



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region 6**

**1445 Ross Avenue, Suite 1200**

**Dallas, TX 75202-2733**

November 3, 2016

Rhea Graham  
Bureau of Reclamation, Albuquerque Area Office  
555 Broadway NE, Suite 100, Mail Stop ALB-103  
Albuquerque, NM 87102

**Re: Comment Letter for the Final Environmental Impact Statement for the Continued Implementation of the 2008 Operating Agreement for the Rio Grande Project, along the Rio Grande River in New Mexico, Texas, and Mexico.**

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Bureau of Reclamation Final Environmental Impact Statement (FEIS) for the Continued Implementation of the 2008 Operating Agreement for the Rio Grande Project. The purpose of the project is to meet contractual obligations while complying with applicable law concerning water allocation, delivery, and accounting. A Federal decision is needed to decide whether to continue operations of the Rio Grande Project through 2050, and whether to allow the storage of San Juan-Chama Project Water in Elephant Butte Reservoir.

EPA provided comments on the Draft Environmental Impact Statement (DEIS) dated May 9, 2016, in which the DEIS was rated "Environmental Concerns – Adequate" (EC-1). EPA is pleased that the FEIS included additional analysis of the proposed and alternative actions to address our concerns.

EPA appreciates the opportunity to review the FEIS. Please send our office one copy of the Record of Decision (ROD). If you have any questions or concerns, please contact Magda Dallemagne of my staff at (214) 665-7396 or by e-mail at [dallemagne.magdeleine@epa.gov](mailto:dallemagne.magdeleine@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Houston", written over a horizontal line.

Robert Houston  
Chief, Special Projects Section

Enclosures

**DETAILED COMMENTS ON THE  
U.S. DEPARTMENT OF THE INTERIOR  
BUREAU OF RECLAMATION  
FINAL ENVIRONMENTAL IMPACT STATEMENT  
FOR THE CONTINUED IMPLEMENTATION OF THE 2008 OPERATING  
AGREEMENT FOR THE RIO GRANDE PROJECT**

**BACKGROUND:** The Continued Operations of the Rio Grande Project consists of altering the operational methods, water movement, and general annual allocation of the Rio Grande Project waters through New Mexico, Texas, and finally through Mexico. No construction is involved in any of the alternatives.

**AGRICULTURE**

The FEIS included more detailed model descriptions and impact summaries in regards to the agricultural impact of the project. The discussion on agricultural versus urban use of water is adequate, as is the discussion on environmental impact of surface water reduction on ground water consumption. Other concerns raised by the EPA in the DEIS have been adequately addressed.

**ENVIRONMENTAL JUSTICE**

The FEIS demonstrates adequate and appropriate process for Tribal and Environmental Justice Analysis. The Bureau of Reclamation scattered its discussion related to Environmental Justice throughout the document, which is not a preferred, nor transparent, way of delivering a concise summary of indirect, direct, and cumulative impacts the preferred alternative would have on the respective minority population. However, the Bureau did provide a statement in the FEIS that “there would be no high or disproportionate adverse impacts on environmental justice communities” to address the concern raised by the EPA in the DEIS.