



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

**1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733**

July 27, 2011

Kathy Mitchell
U.S. Army Corp of Engineers
Fort Worth District
P.O. Box 17300
819 Taylor Street
Fort Worth, TX 76102-0300

SUBJECT: Proposed Emergency Stream bank Erosion Protection Along the Colorado River at Caldwell Lane North of Garfield, Travis County, Texas

Dear Ms. Mitchell:

The Environmental Protection Agency (EPA) Region 6 has reviewed the Draft Environmental Assessment (DEA) prepared by the U.S. Army Corps of Engineers. 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 is providing the following comments regarding the DEA.

In general, the DEA provides little in the way of alternatives development, comparative alternatives analysis, characterization of existing resources, evaluation of impacts to resources, and mitigation efforts. The EPA understands this is an emergency action; however, basic NEPA requirements should be followed. The discussion should include the acres of impacts for the proposed project. Detailed comments are below:

Purpose and Need

The Purpose and Need statements should be revised. The Purpose could be something similar to: "to restore and stabilize the Colorado River stream bank adjacent to Caldwell Lane and the City's water treatment plant". The Need could be similar to: "The proposed project is needed to prevent damage to the City's water treatment plant, prevent damage to Caldwell Lane, and to prevent additional erosion of the stream bank which may cause downstream sedimentation and reduced wildlife habitat."

Affected Environment

Terrestrial and Aquatic Resources, page 6 – The section states "There are several large pool and riffle complexes in the vicinity. Aquatic habitat in the area includes large rocks, undercut banks, logs, root wads and sparse canopy of overhanging vegetation." Most of these features are typically considered beneficial to fish and macroinvertebrates yet the section on "fish" reports that no fish or aquatic invertebrates were observed. Please cite the method that was utilized to sample for these organisms.

Alternative Plans Considered

It appears that the consideration of a non-structural solution was given very little attention. A non-structural alternative (vegetation and/or slope grading) was considered but discounted. The reason given for discounting a "soft" alternative is the lack of available land to cut back the slope. However, it appears that the structural alternatives also require a cut back. At least one non-hardened alternative should be developed utilizing natural stream channel restoration principals.

Selecting the Recommended Plan

Table 1 includes a comparative analysis of costs, but should also include a comparative analysis of environmental impacts.

Recommended Plan

Will the recommended alternative be designed to be incorporated into the channel so that erosion is not accelerated by transferring energy down stream into the meander bend?

Environmental Consequences

All connected actions, such as the staging and storage areas in the Little Webber Ville Park, should be characterized and analyzed for impacts.

No Action Alternative, page 12 - The No Action Alternative refers to "increases in flow events and velocities". This is only mentioned in this section. Please state the basis for that statement and if it was considered in the development of the other alternatives.

Surface Water, page 13 – The proposed project would probably not eliminate the source of streambank erosion, but only decrease it.

Floodplains, page 13 – Coordination with floodplain administrator is required.

Cumulative Impacts

Past, present, and reasonably foreseeable future projects should include any projects, regardless of entity, in the vicinity that may contribute to environmental impacts, i.e., road construction, facility construction, etc.

Mitigation Requirements

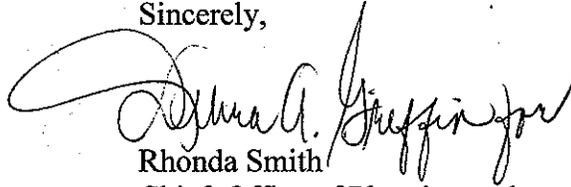
The Final EA should include additional mitigation measures for impacts associated with the recommended alternative. Replacement of vegetation should be at a much higher ratio than 1:1 because 100 percent planting success is not assured. A detailed vegetation survey should be completed to establish a baseline. A re-vegetation plan utilizing appropriate native vegetation should be developed and reviewed by appropriate resource agencies (USFWS, TPWD) for adequacy.

Additionally the preferred alternative, a hardened bank, typically provides little in the way of a diversity of fish and wildlife habitat. Measures to supplement fish and wildlife habitat should be developed and implemented to offset the impacts cause by conversion of natural

riverbank (with restoration potential) to a static riprap lined channel with little chance to vegetate and increase shading to lower water temperatures and provide wildlife habitat.

We appreciate the opportunity to provide comments on the DEA. Thank you for your coordination and don't hesitate to contact John MacFarlane, of my staff, at 214-665-7491 or macfarlane.john@epa.gov should you have any questions or concerns regarding this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Rhonda A. Griffin" or similar, written in a cursive style.

Rhonda Smith
Chief, Office of Planning and
Coordination