

March 15, 2013

BY E-MAIL, mimib@dpsdesign.org and theplan@cabq.gov, ONLY

Mimi Burns
Dekker/Perich/Sabatini
7601 Jefferson NE, Suite 100
Albuquerque, NM 87109

Re: The Plan for the bosque

Dear Ms. Burns:

I am writing on behalf of the Central New Mexico Group of the Sierra Club to provide supplemental comments on The Plan for the bosque and the Rio Grande Valley State Park. The Club previously submitted comments by letter dated January 7, 2013. This letter does not replace those comments, but provides additional context and support for the comments submitted in the Club's earlier letter.

Specifically, the purpose of this letter is to express the Sierra Club's concern that The Plan in its latest public form has not been developed in conformity with the City plans the govern management and development of the bosque in the Rio Grande Valley State Park, because The Plan does not appear to consider the ecological impacts of the proposed development on the bosque. The Plan is not, of course, being written on a blank slate. There are two earlier plans that govern the bosque that have been adopted by the City, the Comprehensive Plan and the Bosque Action Plan. The Bosque Action Plan is a Rank Two Facility Plan. In addition, there is the Major Public Open Space Facility Plan, which summarizes and restates the requirements of the Comprehensive Plan and the Bosque Action Plan. Any plans and actions must implement and be consistent with these earlier plans. The Comprehensive Plan and, especially, the Bosque Action Plan emphasize conservation and provide for recreational development that within the overarching context of the protection and enhancement of bosque habitat. The Sierra Club is concerned that the current draft of The Plan for the bosque has not taken into account conservation in making its plans for recreational use of the bosque, and it is concerned that The Plan does not evaluate the ecological impacts of the proposed recreation development as required by the Bosque Action Plan.

The Comprehensive Plan briefly addresses the bosque in Section II(B)(1), Policy b, which states:

Access to the Rio Grande, bosque, and surrounding river lands should be carefully designed to provide entry to those portions suitable for recreational, scientific and educational purposes, while controlling access in other more sensitive areas to preserve the natural wildlife habitat and maintain essential watershed management and drainage functions.

The Comprehensive Plan thus contemplates that access to and use of the bosque will be limited as

necessary to preserve sensitive habitat.

The Bosque Action Plan provides a detailed blueprint for management of the bosque within the Rio Grande Valley State Park. Section II of the Bosque Action Plan is "Goals, Policies and Implementation." The first Goal under § II is "to protect and enhance the natural resources of the Rio Grande Valley State Park." The Bosque Action Plan provides that "[t]he Rio Grande Valley State Park shall be managed to preserve and enhance its ecological diversity." Policy 3. "Regeneration of cottonwood trees shall be emphasized to perpetuate their existence." Policy 4. The Actions stated under this Goal expressly provide for the establishment of wildlife preserves where access is limited, Policy 1, Action B, and for otherwise controlling access in sensitive areas, e.g., Policy 1, Action K; Policy 3, Action I; Policy 5, Action A. The Bosque Action Plan establishes wildlife preserves near La Orilla, north and south of I-40 on the west side of the river, and from the south boundary of the Park to near the South Diversion Channel outfall on both sides of the river.

The second Goal provides for "Recreation and other Public Uses." This Goal provides for recreational use only to the extent that it is consistent with the first Goal of protecting and enhancing the natural resources of the Park. The Goal is: "***to protect and enhance the natural character*** by facilitating ***appropriate*** management practices and public uses." (Emphasis added). Thus, the focus is on **appropriate** uses so as to protect the bosque. *See also e.g.*, Policy 8 ("Improvements shall be located in non-sensitive areas that are appropriate for such development, considering ecological sensitivity as well as user satisfaction."); Policy 10 (access points in "appropriate areas"); Policy 11 (providing for an "ecologically compatible" trail system).

The Sierra Club is not opposed to appropriate recreational development within the bosque that encourages people to use and enjoy this wonderful place. However, under the provisions of the Bosque Action Plan, planning for recreational use of the bosque cannot take place in a vacuum. Environmental effects must be taken into account. The Bosque Action Plan clearly directs that the Rio Grande Valley State Park should be managed both for environmental and recreation purposes, and that recreational development must be planned so that it does not undermine the goal of protecting and enhancing the natural resources of the bosque. The Plan in its present form addresses only the recreational side of the equation and does not, so far as the Sierra Club can determine, take into account the effect of the proposed development on the environmental goals of the Bosque Action Plan.

Critically, the Bosque Action Plan requires that development in the bosque can only occur after the environmental effects of the development are evaluated and recommendations are made based on consistency with the Goals, Policies, and Actions of the Bosque Action Plan. Action H of Policy 1 provides as follows:

Evaluate the ecological impacts of facility development proposals that fall within and adjacent to the Rio Grande Valley State Park, ***prior to any surface disturbing action***. Recommendations will be based on policies and actions set forth in this document.

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(Emphasis added). Such an evaluation of The Plan should be performed by qualified persons so as to ensure that the development that is proposed in The Plan is consistent with the Goals, Policies, and Actions of the Bosque Action Plan, including the policies of preserving and enhancing the ecological diversity of the bosque and of emphasizing the regeneration of cottonwood trees.

Thank you again for the opportunity to submit comments on The Plan.

Very truly yours,

The Sierra Club,

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

cc: Mayor Richard J. Berry
Ken Sanchez
Roxanna Meyers
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