



February 10, 2018

U.S. Army Corps of Engineers
Los Angeles District
ATTN: Pam Kostka, CESPL-RGN-L
915 Wilshire Blvd., 13th Floor
Los Angeles, CA 90017

Re: Draft Environmental Assessment for the Alamo Dam Flushing Flow Release

Dear Ms. Kostka:

On behalf of Arizona Sportsmen for Wildlife Conservation (AZSFWC) we appreciate the opportunity to comment on the draft Environmental Assessment (EA) for the Alamo Dam flushing flow release proposal by the Army Corps of Engineers (Corps).

AZSFWC is a 501c-3 organization dedicated to wildlife conservation, habitat work, youth recruitment and retention, as well as educating sportsmen and women on issues important to their passions. We have 42 member and affiliate organizations that reach across the spectrum of hunting, angling, shooting and outdoor recreation groups and businesses from all across Arizona.

We believe our Federal public lands and waters should remain under control of the Federal agencies, however we are also a strong proponent of sustainable multi-use when it comes to those lands and waters and believe any management activity impacting those lands and waters needs to address all aspects of potential impact to the public. This management activity includes the recreational use component that is sometimes overlooked or ignored, as an example in this case with the Alamo Lake fishery and your Draft Environmental Assessment.

In your Introduction, you point out two governing laws impacting this very issue:

1. The Flood Control Act of 1944 (Public Law 78-534) specifically includes water conservation and supply, and recreation.

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2. The Water Resources Development Act of 1996 added fish and wildlife benefits as authorized purposes as long as they don't reduce existing flood control or recreation. (Public Law 104-303)

You also correctly point out that Alamo Lake is a recreation facility, a State Park managed by AZ State Parks as well as the AZ Game and Fish Department (AZGFD). You fall short however on the statutory responsibility the AZGFD has, at the lake, as well as upstream and downstream, in concert with the management of all the fish and wildlife on, in and around the lake.

1. Arizona Revised Statutes provides under Title 17 that the AZGFD has jurisdictional authority and public trust responsibilities for management of the state's fish and wildlife resources.
2. AZGFD has specific landowner, management and stakeholder interests within your project footprint. AZGFD has a license with the Corps through the authority of the Fish and Wildlife Coordination Act (FWCA) to manage 17,963 acres upstream of Alamo Dam, water rights to 25,000 acre feet in the reservoir, and downstream, the AZ Game and Fish Commission owns the Planet Ranch.

We understand both AZGFD and the Corps are members of the Bill Williams River Steering Committee. We also understand the Corps informed AZGFD of the impending plans for the dam inspection through this association. However it is evident based on the AZGFD comments on the proposed EA, as well as your draft assessment, that AZGFD was not consulted on the EA, nor involved with any of the proposed plans or actions.

We (AZSFWC) have to ask why that happened.

We understand and appreciate the need to maintain structures and mechanisms associated with the Alamo Dam per the Alamo Dam and Lake Water Control Manual (Manual), no question there at all. However the timing and now the alleged urgency of the proposed maintenance operation is suspect.

The Manual provides that inspections of the dam's upper conduit "would not be scheduled until the lake level recedes low enough, through normal operation of the dam, to allow installation of the bulkhead."

Further, the Manual at VII-11 states: Normal operation describes inspection of the upper conduit to occur in October/November, with the lake drawdown beginning in June, "permitting reservoir evacuation over a 6-month period without excessively high flows" and a target lake elevation of 1100 feet. See Record of Decision for Alamo Lake (2000); Biological Opinion for Alamo Lake Re-operation and Ecosystem Restoration 1999).

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The Corps points out inspections of the conduits (upper and lower) at the Alamo Dam should take place every 5 years as part of normal project inspection protocol. However you go on to state that due to several reasons, the upper conduit was last inspected in 1990, and prior to that 1977.

If the upper conduit has been inspected only twice in 40 years, contrary to the recommendations in the Manual, why now is there a sense of urgency to draw down Alamo Lake in the next few weeks, also contrary to the recommended procedures on evacuation in that same Manual? What is the emergency?

If the Corps were to follow through with their proposed alternatives, the following adverse impacts would result almost immediately:

1. The recreational aspect of the lake would be eliminated. A ring of mud would surround the lake shore. Boat ramps would be out of the water. And any scenic allure to camping or visiting the State Park would be gone.
2. Late winter and spring are some of the best fishing on Alamo Lake. The Corps even sites that in Sec.3.2, saying the "primary sport fishing season on Alamo Lake runs from January through May." But then you ignore the impact! An immediate draw down of the water level would not only make it difficult for boaters to access the lake through the mud, but anyone who had a desire to fish from shore would find that next to impossible.
3. The proposed draw down would occur right in the midst of the spawn, essentially eliminating this year's crop of sport fish, with unknown consequences on the future population and recruitment because of the absence of a spawn.
4. Surrounding communities would see revenue drop with the absence of people recreating and fishing at the lake. As noted in the AZGFD comments, (Felder 2014), direct annual expenditures for recreational fishing at Alamo Lake were \$9,342,963 that supported 122 jobs!
5. AZGFD would likely see revenue drop too, as a result of the lake being eliminated as a destination during the prime time to fish the lake.
6. Prime OHV use below the dam on the Arizona Peace Trail would be curtailed because of flooded crossing points.

These items alone beg the question under Part 3. Affected Environment, as none of them are addressed in your narrative. How can your reference that "recreational resources at Alamo Lake have been established since prior to the existing EIS and WCM, and impacts associated with releases and fluctuating lake levels have been previously evaluated", when the Corps has only inspected the upper conduits twice in 40 years, and never under a scenario proposed like this one? Then ignoring the recreational impact noted above.

AZSFWC has other concerns relative to the proposed EA as follows:

1. What is the impact of the other aquatic species in and below the lake?

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2. How will the habitat be impacted for Endangered Species like the Southwestern willow flycatcher?
3. Will the nesting bald eagles be adversely impacted during their March breeding and nesting?
4. Why isn't the available water in the lake being conserved during this time of "drought"?
5. Why aren't there some proposed alternatives that take into consideration the recreation and conservation related points cited above?
6. How will the plant species be impacted by the sudden draw down of the lake level during the spring germination period?
7. What is the proposed start date and targeted lake level elevation?
8. How much water is proposed to be released and what is the minimum flushing flow to remove sediment from the sill?
9. Why aren't the inspection dates tracking with the recommendations in the Alamo Lake Reoperation and Ecosystem Restoration Final EIS in the section entitled Alamo Dam Maintenance (page 2-5)?

"The Riparian Subcommittee acknowledged the need to conduct periodic inspections of the dam approximately every five years. If the Corps identified the need for drawdown, the subcommittee recommended that the drawdown for inspection and maintenance of the Alamo Dam outlet works occur once every five years from April through September, with sustained flows not exceeding 3,000 cfs during this time frame. Because no releases can be made while the bulkhead is in place, the subcommittee recommended that the actual maintenance should begin in early November, when temperatures have dropped sufficiently to initiate dormancy in trees and water requirements are lower.

10. Why isn't the Corps following the Alamo Lake Record of Decision signed by the Assistant Secretary of the Army on May 12, 2000?
 - a. When lake levels are below 1,125 feet, making releases adequate to satisfy downstream water rights and support riparian habitat.
 - b. Approximately every 5 years, drawing down the pool slowly, beginning in June, to 1,100 feet for inspection and maintenance of the outlet tunnel in October/November.

In summary we have a great deal of concern with much of the proposed EA when it comes to the impact on the recreation, conservation, and the fish and wildlife components that were not considered in the draft plan.

The Corps pointed out in Section 4.1 under Conservation Measures:

“To ensure temporary impacts to recreation are minimized to the maximum extent practicable, the following conservation measures were considered and included in the Project Description:

1. Land management agencies responsible for recreational facilities in the vicinity of the Alamo Lake and BWR have been notified in advance. The proposed release of water from Alamo Dam has been coordinated with Arizona State Parks, Bureau of Reclamation, and USFWS. All agencies have been notified in advance of potential for a proposed spring release of water, allowing for advanced notification of all interested recreational groups.
2. The proposed release has been shaped in a way to minimize potential impacts to recreation through shaping of the hydrograph to have short, high peak. By using a high maximum flow, as opposed to a prolonged release of lesser magnitude, the temporary closure of downstream recreational crossings has been reduced to the maximum extent practicable.

The Corps missed one major player in the consultation regarding this process, the Arizona Game and Fish Department.

AZSFWC would join with the AZGFD and request that additional coordination, evaluation of impacts, and consultation with AZGFD take place prior to the finalization of the proposed EA.

The importance of this coordinated effort can't be understated, since the AZGFD has jurisdictional authority over the management of fish and wildlife in the state of Arizona, particularly since the Corps' EA would have an adverse impact on their ability to carry out management of both fish and wildlife at and around Alamo Lake if this EA is approved.

Thank you for your consideration. Attached is a list of 21 of our member organizations that support our comment on this EA, as well as the AZGFD's comments on the subject too.

Yours in Conservation,

A handwritten signature in dark ink, appearing to read 'Jim Unmacht', with a long horizontal stroke extending to the right.

Jim Unmacht
Executive Director



**AZSFWC Member Organizations supporting the
AZGFD Recommendations on Alamo Dam Flushing Flow
Release Draft EA**

Anglers United
AZ Antelope Foundation
AZ Bass Federation Nation
AZ Big Game Super Raffle
AZ Chapter National Wild Turkey Federation
AZ Chapter Safari Club International
AZ Council of Trout Unlimited
AZ Deer Association
AZ Desert Bighorn Sheep Society
AZ Elk Society
AZ Flycasters Club
AZ Houndsmen
AZ Outdoor Sports
AZ Shooting Sports Education Foundation
Coconino Sportsmen
Kahuna's Kids
Mohave Sportsman Club
Outdoor Experience 4 All
SRT Outdoors
The BASS Federation
Xtreme Predator Callers

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