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20 August 2025

Malia Sutphin
Environmental Resources Section
United States Army Corps of Engineers
Albuquerque District
4101 Jefferson Plaza NE
Albuquerque, NM 87109

RE: Draft Supplemental Environmental Assessment for the Farmers Mutual Ditch Erosion Repair Project; NMERT Project No. NMERT-4929

Dear Ms. Sutphin,

The New Mexico Department of Game and Fish (Department) has reviewed the draft Supplemental Environmental Assessment (SEA) for the Farmers Mutual Ditch Erosion Repair Project (Project). Please consider this letter as the Department's official comments on the SEA and the Project.

As mentioned on page 18 of the SEA, water quality is one of the primary constituent elements (PCEs) of Colorado pikeminnow's (*Ptychocheilus lucius*) critical habitat. Threats to the water quality of the San Juan include increased sedimentation and runoff carrying pollutants as the result of construction and development within the river's floodplains. 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., 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.

The Project area appears to contain one or more wetland types as classified by the New Mexico Environment Department's (NMED's) Wetland Map. This key can assist in interpreting Landscape Position, landform, water flow path, and waterbody type (LLWW) information in the NMED's wetland data. Wetlands provide important habitat for numerous species of wildlife and pollinators and provide ecosystem services, such as water filtration and storage, to downstream users. The Department recommends avoiding disturbance of wetlands whenever possible, avoiding actions or infrastructure installment that may disrupt natural wetland hydrological processes, and reseeding or replanting areas where disturbance cannot be avoided with native wetland plant species appropriate to the local wetland type. For a list of native seed providers, please see the Department's habitat handbook guideline for Restoration and Management of Native and Non-native Trees in Southwestern Riparian Ecosystems. The New Mexico Riparian Habitat Map (NMRipMap) may also provide useful information on local riparian habitat composition and structure.

The Department recommends consultation with relevant species leads at the United States Fish and Wildlife Service's (USFWS's) New Mexico Ecological Services Office (NMESO) before work begins for this project. The Department also recommends use of

the USFWS's Information for Planning and Consultation (IPAC) system (https://ipac.ecosphere.fws.gov/) to confirm whether the project area overlaps critical habitat designated for the Colorado pikeminnow or other species listed under the federal Endangered Species Act.

The current project area appears to be within Crucial Habitat as identified in the Crucial Habitat Assessment Tool (CHAT) layers provided in the New Mexico Environmental Review Tool. This indicates that a diversity of species of conservation concern and sensitive or important habitats for wildlife are likely to be found in the project area. The Department recommends completion of thorough environmental assessment prior to, and exercising care during, implementation of project activities to avoid adverse impacts to sensitive wildlife and habitats.

Thank you for the opportunity to review the SEA. Please contact Jack Marchetti, Aquatic/Riparian Habitat Specialist, at jack.marchetti@dgf.nm.gov or 505-479-1269 if you have any questions.

Sincerely,

Virginia Seamster

Digitally signed by Virginia Seamster
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