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DEPARTMENT OF GAME & FISH

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21 April 2025

Caroline Hildebrand  
Biohabitats Inc.  
383 S Corona St  
Denver, Colorado 80204

***RE: Navajo Lake State Park Riparian Restoration/Management Plan; NMERT  
Project No. NMERT-4408***

Dear Caroline Hildebrand,

The New Mexico Department of Game and Fish (Department) has reviewed your 3 April 2025 submission of the Navajo Lake State Park Riparian Restoration/Management Plan project (Project) to the New Mexico Environmental Review Tool (NMERT). An auto-generated project report, which contains several recommendations regarding potential impacts to wildlife or wildlife habitats from your project, is available for your review in the NMERT.

The Department has completed several habitat improvement projects in the proposed Project area, and requests that any actions for the current Project not degrade or destroy these projects or their habitat features. For example, the Department completed a Quality Waters habitat project in 2011 that enhanced the aquatic and wetland habitat within the river corridor adjacent to the Texas Hole Day Use Area where the San Juan is braided and multi-channeled. Another project was completed in 2014 that improved the wetland habitat of Munoz Flats and created two side channels just downstream of the Texas Hole Area. Additionally, the Department completed a project in 2017 that included aquatic and riparian habitat improvements upstream and adjacent to the Crusher Hole Day Use Area as well as boat ramp construction at the Crusher Hole Area. The Department encourages future projects that improve riparian and aquatic habitat nearby these completed projects to further enhance the habitat quality of the San Juan River corridor downstream of the Navajo Dam for fish and wildlife. Additionally, the Department encourages projects that would improve recreational opportunities and access for hunters, anglers, and wildlife enthusiasts.

The Department recommends that you contact Erika Rowe ([Erika.Rowe@emnrd.nm.gov](mailto:Erika.Rowe@emnrd.nm.gov)) at the [New Mexico Endangered Plant Program](#) of the Energy, Minerals, and Natural Resources Department, regarding potential presence and

conservation needs for state-listed plants. The state endangered plant Clover's cactus (*Sclerocactus cloverae*) has been documented near and potentially within the project area footprint and may need to be considered and/or mitigated for while designing and implementing project activities.

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 reduce these impacts. To prevent sediment and other pollutants from entering the San Juan River, the Department recommends developing a Storm Water Pollution Prevention Plan (SWPPP), and provides the following additional recommendations to minimize or eliminate 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 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., blankets with 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 505-479-1269 if you have any questions.

Sincerely,

Carrie Parris  
Assistant Chief of Habitat and Compliance  
Fisheries Management Division

Cc: Matt Zeigler – NMDGF Sportfish Program Manager