-year comparisons would simple add the same multiplier to the expected change and to the local economy used as a reference.
O8-11	4.9.5-a	Elephant Butte Irrigation District	Inadequate analysis of environmental justice effects. The fact that largely minority populations will be affected is not mentioned in the Draft EIS.	The baseline analysis documents the predominance of minority populations in Doña Ana and El Paso Counties (Table 3.9-6).
O8-12	2.9.2-a	Elephant Butte Irrigation District	Draft EIS fails to account for drought conditions.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
O8-13a	2.9.2-b	Elephant Butte Irrigation District	Impacts on State of New Mexico: The USBWC should not take action that favors or harms one state over the other.	The alternatives will not compromise Interstate Compact obligations, as indicated in response to NM Interstate Stream Commission (comment A7-1).
O8-13b	2.9.2-b	Elephant Butte Irrigation District	Impacts on State of New Mexico: Alternatives analyzed harm the State of New Mexico.	See previous response.
O8-13c	5.1.4-a	Elephant Butte Irrigation District	Impacts on State of New Mexico: A public hearing was not held in New Mexico - an extension to receive comments were only extended a few days.	An administrative decision was made to have one public hearing in an effort to be a fiscally responsible agency to hold costs down since extensive stakeholder consultation has taken place over the four years of EIS development.

Comment	EIS Sections	Author	Summary Comment	Summary Response
O8-14a	2.2.3-a	Elephant Butte Irrigation District	Cessation of Dredging: River dredging was discontinued in 1999.	The channel and other features of the project are constantly monitored and surveyed to ensure that no critical conditions are developing. The USIBWC continues sediment removal according to identified needs and within the short window of opportunity afforded by the non-irrigation season.
O8-14b	2.2.3-a	Elephant Butte Irrigation District	Cessation of Dredging: No assessment of volume reduction by slowing water flows.	The USIBWC continues sediment removal from the channel according to identified needs.
O8-15	4.4.3-a	Elephant Butte Irrigation District	No-mow zones develop tumbleweeds and other non-native undesirable species that become a nuisance rather that fostering native vegetation.	The USIBWC recognized the fact that the agreed to “green zones” might be problematic. Thus the language in the MOU, “These green zones are provisional, pending the outcome of the Canalization EIS, and may or may not be permanent."
O8-16a	2.2.2-a	Elephant Butte Irrigation District	Conclusions of EBID Analyses: Supports true No Action Alternative.	In compliance with the CEQ regulations 40 CFR 1504(d), the Draft EIS identified and analyzed a No Action alternative. This alternative is the current O&M management strategy that is in place for the RGCP.
O8-16b	2.9.1-a	Elephant Butte Irrigation District	Conclusions of EBID Analyses: No alternative can be implemented until agreement with water user (EBID).	Noted. The USIBWC will seek participation from governmental and non-governmental organizations capable of supporting the program and willing to foster its development.
O8-16c	1.1.2-a	Elephant Butte Irrigation District	Conclusions of EBID Analyses: No project should promote introduction of T&E species.	Presence or absence of T&E species were not grounds for implementation of measures to improve habitat. The USIBWC does not have a primary goal of introducing T&E species under the proposed action.
O8-17a	1.1.3-b	Elephant Butte Irrigation District	Legal/Fiscal Concern I: Alternatives that propose extensive planting is not the original intent of Congress.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
O8-17b	1.1.3-c	Elephant Butte Irrigation District	Legal/Fiscal Concern II: Proposed alternatives are not in keeping with the international agreements between the US and Mexico.	The EIS analysis of alternatives demonstrates that there are no alternatives proposed that would impact upon the USIBWC's ability to deliver water to downstream users, including Mexico.
O8-17c	1.5-c	Elephant Butte Irrigation District	Legal/Fiscal Concern III: Expenditures and time spent for water users are unreasonable; therefore no changes from original O&M practices.	The Draft EIS is in compliance with appropriate subparagraphs of CEQ 1500.4. The length and structure of the Draft EIS is in line with NEPA objectives in analyzing the proposed alternatives.
O8-17d	5.1.4-a	Elephant Butte Irrigation District	Legal/Fiscal Concern IV: A public hearing should have been held in New Mexico.	An administrative decision was made to have one public hearing in an effort to be a fiscally responsible agency to hold costs down since extensive stakeholder consultation has taken place over the four years of EIS development.
O8-17e	1.5-c	Elephant Butte Irrigation District	Legal/Fiscal Concern V: Draft EIS didn't comply with CEQ regulation CFR 1500.4 on Reducing Paper Work.	The Draft EIS is in compliance with appropriate subparagraphs of CEQ 1500.4. The length and structure of the Draft EIS is in line with NEPA objectives in analyzing the proposed alternatives.

Comment	EIS Sections	Author	Summary Comment	Summary Response
O8-17f	2.3.1-c	Elephant Butte Irrigation District	Legal/Fiscal Concern VI: Draft EIS misleading - no justification for flood control improvements other than to allow floodway vegetation increases.	This assumption is incorrect: increases in floodway vegetation, as evaluated in the Draft EIS, have a minimum impact on current flood containtment capacity as summarized in Table 4.2-1.
O8-17g	2.3.1-e	Elephant Butte Irrigation District	Legal/Fiscal Concern VII: Draft EIS references studies that are unavailable to public and doesn't disclose pertinent analysis for flood control.	The reference study on levee rehabilitation cost, the March 2001 Alternatives Formulation Report, with all its attachments, was provided in Appendix I of the DEIS (CD-format).
O8-18	1.1.3-c	Elephant Butte Irrigation District	Proposed environmental changes are not in keeping with intent of Minute 129.	The proposed action does not affect the continuing obligations of IBWC Minute No. 129 (continued IBWC jurisdiction over matters concerning the rectified Rio Grande channel).
O8-19a	4.4.1-a	Elephant Butte Irrigation District	Riparian Ecosystem Restoration: The Draft EIS is unspecific as to what the totality of native vegetation was in 1935.	Environmental improvements under consideration are based on the partial restoration concept, not matching assumed historical conditions (see Appendix Q, Section 4.4 of the Reformulation of Alternatives Report).
O8-19b	2.4.2-c	Elephant Butte Irrigation District	Riparian Ecosystem Restoration: A 1904 report chronicle identifies grassed area as well as tree areas along the Rio Grande north of Las Cruces.	Grasslands are a major component of the Rio Grande vegetation; for that reason the selected alternative includes up to 1,641 acres of managed native grasslands, more than 4 times the acreage for native bosque development.
O8-19c	4.4.1-a	Elephant Butte Irrigation District	Riparian Ecosystem Restoration: Reference conditions for ecosystem restoration are not described (1870, 1904 or 1935?).	The potential for partial restoration is the basis for the alternative formulation, not historical conditions (see Appendix Q, Section 4.4 of the Reformulation of Alternatives Report).
O8-20a	2.2.4-a	Elephant Butte Irrigation District	Changes to Maintenance Operations: No record was found on the need for mitigation structures as part of the USACE 404 dredging permit.	The record is available in the USACE Section 404 permit correspondence for Permit No. NM/TX-91-50427 (Canalization Project)
O8-20b	2.2.3-a	Elephant Butte Irrigation District	Changes to Maintenance Operations: Lack of dredging since 1996 has allowed significant sediment buildup and increased urban flooding potential.	The USIBWC continues sediment removal from the channel according to identified needs.
O8-20c	4.1.3-b	Elephant Butte Irrigation District	Changes to Maintenance Operations: Cottonwood planting in the ROW is characterized as significant in terms of water use.	Assuming survival and full development without irrigation, planting of 800 trees would consume a maximum of 10 ac-ft/yr at a typical planting density of 100 trees/ac based on Table 4.1-2 assumptions.
O8-21a	4.1.6-a	Elephant Butte Irrigation District	Soil Salinity: Salt residuals from evapotranspiration would increase salt deposits in soils.	There is no indication that salt deposition on the ROW will increase by partially changing vegetation from mowed grasses and salt cedar to non-irrigated native grasslands and bosques.
O8-21b	2.4.2-d	Elephant Butte Irrigation District	Water/Soil Salinity: Salinity management methods are not well articulated in the Draft EIS.	In terms of RGCP impacts, it is not considered a significant issue. The relevance of this issue will be analyzed as part of pilot studies to be conducted during the initial 5-year implementation phase.

Comment	EIS Sections		Author	Summary Comment	Summary Response
O8-21c	4.1.6-a		Elephant Butte Irrigation District	Soil Salinity: Meanders, "backshaving" and surge flooding will significantly impact water quality by salinity increases.	Up to 2,346 acres of non-irrigated native grasslands and bosques within the ROW would not be significant relative to return flows from 178,000 acres of Rio Grande Project irrigated lands that drain into the RGCP.
O8-22	2.8-a		Elephant Butte Irrigation District	Draft EIS fails to prove that the original canalization project O&M activities have not enhanced the ecology.	The DEIS compares anticipated future conditions for each alternative versus current (baseline) conditions. Effects of RGCP construction, completed in 1943, are not under consideration.
O8-23a	3.1.1-a		Elephant Butte Irrigation District	Analytical Data Provided: The most optimistic data on precipitation were used (1959-2002) period without 1950 drought.	Data for the 1948-2002 period was listed for E. Butte Reservoir data, the most relevant for EBID; the data cover 3 decades of low-rainfall conditions.
O8-23b	4.1.1-a		Elephant Butte Irrigation District	Analytical Data Provided: The most optimistic data on water reduction by salt cedar eradication (1.48 ac-ft/ac) were used.	Estimates of water use by salt cedar vary widely. A compilation of 13 studies reported a range of annual consumption from 2.3 to 11.2 ac-ft/ac. The annual value from the USBR ET-Toolbox quoted in the DEIS, 4.96 ac-ft/a, falls in the middle of the reported range
O8-23c	2.4.2-b		Elephant Butte Irrigation District	Analytical Data Provided: Data from another regions was used for floodway vegetation management.	The best available data were used. Four out of the six references listed are from the same geographic area, the Middle Rio Grande (Crawford, 1996a, b; Wozniak, 1995; and Dresden, 1999).
O8-23d	4.0 -c	4.1.1-a	Elephant Butte Irrigation District	Analytical Data Provided: Use of entire RGCP diversion as a reference for water use misrepresents impacts on New Mexico users.	Water diversions along the RGCP are considered a valid reference for water use by RGCP vegetation. To address EBID's concern, however, potential effects listed in Table 4.1-3 were referenced separately for the EBID and EPCWID#1 in the Final EIS (Subchapter I.E).
O8-23e	4.0 -c		Elephant Butte Irrigation District	Analytical Data Provided: Potential effects are minimized by the method used to evaluate effects of air emissions during levee construction.	A full analysis is presented in Section 4.11.1 compliance with USEPA guidelines (see "Lack of Objections" Draft EIS rating by the agency, comment A2-1).
O8-23f	4.8.5-a	4.0 -c	Elephant Butte Irrigation District	Analytical Data Provided: Retiring 3.9% and 16.6% farmland out of production is a significant impact.	Those values are considered significant and for that reason sponsoring on-farm conservation programs was identified as a high implementation priority (see Section 2.9.2).
O8-23g	4.6.1-b		Elephant Butte Irrigation District	Analytical Data Provided: Provided data are excessive for environmental benefits to endangered species that have little chance of attainment.	Evaluation of T&E species and their habitat was a significant issue identified during the scoping of the alternatives, and a required element of the EIS.
O8-23h	4.7.6-a		Elephant Butte Irrigation District	Analytical Data Provided: It is unlikely that sustainable population of fish can be developed unless greater allocations of water are made for this objective.	Noted.
O8-24a	2.9.2-b		Elephant Butte Irrigation District	Water Rights Acquisition: EBID favors a grass-roots approach to restoration policy development.	Noted.

Comment	EIS Sections	Author	Summary Comment	Summary Response
O8-24b	2.9.2-b	Elephant Butte Irrigation District	Water Rights Acquisition: Draft EIS misses the institutional-building step, a critical point for restoration policy development cited by the King and Maitland (1999) report.	Addressing legal, regulatory and institutional issues will be the initial implementation phase of the selected river management alternative (see Section 2.10 of the Draft EIS).
O8-24c	2.9.2-c	Elephant Butte Irrigation District	Water Rights Acquisition: EBID would bear the burden of water losses associated with the proposed actions.	Potential transfers are evaluated in Section 4.8 of the Draft EIS. Under any scenario, the USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.
O8-24d	4.1.3-a	Elephant Butte Irrigation District	Water Rights Acquisition: The 2003 river efficiency (Project Delivery/Project Release) was 93%, within the bounds of historical efficiency for the level of release, but it could have been better.	As stated by the reviewer, efficiency is within historical limits for the level of release. This indicates that current operation continues to meet RGCP design goals.
O8-24e	4.15.1-a	Elephant Butte Irrigation District	Water Rights Acquisition: Section 4.15.1 states that Upper Rio Grande Modeling will improve delivery efficiency and make more water available for measure implementation.	The statement included in the Draft EIS was incorrect as modeling of flow regulation will not extend below Elephant Butte Reservoir. This correction was made in Subchapter I.E of the Final EIS.
O8-24f	2.13-c1	Elephant Butte Irrigation District	Water Rights Acquisition: No Action Alternative should be selected since USIBWC does not have the capacity to acquire water rights.	Securing water rights is a priority action in implementing a modified river management alternative.
O8-25a	4.1.1-a	Elephant Butte Irrigation District	Consumptive Loss Estimates: Estimates in Draft EIS are inaccurate.	Various water consumption estimates are found in the literature (from multiple studies under diverse test conditions). The USBR's AWARDS System and ET Toolbox was adopted as a single, widely accepted data source for effects evaluation.
O8-25b	2.11-a	Elephant Butte Irrigation District	Consumptive Loss Estimates: Maintenance costs for native vegetation were not considered in the Draft EIS.	The capital cost dictates the difference among alternatives as shown in the March 2001 Alternatives Formulation Report (Table 9.9, Capital vs. Life Cycle Costs). Annual water cost was incorporated into the analysis as the cost of installing on-farm irrigation systems.
O8-25c	4.1.1-a	Elephant Butte Irrigation District	Consumptive Loss Estimates: Pasture grass estimate is inappropriate.	See response to O8-25a
O8-25d	4.1.1-a	Elephant Butte Irrigation District	Consumptive Loss Estimates: Estimates are poorly documented.	All data sources are identified by author and publication source in Section 6 of the Draft EIS (Glossary and References).
O8-26	4.15.1-a	Elephant Butte Irrigation District	New Mexico-Texas Water Commission: Cumulative impacts of EP-LC El Regional Sustainable Water Project must be addressed.	An updated, quantitative evaluation of potential cumulative effects of this project is presented in Subchapter I.E of the Final EIS.
O8-27	4.9.5-b	Elephant Butte Irrigation District	Vector Control: Need to evaluate effects of increased vegetation on public health as environmental project will increase disease vectors along populated areas.	Environmental measures under consideration would be non-irrigated, and largely limited to the areas surrounded by extensive irrigated agriculture. Under those conditions, the contribution of a modified ROW management, if any, would be negligible.

Comment	EIS Sections		Author	Summary Comment	Summary Response
O8-28	4.4.3-a		Elephant Butte Irrigation District	No Mow Zones: Tumbleweeds have become a nuisance.	Historically tumbleweeds have been a problem in the region during winter. The USIBWC floodway is a minor component of the regional problem.
O9-1	2.7.3-a		Paso del Note Watershed Council	Concerns about flood control improvements being premature and not including non-structural measures.	The need for non-structural flood control and potential applicability is discussed in Subsection 2.7.3
O9-2	2.3.1-a		Paso del Note Watershed Council	Stated belief that 2-dimensional modeling is needed.	The USIBWC plans to perform two-dimensional modeling, in combination with results of the levee structural condition study, to aid in levee rehabilitation planning.
O9-3	1.3.4-a	2.13-c4	Paso del Note Watershed Council	Supports the Targeted River Restoration Alternative as a starting point.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
O9-4	1.3.4-b		Paso del Note Watershed Council	Supports controlled water releases for channel-forming flows.	Uncontrolled channel changes are contrary to the water delivery mission of the RGCP, and were specifically excluded during early development of the alternatives.
O9-5	2.9.1-b		Paso del Note Watershed Council	Supports conservation easements acquisition, and establishment of a funding program.	Noted.
O9-6	2.4.2-a	2.2.3-b	Paso del Note Watershed Council	Lists four recommendations for natural reestablishment of native vegetation: regeneration along the banks, planting, seeding with native grasses, and use of bank willow as an alternative to riprap.	The USIBWC appreciates the recommendations which were included, to various degrees, in development of the Integrated USIBWC Land Management and Targeted River Restoration alternatives.
O9-7	2.9.1-a		Paso del Note Watershed Council	Supports the River Restoration Alternative and offers assistance for specific projects based on controlled water releases.	Noted. The USIBWC welcomes participation of governmental and non-governmental organizations capable of supporting the program and willing to foster its development.
P01-1	3.8.2-a		Ortiz, Herman	Land ownership along west ROW is incorrectly reported for Jaralosa, Berrenda, Sibley and Tierra Blanca arroyos.	Most land use data were reported as provided in digital format, primarily by the Doña Ana County. Leased BLM lands are not identified since they are located outside the ROW.
P01-2	4.8.4-a		Ortiz, Herman	The Draft EIS does not address how the alternatives will affect perpetual watering easements.	The USIBWC does not anticipate impacts on perpetual watering rights. If changes were eventually required, alternative watering methods will be proposed that meet the deed holders' long-term needs and requirements.
P01-3	4.8.4-a		Ortiz, Herman	Opposes any proposal that impairs property rights and use of easements.	Noted.
P02-1	2.13-c1		Dipp, Mike	Supports No Action Alternative without MOU to comply with intent and letter of the law.	Noted.
P03-1	1.1.3-a		Fletcher, Leslie	USIBWC's mandate is to deliver water and flood control - these issues are not addressed in the Draft EIS.	Section 2.2 describes flood control and water delivery for each alternative under consideration, and potential effects are analyzed in Sections 4.1 and 4.2.

Comment	EIS Sections	Author	Summary Comment	Summary Response
P03-2	1.5-a	Fletcher, Leslie	Draft EIS is illegal and doesn't follow the dictates of NEPA.	The Draft EIS conforms to the requirements of the NEPA and the implementing CEQ regulations.
P03-3	2.9.2-c	Fletcher, Leslie	Basin closed by NM State Engineer - Which is the source of the extra water to be used.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.
P03-4	2.2.3-a	Fletcher, Leslie	Lack of maintenance is affecting water delivery.	The USIBWC continues sediment removal from the pilot channel according to priorities established on an annual basis.
P03-5	4.8.5-a	Fletcher, Leslie	Economic impact of agriculture is misrepresented in the Draft EIS.	Effects on agricultural land use were one of the key criteria used in effects determination (see Section 4.8 of the Draft EIS).
P03-6	1.3.3-b	Fletcher, Leslie	Draft EIS violates the original plan and purpose of the USIBWC. It was written by and for the interests of SWEC.	In formulating river management alternatives, the USIBWC balanced the need for environmental stewardship along with its mission of flood control and water delivery. The interests of all stakeholders along the RGCP were considered.
P04-1	2.13-c1	Colquitt, John	Prefers the No Action Alternative.	Noted.
P04-2	2.2.3-a	Colquitt, John	USIBWC should maintain legal and contractual obligations and keep the river dredged.	The USIBWC continues sediment removal from the pilot channel according to priorities established on an annual basis.
P04-3	1.3.1-a	Colquitt, John	Requests that MOU be set aside.	The March 1999 MOU with SWEC maybe terminated unilaterally by either party. The USIBWC has no reason, at this time, to terminate the agreement.
P04-4	2.2.3-a	Colquitt, John	USIBWC must comply with water delivery mandate.	Flood control and water delivery are the core functions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding those functions.
P05-1	2.3.1-c	Lack, Rosie	States that three flooding incidents in west boundary bordering the Rio Grande resulted in family's loss of livestock and farm crops losses.	Noted. The USIBWC will complete levee rehabilitation planning based on additional hydraulic modeling and results of the levee structural condition study.
P05-2	2.2.3-a	Lack, Rosie	States that riverbed must be dredged and maintained as a river channel.	The USIBWC continues sediment removal from the pilot channel according to priorities established on an annual basis.
P05-3	2.9.2-a	Lack, Rosie	Questions reasoning for planting trees when NRCS is sponsoring water conservation by salt cedar eradication.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
P05-4	2.9.2-c	Lack, Rosie	Questions sources of water rights to be used and their financing.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.
P05-5	4.8.6-a	Lack, Rosie	Questions who will be responsible for park cleanliness and safety.	Arrangements are made with each organization as part of the cooperating agreement.
P06-1	2.13-c1	Cox, Ted	Adopt No Action Alternative without MOU for maximum water conservation.	Noted.

Comment	EIS Sections	Author	Summary Comment	Summary Response
P07-1	2.13-c1	Salopek, David	Prefers the No Action Alternative.	Noted.
P07-2	1.1.3-a	Salopek, David	Alternatives presented in Draft EIS violate the plan and purpose of the USIBWC.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
P07-3	4.1.5-a	Salopek, David	Plan takes water out of productive and beneficial use.	Sponsoring water conservation methods was proposed as a method that would benefit agricultural community. Retaining farmland in production was a goal adopted in the reformulation of alternatives.
P07-4	2.9.2-a	Salopek, David	USIBWC should not create a new water use in midst of drought.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
P07-5	4.8.5-a	Salopek, David	Economic impacts to the agriculture industry in Doña Ana County are minimized in Draft EIS	The change in agricultural land use was one of the key criteria in the evaluation of potential socioeconomic impacts.
P07-6	1.3.3-a	Salopek, David	USIBWC responsibilities were not addressed in the Draft EIS.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
P08-1	2.13-c1	Salopek, Marion	Prefers the No Action Alternative.	Noted.
P08-2	1.1.3-a	Salopek, Marion	Alternatives presented in Draft EIS violate the plan and purpose of the USIBWC.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
P08-3	4.1.5-a	Salopek, Marion	Plan takes water out of productive and beneficial use.	Sponsoring water conservation methods was proposed as a method that would benefit agricultural community. Retaining farmland in production was a goal adopted in the reformulation of alternatives (discussed in Section 2.9.2)
P08-4	2.9.2-a	Salopek, Marion	USIBWC should not create a new water use in midst of drought.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
P08-5	4.8.5-a	Salopek, Marion	Economic impacts to the agriculture industry in Doña Ana County are minimized in Draft EIS	The change in agricultural land use was one of the key criteria in the evaluation of potential socioeconomic impacts.
P08-6	1.3.3-a	Salopek, Marion	USIBWC responsibilities were not addressed in the Draft EIS.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
P09-1	2.13-c1	Salopek, Paulina	Prefers the No Action Alternative.	Noted.

Comment	EIS Sections	Author	Summary Comment	Summary Response
P09-2	1.1.3-a	Salopek, Paulina	Alternatives presented in Draft EIS violate the plan and purpose of the USIBWC.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
P09-3	4.1.5-a	Salopek, Paulina	Plan takes water out of productive and beneficial use.	Sponsoring water conservation methods was proposed as a method that would benefit agricultural community. Retaining farmland in production was a goal adopted in the reformulation of alternatives.
P09-4	2.9.2-a	Salopek, Paulina	USIBWC should not create a new water use in midst of drought.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
P09-5	4.8.5-a	Salopek, Paulina	Economic impacts to the agriculture industry in Doña Ana County are minimized in Draft EIS	The change in agricultural land use was one of the key criteria in the evaluation of potential socioeconomic impacts.
P09-6	1.3.3-a	Salopek, Paulina	USIBWC responsibilities were not addressed in the Draft EIS.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
P10-1	2.13-c1	Garcia, Frank	Prefers the No Action Alternative.	Noted.
P10-2	1.3.1-b	Garcia, Frank	An EA should have been done for the MOU.	No-mow zones and planting areas considered in the MOU between SWEC and the USIBWC were addressed as categorical exclusions under NEPA.
P10-3	1.1.3-b	Garcia, Frank	USIBWC responsibilities are not habitat restoration, but flood control and water use.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
P10-4	1.3.3-a	Garcia, Frank	No alternative should impede floodway management.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
P11-1	2.9.2-a	Franco, Hector	Planting trees is unwarranted during drought conditions.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
P11-2	4.1.5-a	Franco, Hector	Pro-environmental alternatives will remove large amounts of water.	Potential water use was one of the criteria used in the selection of a preferred RGCP management alternative. Water use was analyzed in Section 4.1 of the Draft EIS, along with the benefit of sponsoring water conservation programs.
P11-3	1.1.3-a	Franco, Hector	Actions are outside USIBWC authority.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.

Comment	EIS Sections	Author	Summary Comment	Summary Response
P12-1	2.3.1-c	Ulmer, J.J.	Adopt no changes: historically the system has been efficient.	Noted. The USIBWC will continue water delivery and flood control as required by the RGCP mission (see description in Section 2.2).
P13-1	2.9.2-a	Jacques, Andrew	Due to drought, planned actions will have a significant impact on agriculture.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
P13-2	2.9.2-c	Jacques, Andrew	Pro-environmental alternatives are detrimental to farmers because they limit agricultural water use.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.
P13-3	1.1.3-a	Jacques, Andrew	USIBWC needs to keep legal mandates of water delivery and flood control.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
P13-4	2.13-c1	Jacques, Andrew	Favors No Action Alternative.	Noted.
P14-1	2.3.1-c	Carson, Bruno	USIBWC has not maintained the project: damage of a 1998 flood is attributed to poor maintenance.	Noted. Planning for levee rehabilitation will be completed based on results of the levee structural condition study and additional hydraulic modeling.
P14-2	2.9.2-c	Carson, Bruno	Planting hurts farmers by depleting water.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.
P14-3	1.3.3-a	Carson, Bruno	USIBWC needs to continue current functions.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
P15-1	2.3.1-c	Carson, Kit	USIBWC has not maintained the project: damage of a 1998 flood is attributed to poor maintenance.	Noted. Planning for levee rehabilitation will be completed based on results of the levee structural condition study and additional hydraulic modeling.
P15-2	2.9.2-c	Carson, Kit	Planting hurts farmers by depleting water.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.
P15-3	1.3.3-a	Carson, Kit	USIBWC needs to continue current functions.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
P16-1	2.3.1-c	Carson, Nick	USIBWC has not maintained the project: damage of a 1998 flood is attributed to poor maintenance.	Noted. Planning for levee rehabilitation will be completed based on results of the levee structural condition study and additional hydraulic modeling.
P16-2	2.9.2-c	Carson, Nick	Planting hurts farmers by depleting water.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.

Comment	EIS Sections	Author	Summary Comment	Summary Response
P16-3	1.3.3-a	Carson, Nick	USIBWC needs to continue current functions.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
P17-1	2.3.1-c	Carson, Rory	USIBWC has not maintained the project: damage of a 1998 flood is attributed to poor maintenance.	Noted. Planning for levee rehabilitation will be completed based on results of the levee structural condition study and additional hydraulic modeling.
P17-2	1.3.3-a	Carson, Rory	USIBWC needs to continue current functions.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
P18-1	2.13-c1	Harvey, Phil	Supports No Action Alternative excluding MOU terms as the only viable.	Noted.
P18-2	4.1.5-a	Harvey, Phil	Opposes habitat restoration as frivolous and impacting water quality and quantity.	Beneficial effects on water quality are anticipated (see Section 4.1.2). Potential water use (quantified in Section 4.1.2 of the Draft EIS) will be compensated by water rights acquisition/water conservation programs.
P18-3	1.3.1-a	Harvey, Phil	States MOU must be terminated as it was not subject to proper legal and environmental review.	The March 1999 MOU with SWEC maybe terminated unilaterally by either party. The USIBWC has no reason, at this time, to terminate the agreement.
P18-4	2.13-c1	Harvey, Phil	Cost of alternatives, other than No Action, is too high, especially if borne by taxpayers.	Noted. Cost was a criterion taken into consideration in the selection of the Integrated USIBWC Land Management as the preferred alternative.
P19-1	2.13-c4	Harvey, Phil	Supports Targeted River Restoration.	Noted.
P19-2	1.3.4-a	Harvey, Phil	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
P20-1	2.2.3-a	Dutton, Mike	Previously conducted dredging was stopped in 1996.	The USIBWC continues sediment removal from the pilot channel and vegetation maintenance.
P20-2	2.3.1-c	Dutton, Mike	Channel and floodway maintenance must be continued.	Sediment removal has not been discontinued.
P20-3	2.13-c1	Dutton, Mike	Favors No Action Alternative without MOU.	Noted.
P21-1	2.2.3-a	Dutton, Mike	Previously conducted dredging was stopped in 1996.	The USIBWC continues sediment removal from the pilot channel and vegetation maintenance.
P21-2	2.3.1-c	Dutton, Mike	Channel and floodway maintenance must be continued.	Sediment removal has not been discontinued.

Comment	EIS Sections	Author	Summary Comment	Summary Response
P21-3	2.13-c1	Dutton, Mike	Favors No Action Alternative without MOU.	Noted.
P22-1	4.1.5-a	McNamee, Mike	Changes in water availability are detrimental for the area.	Sponsoring water conservation methods was proposed as a method that would benefit the agricultural community.
P22-2	2.13-c1	McNamee, Mike	Favors No Action Alternative without MOU.	Noted.
P23-1	1.1.3-b	Nelson, Joe	Water delivery is USIBWC's duty, not habitat development.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
P23-2	4.5.3-a	Nelson, Joe	Farms are good wildlife habitat; wildlife can become a nuisance.	Noted.
P23-3	1.1.3-a	Nelson, Joe	USIBWC's responsibility is to maintain the channel clear of obstructions.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
P23-4	2.13-c1	Nelson, Joe	Favors No Action Alternative without MOU.	Noted.
S01-1	2.13-c4	Sproul, John	Supports Alternative - Targeted River Restoration Alternative.	Noted.
S01-2	2.13-c4	Sproul, John	Supports controlled water releases and opening former river meanders to establish a native ecosystem.	Noted. The Integrated USIBWC Land Management was selected as the preferred alternative on the basis of opportunities and constraints for restoration.
S01-3	1.3.4-e 1.3.4-a	Sproul, John	Would like to see more linear and point project identified for the southern river management units.	Currently, potential levee deficiencies along mostly urbanized areas largely restrict increased vegetation ion the RGCP's southern reach. Several recreation initiatives, however, are underway as indicated in Section 6.8.3.
S02-1	2.13-c4	Tillett, Geri	Supports Targeted River Restoration.	Noted.
S02-2	1.3.4-a	Tillett, Geri	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S03-1	2.13-c4	Tillett, Robin	Supports Targeted River Restoration.	Noted.
S03-2	1.3.4-a	Tillett, Robin	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S04-1	1.1.3-b	Clelland, Michael	USIBWC is not responsible for environmental changes on the Rio Grande.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S04-2	1.3.1-a	Clelland, Michael	Opposes planting of trees and not mowing the river ROW as part of MOU.	Noted.
S04-3	2.13-c1	Clelland, Michael	Supports the No Action Alternative without the MOU.	Noted.
S04-4	4.1.5-a	Clelland, Michael	Against pro-environmental alternatives that would remove substantial amounts of water from its current productive uses.	Noted. Sponsoring water conservation methods was proposed as a method that would benefit agricultural community.
S04-5	1.1.3-b	Clelland, Michael	Opposed to riparian restoration alternatives; not under USIBWC's responsibility.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S05-1	2.13-c4	Groff, Joseph & Ingeborg	Recommends Targeted River Restoration Alternative in the Draft EIS.	Noted.
S05-2	1.3.4-a	Groff, Joseph & Ingeborg	Recommends adoption of additional restoration measures.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S05-3	4.9.5-b	Groff, Joseph & Ingeborg	Suggests adding to EIS that environmental measures also have benefits to farmers and the general public such as salt cedar management and new trees providing shade and reducing evaporation.	Noted. The role of salt cedar removal in offsetting water use by native bosque is quantified in Section 4.1.1.
S05-4	2.11-a	Groff, Joseph & Ingeborg	No description of operation and management costs was found.	O&M costs were not a basis for alternative selection since capital costs already reflect those differences (See March 2001 Alternatives Formulation Report, Table 9.9, Capital vs. Life Cycle Costs).
S05-5	2.4.2-e	Groff, Joseph & Ingeborg	Provides example of mowing disruption wildlife habitat.	Noted. Mowing is a required maintenance operation that represents current, baseline conditions.
S06-1	1.3.4-a	Lockwood, Cassandra	Suggests that USIBWC develop a broad plan that restores a more natural river channel.	A wide range of environmental measures were incorporated into the river management alternatives under consideration.
S06-2	1.3.4-a	Lockwood, Cassandra	Six restoration recommendations are listed.	Noted.
S06-3	1.3.4-a	Lockwood, Cassandra	The USIBWC needs to look beyond the narrow approach used in the Draft EIS.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
S07-1	1.3.3-a	Emery, Allen & Pat	USIBWC not focusing on original responsibility in regard to protecting the Rio Grande.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S07-2	2.2.3-a	Emery, Allen & Pat	USIBWC responsibility is to maintain river to keep water flow.	The USIBWC continues sediment removal from the pilot channel according to priorities established on an annual basis.
S07-3	2.9.2-c	Emery, Allen & Pat	Planting trees that remove water is objectionable.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.
S08-1	1.1.3-b	Archer, L.E.	USIBWC plans to create animal habitat in the RGCP.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S08-2	4.1.5-a	Archer, L.E.	Habitat creation will affect water supply as seen in the Middle Rio Grande.	Sponsoring water conservation methods was proposed as a method that would benefit agricultural community.
S08-3	2.9.2-c	Archer, L.E.	Opposes the proposed actions of USIBWC that would reduce the supply of water.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.
S08-4	2.13-c1	Archer, L.E.	Protests proposed environmental programs.	Noted.
S09-1	1.3.4-a	Ortiz, Nubia	Suggests that USIBWC develop a broad plan that restores a more natural river channel.	A wide range of environmental measures were incorporated into the river management alternatives under consideration.
S09-2	1.3.4-a	Ortiz, Nubia	Six restoration recommendations are listed.	Noted.
S09-3	1.3.4-a	Ortiz, Nubia	The USIBWC needs to look beyond the narrow approach used in the Draft EIS.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
S10-1	4.4.3-a	Franzoy, Jerry	Tumbleweeds from not-mowed areas has caused damage.	Historically tumbleweeds have been a problem in the region during winter. No-mow zones in the USIBWC floodway are a minor component of the regional problem.
S10-2	4.2.5-a	Franzoy, Jerry	Uprooted cottonwoods caught in bridges can be a flood hazard.	The USIBWC will comply with requirements of Directive Volume IV, Chapter 315, July 27, 2000. Maintenance forces continually monitor the river channel for fallen trees that need to be removed.
S10-3	2.9.2-a	Franzoy, Jerry	Water conservation measures are needed.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
S10-4	2.2.3-a	Franzoy, Jerry	Channel maintenance is needed (island removal and bank erosion control).	The USIBWC continues sediment removal from the pilot channel according to priorities established on an annual basis.
S10-5	4.2.5-a	Franzoy, Jerry	Vegetation maintenance in the floodway is needed to avoid impacts.	The USIBWC will comply with requirements of Directive Volume IV, Chapter 315, July 27, 2000. Maintenance forces continually monitor the river channel for fallen trees that need to be removed.
S11-1	1.3.4-a	Alford, Jess	Suggests that USIBWC develop a broad plan that restores a more natural river channel.	A wide range of environmental measures were incorporated into the river management alternatives under consideration.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S11-2	1.3.4-a	Alford, Jess	Six restoration recommendations are listed.	Noted.
S11-3	1.3.4-a	Alford, Jess	The USIBWC needs to look beyond the narrow approach used in the Draft EIS.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
S12-1	1.3.4-a	Alvarez, Josefina	Suggests that USIBWC develop a broad plan that restores a more natural river channel.	A wide range of environmental measures were incorporated into the river management alternatives under consideration.
S12-2	1.3.4-a	Alvarez, Josefina	Six restoration recommendations are listed.	Noted.
S12-3	1.3.4-a	Alvarez, Josefina	The USIBWC needs to look beyond the narrow approach used in the Draft EIS.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
S13-1	2.8-a	Bigelow, Helen	Concern about historical damage done to the Rio Grande.	The DEIS evaluates potential effects on modified management alternatives relative to baseline conditions, not RGCP construction over 60 years ago.
S14-11	2.13-c1	Clayshulte, John	Supports the No Action Alternative excluding the terms of the USIBWC/SWEC MOU.	Noted.
S14-2	1.1.2-a	Clayshulte, John	No T&E species in project area - why habitat restoration?	Presence or absence of T&E species were not grounds for implementation of measures to improve habitat. The USIBWC does not have a primary goal of introducing T&E species under the proposed action.
S14-3	2.9.2-a	Clayshulte, John	Conservation during drought should be the focus, not creating additional use.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
S14-4	1.1.3-a	Clayshulte, John	USIBWC mandate is flood control and delivery of water - USIBWC is responsible to water users.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S15-1	2.13-c1	Clayshulte, Marshall	Supports the No Action Alternative without MOU	Noted.
S15-2	1.3.1-b	Clayshulte, Marshall	Opposes the MOU between USIBWC and the Southwest Environmental Center.	Observation noted
S15-3	2.9.2-c	Clayshulte, Marshall	Where is the water coming from?.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.
S15-4	4.2.5-a	Clayshulte, Marshall	USIBWC should not consider developments that would impede flow of water.	The USIBWC will comply with requirements of Directive Volume IV, Chapter 315, July 27, 2000. Maintenance forces continually monitor the river channel for fallen trees that need to be removed.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S15-5	1.3.3-a	Clayshulte, Marshall	USIBWC should focus on ensuring contractual delivers of water.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
S15-6	2.3.1-c	Clayshulte, Marshall	The RGCP has proven to be effective.	Noted. The USIBWC will conduct levee rehabilitation planning based on hydraulic modeling and results of the levee structural condition study.
S16-1	4.2.5-a	Provencio, Edward	Concerns regarding planting trees within the levees and restricting water flow.	The USIBWC will comply with requirements of Directive Volume IV, Chapter 315, July 27, 2000. Maintenance forces continually monitor the river channel for fallen trees that need to be removed.
S17-1	1.3.4-a	Schutle, Lorraine	Suggests that USIBWC develop a broad plan that restores a more natural river channel.	A wide range of environmental measures were incorporated into the river management alternatives under consideration.
S17-2	1.3.4-a	Schutle, Lorraine	Six restoration recommendations are listed.	Noted.
S17-3	1.3.4-a	Schutle, Lorraine	The USIBWC needs to look beyond the narrow approach used in the Draft EIS.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
S18-1	1.3.4-c	Meyer, Robert	Draft EIS options fail to restore a more natural channel.	Sediment accumulation for uncontrolled channel configuration changes would be contrary to the RGCP water delivery mission.
S18-2	1.3.4-a 2.13-c4	Meyer, Robert	Develop a new river restoration alternative not included in the Draft EIS that fulfills the USIBWC's 1999 agreement with Southwest Environmental Center.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S19-1	1.1.3-b	Pirtle, Paul	USIBWC to focus on water delivery and flood protection and not promote "environmental changes" to the riverbed.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S19-2	1.3.1-a	Pirtle, Paul	Objects to MOU.	Noted.
S19-3	1.1.3-b	Pirtle, Paul	Objections to spending in support of grazing lease management, restoration of meanders, and other "environmental measures."	Noted.
S19-4	5.1.4-a	Pirtle, Paul	Objection that a public hearings were not advertised or conducted in New Mexico where the greatest impact will occur.	Notice of the Hearing at the USIBWC offices was advertised in Las Cruces. An additional public hearing was considered unnecessary given the extensive stakeholder consultation conducted over four years of EIS development.
S19-5	2.9.2-c	Pirtle, Paul	Objection to USIBWC indirectly or directly affecting water flow of the Rio Grande without water rights purchase.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S19-6	2.3.1-c	Pirtle, Paul	Additional flood control is unnecessary if river is dredged.	The USIBWC continues sediment removal from the pilot channel according to priorities established on an annual basis. The need for flood control improvements is associated with the flood storage capacity in the floodway, not the channel.
S19-7	2.13-c1	Pirtle, Paul	Supports the No Action Alternative without the MOU.	Noted.
S19-8	4.1.5-a	Pirtle, Paul	Alternatives presented in Draft EIS would reduce water for productive uses.	Sponsoring water conservation methods was proposed as a method that would benefit agricultural community.
S19-9	1.1.3-b	Pirtle, Paul	Riparian restoration is outside the responsibility of the USIBWC.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S20-1	1.3.4-a 2.13-c4	Bauman, Bob	Prefers the Targeted River Restoration Alternative.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
S20-2	4.8.5-a	Bauman, Bob	Table ES-2 needs clarification (increase in water consumption vs. farmland retirement).	The difference is due to the use of two reference values: water diversions along the RGCP, and potential farmland retirement based on the 0.5-mile corridor adjacent to the RGCP.
S20-3	4.8.6-a	Bauman, Bob	No mention of enhanced recreational opportunities resulting from the Targeted River Restoration Alternatives.	Currently, recreational use by the public is limited to park areas managed by cooperating organizations. Public use of managed riparian bosques or grasslands is possible, but not anticipated.
S21-1	2.13-c1	Williams, Patricia	Prefers the No Action Alternative.	Noted.
S21-2	2.9.2-a	Williams, Patricia	USIBWC needs to address drought and effects on farmers.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
S22-1	2.13-c1	Wright, Irma	Prefers the No Action Alternative.	Noted.
S22-2	1.1.2-a	Wright, Irma	USIBWC has no business in habitat restoration since no T&E species are found.	Presence or absence of T&E species were not grounds for implementation of measures to improve habitat. The USIBWC does not have a primary goal of introducing T&E species under the proposed action.
S22-3	4.1.5-a	Wright, Irma	Restoration will further strain water supply.	Sponsoring water conservation methods was proposed as a method that would benefit agricultural community.
S22-4	2.9.2-a	Wright, Irma	USIBWC needs to address drought and effects on farmers.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
S23-1	1.3.4-a	Hunt, Pamela	Suggests that USIBWC develop a broad plan that restores a more natural river channel.	A wide range of environmental measures were incorporated into the river management alternatives under consideration.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S23-2	1.3.4-a	Hunt, Pamela	Six restoration recommendations are listed.	Noted.
S23-3	1.3.4-a	Hunt, Pamela	The USIBWC needs to look beyond the narrow approach used in the Draft EIS.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
S24-1	2.13-c1	Adamek, John & Kay	Supports the No Action Alternative with terms in the MOU with SWEC excluded.	Noted.
S24-2	2.2.3-a	Adamek, John & Kay	USIBWC should not have stopped dredging the channel.	The USIBWC continues sediment removal from the pilot channel according to priorities established on an annual basis.
S25-1	2.13-c1	Clayshulte, John	Prefers the No Action Alternative without the MOU with SWEC.	Noted.
S25-2	2.9.1-b	Clayshulte, John	States that Congress was identified by the SWEC as the funding source for the river restoration initiatives.	Noted.
S25-3	2.9.1-a	Clayshulte, John	Compromising with environmental organizations does not appear to be feasible.	Noted. The USIBWC will seek participation from governmental and non-governmental organizations capable of supporting the program and willing to foster its development.
S26-1	2.13-c1	Darbyshire, Daniel	Prefers the No Action Alternative without the MOU with SWEC.	Noted.
S26-2	2.8-a	Darbyshire, Daniel	The interpretation of the river historical conditions is questionable.	The DEIS evaluates potential effects on modified management alternatives relative to baseline conditions, not RGCP construction over 60 years ago.
S27-1	1.3.1-b	Darbyshire, Jack	MOU with SWEC circumvents intent of NEPA.	No-mow zones and planting areas considered in the MOU between SWEC and the USIBWC were addressed as categorical exclusions under NEPA.
S27-2	2.13-c1	Darbyshire, Jack	Prefers the No Action Alternative without the MOU.	Noted.
S27-3	1.1.3-a	Darbyshire, Jack	USIBWC is overreaching its mandate and fiduciary responsibility.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S28-1	2.13-c4	King, Cynthia	Supports Targeted River Restoration.	Noted.
S28-2	1.3.4-a	King, Cynthia	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S29-1	2.13-c4	Kingler, Stephen	Supports Targeted River Restoration.	Noted.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S29-2	1.3.4-a	Kingler, Stephen	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S30-1	2.13-c4	Konings, Adrianus & Gertrud	Supports Targeted River Restoration.	Noted.
S30-2	1.3.4-a	Konings, Adrianus & Gertrud	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S31-1a	1.3.3-a	Miller, Rebecca	Potential Conflicts with Agricultural Community: The USIBWC has compromised its water delivery and flood control mandates.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
S31-1b	1.3.3-b	Miller, Rebecca	Potential Conflicts with Agricultural Community: The USIBWC responded to pressure by special interest environmental groups.	In formulating river management alternatives, the USIBWC balanced the need for environmental stewardship along with its mission of flood control and water delivery. The interests of all stakeholders along the RGCP were considered.
S31-1c	1.1.1-a	Miller, Rebecca	Potential Conflicts with Agricultural Community: Definition of environmental enhancement is inconsistent with region's environmental objectives.	In the formulation of alternatives, key considerations were the limited and fully allocated water supply, and the benefit of maintaining farmlands in production, not only to minimize socioeconomic effects, but also as a supplemental wildlife habitat that would provide riparian vegetation a buffer from urban development.
S31-1d	1.1.3-a	Miller, Rebecca	Potential Conflicts with Agricultural Community: The USIBWC vision has changed; the agency is acting beyond its authority.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S31-1e	1.1.1-a	Miller, Rebecca	Potential Conflicts with Agricultural Community: Purpose and Need in Draft EIS with respect to its proposed action is contradictory.	The rationale for the USIBWC to evaluate a modified river management alternatives was not correctly interpreted. The agency will continue to perform the flood control and efficient water delivery functions as it has done since the RGCP construction.
S31-2a	1.1.3-b	Miller, Rebecca	NEPA Compliance: Draft EIS understates mandates and overstates objectives to achieve native conditions.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S31-2b	1.5-a	Miller, Rebecca	NEPA Compliance: Draft EIS does not discuss actual benefits from proposed enhancements and expense.	Environmental benefits can seldom be quantified in monetary terms. They are qualitatively discussed in detail in Sections 4.4 through 4.7.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S31-2c	2.8-b	Miller, Rebecca	NEPA Compliance: Other SWEC proposals were not addressed in Draft EIS.	An ongoing SWEC project, the Rio Bosque at mile 41 would add bosque areas and wetlands outside the ROW. This project is co-located with a point project under consideration.
S31-2d	1.1.3-a	Miller, Rebecca	NEPA Compliance: The USIBWC is acting beyond mandate of water delivery and flood control.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S31-2e	1.5-a	Miller, Rebecca	NEPA Compliance: Draft EIS should be re-written in accordance with the objectives of NEPA.	The Draft EIS followed the provisions of NEPA and CEQ regulations, and used the suggested format. The scope of the environmental review was defined by the scoping and 3-year consultation process.
S31-2f	3.8.1-a	Miller, Rebecca	NEPA Compliance: Agriculture is a key player in achieving environmental objectives.	The action alternatives were largely limited to the RGCP right-of-way. Adjacent farmlands provide additional habitat as indicated by the commentator, and thus the adopted goal of minimizing farmland retirement.
S31-2g	1.5-a	Miller, Rebecca	NEPA Compliance: Seven NEPA guidelines stated as key are listed.	The Draft EIS conforms to the requirements of the NEPA and the implementing CEQ regulations. All listed guidelines were incorporated in implementing the NEPA process
S31-2h	1.3.3-a	Miller, Rebecca	NEPA Compliance: Requests that the USIBWC focus on flood control and water delivery mandates.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
S31-3a	1.5-a	Miller, Rebecca	Contents and Executive Summary: Draft EIS does not meet requirements of NEPA.	The Draft EIS conforms to the requirements of the NEPA and the implementing CEQ regulations.
S31-3b	1.1.1-a	Miller, Rebecca	Purpose and need is confusing - two of the most significant natural resources, water and farmland, are not accurately portrayed.	Multiple constraints and opportunities related to flood control and water use were taken into consideration in selecting environmental measures and developing river management strategies (see Tables 1.3-2, 1.3-3, 1.3-4, and 1.3-5 of the Draft EIS).
S31-3c	1.5-a	Miller, Rebecca	Contents and Executive Summary: Not in compliance with NEPA by redefining overall environmental quality to mean a river with more natural processes.	The Draft EIS conforms to the requirements of the NEPA and the implementing CEQ regulations.
S31-3d	1.1.1-a	Miller, Rebecca	Scope of the Draft EIS is too narrowly defined and is inconsistent with agency's mandates.	The rationale for the USIBWC to evaluate a modified river management alternatives was not correctly interpreted. The agency will continue to perform flood control and efficient water delivery functions as it has done since the RGCP construction.
S31-3e	3.1.1-a	Miller, Rebecca	Contents and Executive Summary: Draft EIS fails to mention region's critical water situation.	Information on drought is presented in the Water Resources baseline analysis (Subsection 3.1.1) including USBR's 2003 data indicating E. Butte storage is at the most critical condition since 1978.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S31-3f	2.8-b	Miller, Rebecca	Contents and Executive Summary: Importance of farmland and cumulative impacts of demands to reallocated agricultural water to municipal water needs to be addressed.	These are direct effects that are evaluated extensively in the Draft EIS as related to water resources, land use, and socioeconomic effects (Sections 4.1, 4.8, and 4.9, respectively).
S31-3g	4.15.1-a	Miller, Rebecca	Contents and Executive Summary: Cumulative Impacts ignored in Draft EIS.	Cumulative effects are addressed in Section 4.15. A quantitative evaluation of potential cumulative effects is presented in Subchapter I.E of the Final EIS.
S31-4a	1.5-b	Miller, Rebecca	Summary Conclusions: A supplemental Draft EIS should be prepared.	The Draft EIS conforms to the requirements of the NEPA and the implementing CEQ regulations. The purpose and need is broadly defined in the EIS, and incorporates the RGCP mission of flood control and water delivery.
S31-4b	1.5-b	Miller, Rebecca	Summary Conclusions: Supplemental Draft EIS should change purpose and need previously established in public scoping.	The purpose and need is broadly defined in the EIS, and incorporates the RGCP flood control and water delivery mission. The current EIS is inclusive of the ongoing O&M activities for the RGCP.
S31-4c	1.5-b	Miller, Rebecca	Summary Conclusions: Supplemental Draft EIS should address improvements for normal O&M with mitigation that is not harmful and that will enhance riparian/aquatic habitats.	Alternatives development took into account constraints and opportunities for flood control and water issues as discussed in Section 1.3.4.
S31-4d	2.2.3-a	Miller, Rebecca	Summary Conclusions: Supplemental Draft EIS should address sediment removal until control dams are built.	The USIBWC continues sediment removal from the pilot channel according to priorities established on an annual basis.
S31-4e	2.13-c2	Miller, Rebecca	Summary Conclusions: The Flood Control Improvement Alternative includes riparian habitat enhancements that are consistent with both water conservation objectives and local wildlife conditions.	Noted. The Integrated USIBWC Land Management was selected as the preferred alternative on the basis of multiple criteria, including water use and wildlife habitat development.
S31-4f	1.5-b	Miller, Rebecca	Summary Conclusions: Supplemental Draft EIS - riparian habitat enhancements in the ILM and TRR Alternatives are inconsistent with USIBWC duties and impact region.	Ensuring that there is no conflict and that the RGCP flood control and water delivery efficiency mandate can be met is a common denominator for establishing environmental measures and alternatives.
S31-5a	1.1.3-b	Miller, Rebecca	Purpose and Need: Purpose is not consistent with flood control and water delivery objectives, and should not include riparian habitat improvements.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S31-5b	2.7.1-b	Miller, Rebecca	Purpose and Need: Effects of RGCP operation discontinuation were assessed in 1977 EA but not in the Draft EIS.	Discontinued operation of the RGCP is not a viable option that was ruled out early in the alternatives formulation process as incompatible with project's flood and water delivery functions.
S31-5c	1.3.3-a	Miller, Rebecca	Purpose and Need: Draft EIS understates the USIBWC flood control mandate in regard to public health and safety in the purpose and need.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S31-5d	2.3.1-c	Miller, Rebecca	Purpose and Need: Flood improvements recommended by 1996 US Army Corps of Engineers Report and the 1977 Draft EIS have not been constructed.	The USIBWC is evaluating improvements based on results of levee structural integrity study and hydraulic modeling. After completion of these evaluations, all recommendations made by the USACE in 1996 will be taken into consideration.
S31-5e	4.15.1-a	Miller, Rebecca	Purpose and Need: Water crisis and proposed solution to convert agricultural water - cumulative impact of El Paso-Las Cruces RSWP is needed.	A quantitative evaluation of potential cumulative effects of the El Paso-Las Cruces Regional Sustainable Water Project is presented in Subchapter I.E of the Final EIS.
S31-5f	1.1.2-a	Miller, Rebecca	Purpose and Need: Draft EIS states no endangered or threatened species in project area; therefore purpose and need should be changed to focus on flood control, etc.	Presence or absence of T&E species were not grounds for implementation of measures to improve habitat. The USIBWC does not have a primary goal of introducing T&E species under the proposed action.
S31-5g	1.1.3-b	Miller, Rebecca	Purpose and Need: No need is given to change O&M changes for restoration purposes.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S31-5h	1.3.3-c	Miller, Rebecca	Purpose and Need: Draft EIS has not adequately defined proposed action or emphasized significant issues. The need for environmental improvements in not proven, and provided information is contradictory.	Significant issues were identified during the 3-year consultation process (see Section 5.1) as summarized in Section 1.3.3. All proposed actions are described in detail in Section 2.
S31-5i	1.1.1-a	Miller, Rebecca	Purpose and Need: Draft EIS erroneously concludes that USIBWC needs to focus on wildlife habitat rather than protection of human lives, health, etc. in violation of NEPA.	All significant resource areas are evaluated in Section 4, including socioeconomic issues.
S31-6a	1.3.1-b	Miller, Rebecca	Violation of Due Process: Draft EIS objective similar to the SWEC objective to enhance environment.	No-mow zones and planting areas were considered as baseline conditions for the Draft EIS evaluation.
S31-6b	4.6.1-b	Miller, Rebecca	Violation of Due Process: A Biological Assessment by Itself would have brought the agency into compliance with ESA.	While this is an important technical support document, the Biological Assessment only fulfills NEPA requirements for evaluating environmental effects on one of several resource areas addressed in the Draft EIS.
S31-6c	1.3.1-b	Miller, Rebecca	Violation of Due Process: The establishment of "green zones" as a Categorical Exclusion is a violation of NEPA.	USIBWC 1981 Operational Procedures for implementing NEPA, Section 102 established 13 categories for Categorical Exclusion (Federal Register 46, No. 170: 44083-44093, Section 100.6), including "participation in research or study projects which do not cause significant environmental impacts." Green zones fit this category. The Categorical Exclusion applies in accordance with CEQ 1508.4.
S31-6d	1.3.3-c	Miller, Rebecca	Violation of Due Process: Initial narrow scope prejudiced ultimate decision.	Significant issues were identified during the 3-year consultation process (see Section 5.1) as summarized in Section 1.3.3. All proposed actions are described in detail in Section 2.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S31-6e	1.3.3-b	Miller, Rebecca	Violation of Due Process: The El Paso-Las Cruces Regional Sustainable Water Project set a precedent for the MOU.	As early as 1991, long before the Sustainable Water Project, the USIBWC addressed USACE permit requirements under the Clean Water Act on its flood control projects.
S31-6f	1.3.3-a	Miller, Rebecca	Violation of Due Process: River restoration is given priority over flood control as a purpose.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
S31-6g	1.3.3-b	Miller, Rebecca	Violation of Due Process: USIBWC has made incremental decisions in favor of environmental groups.	In formulating river management alternatives, the USIBWC balanced the need for environmental stewardship along with its mission of flood control and water delivery. The interests of all stakeholders along the RGCP were considered.
S31-6h	4.0 -c	Miller, Rebecca	Violation of Due Process: Draft EIS source documents understate complex water and agricultural issues.	A full analysis was conducted using standard or widely accepted methods, and best available data. Detailed evaluations of water and agricultural issues are presented in the August 2003 Reformulation of Alternatives Report (see Appendix Q).
S31-6i	1.3.1-b	Miller, Rebecca	Violation of Due Process: Historical chronology of events occurring prior to USIBWC entering in the MOU with SWEC - USIBWC has not corrected violations.	No-mow zones and planting areas considered in the MOU between SWEC and the USIBWC were addressed as categorical exclusions under NEPA.
S31-7a	4.8.5-a	Miller, Rebecca	Farmland Protection Issues: Farmland should be considered in Draft EIS as a resource that is impacted - focus on wildlife enhancements violate NEPA objectives.	Farmland is addressed in two sections: land use and socioeconomics. Effects on agricultural land use was the primary criterion used in Section 4.8
S31-7b	4.9.1-c	Miller, Rebecca	Farmland Protection Issues: Requirements pursuant to FPPA should be incorporated into the process early - USIBWC and NRCS failed to meet requirements.	No impacts on prime farmland, as defined by the FPPA, are anticipated since: 1) nearly all measures under consideration apply to non-agricultural lands within the ROW; and 2) the preferred implementation strategy to secure water is funding of water conservation programs.
S31-7c	3.8.1-a	Miller, Rebecca	Farmland Protection Issues: Draft EIS ignores importance of farmland contribution to the environment and value to natural and socioeconomic environments.	The action alternatives were largely limited to the RGCP right-of-way. Adjacent farmlands provide additional habitat as indicated by the commentator, and thus the adopted goal of minimizing farmland retirement.
S31-7d	4.9.1-b	Miller, Rebecca	Farmland Protection Issues: Draft EIS misrepresents the importance of agriculture in the three counties affected by the project.	State and federal statistics, identified in Section 4.9, were the source of cited data.
S31-7e	4.5.1-a 3.8.1-a	Miller, Rebecca	Farmland Protection Issues: Draft EIS doesn't mention benefits to wildlife and air quality associated with orchards - a specific study for pecan orchards should be conducted.	Farmlands provide supplemental wildlife habitat along the riparian corridor and buffer areas t from urban expansion. This is one of the main reasons why not retiring farmland was adopted as a key goal in development of the alternatives.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S31-7f	3.8.1-a	Miller, Rebecca	Farmland Protection Issues: Environmental benefits from agriculture should be identified - reference Agriculture Handbook No. AH 722.	The action alternatives were largely limited to the RGCP right-of-way. Adjacent farmlands provide additional habitat, and thus the adopted goal of minimizing farmland retirement.
S31-7g	4.9.5-b	Miller, Rebecca	Farmland Protection Issues: Draft EIS does not address impacts associated with mosquito and bird-borne disease.	Environmental measures under consideration would be non-irrigated, and largely limited to the areas surrounded by extensive irrigated agriculture. Under those conditions, the contribution of a modified ROW management, if any, would be negligible.
S31-7h	4.9.1-a	Miller, Rebecca	Farmland Protection Issues: Draft EIS does not discuss and analyze the effects of water transfers from agriculture use cumulatively to farming, environmental, and population.	The purpose of the Economic Impact Forecast System used in the socioeconomic effects evaluation is to account for indirect and cumulative effects on the economy.
S31-7i	3.8.1-a	Miller, Rebecca	Farmland Protection Issues: Recognition of preserving farmland and achieving NEPA goals - USDA and NRCS strategic approaches are discussed.	Adjacent farmlands do provide additional environmental benefits as indicated by the commenter, and thus the adopted goal of minimizing farmland retirement.
S31-7j	2.2.3-a	Miller, Rebecca	Farmland Protection Issues: Sediment accumulation and its effects on groundwater were not discussed in the Draft EIS.	The evaluation is unwarranted as the USIBWC continues sediment removal from the pilot channel according to priorities established on an annual basis.
S31-7k	2.2.3-a	Miller, Rebecca	Farmland Protection Issues: Draft EIS should have included impacts to agriculture and economy as result of not removing sediment.	The assumption of discontinued sediment removal is incorrect. Since the USIBWC continues sediment removal from the pilot channel the evaluation is unwarranted.
S31-8a	4.15.1-a	Miller, Rebecca	Cumulative Impacts: Draft EIS did not address the cumulative economic impact of EP-LC RSWP due to conversion of agricultural water.	A quantitative evaluation of potential cumulative effects of the El Paso-Las Cruces Regional Sustainable Water Project is presented in Subchapter I.E of the Final EIS.
S31-8b	2.8-b 4.1.1-b	Miller, Rebecca	Cumulative Impacts: Draft EIS doesn't address cumulative impacts to groundwater, pending actions on Middle Rio Grande, and FWS critical habitat for the silvery minnow.	Cumulative impacts are not associated with those actions as discussed in detail in the text (Chapter II of the Final EIS).
S31-8c	2.9.2-a	Miller, Rebecca	Cumulative Impacts: Preference to drip irrigation is not an option - expensive to farmers and unknowns regarding groundwater recharge.	The basis for the conservation program is to provide funding to farmers for installation of drip irrigation systems. The use of this systems is supported by the NMOSE (2001)
S31-8d	2.9.1-a	Miller, Rebecca	Cumulative Impacts: Individual stakeholder states that agricultural community would not support Paso del Norte Watershed Council in an advisory capacity as suggested in the Draft EIS.	Noted. The USIBWC will seek participation from governmental and non-governmental organizations capable of supporting the program and willing to foster its development.
S32-1	2.13-c4	Pelton, Clifford	Supports Targeted River Restoration.	Noted.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S32-2	1.3.4-a	Pelton, Clifford	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S33-1	2.13-c1	Ortega, Anita	Supports No Action Alternative without the MOU with SWEC.	Noted.
S33-2	1.3.1-a	Ortega, Anita	Objects to MOU as outside USIBWC mandate and 1977 Environmental Impact Study.	The March 1999 MOU with SWEC maybe terminated unilaterally by either party. The USIBWC has no reason, at this time, to terminate the agreement.
S33-3	4.1.6-a	Ortega, Anita	Believes habitat restoration has negative impact on water quality.	Potential beneficial or adverse changes in water quality would not be significant considering that the ROW is not irrigated, and is a minor component of the tributary basin.
S33-4	1.1.2-a 4.1.5-a	Ortega, Anita	Believes habitat restoration threatens water rights by introducing endangered species.	The USIBWC does not have a primary goal of introducing T&E species under the proposed action. The proposed action, however, may improve conditions conducive to advancing the natural introduction of T&E species.
S34-1	2.13-c1	Ortega, Enrique	Supports No Action Alternative without the MOU with SWEC.	Noted.
S34-2	1.3.1-a	Ortega, Enrique	Objects to MOU as outside USIBWC mandate and 1977 Environmental Impact Study.	The March 1999 MOU with SWEC maybe terminated unilaterally by either party. The USIBWC has no reason, at this time, to terminate the agreement.
S34-3	4.1.6-a	Ortega, Enrique	Believes habitat restoration has negative impact on water quality.	Potential beneficial or adverse changes in water quality would not be significant considering that the ROW is not irrigated, and is a minor component of the tributary basin.
S34-4	1.1.2-a	Ortega, Enrique	Believes habitat restoration threatens water rights by introducing endangered species.	The USIBWC does not have a primary goal of introducing T&E species under the proposed action. The proposed action, however, may improve conditions conducive to advancing the natural introduction of T&E species.
S35-1	2.13-c1	Ortega, Manuel	Supports No Action Alternative without the MOU with SWEC.	Noted.
S35-2	1.3.1-a	Ortega, Manuel	Objects to MOU as outside USIBWC mandate and 1977 Environmental Impact Study.	The March 1999 MOU with SWEC maybe terminated unilaterally by either party. The USIBWC has no reason, at this time, to terminate the agreement.
S35-3	4.1.6-a	Ortega, Manuel	Believes habitat restoration has negative impact on water quality.	Potential beneficial or adverse changes in water quality would not be significant considering that the ROW is not irrigated, and is a minor component of the tributary basin.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S35-4	1.1.2-a	Ortega, Manuel	Believes habitat restoration threatens water rights by introducing endangered species.	The USIBWC does not have a primary goal of introducing T&E species under the proposed action. The proposed action, however, may improve conditions conducive to advancing the natural introduction of T&E species.
S36-1	2.13-c1	Ortega, Roy & Celestina	Supports No Action Alternative without the MOU with SWEC.	Noted.
S36-2	1.3.1-a	Ortega, Roy & Celestina	Objects to MOU as outside USIBWC mandate and 1977 Environmental Impact Study.	The March 1999 MOU with SWEC maybe terminated unilaterally by either party. The USIBWC has no reason, at this time, to terminate the agreement.
S36-3	4.1.6-a	Ortega, Roy & Celestina	Believes habitat restoration has negative impact on water quality.	Potential beneficial or adverse changes in water quality would not be significant considering that the ROW is not irrigated, and is a minor component of the tributary basin.
S36-4	1.1.2-a	Ortega, Roy & Celestina	Believes habitat restoration threatens water rights by introducing endangered species.	The USIBWC does not have a primary goal of introducing T&E species under the proposed action. The proposed action, however, may improve conditions conducive to advancing the natural introduction of T&E species.
S37-1	2.13-c1	Polanco, Albert & Gloria	Supports No Action Alternative without the MOU with SWEC.	Noted.
S37-2	1.3.1-a	Polanco, Albert & Gloria	Objects to MOU as outside USIBWC mandate and 1977 Environmental Impact Study.	The March 1999 MOU with SWEC maybe terminated unilaterally by either party. The USIBWC has no reason, at this time, to terminate the agreement.
S37-3	4.1.6-a	Polanco, Albert & Gloria	Believes habitat restoration has negative impact on water quality.	Potential beneficial or adverse changes in water quality would not be significant considering that the ROW is not irrigated, and is a minor component of the tributary basin.
S37-4	1.1.2-a	Polanco, Albert & Gloria	Believes habitat restoration threatens water rights by introducing endangered species.	The USIBWC does not have a primary goal of introducing T&E species under the proposed action. The proposed action, however, may improve conditions conducive to advancing the natural introduction of T&E species.
S38-1	2.13-c4	Stinnett, Ken	Supports Targeted River Restoration.	Noted.
S38-2	1.3.4-a	Stinnett, Ken	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S39-1	2.13-c4	Wark, Thomas & Lois	Supports Targeted River Restoration.	Noted.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S39-2	1.3.4-a	Wark, Thomas & Lois	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S40-1	2.13-c4	Yarnes, Chris	Supports Targeted River Restoration.	Noted.
S40-2	1.3.4-a	Yarnes, Chris	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S41-1	2.13-c1	Unknown	Supports No Action Alternative with the exclusion of MOU.	Noted.
S41-2	2.9.2-c	Unknown	Objects to taking water out of beneficial use.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.
S41-3	1.3.1-b	Unknown	Objects to No Action that includes terms of MOU because they did not go through the proper legal and environmental review.	No-mow zones and planting areas considered in the MOU between SWEC and the USIBWC were addressed as categorical exclusions under NEPA.
S41-4	4.1.6-a	Unknown	Negative impacts to water quality would occur from habitat restoration.	Potential beneficial or adverse changes in water quality would not be significant considering that the ROW is not irrigated, and is a minor component of the tributary basin.
S41-5	1.1.2-a	Unknown	Without the presence of T&E species, why habitat restoration?	Presence or absence of T&E species were not grounds for implementation of measures to improve habitat. The USIBWC does not have a primary goal of introducing T&E species under the proposed action.
S41-6	2.9.2-a	Unknown	Focus should be on current drought conditions and conservation instead of creating additional uses.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
S41-7	1.3.3-a	Unknown	USIBWC should follow mandate of water delivery and flood control.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
S41-8	1.3.3-a	Unknown	Objects to changing the river channel's design and purpose.	Noted.
S41-9	1.3.3-a	Unknown	USIBWC is responsible to water users.	Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
S42-1	1.3.4-a 2.13-c4	Davis, Jonathan	USIBWC should maintain their agreement with the SWEC and develop a new river restoration alternative.	The USIBWC incorporated restoration measures in the management alternatives to the extent that they were compatible with the RGCP flood control and water delivery mission.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S42-2	1.3.4-a 2.13-c4	Davis, Jonathan	USIBWC has a historic opportunity for river improvement.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
S43-1	2.13-c1	Darbyshire, Jean	Prefers the No Action Alternative without the MOU with SWEC..	Noted.
S44-1	2.2.3-a	Dutton, Garry Michael	In 1996 the USIBWC stopped dredging the channel contrary to 1977 EIS.	The USIBWC continues sediment removal from the pilot channel according to priorities established on an annual basis.
S44-2	1.3.3-a	Dutton, Garry Michael	The floodway must be kept clean of any debris and vegetation.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
S44-3	2.13-c1	Dutton, Garry Michael	Prefers the No Action Alternative excluding MOU with SWEC.	Noted.
S45-1	2.13-c4	Hughes, Larry	Supports Targeted River Restoration.	Noted.
S45-2	1.3.4-a	Hughes, Larry	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S46-1	2.13-c4	McKimmie, Tim	Supports Targeted River Restoration.	Noted.
S46-2	1.3.4-a	McKimmie, Tim	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S47-1	2.13-c4	Mulholland, Lynn	Supports Targeted River Restoration.	Noted.
S47-2	1.3.4-a	Mulholland, Lynn	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S48-1	2.13-c4	Page, Linda & Douglas	Supports Targeted River Restoration.	Noted.
S48-2	1.3.4-a	Page, Linda & Douglas	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S49-1	2.13-c4	Poss, Jane	Supports Targeted River Restoration.	Noted.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S49-2	1.3.4-a	Poss, Jane	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S50-1	2.13-c4	Sisk, Sarah	Supports Targeted River Restoration.	Noted.
S50-2	1.3.4-a	Sisk, Sarah	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S51-1	1.3.4-a	Tillett, Geri	Suggests that USIBWC develop a broad plan that restores a more natural river channel.	A wide range of environmental measures were incorporated into the river management alternatives under consideration.
S51-2	1.3.4-a	Tillett, Geri	Six restoration recommendations are listed.	Noted.
S51-3	1.3.4-a	Tillet, Geri	The USIBWC needs to look beyond the narrow approach used in the Draft EIS.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
S52-1	2.13-c4	Villaverde, Gloria	Supports Targeted River Restoration.	Noted.
S52-2	1.3.4-a	Villaverde, Gloria	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S53-1	2.13-c4	Wood, Ronald	Supports Targeted River Restoration.	Noted.
S53-2	1.3.4-a	Wood, Ronald	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S54-1	2.13-c4	Wood, Sarah	Supports Targeted River Restoration.	Noted.
S54-2	1.3.4-a	Wood, Sarah	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S55-1	2.13-c4	Wright, S.K.	Supports Targeted River Restoration.	Noted.
S55-2	1.3.4-a	Wright, S.K.	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S56-1	2.9.2-c	Furgason, Barbara	Planted trees are using water rights.	The USIBWC will quantify potential water use, and acquire use of water rights as needed to support environmental measures.
S56-2	4.9.5-a	Furgason, Barbara	Additional water uses could increase unemployment.	Section 4.9.5 indicates potential job losses by minority groups due to water use/farm retirement would be coupled with potential job increases by levee rehabilitation.
S56-3	1.3.3-a	Furgason, Barbara	Some actions are against USIBWC mission.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
S57-1	1.1.3-b	Furgason, Bill	USIBWC should not be making environmental policy.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S57-2	4.2.5-a	Furgason, Bill	Tree planting creates flood problems.	The USIBWC will comply with requirements of Directive Volume IV, Chapter 315, July 27, 2000. Maintenance forces continually monitor the river channel for fallen trees that need to be removed.
S57-3	2.9.1-b	Furgason, Bill	Tax payers should not be charged for environmental initiatives.	Opinion noted.
S58-1	2.13-c1	Madrid, David	Supports the No Action Alternative.	Noted.
S58-2	1.1.3-b	Madrid, David	USIBWC needs to follow mandates in 1977 Environmental Impact Study.	The authority to construct, operate and maintain RGCP works also includes a responsibility to consider environmental improvements in the project area.
S58-3	1.3.1-b	Madrid, David	New EIS needs to be conducted for no-mow zones.	No-mow zones and planting areas considered in the MOU between SWEC and the USIBWC were addressed as categorical exclusions under NEPA.
S58-4	2.9.2-a	Madrid, David	How is the board addressing drought?	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
S59-1	1.3.3-a	Ogaz, Adrian	USIBWC should maintain water delivery and flood control.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
S60-1	2.13-c4	Blevins, Mary	Supports Targeted River Restoration.	Noted.
S60-2	1.3.4-a	Blevins, Mary	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S61-1	2.13-c4	Crider, Nancy	Supports Targeted River Restoration.	Noted.
S61-2	1.3.4-a	Crider, Nancy	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S62-1	1.3.4-a	d'Olier, Ann	Suggests that USIBWC develop a broad plan that restores a more natural river channel.	A wide range of environmental measures were incorporated into the river management alternatives under consideration.
S62-2	1.3.4-a	d'Olier, Ann	Six restoration recommendations are listed.	Noted.
S62-3	1.3.4-a	d'Olier, Ann	The USIBWC needs to look beyond the narrow approach used in the Draft EIS.	Noted. River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission.
S63-1	1.3.3-a	Rose, Billie	A well maintained Rio Grande is needed for flood control and water use.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
S63-2	2.3.1-c	Rose, Billie	Neighboring property should be protected from flooding.	Planning for levee rehabilitation will be completed based on results of the levee structural condition study and additional hydraulic modeling.
S64-1	1.3.3-a	Rose, Terry	A well maintained Rio Grande is needed for flood control and water use.	Flood control and water deliveries are the core actions conducted by the USIBWC in the RGCP. Measures evaluated in the EIS were considered in light of not impeding efficient water flow or flood control.
S64-2	2.3.1-c	Rose, Terry	Neighboring property should be protected from flooding.	Planning for levee rehabilitation will be completed based on results of the levee structural condition study and additional hydraulic modeling.
S65-1	2.13-c4	Fields, Chris & Alison Tinsley	Supports Targeted River Restoration.	Noted.
S65-2	1.3.4-a	Fields, Chris & Alison Tinsley	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S66-1	2.13-c4	Smith, Daryl	Supports Targeted River Restoration.	Noted.
S66-2	1.3.4-a	Smith, Daryl	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S67-1	2.3.1-a	Stotz, Nancy	Concern that the Draft EIS was released before advanced hydraulic modeling was conducted.	Environmental effects evaluation did not warrant use of a two-dimensional model; that type of model, however, will be used in planning of flood control improvements to narrow the degree of potential levee deficiencies.
S67-2	2.13-c4	Stotz, Nancy	Qualified support for the Targeted Restoration Alternative.	Noted.
S67-3	2.9.1-a	Stotz, Nancy	Partner with other agencies to address measures for Rio Grande restoration.	The USIBWC will seek participation from governmental and non-governmental organizations capable of supporting the program and willing to foster its development.
S68-1	4.4.4-a	Von Finger, Kevin	Concern regarding how acreages were derived for restoration activities, particularly no mention of cottonwood tree planting.	Numerous data sources were used to assess current conditions, historical characteristics, and potential restoration locations. Locations, methods and size of restoration projects were discussed in the Reformulation of Alternatives Report (Appendix Q).
S68-2	4.4.4-a	Von Finger, Kevin	Concern regarding how the number of acres were derived for salt cedar removal.	Assumptions concerning salt cedar removal acreage are found in Subsection 4.4.1, specifically within Table 4.4-2.
S68-3	4.4.4-a	Von Finger, Kevin	Concern about why there were fewer acres planned for planting native vegetation in the Targeted River Restoration than the Integrated USIBWC Land Management Alternative.	Some areas identified as point projects for planting under the IULM Alternative would be inundated for natural revegetation under the TRR Alternative as a result of seasonal peak flows.
S68-4	5.1.4-c	Von Finger, Kevin	Two-dimensional modeling should be used to determine restoration areas.	The basis for restoration is described in detail in the Reformulation of Alternatives Report ((Final IES, Appendix Q). A two-dimensional hydraulic model may be used to enhance our planning of environmental measures, flood control and other activities associated with implementing the preferred alternative.
S68-5	2.8-a	Von Finger, Kevin	Concern that impacts from current O&M activities were not analyzed under NEPA - concern of impacts to wildlife and habitat.	Potential effects were evaluated relative to current conditions. Wildlife conditions resulting from current O&M are described in terms of Habitat Quality Index in Section 3.5.
S68-6	3.10.2-a	Von Finger, Kevin	Consultation should be conducted with the Tigua and results documented in Final EIS.	Continued Native American consultation will be conducted as part of a programmatic agreement, as suggested by the New Mexico Department of Cultural Affairs.
S68-7	2.13-c4	Von Finger, Kevin	Supports alternative with the greatest restoration of riparian, wetland, and aquatic habitat and restoration of river hydrological functions.	Noted. The Integrated USIBWC Land Management was selected as the preferred alternative on the basis of opportunities and constraints for restoration.
S69-1	2.13-c1	Clayshulte, Nelson	Supports the No Action Alternative without the MOU.	Noted.
S69-2	1.3.1-b	Clayshulte, Nelson	The MOU is contrary to the agency's mandate.	No-mow zones and planting areas considered in the MOU between SWEC and the USIBWC were addressed as categorical exclusions under NEPA.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S69-3	2.9.2-a	Clayshulte, Nelson	Creating additional water uses is not consistent with conservation and current drought.	A high priority was given to on-farm water conservation programs to allow implementation of environmental measures while addressing drought conditions.
S70-1	2.13-c4	Hughes, Billie	Supports Targeted River Restoration.	Noted.
S70-2	1.3.4-a	Hughes, Billie	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S71-1	1.3.4-a 2.13-c4	Moore, Taylor	The Targeted River Restoration is a step in the right direction but it doesn't address historical damage to the river.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S71-2	2.13-c4	Moore, Taylor	Endorses SWEC's restoration recommendations.	Noted.
S71-3	2.9.1-b	Moore, Taylor	Indicates that federal government should finance Rio Grande Basin restoration.	Noted.
S71-4	5.1.4-b	Moore, Taylor	Questions the decision not to accept e-mail comments.	Based on comments received during the Regional Sustainable Water Project DEIS public review period, the email system was used largely by special interest groups to send form comment letters; therefore, an administrative decision was made to only accept written comments sent by United States Postage.
S72-1	2.13-c4	Schiffmiller, Gary	Supports Targeted River Restoration.	Noted.
S72-2	1.3.4-a	Schiffmiller, Gary	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S73-1	2.13-c4	Stephens, Martha	Recommends helping restore the river.	Noted.
S73-2	2.13-c4	Stephens, Martha	Supports the Alliance for the Rio Grande Heritage plan.	Noted.
S74-1	1.3.4-a 2.13-c4	Welch, John	Management plan should restore the river's ecological health.	A wide range of environmental measures were incorporated into the river management alternatives under consideration.
S74-2	1.3.4-a 2.13-c4	Welch, John	Endorses SWEC recommendations for river restoration.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
S75-1	2.13-c4	Wilson, Margaret	Supports Targeted River Restoration.	Noted.

Comment	EIS Sections	Author	Summary Comment	Summary Response
S75-2	1.3.4-a	Wilson, Margaret	Addition of several measures to a modified restoration alternative is recommended.	River management alternatives incorporated restoration measures to the extent that they were compatible with the RGCP flood control and water delivery mission. A number of recommended measures are in conflict with this mission.
ST1-1	4.4.4-a	Von Finger, Kevin	Draft EIS states 200-some acres for tree planting, riparian planting, but bosque would increase by 1500 acres?	A total of 1,549 acres of native bosque would be developed as follows: 189 acres of native vegetation planting; 516 acres inundated by seasonal peak flows; 73 acres resulting from reopening meanders; and 771 acres from voluntary conservation easements
ST1-2	4.4.4-a	Von Finger, Kevin	Draft EIS states 223 acres of tree planting - will there be additional cottonwood plantings as done in the past?	Planting would be conducted to the extent indicated for each alternative.
ST1-3	5.1.4-c	Von Finger, Kevin	Suggests that a two-dimensional hydrologic model be used.	A two-dimensional hydraulic model may be used to enhance our planning of environmental measures, flood control and other activities associated with implementing the preferred alternative.
ST2-1	3.10.2-a	Rivera, Lori	Draft EIS states a letter was sent, but no response, this does not constitute government-to-government consultation.	Continued Native American consultation will be conducted as part of a programmatic agreement, as suggested by the New Mexico Department of Cultural Affairs. The programmatic agreement will specify requirements for formal government-to-government consultation for specific projects.
ST2-2	3.10.2-a	Rivera, Lori	Draft EIS discusses known and undiscovered archeological resources - A statement was made regarding Ysleta del Sur Pueblo cultural affiliation with known Puebloan groups.	See response to comment ST2-1.
ST3-1	2.3.2-a	Vega, Armando	Changes in grazing would modify grassland management - to evaluate, need to know current management and changes.	Description of current practices are described in Section 2.2.2, Floodway Management; Proposed changes are indicated in Sections 2.3.2 and 2.4.2 for grazing and grasslands, respectively.

APPENDIX M

ADDITIONAL CULTURAL RESOURCES CONSULTATION

- **MAY 10, 2004 LETTER FROM THE NEW MEXICO DEPARTMENT OF CULTURAL AFFAIRS**
- **MARCH 4, 2004 USIBWC LETTER (TRANSMITTAL OF THE RGCP CULTURAL RESOURCES STUDY)**
- **FEBRUARY 19, 2004 LETTER FROM THE NEW MEXICO DEPARTMENT OF CULTURAL AFFAIRS**

Comment Letter A5b

STATE OF NEW MEXICO
DEPARTMENT OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

228 EAST PALACE AVENUE
SANTA FE, NEW MEXICO 87501
(505) 827-6320

BILL RICHARDSON
Governor

May 10, 2004

Mr. Douglas Echlin
Lead Environmental Protection Specialist
USIBWC, Environmental Management Division
4171 North Mesa Street, C-100
El Paso, TX 79902

RE: Request for comments on the DEIS on River Management Alternatives for the Rio Grande Canalization Project (RGCP)

Dear Mr. Echlin:

I am writing to follow-up my letter dated February 19, 2004 in which we noted that we needed a copy of the *Cultural Resource Class I Survey and Geoarchaeological Study* prepared by Ecosystem Management, Inc. (edited by Kenneth Brown) in order to complete our review of the DEIS. Thank you for providing a copy of this excellent study. Below we summarize our observations.

A5b-1 According to the DEIS and Class I Survey and Geoarchaeological report, field reconnaissance within the narrow Canalization Project right-of-way determined that of the 19 previously recorded archaeological sites, four are on private land outside of the right-of-way and eight sites are within the right-of-way. Of the eight sites within the right-of-way, seven were not relocated, either because of the absence of landowner permission, could not be field verified because of the absence of property boundary markers, or could not relocated because of dense vegetation. According to Table 9.1 (Brown:115-116), Ecosystem Management recommended actions to the following sites:

- LA 1646 and LA 1671 need to be rerecorded.
- LA 2410 may be within the work area and needs to be relocated.
- LA 2800 and LA 72703- Need to obtain landowner permission and relocate.
- LA 2931 needs to be relocated.
- LA 106782 - Consult with NM SHPO
- LA 107943 is within USIBWC right-of way and its location was confirmed.
- LA 120257- avoid
- LA 131204- avoid
- LA 131868 - determine canal origin.

It is not clear from the DEIS or the Class I study whether there will be any effects to these sites. The effects, if any, need to be specified.

In addition to the field reconnaissance, a geomorphic study at ten select locations along the Rio Grande from Percha Dam, Sierra County to the American Dam in El Paso County, Texas was conducted. The purpose of the geomorphic study was to provide a model for predicting where buried archaeological sites might occur (Brown:42). Although ten areas were identified as potential meander restoration areas where the clearing of trees or bulldozing of the river embankment may potentially expose buried cultural deposits, no buried deposits were found.

A5b-2 The geomorphic study documented the presence of buried landforms in the right-of-way project; however few prehistoric sites are recorded within the Rio Grande floodplain and our understanding of the relation between prehistoric occupation surfaces and the landforms within the Rio Grande corridor are presently unknown (Brown:116). Consequently site densities and types are difficult to ascertain given the paucity of research along the Rio Grande channel. Figures 9.1-9.15 (Brown:118-132) show areas within the right-of-way that have the highest potential to have surface cultural remains based on the presence of ground surfaces that are elevated above the floodplain. These areas are identified as having a better chance for visibility during a pedestrian survey and are areas less likely to have been silted over or scoured away by seasonal flooding (Brown:116-117). These areas need to be systematically surveyed to identify any cultural remains that may be present on the surface in order to make a determination of effect for the project.

A5b-3 In addition, as a result of the geomorphic study, areas were identified that might require deeper testing since these sediments may contain buried sites. In these instances an archaeological monitor and/or discovery protocol as outlined in the DEIS will be implemented in order to mitigate adverse effects.

A5b-4 In your letter date stamped March 4, 2004, you indicated that did not wish to extend the comment period on the DEIS to encompass consultation with the tribes that I identified in my February 19 letter. It is our opinion that the tribes we identified (Comanche Indian Tribe, Kiowa Tribe, Navajo Nation, and Hopi Tribe) should be contacted. Although the Native American Consultation database is a good starting point, it is based on land claims filed with the National Park Service. The additional tribes we identified may have traditional cultural properties in the area of effect even though they have not filed a land claim. In addition, the Class I study and DEIS state that the Mescalero Apache Tribe, the Pueblo of Isleta, and the White Mountain Apache tribe in Whiteriver, Arizona which to review the EIS or be kept informed about the project.

A5b-5 In order to complete consultation under Section 106 of the National Historic Preservation Act additional cultural resources identification and tribal consultation needs to be conducted. Since this project requires a programmatic agreement, the record of decision

identification of cultural resources will be occur and that the process will be outlined in the programmatic agreement.

If you have any questions concerning these comments, please do not hesitate to contact me. I can be reached at (505) 827-4064.

Sincerely,

Michelle M. Ensey
Staff Archaeologist

Log: 70478

INTERNATIONAL BOUNDARY AND WATER COMMISSION
UNITED STATES AND MEXICO

OFFICE OF THE COMMISSIONER
UNITED STATES SECTION

MAR 4 - 2004

Ms. Michelle M. Ensey
Staff Archaeologist
Department of Cultural Affairs
Historic Preservation Division
228 East Palace Avenue
Santa Fe, New Mexico 87501

Dear Ms. Ensey:

Thank you for your February 19, 2004 comment letter regarding the Draft Environmental Impact Statement (EIS) for River Management Alternatives for the Rio Grande Canalization Project. You stated that your office did not have a copy of the Ecosystem Management, March 2001 report titled, *Cultural Resource Class I Survey and Geoarchaeological Study, USIBWC Rio Grande Canalization Project, Sierra and Doña Ana Counties, New Mexico and El Paso County, Texas*. Our records show that we failed to provide your office a copy of the report; one is now enclosed for your information.

We appreciate your comments on the Draft EIS, and they will be considered in the preparation of the Final EIS. I do want to respond to one of your comments at this time, however, in an effort to offset the need to extend the comment period. You indicate that additional listed tribes need to be contacted. In Chapter 7 of the March 2001 report, the Native American Consultation Database (NACD) was queried to fully assess possible Tribal concerns for those Tribes who have filed land claims in Sierra or Doña Ana counties, New Mexico and El Paso County, Texas. The Tribes consulted are those listed by the NACD. We believe that this provides a good rational for not contacting the additional tribes you recommend.

Thank you for taking the time to review and comment on the Draft EIS. Again, we apologize for not providing you a copy of the March 2001 report. If you have questions, please call Environmental Protection Specialist Douglas Echlin at (915) 832-4741.

Sincerely,

Sylvia A. Waggoner
Division Engineer
Environmental Management Division

Enclosure: *Cultural Resource Class I Survey and Geoarchaeological Study, USIBWC Rio Grande Canalization Project, Sierra and Doña Ana Counties, New Mexico and El Paso County, Texas*, March 2001

cc w/o Enclosure: Dr. R.C. Wooten, Senior Associate, Parsons Corporation, Austin

Comment Letter A5

STATE OF NEW MEXICO
DEPARTMENT OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

228 EAST PALACE AVENUE
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(505) 827-6320

BILL RICHARDSON
Governor

February 19, 2004

Mr. Douglas Echlin
Lead Environmental Protection Specialist
USIBWC, Environmental Management Division
4171 North Mesa Street, C-310
El Paso, TX 79902

RE: Request for comments on the DEIS on River Management Alternatives for the Rio Grande Canalization Project (RGCP)

Dear Mr. Echlin:

I am writing in response to your invitation for comments on the DEIS for the RCGP. Although we have missed the February 10, 2204 deadline for submission of comments, we hope that the United States Section, International Boundary and Water Commission (USIBWC) will consider our comments. After a through review of the DEIS we have several concerns, which are discussed in more detail below.

A5-1 According to the DEIS, a field reconnaissance, records search and geoarchaeological studies were conducted of the RGCP and the RGCP ROW to note historic structures and archaeological resources. Table 3.10-4 (page 3-63) lists historical and archaeological sites and areas with a higher potential for preservation of cultural resources based on the field reconnaissance and geoarchaeological studies conducted by Ecosystem Management in 2001. Our office does not have a copy of this report and we need a copy for review before determining whether this strategy of identification is appropriate for the project. I have contacted Ecosystem Management directly to see if I can obtain a copy.

A5-2 Consultation with Native American groups was initiated in December 2000. Letters were sent to Pueblo of Isleta, Mescalero Apache Tribe, White Mountain Apache Tribe, Pueblo of Zuni, Ysleta del Sur Pueblo, and Fort Sill Apache Tribe. According to our consultations with Native American tribes, we have determined that, in addition to the above listed tribes; the following tribes should be contacted:

Comanche Indian Tribe
Kiowa Tribe
Navajo Nation
Hopi Tribe

Since tribal consultation was initiated in 2000, new letters should be sent to the tribes along with a copy of the DEIS to continue the consultation process. I have enclosed a current list of tribal contacts for your use.

A5-3 The Summary of Potential Effects (Section 4.10.2, page 4-61) lists the potential effects of each alternative on cultural resources. The DEIS states that the Flood Control Improvement Alternative will not effect cultural resources and the integrated USIBWC Land Management Alternative and Targeted River Restoration Alternative have the potential to effect areas with a greater potential for undiscovered sites or would be in the general vicinity of a recorded site. We are unable to make determinations of effect for each alterative until we have the opportunity to review the 2001 Ecosystem Management report discussed above.

A5-4 The mitigation measures outlined in the DEIS (Table 4.14-4, page 4-84) appear to be a discovery protocol. These mitigation measures are inadequate to resolve adverse effects.

A5-5 To summarize, although the DEIS provides important information, it does not contain sufficient information for consultation under Section 106 of the National Historic Preservation Act. The level of cultural resource identification, effects of the project, and mitigation measures can be addressed in a programmatic agreement (PA) between the USIBWC, this office, the Texas SHPO, and the Advisory Council.

Please do not hesitate to contact me if you have any questions concerning these comments. We will be happy to provide assistance in developing the PA. I can be reached at (505) 827-4064.

Sincerely,

Michelle M. Ensey
Staff Archaeologist

Log: 69813
Enc. Tribal Consultation List

Indian Affairs Department

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State of New Mexico
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rev. 01/13/2004

APPENDIX N
SOCIOECONOMIC EFFECTS ANALYSIS SUPPORT DOCUMENTATION

ECONOMIC IMPACT FORECAST SYSTEM (EIFS) MODEL RESULTS FOR LEVEE CONSTRUCTION IN DOÑA ANA COUNTY, NEW MEXICO

PROJECT NAME

Levee Construction: Dona Ana County

FORECAST INPUT

Change In Local Expenditures	$5,283,000
Change In Civilian Employment	62
Average Income of Affected Civilian	$29,046
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	$0
Percent of Militart Living On-post	0

FORECAST OUTPUT

Employment Multiplier	2.66	
Income Multiplier	2.66	
Sales Volume - Direct	$6,730,885	
Sales Volume - Induced	$11,173,270	
Sales Volume - Total	$17,904,150	0.56%
Income - Direct	$2,931,083	
Income - Induced)	$2,390,379	
Income - Total(place of work)	$5,321,462	0.2%
Employment - Direct	101	
Employment - Induced	64	
Employment - Total	165	0.24%
Local Population	0	
Local Off-base Population	0	0%

RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	9.53 %	9.46 %	3.42 %	1.79 %
Negative RTV	-8.86 %	-7.34 %	-2.91 %	-1.92 %

SALES VOLUME

Year	Value	Adj_Value	Change	Deviation	%Deviation
1969	155208	678259	0	0	0
1970	166628	688174	9915	-21827	-3.17
1971	185912	736212	48038	16296	2.21
1972	199501	764089	27877	-3865	-0.51
1973	219286	791622	27534	-4208	-0.53
1974	242625	788531	-3091	-34833	-4.42
1975	262278	781588	-6943	-38685	-4.95
1976	300061	846172	64584	32842	3.88
1977	348876	921033	74861	43119	4.68
1978	397328	977427	56394	24652	2.52
1979	437955	967881	-9546	-41288	-4.27
1980	472222	916111	-51770	-83512	-9.12
1981	529513	931943	15832	-15910	-1.71
1982	579698	962299	30356	-1386	-0.14
1983	656764	1057390	95091	63349	5.99
1984	721088	1110475	53085	21343	1.92
1985	782759	1166311	55835	24093	2.07
1986	823909	1202907	36596	4854	0.4
1987	880489	1364758	161851	130109	9.53
1988	918283	1248865	-115893	-147635	-11.82
1989	984321	1269774	20909	-10833	-0.85
1990	1053729	1296087	26313	-5429	-0.42
1991	1136232	1340754	44667	12925	0.96
1992	1232580	1405141	64387	32645	2.32
1993	1309710	1453778	48637	16895	1.16
1994	1328923	1435237	-18541	-50283	-3.5
1995	1412183	1482792	47555	15813	1.07
1996	1457373	1486520	3728	-28014	-1.88
1997	1515346	1515346	28826	-2916	-0.19
1998	1649197	1616213	100867	69125	4.28
1999	1719920	1651123	34910	3168	0.19
2000	1821515	1694009	42886	11144	0.66

INCOME

Year	Value	Adj_Value	Change	Deviation	%Deviation
1969	196751	859802	0	0	0
1970	209715	866123	6321	-54917	-6.34
1971	235668	933245	67122	5884	0.63
1972	257199	985072	51827	-9411	-0.96
1973	285616	1031074	46002	-15236	-1.48
1974	332827	1081688	50614	-10624	-0.98
1975	361457	1077142	-4546	-65784	-6.11
1976	412332	1162776	85634	24396	2.1
1977	464108	1225245	62469	1231	0.1
1978	534501	1314872	89627	28389	2.16
1979	588857	1301374	-13498	-74736	-5.74
1980	669928	1299660	-1714	-62952	-4.84
1981	778009	1369296	69635	8397	0.61
1982	860147	1427844	58548	-2690	-0.19
1983	978564	1575488	147644	86406	5.48
1984	1074863	1655289	79801	18563	1.12
1985	1185686	1766672	111383	50145	2.84
1986	1278981	1867312	100640	39402	2.11
1987	1374189	2129993	262681	201443	9.46
1988	1452129	1974895	-155097	-216335	-10.95
1989	1607211	2073302	98407	37169	1.79
1990	1729243	2126969	53667	-7571	-0.36
1991	1852366	2185792	58823	-2415	-0.11
1992	2024381	2307794	122003	60765	2.63
1993	2132658	2367250	59456	-1782	-0.08
1994	2211005	2387885	20635	-40603	-1.7
1995	2395144	2514901	127016	65778	2.62
1996	2490274	2540079	25178	-36060	-1.42
1997	2612997	2612997	72918	11680	0.45
1998	2817617	2761265	148268	87030	3.15
1999	2904770	2788579	27314	-33924	-1.22
2000	3031625	2819411	30832	-30406	-1.08

EMPLOYMENT

Year	Value	Change	Deviation	%Deviation
1969	26609	0	0	0
1970	27081	472	-1053	-3.89
1971	28317	1236	-289	-1.02
1972	29479	1162	-363	-1.23
1973	30623	1144	-381	-1.24
1974	31046	423	-1102	-3.55
1975	31214	168	-1357	-4.35
1976	32450	1236	-289	-0.89
1977	35178	2728	1203	3.42
1978	37763	2585	1060	2.81
1979	39669	1906	381	0.96
1980	39689	20	-1505	-3.79
1981	40269	580	-945	-2.35
1982	41941	1672	147	0.35
1983	44421	2480	955	2.15
1984	47051	2630	1105	2.35
1985	48800	1749	224	0.46
1986	50238	1438	-87	-0.17
1987	52798	2560	1035	1.96
1988	56127	3329	1804	3.21
1989	57482	1355	-170	-0.3
1990	58175	693	-832	-1.43
1991	60381	2206	681	1.13
1992	61183	802	-723	-1.18
1993	62212	1029	-496	-0.8
1994	62781	569	-956	-1.52
1995	66127	3346	1821	2.75
1996	67445	1318	-207	-0.31
1997	68726	1281	-244	-0.36
1998	70565	1839	314	0.44
1999	73068	2503	978	1.34
2000	75417	2349	824	1.09

POPULATION

Year	Value	Change	Deviation	%Deviation
1969	69000	0	0	0
1970	70254	1254	-2059	-2.93
1971	72726	2472	-841	-1.16
1972	76553	3827	514	0.67
1973	76909	356	-2957	-3.84
1974	78888	1979	-1334	-1.69
1975	81979	3091	-222	-0.27
1976	85259	3280	-33	-0.04
1977	88302	3043	-270	-0.31
1978	92193	3891	578	0.63
1979	93741	1548	-1765	-1.88
1980	97012	3271	-42	-0.04
1981	99623	2611	-702	-0.7
1982	103448	3825	512	0.49
1983	107627	4179	866	0.8
1984	112474	4847	1534	1.36
1985	116321	3847	534	0.46
1986	120474	4153	840	0.7
1987	125032	4558	1245	1
1988	130016	4984	1671	1.29
1989	132957	2941	-372	-0.28
1990	136593	3636	323	0.24
1991	141228	4635	1322	0.94
1992	146995	5767	2454	1.67
1993	153049	6054	2741	1.79
1994	157530	4481	1168	0.74
1995	161014	3484	171	0.11
1996	165618	4604	1291	0.78
1997	169081	3463	150	0.09
1998	172057	2976	-337	-0.2
1999	173889	1832	-1481	-0.85
2000	175028	1139	-2174	-1.24

******** End of Report ********

APPENDIX N
SOCIOECONOMIC EFFECTS ANALYSIS SUPPORT DOCUMENTATION

ECONOMIC IMPACT FORECAST SYSTEM (EIFS) MODEL RESULTS FOR LEVEE CONSTRUCTION IN EL PASO COUNTY, TEXAS

EIFS REPORT

PROJECT NAME

Levee Construction: El Paso County

STUDY AREA

48141 El Paso, TX

FORECAST INPUT

Change In Local Expenditures	$3,102,450
Change In Civilian Employment	36
Average Income of Affected Civilian	$29,046
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	$0
Percent of Militart Living On-post	0

FORECAST OUTPUT

Employment Multiplier	2.98	
Income Multiplier	2.98	
Sales Volume - Direct	$3,943,158	
Sales Volume - Induced	$7,807,452	
Sales Volume - Total	$11,750,610	0.06%
Income - Direct	$1,582,734	
Income - Induced)	$1,351,582	
Income - Total(place of work)	$2,934,316	0.03%
Employment - Direct	55	
Employment - Induced	38	
Employment - Total	93	0.03%
Local Population	0	
Local Off-base Population	0	0%

RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	7.74 %	7.72 %	4.8 %	2.49 %
Negative RTV	-6.39 %	-6.06 %	-4.85 %	-1.88 %

SALES VOLUME

Year	Value	Adj_Value	Change	Deviation	%Deviation
1969	871053	3806502	0	0	0
1970	909976	3758201	-48301	-200361	-5.33
1971	1005178	3980505	222304	70244	1.76
1972	1096384	4199151	218646	66586	1.59
1973	1264877	4566206	367055	214995	4.71
1974	1422439	4622927	56721	-95339	-2.06
1975	1566065	4666874	43947	-108113	-2.32
1976	1762650	4970673	303799	151739	3.05
1977	1955569	5162702	192029	39969	0.77
1978	2203826	5421412	258710	106650	1.97
1979	2488759	5500157	78745	-73315	-1.33
1980	2759923	5354251	-145907	-297967	-5.57
1981	3127148	5503780	149530	-2530	-0.05
1982	3319182	5509842	6062	-145998	-2.65
1983	3513818	5657247	147405	-4655	-0.08
1984	3867836	5956467	299220	147160	2.47
1985	4165914	6207212	250745	98685	1.59
1986	4322503	6310855	103643	-48417	-0.77
1987	4519664	7005479	694624	542564	7.74
1988	4849533	6595365	-410114	-562174	-8.52
1989	5198878	6706552	111187	-40873	-0.61
1990	5532289	6804716	98163	-53897	-0.79
1991	5828561	6877702	72986	-79074	-1.15
1992	6398423	7294202	416500	264440	3.63
1993	6701277	7438418	144215	-7845	-0.11
1994	7094418	7661972	223554	71494	0.93
1995	7355394	7723163	61192	-90868	-1.18
1996	7472096	7621538	-101626	-253686	-3.33
1997	8000874	8000874	379336	227276	2.84
1998	8453802	8284726	283852	131792	1.59
1999	8875052	8520050	235324	83264	0.98
2000	9325192	8672429	152379	319	0

INCOME

Year	Value	Adj_Value	Change	Deviation	%Deviation
1969	1024090	4475273	0	0	0
1970	1077729	4451021	-24252	-251834	-5.66
1971	1186052	4696766	245745	18163	0.39
1972	1289287	4937969	241203	13621	0.28
1973	1474005	5321158	383189	155607	2.92
1974	1665274	5412140	90983	-136599	-2.52
1975	1750839	5217500	-194640	-422222	-8.09
1976	1973864	5566296	348796	121214	2.18
1977	2184074	5765956	199659	-27923	-0.48
1978	2462736	6058331	292375	64793	1.07
1979	2838029	6272044	213714	-13868	-0.22
1980	3171280	6152283	-119761	-347343	-5.65
1981	3857265	6788786	636503	408921	6.02
1982	4137470	6868200	79414	-148168	-2.16
1983	4437903	7145024	276824	49242	0.69
1984	4875121	7507686	362662	135080	1.8
1985	5267499	7848574	340887	113305	1.44
1986	5496991	8025607	177034	-50548	-0.63
1987	5769812	8943208	917601	690019	7.72
1988	6183927	8410141	-533068	-760650	-9.04
1989	6789799	8758840	348700	121118	1.38
1990	7384805	9083310	324470	96888	1.07
1991	7640200	9015436	-67875	-295457	-3.28
1992	8407051	9584038	568602	341020	3.56
1993	8853562	9827454	243416	15834	0.16
1994	9360739	10109599	282145	54563	0.54
1995	9823953	10315150	205552	-22030	-0.21
1996	10164728	10368022	52872	-174710	-1.69
1997	10977125	10977125	609103	381521	3.48
1998	11624424	11391936	414811	187229	1.64
1999	11987951	11508433	116497	-111085	-0.97
2000	12642892	11757890	249457	21875	0.19

EMPLOYMENT

Year	Value	Change	Deviation	%Deviation
1969	154630	0	0	0
1970	149227	-5403	-10799	-7.24
1971	153941	4714	-682	-0.44
1972	157454	3513	-1883	-1.2
1973	171065	13611	8215	4.8
1974	176970	5905	509	0.29
1975	181967	4997	-399	-0.22
1976	188723	6756	1360	0.72
1977	192978	4255	-1141	-0.59
1978	199707	6729	1333	0.67
1979	207562	7855	2459	1.18
1980	214116	6554	1158	0.54
1981	222780	8664	3268	1.47
1982	222226	-554	-5950	-2.68
1983	219050	-3176	-8572	-3.91
1984	227577	8527	3131	1.38
1985	232670	5093	-303	-0.13
1986	235294	2624	-2772	-1.18
1987	245738	10444	5048	2.05
1988	254885	9147	3751	1.47
1989	264814	9929	4533	1.71
1990	269821	5007	-389	-0.14
1991	271930	2109	-3287	-1.21
1992	282642	10712	5316	1.88
1993	290200	7558	2162	0.75
1994	297093	6893	1497	0.5
1995	301205	4112	-1284	-0.43
1996	300842	-363	-5759	-1.91
1997	309696	8854	3458	1.12
1998	316662	6966	1570	0.5
1999	320972	4310	-1086	-0.34
2000	327289	6317	921	0.28

POPULATION

Year	Value	Change	Deviation	%Deviation
1969	364022	0	0	0
1970	360462	-3560	-13500	-3.75
1971	369189	8727	-1213	-0.33
1972	378364	9175	-765	-0.2
1973	398203	19839	9899	2.49
1974	411532	13329	3389	0.82
1975	427292	15760	5820	1.36
1976	440333	13041	3101	0.7
1977	450007	9674	-266	-0.06
1978	460611	10604	664	0.14
1979	472343	11732	1792	0.38
1980	483711	11368	1428	0.3
1981	497523	13812	3872	0.78
1982	511892	14369	4429	0.87
1983	521038	9146	-794	-0.15
1984	529668	8630	-1310	-0.25
1985	538809	9141	-799	-0.15
1986	549592	10783	843	0.15
1987	559479	9887	-53	-0.01
1988	568804	9325	-615	-0.11
1989	580982	12178	2238	0.39
1990	595350	14368	4428	0.74
1991	608206	12856	2916	0.48
1992	619138	10932	992	0.16
1993	634044	14906	4966	0.78
1994	646181	12137	2197	0.34
1995	654250	8069	-1871	-0.29
1996	656482	2232	-7708	-1.17
1997	665066	8584	-1356	-0.2
1998	671250	6184	-3756	-0.56
1999	675397	4147	-5793	-0.86
2000	682111	6714	-3226	-0.47

******** End of Report ********

APPENDIX N
SOCIOECONOMIC EFFECTS ANALYSIS SUPPORT DOCUMENTATION

ECONOMIC IMPACT FORECAST SYSTEM (EIFS) MODEL RESULTS FOR POTENTIAL FARMLAND RETIREMENT IN DOÑA ANA COUNTY

INTEGRATED USIBWC LAND MANAGEMENT ALTERNATIVE

EIFS REPORT

PROJECT NAME

Crop Reduction Impact: Integ. Land Mgt. Alt.

STUDY AREA

35013 Dona Ana, NM

FORECAST INPUT

Change In Local Expenditures	($899,435)
Change In Civilian Employment	-10
Average Income of Affected Civilian	$12,500
Percent Expected to Relocate	0
Change In Military Employment	0
Average Income of Affected Military	$0
Percent of Militart Living On-post	0

FORECAST OUTPUT

Employment Multiplier	2.66	
Income Multiplier	2.66	
Sales Volume - Direct	($999,935)	
Sales Volume - Induced	($1,659,892)	
Sales Volume - Total	($2,659,827)	-0.08%
Income - Direct	($317,423)	
Income - Induced)	($355,113)	
Income - Total(place of work)	($672,536)	-0.03%
Employment - Direct	-16	
Employment - Induced	-10	
Employment - Total	-25	-0.04%
Local Population	0	
Local Off-base Population	0	0%

RTV SUMMARY

	Sales Volume	Income	Employment	Population
Positive RTV	9.53 %	9.46 %	3.42 %	1.79 %
Negative RTV	-8.86 %	-7.34 %	-2.91 %	-1.92 %

RTV DETAILED

SALES VOLUME

Year	Value	Adj_Value	Change	Deviation	%Deviation
1969	155208	678259	0	0	0
1970	166628	688174	9915	-21827	-3.17
1971	185912	736212	48038	16296	2.21
1972	199501	764089	27877	-3865	-0.51
1973	219286	791622	27534	-4208	-0.53
1974	242625	788531	-3091	-34833	-4.42
1975	262278	781588	-6943	-38685	-4.95
1976	300061	846172	64584	32842	3.88
1977	348876	921033	74861	43119	4.68
1978	397328	977427	56394	24652	2.52
1979	437955	967881	-9546	-41288	-4.27
1980	472222	916111	-51770	-83512	-9.12
1981	529513	931943	15832	-15910	-1.71
1982	579698	962299	30356	-1386	-0.14
1983	656764	1057390	95091	63349	5.99
1984	721088	1110475	53085	21343	1.92
1985	782759	1166311	55835	24093	2.07
1986	823909	1202907	36596	4854	0.4
1987	880489	1364758	161851	130109	9.53
1988	918283	1248865	-115893	-147635	-11.82
1989	984321	1269774	20909	-10833	-0.85
1990	1053729	1296087	26313	-5429	-0.42
1991	1136232	1340754	44667	12925	0.96
1992	1232580	1405141	64387	32645	2.32
1993	1309710	1453778	48637	16895	1.16
1994	1328923	1435237	-18541	-50283	-3.5
1995	1412183	1482792	47555	15813	1.07
1996	1457373	1486520	3728	-28014	-1.88
1997	1515346	1515346	28826	-2916	-0.19
1998	1649197	1616213	100867	69125	4.28
1999	1719920	1651123	34910	3168	0.19
2000	1821515	1694009	42886	11144	0.66

INCOME

Year	Value	Adj_Value	Change	Deviation	%Deviation
1969	196751	859802	0	0	0
1970	209715	866123	6321	-54917	-6.34
1971	235668	933245	67122	5884	0.63
1972	257199	985072	51827	-9411	-0.96
1973	285616	1031074	46002	-15236	-1.48
1974	332827	1081688	50614	-10624	-0.98
1975	361457	1077142	-4546	-65784	-6.11
1976	412332	1162776	85634	24396	2.1
1977	464108	1225245	62469	1231	0.1
1978	534501	1314872	89627	28389	2.16
1979	588857	1301374	-13498	-74736	-5.74
1980	669928	1299660	-1714	-62952	-4.84
1981	778009	1369296	69635	8397	0.61
1982	860147	1427844	58548	-2690	-0.19
1983	978564	1575488	147644	86406	5.48
1984	1074863	1655289	79801	18563	1.12
1985	1185686	1766672	111383	50145	2.84
1986	1278981	1867312	100640	39402	2.11
1987	1374189	2129993	262681	201443	9.46
1988	1452129	1974895	-155097	-216335	-10.95
1989	1607211	2073302	98407	37169	1.79
1990	1729243	2126969	53667	-7571	-0.36
1991	1852366	2185792	58823	-2415	-0.11
1992	2024381	2307794	122003	60765	2.63
1993	2132658	2367250	59456	-1782	-0.08
1994	2211005	2387885	20635	-40603	-1.7
1995	2395144	2514901	127016	65778	2.62
1996	2490274	2540079	25178	-36060	-1.42
1997	2612997	2612997	72918	11680	0.45
1998	2817617	2761265	148268	87030	3.15
1999	2904770	2788579	27314	-33924	-1.22
2000	3031625	2819411	30832	-30406	-1.08

EMPLOYMENT

Year	Value	Change	Deviation	%Deviation
1969	26609	0	0	0
1970	27081	472	-1053	-3.89
1971	28317	1236	-289	-1.02
1972	29479	1162	-363	-1.23
1973	30623	1144	-381	-1.24
1974	31046	423	-1102	-3.55
1975	31214	168	-1357	-4.35
1976	32450	1236	-289	-0.89
1977	35178	2728	1203	3.42
1978	37763	2585	1060	2.81
1979	39669	1906	381	0.96
1980	39689	20	-1505	-3.79
1981	40269	580	-945	-2.35
1982	41941	1672	147	0.35
1983	44421	2480	955	2.15
1984	47051	2630	1105	2.35
1985	48800	1749	224	0.46
1986	50238	1438	-87	-0.17
1987	52798	2560	1035	1.96
1988	56127	3329	1804	3.21
1989	57482	1355	-170	-0.3
1990	58175	693	-832	-1.43
1991	60381	2206	681	1.13
1992	61183	802	-723	-1.18
1993	62212	1029	-496	-0.8
1994	62781	569	-956	-1.52
1995	66127	3346	1821	2.75
1996	67445	1318	-207	-0.31
1997	68726	1281	-244	-0.36
1998	70565	1839	314	0.44
1999	73068	2503	978	1.34
2000	75417	2349	824	1.09

POPULATION

Year	Value	Change	Deviation	%Deviation
1969	69000	0	0	0
1970	70254	1254	-2059	-2.93
1971	72726	2472	-841	-1.16
1972	76553	3827	514	0.67
1973	76909	356	-2957	-3.84
1974	78888	1979	-1334	-1.69
1975	81979	3091	-222	-0.27
1976	85259	3280	-33	-0.04
1977	88302	3043	-270	-0.31
1978	92193	3891	578	0.63
1979	93741	1548	-1765	-1.88
1980	97012	3271	-42	-0.04
1981	99623	2611	-702	-0.7
1982	103448	3825	512	0.49
1983	107627	4179	866	0.8
1984	112474	4847	1534	1.36
1985	116321	3847	534	0.46
1986	120474	4153	840	0.7
1987	125032	4558	1245	1
1988	130016	4984	1671	1.29
1989	132957	2941	-372	-0.28
1990	136593	3636	323	0.24
1991	141228	4635	1322	0.94
1992	146995	5767	2454	1.67
1993	153049	6054	2741	1.79
1994	157530	4481	1168	0.74
1995	161014	3484	171	0.11
1996	165618	4604	1291	0.78
1997	169081	3463	150	0.09
1998	172057	2976	-337	-0.2
1999	173889	1832	-1481	-0.85
2000	175028	1139	-2174	-1.24

******** End of Report ********

APPENDIX O

ACT OF CONGRESS AUTHORIZING USIBWC TO CONSTRUCT, OPERATE, AND MAINTAIN THE RIO GRANDE CANALIZATION PROJECT

- ACT OF AUGUST 29, 1935 (49 STAT. 961)
- ACT OF JUNE 4, 1936 (49 STAT. 1463)

Numbered 286, Seventy-fourth Congress, approved August 19,1935, as amended.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,That section 4 of Public Act Numbered 286,Seventy-fourth Congress, approved August 19, 1935, is amended by striking out the words "section 2 hereof" and inserting in lieu thereof the words "section 2, paragraph 2, and section 3 of this Act".
22 USCA 277c Approved May 22, 1936

211.8 Act of June 4, 1936
(49 Stat. 1463)

An act authorizing construction, operation, and maintenance of Rio Grande canalization project and authorizing appropriation for that purpose.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That upon the completion of the engineering investigation,study,and report to the Secretary of State, as heretofore authorized by Public Resolution Numbered 4, Seventy-fourth Congress, approved February 13,1935, the Secretary of State, acting through the American Section, International Boundary Commission, United States and Mexico,in order to facilitate compliance with the convention between the United States and Mexico concluded May 21,1906, providing for the equitable division of the waters of the Rio Grande, and to properly regulate and control, to the fullest extent possible, the water supply for use in the two countries as provided by treaty, is authorized to construct,operate, and maintain,in substantial accordance with the engineering plan contained in said report, works for the canalization of the Rio Grande from the Caballo Reservoir site in New Mexico to the international dam near El Paso,Texas,and to acquire by donation, condemnation, or purchase such real and personal property as may be necessary therefor.

Sec. 2. There is authorized to be appropriated the sum of $3,000,000 for the purpose of carrying out the provisions of section 1 thereof, other than for operation and maintenance, including salaries and wages, fees for professional services; rents; travel expenses; per diem in lieu of actual subsistence; printing and binding, law books and books of reference: Provided, That the amount herein authorized to be appropriated shall include so much as may be necessary for completion of construction of the diversion dam in the Rio Grande wholly in the United States, in addition to the $1,000,000 authorized to be appropriated for this purpose by the Act of August 29, 1935 (49 Stat.961): Provided further, That the total cost of construction of said diversion dam and canalization works shall not exceed $4,000,000: Provided further, That the provisions of section 3709 of the Revised Statutes (U.S.C. title 41, sec. 5) shall not apply to any purchase made or service procured when the aggregate amount involved is $100 or less; purchase, exchange, maintenance, repair and operation of motor-propelled passenger - and freight - carrying vehicles; hire with or without personal services, of work animals and animal-drawn and motor-propelled vehicles and equipment; acquisition by donation, condemnation, or purchase of real and personal property; transportation (including drayage) of personal effects of employees upon change of station; telephone; telegraphic, and airmail communications; rubber boots for official use by employees; ice; equipment, services, supplies and materials and other such miscellaneous expenses as the Secretary of State

may deem necessary properly to carry out the provisions of the Act: And provided further, That any part of any appropriation made hereunder may be transferred to,for direct expenditure by, the Department of Interior pursuant to such arrangements therefor as may be from time to time effected between the Secretary of State and the Secretary of the Interior, or as directed by the President of the United States.

211.9 Act of June 19, 1939
(53 Stat. 841)

To amend Public Law Numbered 370,Seventy-fourth Congress,approved August 27, 1935 (49 Stat. 906)

Be it enacted by the Senate and House of Representatives of the United States of America, in Congress assembled, That Public Law Numbered 370, Seventy-fourth Congress, approved August 27, 1935, is amended by adding a paragraph to the said Act reading as follows:

"The Secretary of State acting through such officers as he may designate,is further authorized to consider,adjust, and pay from funds appropriated,for the project, the construction of which resulted in damages,any claim for damages accruing after March 31,1937, caused to owners of lands or other private property of any kind by reason of the operations of the United States,its officers or employees,in the survey, construction, operation or maintenance of any project constructed or administered through the American Commissioner, International Boundary Commission, United States and Mexico,if such claim for damages does not exceed $1,000 and has been filed with the American Commissioner within one year after the damage is alleged to have occurred, and when in the opinion of the American Commissioner such claim is substantiated by a report of a board appointed by the said Commissioner."
22 USCA 277e Approved August 19, 1939

211.10 Act of April 22, 1940
(54 Stat. 151)

An Act authorizing the reconstruction or replacement of certain bridges necessitated by the Rio Grande canalization project, and authorizing appropriation for that purpose.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That the Secretary of State, acting through the American Section, International Boundary Commission, United States and Mexico,is authorized to reconstruct or replace certain bridges over the Rio Grande within the Rio Grande canalization project known as the Courchesne, Country Club, Borderland, and Vinton Bridges in El Paso County, Texas, and the Berino, Vado, Mesquite, Shalem, and Hatch-Rincon Bridges in Dona Ana County, New Mexico, and such other bridges within said project as the Secretary of State may determine to include.

Sec. 2. That notwithstanding the limitation imposed on the total cost of construction of the Rio Grande canalization project by section 2 of the Act entitled "An Act authorizing construction,operation and maintenance of Rio Grande canalization project and authorizing appropriation for that purpose", approved June 4, 1936, there is authorized to be appropriated the sum of $350,000 which shall be in addition to appropriations heretofore authorized for such project, for the purposes of carrying out the provisions of section 1 hereof, other than for operation and maintenance, including salaries and wages, fees for professional services;

APPENDIX P

USFWS Letter of Concurrence with Findings of the RGCP Biological Assessment

United States Department of the Interior

FISH AND WILDLIFE SERVICE
New Mexico Ecological Services Field Office
2105 Osuna NE
Albuquerque, New Mexico 87113
Phone: (505) 346-2525 Fax: (505) 346-2542

June 28, 2004

Cons. # 2-22-00-I-025

Sylvia A. Waggoner, Division Engineer
U.S. International Boundary and Water Commission
Environmental Management Division
The Commons, Building C, Suite 310
4171 N. Mesa Street
El Paso, Texas 79902

Dear Ms. Waggoner:

Thank you for your February 11, 2004, letter requesting consultation pursuant to section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. § 1531 *et seq.*). This consultation concerns the effects of the Integrated U.S. International Boundary and Water Commission (USIBWC) Land Management Alternative (proposed action) on the endangered southwestern willow flycatcher (*Empidonax traillii extimus*) (flycatcher), threatened bald eagle (*Haliaeetus leucocephalus*) and endangered interior least tern (*Sterna antillarum*) (least tern). Supplemental information for the proposed action was received by the U.S. Fish and Wildlife Service (Service) on May 14 and June 15 and 24, 2004.

The USIBWC proposes to implement the 20-year proposed action to improve the flood-control capacity of the RGCP and improve its ecosystem. Flood-control improvements would include: 1) Raising the height of 60.1 miles of levees by 2 feet, 2) constructing a 2.8-mile floodwall near Canutillo, 3) constructing 6 miles of new levees, and 4) reinforcing 3.2 miles of levees with riprip.

Measures would also be implemented to control erosion associated with the operation and maintenance of the RGCP. Measures would include the implementation of erosion-control best management practices, including modified mowing practices, modified floodway grading practices, mulching and seeding of disturbed areas, and the use of hay bales, silt fences and other erosion control measures.

The proposed action would also incorporate management actions to improve riparian and grassland habitat in the project area. These actions would include site preparation such as invasive weed control, disking, and salinity management to create suitable seed/planting beds for native vegetation. Pole plantings and seeding would be used to reintroduce native species back to the disturbed environments. To ensure that native species successfully reestablish, a monitoring and maintenance plan would be developed and implemented.

The proposed action would also include bank shavedowns in specific areas to facilitate overbank flows and reestablish natural river processes critical to the regeneration of native vegetation such as willow and cottonwood. Prior to constructing the shavedowns, the USIBWC would coordinate with the Service's New Mexico Ecological Services Field Office (NMESFO) to identify areas where functional, regenerating native riparian habitats could be restored and/or enhanced to provide suitable habitats for desired native flora and fauna. Restoration and enhancement areas would be monitored and maintained to ensure that they are suitable for native plants and wildlife.

Suitable habitats for the bald eagle, least tern, the threatened piping plover (*Charadrius melodus*), and flycatcher occur within the action area of RGCP. The USIBWC has determined that the piping plover would not be affected by the project because of its migrant status and because it was not identified during surveys of the project area. The flycatcher has been detected adjacent to the RGCP right-of-way during surveys in the Seldon Canyon area, which is within the action area of this project.

The NMESFO concurs with the USIBWC's determination of "may affect, not likely to adversely affect" the flycatcher for the proposed action. Our concurrence is based on the following understanding of your proposed action:

- Disturbance of individuals or nests, predation, or parasitism would not be likely because livestock use would not occur in occupied habitat during any time of the year.

- Suitability for nesting flycatchers would not be reduced because livestock grazing in unoccupied suitable habitat would not occur during the growing season (key vegetation characteristics are maintained or enhanced and conditions promoting cowbird parasitism are avoided).

- Cowbird parasitism would be unlikely because grazing would occur greater than 5 miles from occupied habitat during the breeding season,

- or -

Monitoring of flycatcher nests would demonstrate that no cowbird parasitism is occurring when livestock use occurs closer than 5 miles, but not within, occupied habitat.

- or -

Cowbird parasitism would be unlikely due to the physical juxtapositions of habitat type, terrain, facilities, elevation, and other factors.

- Progression of potential habitat towards becoming suitable within 10 years would not be impeded by livestock grazing (e.g., regeneration or maintenance of woody vegetation is not impaired by trampling, bedding, or feeding).

- Sufficient monitoring is in place to demonstrate that habitat suitability is being maintained or enhanced in accordance with the second and fourth bullets. Such monitoring would continue through the life of the grazing action under consideration.

- Vegetation treatments would occur outside the portion of the flycatcher nesting season that extends from May through July. The entire nesting season extends from April 15 through August. If treatments are necessary within this nesting season, flycatcher surveys would be conducted and active nests would be identified and avoided.

- Minimum impact vegetation treatments would be implemented to minimize or avoid impacts to flycatchers and their habitats.

- At least one acre of native riparian vegetation would be established in the general project area for each acre of potentially suitable flycatcher habitat disturbed during project implementation. This would include areas disturbed by levee reconstruction and reinforcement, floodway maintenance and mowing, and invasive weed control activities, among other projects, when it removes potentially suitable flycatcher habitat. Cottonwood and willow plantings would occur during the appropriate season and under appropriate soil moisture conditions. A monitoring and maintenance plan would be developed and implemented to ensure suitable habitat develops for native flora and fauna. The NMESFO would receive annual reports on this plan.

Bald eagles are known to be present along the Rio Grande and have been documented in the project area. Adult and juvenile birds may be present in the area between late November and early March. Although not identified during the 2000 and 2001 surveys, they were observed in the project area during a January 1999 survey.

The NMESFO concurs with the USIBWC's determination of "may affect, not likely to adversely affect" the bald eagle, for the proposed action. Our concurrence is based on the following understanding of your proposed project:

- No potential bald eagle winter roosting trees would be disturbed during construction.

- Presence/absence of bald eagles would be monitored during construction in the fall and winter.

- If a bald eagle is present within 0.25 mile of the project area in the morning before project activity begins, or arrives during breaks in project activity, the contractor would be required to suspend all activity until the bird leaves of its own volition; or a USIBWC biologist, in consultation with the NMESFO, determines that the potential for harassment is minimal.

- If bald eagles are consistently found in the immediate project area during the construction period, the USIBWC would contact the NMESFO to determine if formal consultation under the Endangered Species Act is necessary.

The NMESFO concurs with the USIBWC's determination of "may affect, not likely to adversely affect" the least tern for the proposed action. Our concurrence is based on the migratory status of this species in the action area and that no known nesting habitat is available.

Please contact Lyle Lewis, Endangered Species Branch Chief for the NMESFO, at (505) 761-4714 by July 15, 2004, to initiate coordination with this office on the restoration and enhancement of native riparian habitats. Please also contact the NMESFO to verify that the above determinations and concurrences are still valid if: 1) future surveys detect listed or proposed species in habitats where they have not been previously observed; 2) the project is changed or new information reveals effects of the actions to the listed species or their habitats to an extent not considered in this evaluation; or 3) a new species is listed that may be affected by this project. Section 7 consultation for individual projects may be necessary during project planning if circumstances are different from those described above.

This concludes section 7 consultation on the proposed action. The NMESFO appreciates the information provided by the USIBWC in preparing this evaluation. We also appreciate your commitment to avoid adverse effects to listed species and your efforts to improve fish and wildlife habitat. In future communications regarding this letter or the proposed project, please refer to Consultation #2-22-00-I-025. If you have any questions concerning this letter, please contact Dr. Patricia Zenone of my staff at (505) 761-4718.

Sincerely,

Susan MacMullin

Susan MacMullin
Field Supervisor

cc:
Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico
Director, New Mexico Energy, Minerals, and Natural Resources Department, Forestry and Resources Conservation Division, Santa Fe, New Mexico