



Central New Mexico Group «» 142 Truman NE, Albuquerque, N.M. 87108 «» 505/243-7767

December 15, 2014

By email, [mschmader@cabq.gov](mailto:mschmader@cabq.gov), and first class U.S. mail  
Dr. Matthew Schmader  
City of Albuquerque Open Space Division  
P.O. Box 1293  
Albuquerque, N.M. 87103

Re: SWCA Environmental Monitoring Plan and Baseline Monitoring Report

Dear Dr. Schmader:

I am writing to provide comments on the draft SWCA Environmental Monitoring Plan and Baseline Monitoring Report on behalf of the Sierra Club. The Sierra Club is a national environmental advocacy organization with regional Chapters and local Groups. The Club has over 3200 members in the Central New Mexico Group and over 7500 members in the Rio Grande Chapter, which includes all of New Mexico.

Thank you for the opportunity to submit these comments. The Club very much appreciates the City's efforts to obtain input from interested City residents and the City's willingness to consider the views of residents as it proceeds with its Bosque planning process. The City's openness to input from interested persons creates trust in the process and, it is hoped, will result in a better plan that reflects the desires of City residents for the Rio Grande Valley State Park.

The Sierra Club offers the following comments on the SWCA Environmental Monitoring Plan and Baseline Monitoring Report:

1. The Club is very pleased with the City's commitment to environmental monitoring and assessment, and the Club supports these efforts. The Club understands that in addition to the current baseline monitoring report, which may allow the City to assess the impacts of the project after they are constructed so as to adaptively manage the project, the City will also undertake an assessment of the ecological impacts of various proposals once they are made, so as to assist it in selecting the project to be constructed. The Club applauds the effort to take environmental effects into account in planning and in the management of the Rio Grande Valley State Park. These efforts are critical to the wise management of this jewel in the middle of our City, the Bosque.

With respect to adaptive management, however, the Club is concerned that there is no formalized procedure to adaptively manage the Bosque. The Club urges the City to adopt some regularized and formal adaptive management procedure to ensure that there is regular monitoring and that any adverse effects revealed by future monitoring are addressed.

2. The Club is concerned that the monitoring plan devised by SWCA may be inadequate to capture adverse environmental impacts should such impacts occur. The monitoring protocol does not monitor mammals, reptiles, or amphibians, despite noting the sensitivity of such classes of animal to impacts. Page 56. The Club understands that additional monitoring will result in additional expense, but it believes that such expense is essential if the environmental impacts of the project are to be adequately assessed. The Bosque Action Plan is premised on the idea of monitoring and adaptive management. In order to find the right balance of human enjoyment and environmental protection, it is essential that the facts be known. The Club urges the City to have a peer review conducted of the SWCA monitoring methodology to ensure that the methodology will capture adverse impacts if they occur and to ensure that the effects of the project are adequately assessed.

3. The Club is concerned that the bird monitoring protocol may be inadequate to accurately capture the true state of bird populations. The Club does not itself have scientific expertise, but it understands that the proposed bird monitoring has been questioned, including because the report does not set forth its methodology and because it will only have a small number of survey visits (one visit only to each site four times per year) and only monitors small transects. Birds are the only class of animals whose project impact is presently being monitored. The City should be certain that the survey protocol is adequate to detect any adverse environmental impacts on bird populations that may occur. Again, peer review would ensure that the methodology is adequate.

4. The report states that baseline monitoring will be used to determine if there is any sensitive habitat or ecological concerns in the project area. (Executive Summary, ¶ 2) The Sierra Club supports this goal. However, there is nothing in the report reflecting this analysis. An evaluation of whether there are any sensitive habitats or ecological concerns should involve a survey of the entire project area, not just a survey of the transects. Further, "sensitive habitat" is not defined in the report, so it is unknown what is considered to be sensitive habitat. There is habitat in the project area that appears to the Club to be sensitive, high value habitat. These habitats include the willow swales and riverside habitat. There appear to be locations that could serve as habitat for various sensitive species, including the southwestern willow flycatcher, the New Mexico meadow jumping mouse, and the yellow-billed cuckoo. The Club is particularly concerned that too much of the trail may follow the bank of the river, which is the most valuable habitat area. The Sierra Club's experience is that the City is concerned to avoid adverse impacts to sensitive areas, but the City should ensure that the project area has been adequately surveyed so that sensitive areas are identified. The SWCA report does not appear to be sufficient in this regard.

5. The report comes to very broad conclusions about environmental impacts of the "project" that are not warranted by the analysis included in the report. In the Executive Summary, the report states: "SWCA concludes that activity within the monitored areas is not likely to result in expectable adverse environmental impacts or degradation to this area of the bosque." In the Conclusions section at page 84, the report states: "Given the already environmentally disturbed condition of the MRG bosque, the proposed project is not anticipated to have a significant negative environmental impact on the area." These conclusion are inappropriate for three reasons.

First, the study does not contain any evaluation of the environmental impacts of any proposed project. The conclusion of no negative environmental impact is unsupported by any scientific evaluation. The conclusion appears to simply represent the unsupported, subjective judgment of the author.

Second, the only articulated basis for the conclusion, that the area is already "environmentally disturbed," is misleading. It is true that the Bosque is an ecosystem that is very altered from its condition prior to extensive human development as described in the report. However, that does not mean that there is not a lot of terrific, native habitat in the area of the proposed development. There is, especially closer to the river. The alteration of the Bosque over the centuries should not be used as an excuse to ignore the outstanding Bosque habitat that exists there now. Further, the report should take into account not only the present condition of the Bosque in the project area, but the potential to be restored to productive habitat.

(See also, Report, page 3-4, where the author states that "plants and animals found in the bosque today are largely represented by biotic communities that resulted from human intervention, and which are greatly changed from their former pre-human disturbance conditions," which also seems to be a mischaracterization of the plant and animal communities that downplays their ecological value and the potential adverse impacts that a project could have.)

Third, there is no "proposed project" at this point in the process. As a result, it is impossible to say whether any project will or will not have adverse environmental effects. It is premature to make this assessment until proposed alternatives are designed.

As noted above, it is the Club's understanding that the City has agreed to undertake an assessment of the ecological impacts of the project once alternatives are selected. The Club applauds this commitment. Any conclusions about the effect of the project should be reserved until that analysis is undertaken. The inclusion in a purportedly scientific report of the unsupported, subjective conclusion that the project will not have adverse environmental impacts also calls into question the scientific validity and impartiality of the entire report. The conclusion of SWCA should be removed from the final report, not only because it is unsupported by any analysis and is misleading, but in order to repair trust in the report.

6. The report indicates that monitoring is funded for the year 2015. The Club urges the City to secure funding for continued monitoring in years beyond 2015. The project may not even be completed until the end 2015 or later, and any impacts of the project may not show up immediately. Regular monitoring is necessary to assess the impacts and so that adaptive management can occur.

7. The Club urges the City to include an analysis of cumulative impacts when it looks at the environmental effects of proposed project alternatives. If the plan is to construct similar projects throughout the RGVSP, then total impacts should be looked at. Cumulative impacts is an essential component of adequate environmental monitoring.

8. In the introductory section of the report, the report purports to describe the project. For instance, on page 1, the report states that "The trail cross-section is proposed to vary from approximately 1.2 meters to 2.4 meters (4 to 8 feet) in width." This statement is disturbing, because it indicates someone has told the consultants what the trail will be before alternatives have even been designed and public comment has even been taken on the proposed designs. The Club has been assured that no decisions have been made about the design of the trail, and the Club takes the City at its word. The report, however, should not suggest that such decisions have been made. The descriptions of the project should be removed from the final report.

9. Lastly, and importantly, the Sierra Club commends the report for § 8 on habitat restoration and visitor management. The Club whole-heartedly supports the goals of restoration. The report correctly notes that people are drawn "to the bosque to enjoy its natural beauty and flora and fauna." The Club urges that additional funding be allocated to restoration goals so that people can enjoy those things that make the Bosque such a unique and special place. The Sierra Club does feel compelled to note, however, that this section does, again, make inappropriate conclusions and references to a project which does not yet exist, *e.g.*, "The proposed project also is in agreement with the recommendations of several key MRG bosque natural resource management plans. . . ." These references and others in the report should be deleted.

Thank you again for the opportunity to submit these comments. The Sierra Club has been encouraged by the trajectory of the Bosque planning process over the past year. It appears to the Club at this time that the City is committed to devising a plan for the Bosque that helps people to enjoy the Bosque while at the same time protecting this wonderful resource. The Club looks forward to continuing to participate in this process.

Dr. Matthew Schmader

Sierra Club comments on SWCA Environmental Monitoring Plan and Baseline Monitoring Rpt.

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Very truly yours,

THE SIERRA CLUB,

By: Richard D. Barish  
Richard D. Barish  
Bosque Issues Chair  
Central New Mexico Group

cc: Interested persons