

Arkansas Valley Audubon Society

725 Frankie Lane
Canon City, Colorado 81212
October 30, 2012

Bureau of Reclamation
Attn: J. Signe Snortland
Bureau of Reclamation
Dakotas Area Office,
PO Box 1017, Bismarck ND 58502

REF: Draft Arkansas Valley Conduit Long-Term Excess Capacity Master Contract Environmental Impact Statement

Dear Ms. Snortland,

Please accept the following comments from the Arkansas Valley Audubon Society (AVAS), the local chapter of the National Audubon Society that covers most of the area of the Arkansas Basin in Colorado. The mission of the AVAS is to promote the conservation of nature through education, political action, and field activities with a focus on birds and other wildlife and their habitats in southern Colorado. AVAS represents approximately 450 members who enjoy and are concerned with the conservation of wildlife.

As noted in the Draft Arkansas Valley Conduit Long-Term Excess Capacity Master Contract Environmental Impact Statement (hereafter referred to as the DEIS), the impacts to species, their habitat and environmental attributes are primarily negligible in upper Arkansas River area so I will focus on our concerns in the area east of the Pueblo Reservoir.

Noted early in the DEIS is the statement that included in the importance of the Interconnect is the need for redundancy for the Pueblo Fish Hatchery in case the south outlet works at the Pueblo Reservoir shut down. (p1-23). We support providing redundancy for the Pueblo Fish Hatchery but add that there is a need for the Pueblo Fish Hatchery to be able to access it's water rights from the reservoir even at times of low output. Currently they are unable to access their water rights during times of low releases due to some functional issue in opening and closing the outlet at the dam. Since the Pueblo Fish Hatchery is stated as one of the four stated needs in the DEIS for the Interconnect, it should be given some priority for assuring that it can access it's water rights even during low output.

The River South Alternative is clearly the Alternative that we recommend. One of the major reasons for supporting this Alternative is that it minimizes the number of wetland acres disturbed by the proposed project. Wetlands are vital to any river system in providing their invaluable benefits of reducing flooding, retaining sediment that clogs reservoirs and can impair aquatic life and cleaning of pollutants from the water. Wetlands also provide habitat for fish, birds and other wildlife species. The State of Colorado has a goal of no net loss of wetland habitat.

The River South Alternative provides negligible to minor impacts to water quality which is important for fish, insect and bird life that use or inhabit the Arkansas River. It has a negligible impact to surface flow hydrology (except at Holbrook Reservoir, which this year went totally dry) during average years.

Again, important for the fish, insect and bird life that use or inhabit this river especially the fish species of special concern. Of the action Alternatives, the River South Alternative appears to have the least negative impact on the monthly Arkansas River above Pueblo streamflow. The Pueblo Reservoir and streambased aquatic life impacts are negligible with moderate impacts to aquatic life only in Holbrook Reservoir (again, this reservoir went totally dry this year so currently has no aquatic life).

Of the six action Alternatives, only the River South Alternative and the Master Contract Only Alternative have negligible impacts on the Colorado Species of Potential Concern habitat. The River South Alternative is one of the action Alternatives that does not disrupt the use of the Pueblo Nature Center or trails. AVAS is a supporter of the Pueblo Nature Center which provides nature programs and educational activities. The trail system along the Arkansas River is used by thousands of nature enthusiasts.

We are in agreement that all Alternatives for this proposed project have negligible impacts on birds, other wildlife and especially State and Federal Threatened and Endangered species would be negligible with the exception of the roundtail horned lizard and the common kingsnake. It is our recommendation that this proposed project utilize trained observers to survey construction areas in potential habitat for these two state listed species prior to initiation of construction and that all reasonable efforts be made to avoid destroying habitat in proximity to any populations located.

Of concern to us is the loss of return flows from rotational fallowing of the 4,800 acres of irrigated land in Pueblo, Otero and Bent Counties. Wetlands and riparian vegetation, both vital to birds and other wildlife, are often supported by the water from return flows on adjacent cropland and ditches. It is vital that these losses be mitigated. Since these may be located in several locations that may be difficult to mitigate we recommend that this project provide an adequate amount of water to supplement the water from return flows that supports the upland wetlands in the Ft Lyons State Wildlife Area adjacent to John Martin Reservoir. The Ft Lyons State Wildlife Area adjacent to John Martin Reservoir has been identified by the Arkansas Basin Roundtable as a non-consumptive priority area in the lower Arkansas River. These wetlands have been found in a study funded by the Colorado Water Conservation Board to be supported by return irrigation flows and leakage from irrigation ditches.

Thank you for the opportunity to provide comments on this proposed project.

Sincerely,

SeEtta Moss, M.S.
Conservation Chairperson
Arkansas Valley Audubon Society