



United States Department of the Interior

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October 29, 2012

To: Signe Snortland, Bureau of Reclamation

From: Cheryl Eckhardt, Environmental Compliance Specialist, National Park Service

Subject: National Park Service Comments on the Draft Environmental Impact Statement for the Arkansas Valley Conduit and Long-term Excess Capacity Master Contract

The National Park Service (NPS) has reviewed the Draft Environmental Impact Statement (DEIS) entitled "Arkansas Valley Conduit and Long-Term Excess Capacity Master Contract (DES 12-39)". This DEIS evaluates the potential impacts of several alternatives related to the Arkansas Valley Conduit (AVC), which was originally proposed as part of the Fryngpan-Arkansas Project. The purpose of the Arkansas Valley Conduit project is to deliver reliable and high quality water to various water providers in the service area. The NPS recognizes the benefits to be provided to the communities in the Arkansas Valley and supports the completion of this project. However, the NPS does have some concerns about the potential long-term impacts from changes in water quantity and quality in the Arkansas River to the flow-dependent resources of Bent's Old Fort National Historic Site (Bent's Old Fort NHS), a unit of the National Park Service (NPS), as well as the Santa Fe National Historic Trail.

The NPS recognizes the need for an improvement in water quality and reliability of water supply in the Arkansas River Valley and therefore does not oppose the completion of the AVC. However, as the caretaker for the nationally important Bent's Old Fort NHS, an analysis of the long term impacts by the various alternatives proposed in the DEIS on the flow-dependent resources within the park unit should be completed.

Bent's Old Fort NHS is located on the Arkansas River approximately 7 miles downstream of La Junta, CO. The fort was built on a segment of the Old Santa Fe Trail in 1833 for trade with trappers and native tribes. On June 3, 1960, a Congressional Act (74 Stat. 155) incorporated the fort into the NPS system "...to commemorate the historic role played by such fort in the opening of the West. This Act provides further direction on the management of the unit to "administer, protect and develop such monument, subject to the provisions of the Act entitled 'An Act to establish a National Park Service, and for other purposes', approved August 25, 1916". The Act of August 25, 1916, commonly referred to as the NPS Organic Act, directs the NPS to "...conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." (16. U.S.C. 1)

The Arkansas River is an important feature in the management and interpretation of Bent's Old Fort NHS. The river and riparian area of the park are part of the historic setting and as such are one of the three identified fundamental resources of the park. The river and riparian area, the short-grass prairie, and the viewshed maintain a sense of place important to interpreting the history of the site. Flow dependent riparian species within Bent's Old Fort NHS include Salix exigua (Sandbar willow), Salix amygdaloides (Peach-leaved willow) and Populus deltoids subspecies monilifera (Plains cottonwood). Some of the other water dependent species in the park are

Phragmites australis, Eleocharis palustris, Schoenoplectus pungens, Spartina pectinata and Veronica anagallis-aquatica.

Impacts to the flow-dependent resources of Bent's Old Fort NHS from the various proposed alternatives were not specifically evaluated in the DEIS. Impacts were evaluated to vegetation and other resources within the reach of stream identified as the "Lower Arkansas River" between La Junta and Las Animas, CO where Bent's Old Fort NHS is located. The NPS believes that an evaluation of impacts to the flow-dependent resources of Bent's Old Fort NHS should be included in the Final Environmental Impact Statement.

The flow regime in the Arkansas River has been altered considerably since the arrival of settlers when the fort was operating as a trading post. The construction of reservoirs, surface and groundwater diversions, which are now controlled by the implementation of the Arkansas River Water Rights Compact between Colorado and Kansas, has contributed to significant changes in flow and water quality. As a result, the river-related processes that established and allowed the riparian vegetation to exist have been altered.

The NPS is concerned that further modification of the flow system in the Arkansas River will be detrimental to the riparian vegetation dependent on the flow characteristics and water quality in the Arkansas River. While analyses in the DEIS describe impacts from the various alternatives in the Lower Arkansas River section to be negligible or minor, it is unknown whether these small impacts, when considered with the existing flow alterations and water quality issues, could adversely affect the flow-dependent resources of the park unit over the long term.

Specifically, the NPS is concerned if there will be any further reduction in high flow events at the park. High flows create new habitat for cottonwood regeneration and also can remove a build-up of salts on floodplains that can inhibit cottonwood growth and reproduction. A further reduction in high flows could increase salt concentrations and other constituents that can accumulate and increase over time in soils. Periodic high flow events flush out and reduce these levels.

While development of the alternatives outlined in the DEIS may not have detrimental effects on the flow-dependent resources of Bent's Old Fort NHS, the NPS is concerned about the potential effects from the proposals outlined in the DEIS in combination with the already modified hydrology of the Arkansas River.

Impacts to the cultural and natural resources and interpretation of Bent's Old Fort NHS from the various proposed alternatives were not specifically evaluated in the DEIS. The NPS would like to see more discussion of the impacts to Bent's Old Fort National Historic Site since several alternatives parallel Highway 50 and appear to have potential to impact two archeological sites, the Sandhill Site (State number 5OT141) and BEOL 3 - South (State Number 5OT536,) as well as an additional 40 acres of National Park Service land. The NPS would also like to see consideration given to the impacts to the visitors of the park. These likely would be relatively short-term impacts, but should be discussed. The NPS is concerned that no consideration has been given to the impact to these sites or to the land on the southern section of the national historic site.

Santa Fe National Historic Trail

NPS administers the Santa Fe National Historic Trail (NHT) in accordance with a Comprehensive Management Plan (CMP) prepared in 1990. We work with land managers, property owners, trail advocates, and others to accomplish the administrative goals for the trail as mandated in the National Trails System Act. These include the identification, protection, and interpretation of the trail and its associated resources for the enjoyment and education of the American people. The CMP and its associated maps are available online at <http://www.nps.gov/safe/parkmgmt/comprehensive-management-plan.htm>. We request that you review this document as part of your analysis, and refer to it in the text and references section of the document.

While we appreciate the explicit recognition of the trail in the document, we wish to point out that it is not the same entity as the Santa Fe Trail Scenic and Historic Byway as is implied on page 3-86 of the document. We

request that the Santa Fe NHT be recognized as a different entity than the Scenic Byway, and that impacts to trail resources and settings be evaluated on their own and not as part of the analysis of impacts to the Scenic Byway.

The eastern portion of the current project includes about 45 miles of the Mountain Route of the Santa Fe NHT between La Junta and Lamar. The project involves activities that could affect trail resources, the viewshed and setting of the trail, and opportunities to develop and interpret certain high potential sites along the trail that are identified in our CMP. These include, from west to east, the Arkansas River Crossing, Bent's Old Fort, Boggsville, New Fort Lyon, Bent's New Fort, and Old Fort Lyon. We request that any activities associated with or authorized by this project take into account the direct, indirect, and cumulative impacts of any project activity on these important trail resources and their settings.

Thank you for this opportunity to provide comments on this important project. If you have any questions concerning these comments, please contact Jeff Hughes of the NPS, Water Resources Division at (970) 225-3527, jeff_hughes@nps.gov. For questions specific to the Santa Fe National Historic Trail, please contact Michael Elliott at 505-988-6092, michael_elliott@nps.gov.

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