

Weimerskirch, MickiJ

Subject: FW: AVC EIS comments (UNCLASSIFIED)
Attachments: Tern -Plover Annual Report -2012.pdf; ATT00001.htm

From: "Price, Dana M SPA" <dana.m.price@usace.army.mil>
Date: October 30, 2012, 7:19:16 PM CDT
To: "Snortland, Jan S (Signe)" <JSnortland@usbr.gov>
Cc: "Downey, Karen S SPA" <Karen.S.Downey@usace.army.mil>, "Everhart, Gregory D SPA" <Gregory.D.Everhart@usace.army.mil>, "Carpenter, Joshua G SPA" <Joshua.G.Carpenter@usace.army.mil>, "Alcon, Julie A SPA" <Julie.A.Alcon@usace.army.mil>
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Classification: UNCLASSIFIED
 Caveats: NONE

Hi Signe,

I have minimal comments on the AVC DEIS. I reviewed the "vegetation and Wetlands" and "Wildlife" including T&E species sections. I also looked at the Best Management Practices in Appendix B.5; a thorough list.

I was pleased to read that Reclamation intends to bore under the wetlands and perennial stream crossings instead of trenching, avoiding impacts to these resources.

Assuming the hydrologic analysis is correct and the effects on storage at John Martin would be minimal, I concur with Reclamation's conclusion that effects to nesting Least Terns and Piping Plovers would be negligible. I would caution that if storage rises significantly and stays elevated during the nesting season, there would be less habitat available for nesting. The analysis places a lot of emphasis on the Corps' ongoing habitat management as a major factor in nest success. Although this is essentially true, we have limited time and resources for vegetation management. The higher we need to go above areas that are frequently inundated, the longer the vegetation has had to grow, the harder it is to remove.

I do agree that a slight increase in storage would help our nesting island (Dinosaur Island) to remain an island longer into the summer. As long as the island is out of the water by nesting season, we may see a slight benefit. The island exists at water elevations between approx. 3809' and 3814' (the top of the island is slightly over 3814').

I've attached our 2012 monitoring report for use in updating the information on these species.

On another topic:

With regards to the BMPs for rare plant species, if populations are encountered that can't be avoided, I would suggest that a restoration plan be developed in collaboration with the botanists at the Colorado Natural Heritage Program. I worked with rare/endorsed plants for several years and it is NOT a simple matter of transplanting them somewhere else when there are impacts to a site. A suitable reintroduction site needs to be identified and the reintroduction

needs to be carefully planned and monitored. Similar to Reclamation's development of a mitigation plan for wildlife that may be affected, plants deserve a plan.

Thank you,
Dana

Dana M. Price
Botanist, Environmental Resources Section
USACE, Albuquerque District
(505) 342-3378

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