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30 April 2024

Ms. Jessica Alden  
Parametrix  
4041 Jefferson St. NE, Suite 210  
Albuquerque, NM 87109

***RE: I-40 Carnuel Bridge Replacement. NMERT No. NMERT-3427***

Dear Ms. Alden,

The New Mexico Department of Game and Fish (Department) has reviewed your 16 April 2024 submission of the I-40 Carnuel Bridge Replacement project (Project) to the New Mexico Environmental Review Tool (NMERT). An auto-generated Project report is available for your review in the NMERT. Please note that this Project report recommends following the Department's [Restoration and Management of Native and Non-native Trees in Southwestern Riparian Ecosystems](#) guidelines.

The proposed Project is located in an important area for wildlife crossing between the Sandia and Manzano mountains. The Department emphasizes the importance of conserving or enhancing all highway features and other elements (e.g., signs, animal detection systems, etc.) that facilitate safe wildlife crossings along this stretch of I-40. The area along I-40 just east of the Project was identified as a Wildlife-Vehicle Collision Hotspot during development of the [Wildlife Corridors Action Plan](#) (though not as one of the top priority hotspots for safe passage implementation). The Department has previously worked with the New Mexico Department of Transportation (NMDOT) to improve wildlife crossing features in this area. Given the importance of protecting wildlife movement across the I-40 corridor in the Project area, the Department recommends that, during Project design and implementation, Parametrix and NMDOT consider connectivity of wildlife movement between the adjacent mountain ranges and ways to improve, or at least not remove or diminish, any existing features that facilitate wildlife crossing.

Since the proposed highway project includes bridge or road construction activities, the Department recommends implementation of its [Bridge and Culvert Construction Guidelines for Stream, Riparian, and Wetland Habitats](#) for any rivers, streams, washes, springs, seeps, or riparian areas that fall within the Project footprint. Following these

guidelines should assist in minimizing impacts to local rivers or wetlands. The Department recommends these guidelines generally be incorporated into standard best management practices for activities similar to those anticipated for the proposed Project.

The Department also recommends conducting preconstruction bat surveys, during summer months, to determine if bats are present at Project bridge sites. If bats are detected, Project work should be scheduled so as to avoid impacting roosting bats (i.e., conduct Project work in winter months).

Because the Project is adjacent to a riparian area with ephemeral surface water, the Department recommends development of a Storm Water Pollution Prevention Plan. Construction areas and other impervious surfaces can have significant impacts on surface waters by increasing the amount of sediment and other pollutants that are washed into surface waters, increasing the velocity and volume of water, and reducing infiltration into groundwater. Reducing the amount of impervious surfaces and phasing construction will minimize these impacts. The Department provides the following additional recommendations to reduce or eliminate Project impacts to wildlife and wildlife habitat:

- Divert water around construction site whenever possible.
- Preserve natural areas within the Project site. Strive to maintain the natural drainage system of the site, including natural stream channels, wetlands, and floodplains. Design, construct, and maintain the Project site to protect (or restore) the natural hydrology.
- Following construction, disturbed areas should be re-vegetated using native species that approximate the pre-disturbance plant community composition or native plant communities appropriate for the site, including from a region that represents potential future climatic conditions at the site, whichever is more beneficial to wildlife. Short-term erosion control seed mixes are available for temporary control of surface erosion during project implementation; native mixes should be used for temporary as well as permanent erosion control. Native plants and materials should also be used for landscaping. All seed mixtures should be certified as weed-free. New Mexico grass ecotypes for commercial seeding are available through the Los Lunas Plant Materials Center and New Mexico State University. Seeding guidelines are available from the Natural Resources Conservation Service and the Colorado Natural Areas Program.
- If erosion control blankets are used post-construction, burying the blanket edges, and using blankets without fused mesh corners (e.g., use woven mesh) can reduce the chances of unintentional wildlife entanglement. Regularly check the erosion control blankets after applying them to identify and release any wildlife that does become entangled.
- Maintain a vegetated buffer zone along all watercourses, including ephemeral arroyos, sufficient to minimize erosion and sediment delivery.

- Use properly engineered drainage swales and other vegetated channel systems instead of storm sewers, lined channels, curbs, and gutters. Vegetated swales should be gently sloped (4:1) so that small wildlife is able to maneuver them.
- Efforts should be made during construction to minimize impacts on vegetative communities. Existing roads and rights-of-way should be used for all transportation. Off-road driving should be avoided. Staging areas should be located in previously disturbed sites, where possible, and kept as small as possible.

Thank you for the opportunity to review your project. Please contact Jack Marchetti, Aquatic/Riparian Habitat Specialist, at [jack.marchetti@dgf.nm.gov](mailto:jack.marchetti@dgf.nm.gov) or at 505-479-1269 if you have any questions.

Sincerely,

Virginia Seamster, Ph.D.  
Assistant Chief for Technical Guidance