

APPENDIX C: Coordination, Public Comments, and USACE Responses

Farmers Mutal Ditch Erosion Repair Project Supplemental Environmental Assessment Farmington, New Mexico

September 2025



**US Army Corps
of Engineers** ®
Albuquerque District

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Coordination

U.S. Fish and Wildlife Service

Pikeminnow Critical Habitat-Farmers Mutual Ditch Project



Sutphin, Malia J CIV (USA)

To  melissa_mata@fws.gov

Hi Melissa,

I am reaching out to inform you of the U.S. Army Corps of Engineers' (USACE) determination regarding the Farmers Mutual Ditch Erosion Repair Project, located near the San Juan River in Farmington, New Mexico (GPS coordinates: 36° 44' 14.20" N, 108° 15' 23.02" W). After reviewing the project and considering the Colorado Pikeminnow and its designated critical habitat, we have determined that the project will not adversely affect the species or its habitat.

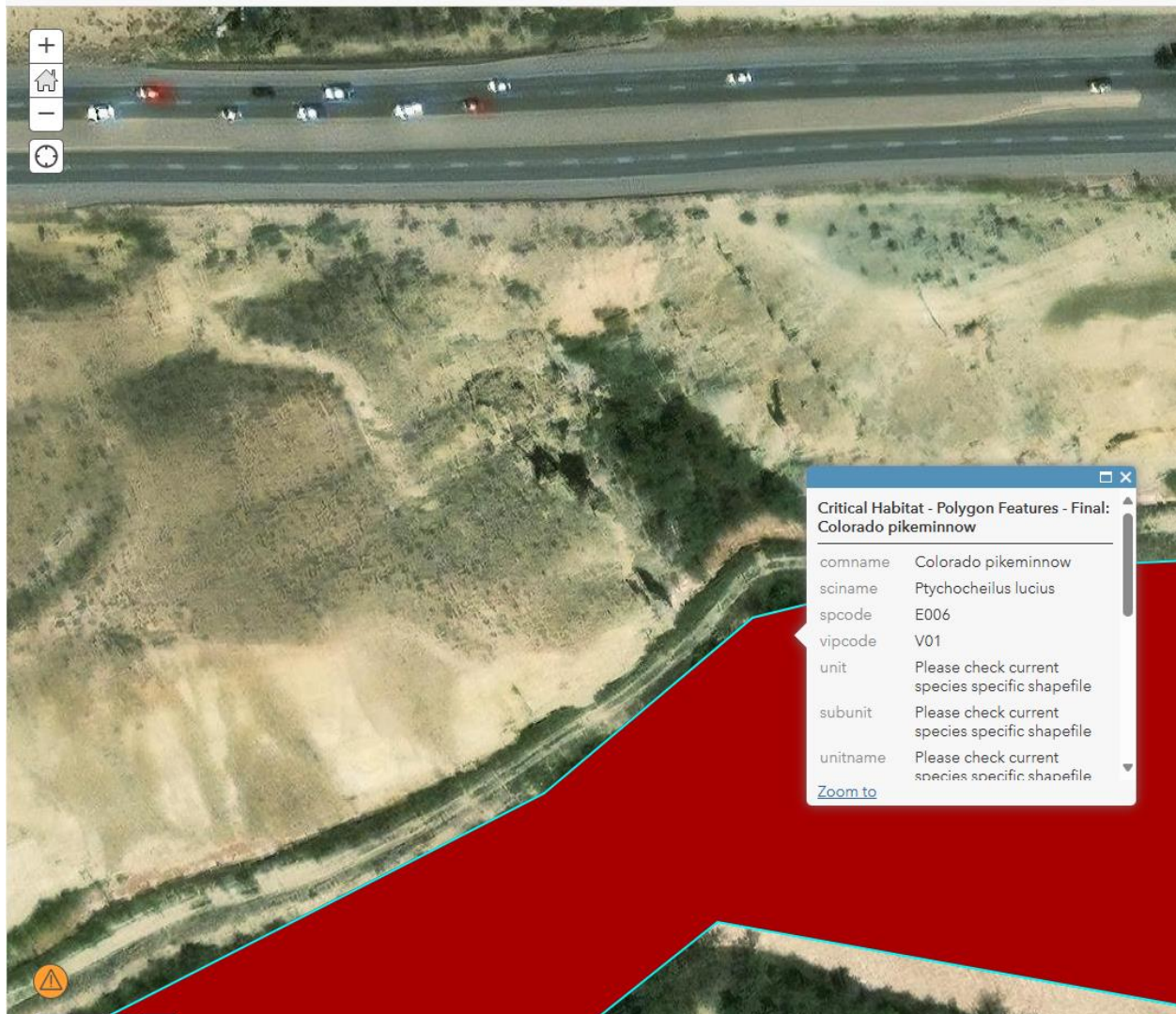
The project consists of erosion repair and bank stabilization along a 98.70-foot segment of the San Juan Riverbank to protect the Farmers Mutual Ditch (Acequia) where it crosses the arroyo. Work includes excavation and riprap placement to stabilize the bank while avoiding in-stream work or vegetation removal. Best management practices (BMPs) will be implemented to minimize sediment transport and prevent erosion. Construction is anticipated to take place between October - April, outside of the irrigation season and the majority of migratory bird season.

We would appreciate any suggestions you may have regarding BMPs or if you would like to discuss the project further. I am available for a conversation or meeting at your convenience.

Thank you for your time.



Malia Sutphin
Biologist
Environmental Resources Section
Albuquerque District Office



U.S. Bureau of Land Management

From: Sutphin, Malia J CIV (USA) <Malia.J.Sutphin@usace.army.mil>

Sent: Monday, August 11, 2025 8:47 AM

To: Mullins, Maria L <mmullins@blm.gov>

Subject: [EXTERNAL] Seeding Specs Guidelines



This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.



Good morning Maria,

I

I'm looking for a formal reference guide or document we can include in our specifications for contractors to follow when reseeding with native vegetation. This is for an erosion repair project along the San Juan River in Farmington, NM.

Do you have any recommended resources or guidance on this topic? Any referrals or insight would be greatly appreciated.

Sincerely,

Malia Sutphin
Biologist
Environmental Resources Section
Albuquerque District Office
U.S. Army Corps of Engineers
Cell: (541) 531-5766

From: Mullins, Maria L <mmullins@blm.gov>
Sent: Monday, August 11, 2025 9:47 AM
To: Sutphin, Malia J CIV (USA) <Malia.J.Sutphin@usace.army.mil>
Subject: Re: [EXTERNAL] Seeding Specs Guidelines

Hi Malia,

Attached is a recent reclamation guidance document we reference a lot. It was designed specifically for oil and gas reclamation, but many of the principles are relevant to other types of reclamation as well. The best practices section from pages 19-45 may be the most relevant.

Best,

Maria

Maria Mullins

Plant Conservation & Restoration Program Lead
Bureau of Land Management
New Mexico State Office, Santa Fe NM
office: 505-954-2045
cell: 505-917-6979

[Plant Conservation & Restoration Program](#) (PCRP)

[PCRP StoryMaps](#)

[New Mexico Rare Plants](#)

[Oil and gas reclamation—Operations, monitoring methods, and standards](#)

Hi Malia - looks like the file was too big to email but here is a link you can download it from.

Maria Mullins

Plant Conservation & Restoration Program Lead
Bureau of Land Management
New Mexico State Office, Santa Fe NM
office: 505-954-2045
cell: 505-917-6979

[Plant Conservation & Restoration Program](#) (PCRP)

[PCRP StoryMaps](#)

[New Mexico Rare Plants](#)

Notice of Availability

Notice of Availability

Draft Supplemental Environmental Assessment, Farmers Mutual Ditch Erosion Repair Project

The U.S. Army Corps of Engineers, Albuquerque District (USACE) has prepared a Draft Supplemental Environmental Assessment (SEA) for the Farmers Mutual Ditch Erosion Repair Project in Farmington, San Juan County, New Mexico. The SEA evaluates potential environmental impacts of proposed erosion control and bank stabilization measures at Drainage Crossing 1 to protect the Farmers Mutual Ditch system.

This SEA has been prepared to solicit input from federal, state, tribal, and local agencies and the public, as required by the National Environmental Policy Act (NEPA) of 1969, as amended.

A hard copy of the Draft “**Supplemental Environmental Assessment for the Farmers Mutual Ditch Erosion Repair Project, San Juan County, New Mexico**” can be sent upon request and is available electronically at the USACE Albuquerque District website:

<https://www.spa.usace.army.mil/Missions/Environmental/Environmental-Compliance-Documents/Environmental-Assessments-FONSI/>

USACE is soliciting comments from interested parties to comply with NEPA. The SEA will be available for public review from August 8, 2025, through September 6, 2025.

Written comments may be emailed to: SEAFarmersDitch@usace.army.mil

Or mailed to:

U.S. Army Corps of Engineers, Albuquerque District
Environmental Resources Section
Attn: CESP-PM-LE (Ms. Malia Sutphin)
4101 Jefferson Plaza NE
Albuquerque, NM 87109

Please submit comments no later than September 6, 2025, to ensure full consideration in the final SEA.

Paper copies of the SEA are available for public review at:

Farmington Public Library
2101 Farmington Ave, Farmington, NM 87401

Affidavit of Publication

BALLANTINE

COMMUNICATIONS

AFFIDAVIT OF PUBLICATION

STATE OF NEW MEXICO

County of San Juan

Adelle Zorrino, the undersigned, authorized Representative of the Tri-City Record, on oath states that this newspaper is duly qualified to publish legal notices or advertisements within the meaning of Section 3, Chapter 167, Session Law of 1937, that payment therefore has been made of assessed as court cost; and that the notice, copy of which is hereto attached, was published in said paper in the regular daily edition, for 1 time(s) on the following date(s):

8/8/2025

Sworn and subscribed before me, a notary public in and for the county of La Plata and the State of Colorado, 8-11-25

Gail Lynn Vitarius
Notary Public

PRICE: \$ 132.77

Statement to come at the end of the month.

ACCOUNT NUMBER: 112248

GAIL LYNN VITARIUS
Notary Public
State of Colorado
Notary ID # 20254005989
My Commission Expires 02-12-2029

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Notice of Availability

Draft Supplemental Environmental Assessment, Farmers Mutual Ditch Erosion Repair Project

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A hard copy of the Draft
**"Supplemental
Environmental Assessment
for the Farmers Mutual Ditch**

Erosion Repair Project, San Juan County, New Mexico"
can be sent upon request and is available electronically at the USACE Albuquerque District website: <https://www.spa.usace.army.mil/Missions/Environmental/Environmental-Compliance-Documents/Environmental-Assessments-FONSI/>

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Written comments may be emailed to: *SEAFarmersDitch@usace.army.mil*

Or mailed to:

U.S. Army Corps of Engineers,
Albuquerque District
Environmental Resources
Section
Attn: CESPAM LE
(Ms. Malia Sutphin)
4101 Jefferson Plaza NE
Albuquerque, NM 87109

Please submit comments no later than September 6, 2025, to ensure full consideration in the final SEA.

Paper copies of the SEA are available for public review at:

Farmington Public Library
2101 Farmington Ave,
Farmington, NM 87401

Published in Tri-City Record
August 8, 2025

Example Letter Sent to Agencies



DEPARTMENT OF THE ARMY
ALBUQUERQUE DISTRICT, CORPS OF ENGINEERS
4101 JEFFERSON PLAZA NE
ALBUQUERQUE NM 87109-3435

07 August 2025

Planning, Project and Program Management Division
Planning Branch
Environmental Resources Section

Ms. Jennifer Faler
Bureau of Reclamation
555 Broadway Blvd. NE, Suite 100
Albuquerque, New Mexico 87102

Dear Ms. Faler,

The U.S. Army Corps of Engineers, Albuquerque District (USACE), has prepared a Draft Supplemental Environmental Assessment (SEA) for the Farmers Mutual Ditch Erosion Repair Project, located near Farmington, San Juan County, New Mexico. The purpose of the SEA is to assess the environmental impacts of proposed repairs to Drainage Crossing 1, which experienced severe erosion during a flood event on June 22, 2024.

Two alternatives were considered in the Draft SEA: a No Action Alternative and an Erosion Repair Alternative. The No Action Alternative would allow continued erosion at Drainage Crossing 1, increasing the risk of embankment failure, sedimentation into the San Juan River, and potential impacts to designated critical habitat for the endangered Colorado Pikeminnow. The recommended action, the Erosion Repair Alternative, includes removal and disposal of all damaged articulated concrete block (ACB) matting, installation of new matting, placement of riprap at the toe of the slope and upstream channel, and stabilization of the streambank to prevent future erosion (**See enclosed project maps**). All work would occur within previously disturbed areas and utilize existing staging areas and access roads to minimize environmental impacts. Construction is anticipated to begin between late October and mid-November 2025, with completion expected by April 2026. Work would be scheduled to occur outside of the primary irrigation season and the peak migratory bird nesting season to avoid disruption and minimize impacts to sensitive resources.

The Draft SEA is available electronically at the Albuquerque District website, <https://www.spa.usace.army.mil/Missions/Environmental/Environmental-Compliance-Documents/Environmental-Assessments-FONSI/>. A hard copy of the SEA will be sent upon request. The USACE is soliciting comments from Federal interests to comply with the National Environmental Policy Act.

We welcome your review and comments on the document. Written responses can be sent to the address above, Attn: Malia Sutphin, Environmental Resources Section, or by email to malia.sutphin@usace.army.mil. Comments must be received by 06 September 2025 to ensure they are considered during finalization of the SEA. If no response is received by this date, we will assume you have no concerns or objections.

If you have any questions or require further information, please contact Malia Sutphin, Biologist, at (505) 342-3371 or malia.sutphin@usace.army.mil.

Sincerely,

Danielle A. Galloway

Danielle A. Galloway
Chief, Environmental Resources Section

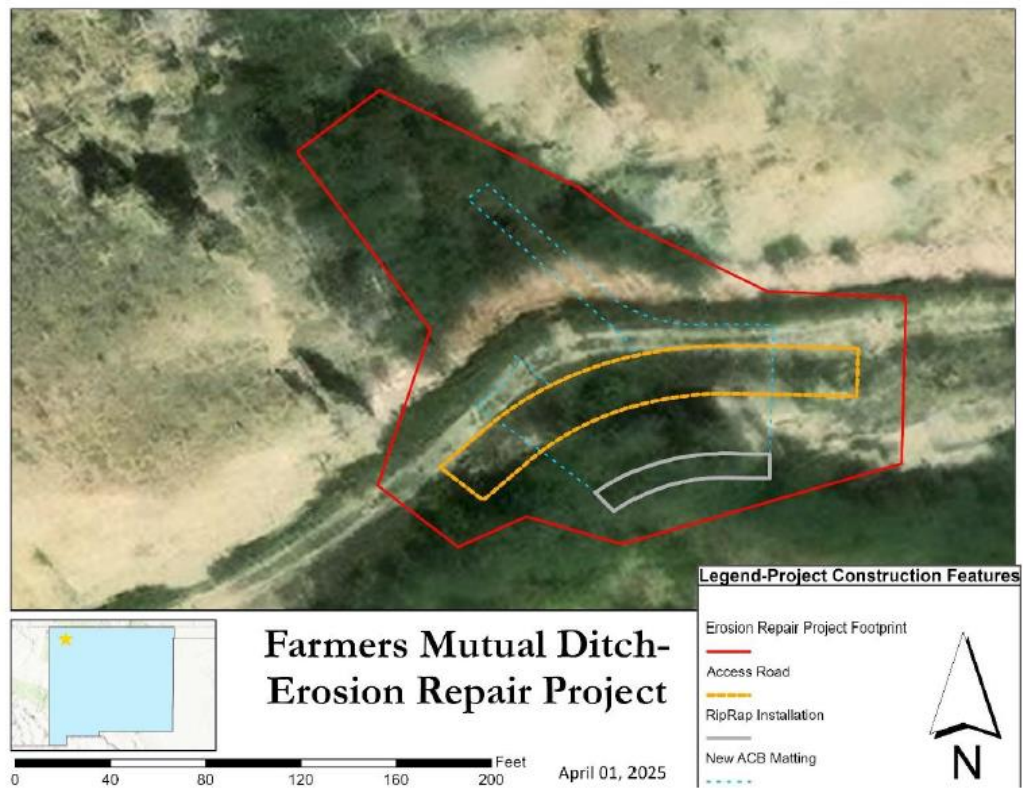


Figure 1. Close-up view of Farmers Mutual Ditch Erosion Repair Project Footprint.

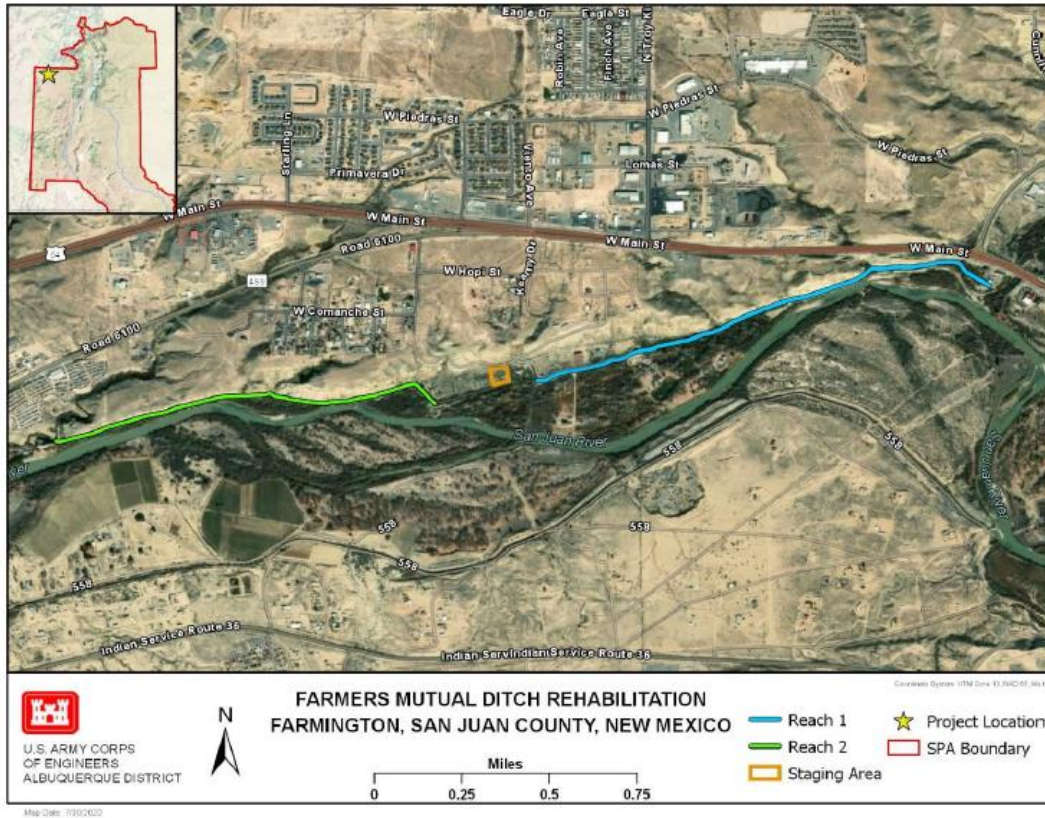


Figure 2. Overview of Farmers Mutual Ditch Erosion Repair Project Area.

Mailing List for the Draft Environmental Assessment

Mailing List for Draft Supplemental Environmental Assessment

Shawn Sartorius, Field Supervisor USFWS - Ecological Services 2105 Osuna Road NE Albuquerque, NM 87113	Ms. Hannah Riseley-White, Director New Mexico Interstate Stream Commission P.O. Box 25102 Santa Fe, NM 87504
Ms. Christina Schroeder Regulatory Division U.S. Army Corps of Engineers Albuquerque District 4101 Jefferson Plaza NE Albuquerque, NM 87109	Ginny Seamster Ecological and Environmental Planning Section Wildlife Management Division New Mexico Department of Game and Fish 1 Wildlife Way Santa Fe, NM 87507
Ms. Shelly Lemon NM Environment Department Surface Water Quality Bureau P.O. Box 5469 Santa Fe, NM 87502	Mr. Scott Mason U.S. EPA Region 6 1201 Elm Street, Suite 500 Dallas, TX 75270
Ms. Jennifer Faler Bureau of Reclamation 555 Broadway Blvd. NE, Suite 100 Albuquerque, New Mexico 87102	Ms. Erica Rowe State Botanist Energy, Minerals, and Natural Resources Department P.O. Box 1948 Santa Fe, NM 87504
Shawn Williams NM Office of the State Engineer 100 Gossett Drive, Suite A Aztec, NM 87410	

Comments Received

New Mexico Department of Game and Fish

RE: Draft Supplemental Environmental Assessment for the Farmers Mutual Ditch Erosion Repair Project; NMERT Project No. NMERT-4929

I Marchetti, Jack, DGF <jack.marchetti@dgf.nm.gov>
Sutphin, Malia J CIV (USA) <Malia.J.Sutphin@usace.army.mil>
DGF-EEP-TG <DGF-EEP-TG@dgf.nm.gov>

Dear Malia Sutphin,

The New Mexico Department of Game and Fish (Department) has reviewed the draft Supplemental Environmental Assessment (SEA) for the Farmers Mutual Ditch Erosion Repair Project (Project). Please consider the attached letter as the Department's official comments on the SEA and the Project.

Thank you for the opportunity to provide comments. Please let me know if you have any questions.

Sincerely,

Jack Marchetti (he/him)
Aquatic/Riparian Habitat Specialist
Fisheries Management Division
New Mexico Department of Game and Fish
Cell: 505-479-1269
jack.marchetti@dgf.nm.gov

GOVERNOR
Michelle Lujan Grisham



DIRECTOR AND SECRETARY
TO THE COMMISSION
Michael B. Sloane

STATE OF NEW MEXICO
DEPARTMENT OF GAME & FISH

One Wildlife Way, Santa Fe, NM 87507
Tel: (505) 476-8000 | Fax: (505) 476-8180
For information call: (888) 248-6866

<https://wildlife.dgf.nm.gov>

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Albuquerque

20 August 2025

I

Malia Sutphin
Environmental Resources Section
United States Army Corps of Engineers
Albuquerque District
4101 Jefferson Plaza NE
Albuquerque, NM 87109

***RE: Draft Supplemental Environmental Assessment for the Farmers Mutual Ditch
Erosion Repair Project; NMERT Project No. NMERT-4929***

Dear Ms. Sutphin,

The New Mexico Department of Game and Fish (Department) has reviewed the draft Supplemental Environmental Assessment (SEA) for the Farmers Mutual Ditch Erosion Repair Project (Project). Please consider this letter as the Department's official comments on the SEA and the Project.

As mentioned on page 18 of the SEA, water quality is one of the primary constituent elements (PCEs) of Colorado pikeminnow's (*Ptychocheilus lucius*) critical habitat. Threats to the water quality of the San Juan include increased sedimentation and runoff carrying pollutants as the result of construction and development within the river's floodplains. Construction areas and other impervious surfaces can have significant impacts on surface waters by increasing the amount of sediment and other pollutants that are washed into surface waters, increasing the velocity and volume of water, and reducing infiltration into groundwater. Reducing the amount of impervious surfaces and phasing construction will reduce these impacts. To prevent sediment and other pollutants from entering the San Juan River, the Department recommends developing a Storm Water Pollution Prevention Plan (SWPPP) and provides the following additional recommendations to minimize or eliminate impacts to wildlife and wildlife habitat:

- Divert water around construction site whenever possible.
- Preserve natural areas within the project site. Strive to maintain the natural drainage system of the site, including natural stream channels, wetlands, and floodplains. Design, construct, and maintain the site to protect (or restore) the natural hydrology.

- Following construction, disturbed areas should be re-vegetated using native species that approximate the pre-disturbance plant community composition or native plant communities appropriate for the site, including from a region that represents potential future climatic conditions at the site, whichever is more beneficial to wildlife. Short-term erosion control seed mixes are available for temporary control of surface erosion during project implementation; native mixes should be used for temporary as well as permanent erosion control. Native plants and materials should also be used for landscaping. All seed mixtures should be certified as weed-free. New Mexico grass ecotypes for commercial seeding are available through the Los Lunas Plant Materials Center and New Mexico State University. Seeding guidelines are available from the Natural Resources Conservation Service and the Colorado Natural Areas Program.
- If erosion control blankets are used post-construction, burying the blanket edges, and using blankets without fused mesh corners (e.g., woven mesh) can reduce the chances of unintentional wildlife entanglement. Regularly check the erosion control blankets after applying them to identify and release any wildlife that does become entangled.
- Maintain a vegetated buffer zone along all watercourses, including ephemeral arroyos, sufficient to minimize erosion and sediment delivery.
- Use properly engineered drainage swales and other vegetated channel systems instead of storm sewers, lined channels, curbs, and gutters. Vegetated swales should be gently sloped (4:1) so that small wildlife is able to maneuver them.
- Efforts should be made during construction to minimize impacts on vegetative communities. Existing roads and rights-of-way should be used for all transportation. Off-road driving should be avoided. Staging areas should be located in previously disturbed sites, where possible, and kept as small as possible.

The Project area appears to contain one or more wetland types as classified by the New Mexico Environment Department's (NMED's) [Wetland Map](#). This [key](#) can assist in interpreting Landscape Position, landform, water flow path, and waterbody type (LLWW) information in the NMED's wetland data. Wetlands provide important habitat for numerous species of wildlife and pollinators and provide ecosystem services, such as water filtration and storage, to downstream users. The Department recommends avoiding disturbance of wetlands whenever possible, avoiding actions or infrastructure installment that may disrupt natural wetland hydrological processes, and reseeding or replanting areas where disturbance cannot be avoided with native wetland plant species appropriate to the local wetland type. For a list of native seed providers, please see the Department's habitat handbook guideline for [Restoration and Management of Native and Non-native Trees in Southwestern Riparian Ecosystems](#). The [New Mexico Riparian Habitat Map \(NMRipMap\)](#) may also provide useful information on local riparian habitat composition and structure.

The Department recommends consultation with relevant species leads at the United States Fish and Wildlife Service's (USFWS's) New Mexico Ecological Services Office (NMESO) before work begins for this project. The Department also recommends use of

the USFWS's Information for Planning and Consultation (IPAC) system (<https://ipac.ecosphere.fws.gov/>) to confirm whether the project area overlaps critical habitat designated for the Colorado pikeminnow or other species listed under the federal Endangered Species Act.

The current project area appears to be within Crucial Habitat as identified in the Crucial Habitat Assessment Tool (CHAT) layers provided in the New Mexico Environmental Review Tool. This indicates that a diversity of species of conservation concern and sensitive or important habitats for wildlife are likely to be found in the project area. The Department recommends completion of thorough environmental assessment prior to, and exercising care during, implementation of project activities to avoid adverse impacts to sensitive wildlife and habitats.

Thank you for the opportunity to review the SEA. Please contact Jack Marchetti, Aquatic/Riparian Habitat Specialist, at jack.marchetti@dgf.nm.gov or 505-479-1269 if you have any questions.

Sincerely,

Virginia
Seamster



Digitally signed by
Virginia Seamster
Date: 2025.08.20
17:20:02 -06'00'

Virginia Seamster, Ph.D.
Assistant Chief for Technical Guidance
Ecological and Environmental Planning Section

USACE Regulatory Division

Schroeder, Christina L CIV USARMY CESPA (USA)
<Christina.L.Schroeder@usace.army.mil>

Sutphin, Malia J CIV (USA) <Malia.J.Sutphin@usace.army.mil>

Crosson, Steven B (Brad) CIV USARMY CESPA (USA)
<Steven.B.Crosson@usace.army.mil>

Hello Malia,

Thank you for coordinating with our office. I reviewed your draft SEA for the above referenced project. The individual WQC for the original Farmers Mutual Ditch Rehabilitation EA should still be applicable based on the email you received from Shelly Lemon and references to the programmatic WQC for NWP is not needed. I do not have any additional comments. I concur with the [404 analysis](#) provided in the SEA.

Sincerely,

Christina Schroeder
Acting Division Chief, Regulatory Division
Albuquerque District
Office: 505-342-3374
Mobile: 505-377-8799

U.S. Army Corps of Engineers
Albuquerque District - Regulatory Division
4101 Jefferson Plaza, NE
Albuquerque, New Mexico 87109-3435



<https://www.spa.usace.army.mil/Missions/Regulatory-Program-and-Permits/>

New Mexico Environment Department

RE: [EXTERNAL] Farmers Mutual Ditch Erosion Repair Project-Agency Coordination Letter

Lemon, Shelly, ENV <Shelly.Lemon@env.nm.gov>Sutphin, Malia J CIV (USA)
<Malia.J.Sutphin@usace.army.mil>

Klatt, Alan, ENV <Alan.Klatt@env.nm.gov>

Lacey-Young, Kate, ENV <Kathryn.Lacey@env.nm.gov>

Hello Malia Sutphin.

SWQB reviewed the original EA and issued an Individual Water Quality Certification for the Farmers Mutual Ditch Rehabilitation project back in May of 2023.

SWQB staff reviewed the USACE coordination letter for the Erosion Repair Project and do not have any comments, concerns, or objections regarding the proposed erosion repair work.

Thank you for the opportunity to review and comment.

Regards,

Shelly

Shelly Lemon

Bureau Chief - Surface Water Quality Bureau
New Mexico Environment Department
Cell: (505) 470-5018
Pronouns: she/her

shelly.lemon@env.nm.gov

<https://www.env.nm.gov/surface-water-quality/>

Comments Response Table

Commenter	Comment	Response
NMDGF (Letter of August 20)	“To prevent sediment and other pollutants from entering the San Juan River, the Department recommends developing a Storm Water Pollution Prevention Plan (SWPPP) and provides the following additional recommendations: divert water around construction whenever possible; preserve natural areas within the project site; maintain natural drainage systems; and phase construction to reduce impervious surface impacts.”	Thank you for your thorough review and recommendations. As described in the SEA, project disturbance is less than 1 acre and does not require an NPDES permit (Section 402, p. 15). However, because the project is adjacent to the San Juan River, erosion and sediment control BMPs, such as silt fences, straw wattles, and erosion control blankets, will be implemented to minimize impacts on water quality (SEA Section 3.1.1, pp. 13–15; Section 5.2, p. 27). If at any time disturbance exceeds one acre, a SWPPP will be required.
NMDGF (Letter of August 20)	“Following construction, disturbed areas should be re-vegetated using native species that approximate pre-disturbance communities or those suitable under future climate conditions. Short-term erosion control mixes may be used for temporary stabilization, but all permanent seeding should use certified weed-free native mixes. Native ecotypes are available through Los Lunas Plant Materials Center and NMSU.”	Thank you for this recommendation. As noted in the SEA, disturbed areas will be reseeded following construction with a weed-free native mix appropriate for the San Juan River floodplain and upland areas, including species such as sand dropseed (<i>Sporobolus cryptandrus</i>), galleta (<i>Pleuraphis jamesii</i>), Indian ricegrass (<i>Oryzopsis hymenoides</i>), and wild sunflower (<i>Helianthus annuus</i>), (SEA p. 12, Table 1). Please note this is not an exhaustive list. These

		measures will restore vegetation cover and provide erosion control while supporting native habitat conditions.
NMDGF (Letter of August 20)	"If erosion control blankets are used post-construction, edges should be buried, and non-fused mesh materials used to avoid wildlife entanglement. Blankets should be monitored regularly."	Noted; thank you. As described in the SEA, erosion control blankets or wattles will be installed in disturbed areas to stabilize soils (SEA Section 5.2, p. 27). Wildlife-safe products will be selected and included in the specifications for the contractor to obtain.
NMDGF (Letter of August 20)	"Maintain a vegetated buffer zone along all watercourses, including ephemeral arroyos, to minimize erosion and sediment delivery."	Thank you for this recommendation. As described in the SEA, no vegetation will be removed during construction, and all work will occur within the existing ditch right-of-way (SEA Section 2.2, pp. 8–11). In addition, a review of the USFWS Wetlands Mapper confirmed that no ephemeral arroyos occur within the project footprint. Therefore, vegetated buffers along the San Juan River and adjacent riparian areas will remain intact and protected.
NMDGF (Letter of August 20)	"Use engineered drainage swales and vegetated channel systems rather than storm sewers, lined channels, curbs, and gutters. Swales should be gently sloped (4:1) for wildlife passage."	The project is located in a steep ephemeral arroyo. While the erosion repair would grade the sides of the channel to gentle slopes as much as practicable, the arroyo channel is so highly eroded that it isn't possible to establish enough vegetation to stabilize it. Concrete block matting is required for erosion

		protection of the acequia pipe.
NMDGF (Letter of August 20)	“Construction should minimize impacts on vegetative communities. Use existing roads and rights-of-way; avoid off-road driving. Stage equipment in previously disturbed areas.”	Concur. As described in the SEA, construction will use existing access roads, staging areas, and borrow sites from the previous project phase to minimize disturbance (SEA Section 2.2, pp. 9–11; No new access routes are proposed and impacts to undisturbed vegetation will be avoided.
NMDGF (Letter of August 20)	“The Project area appears to contain wetlands. Avoid disturbance where possible, avoid disrupting hydrology, and replant unavoidable impacts with appropriate native wetland species.”	Thank you for this recommendation. As part of the original Environmental Assessment prepared for the Farmers Mutual Ditch Rehabilitation Project, a USACE biologist conducted a field vegetation survey in 2023. That survey documented sparse, disturbed vegetation within the project footprint consisting of mixed grasses, cottonwoods, willows, Russian olive, and tamarisk, and confirmed that no jurisdictional wetlands occur within the project footprint. The USFWS National Wetlands Inventory identifies a 0.09-acre riparian scrub-shrub polygon (Rp1SS6MD, mixed deciduous) adjacent to the ditch. However, National Wetlands Inventory mapping alone does not establish jurisdictional wetland status, which requires hydrophytic vegetation,

		hydric soils, and wetland hydrology. These conditions were not documented within the construction limits during the field survey. All work will remain within the ditch right-of-way, avoiding disturbance to the San Juan River riparian corridor.
NMDGF (Letter of August 20)	“Consult with USFWS New Mexico Ecological Services Office prior to work; confirm overlap with Colorado pikeminnow critical habitat using IPaC.”	Thank you for this recommendation. As described in the SEA (Section 3.2.1, pp. 16–19), the San Juan River adjacent to the project is designated critical habitat for the federally endangered Colorado pikeminnow (<i>Ptychocheilus lucius</i>). The Primary Constituent Elements of this habitat include water quality and quantity, physical habitat, and the biological environment. Project activities will occur along the riverbank and uplands but will not involve in-stream work or modification of the river channel. BMPs, including silt fences, erosion control blankets, and sediment barriers will be implemented to prevent sediment transport into the river, protecting water quality. Flow regimes will not be altered, and no spawning cobbles, nursery backwaters, or eddies occur within the project area. The Corps has confirmed critical habitat overlap in IPaC and has

		provided its determination to Melissa Mata at USFWS New Mexico Ecological Services Office for review.
NMDGF (Letter of August 20)	"The project area lies within Crucial Habitat (CHAT tool). A thorough environmental assessment should be completed prior to construction, with measures to avoid impacts to sensitive habitats."	The original Environmental Assessment completed in 2023 for the entire acequia project analyzed impacts thoroughly. This SEA addresses only the impacts of the erosion repair project at hand. The CHAT tool provides a coarse scale view of potentially sensitive habitats. A detailed look at the project site reveals that it is outside the mapped riparian corridor. SWAP habitat mapped at the project location is Intermountain Dry Shrubland and Grassland.
USACE Regulatory (Response of September 3)	"Thank you for coordinating with our office. I reviewed your draft SEA for the above referenced project. The individual WQC for the original Farmers Mutual Ditch Rehabilitation EA should still be applicable based on the email you received from Shelly Lemon and references to the programmatic WQC for NWP is not needed. I do not have any additional comments. I concur with the 404-analysis provided in the SEA."	Noted; thank you for your review.
NMED (Response of August 7)	"SWQB reviewed the original EA and issued an Individual Water Quality Certification for the	Noted; thank you for your review.

	Farmers Mutual Ditch Rehabilitation project back in May of 2023. SWQB staff reviewed the USACE coordination letter for the Erosion Repair Project and do not have any comments, concerns, or objections regarding the proposed erosion repair work. Thank you for the opportunity to review and comment.”	
--	--	--