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# LOS ALAMOS COUNTY

P.O. Box 30 Los Alamos, NM 87544 (505) 663-1750 Fax (505) 662-8079  
Website: [www.lac-nm.us](http://www.lac-nm.us)

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*Max H. Baker*

December 21, 2007

George Rael, Assistant Manager  
for Environmental Programs  
National Nuclear Security Administration  
U.S. Department of Energy  
528 35th Street, MS A316  
Los Alamos Area Office  
Los Alamos, New Mexico 87544

Susan Stiger, Associate Director  
for Environmental Programs  
Los Alamos National Laboratory  
P. O. Box 1663, MS M991  
Los Alamos, New Mexico 87545

Dear Mr. Rael and Ms. Stiger:

The Incorporated County of Los Alamos has reviewed the "Approval with Direction" notice from the New Mexico Environment Department (NMED) to the Department of Energy (DOE) and Los Alamos National Security, LLC (LANS) concerning the Los Alamos and Pueblo Canyons Supplemental Investigation.

Although the County acknowledges the need for reducing contaminant transport in Pueblo Canyon, we are strongly opposed to NMED's requirement to install a low-head weir in the canyon between Graduation and Kwage Canyons. The presence of a weir would have the following negative impacts on County management of Pueblo Canyon:

- One of the County's sewer mains runs through the canyon. The proposed weir is sited on top of the line and the maintenance road for the line. The weir would force a relocation of both the sewer and the road, and might require installation of a lift station in the canyon. At a minimum, the present sewer line is certainly incompatible with a weir's construction.
- The location of the proposed weir is at the heart of the Los Alamos County Open Space System. Pueblo and Bayo Canyons are part of a continuous greenway that extends from the eastern County boundary to the Santa Fe National Forest to the west of town. The greenway functions as an important recreation area, as undisturbed habitat for wildlife, and as a corridor for wildlife movement. In addition, the area holds a high concentration of "tent rocks," picturesque volcanic features that hold great significance to the residents of northern New Mexico and that are fragile features that are easily damaged by vehicle traffic and vibrations.

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- The proposed weir site is located within a high-use area of the County Trail Network. Pueblo Canyon and the Tent Rocks Trail are valued by hikers, mountain bikers, runners and equestrians. These trails are part of several popular loop trips for recreational trail users. Weekend use, particularly in spring and fall, is high.
- The County Council of Los Alamos has directed staff to develop a plan to protect the critical viewsheds within the County. Lower Pueblo Canyon, which is visible from Los Alamos, North, and Kwage Mesas, has been identified as part of a critical viewshed.
- The proposed site is within the known summer nesting area of a pair of Peregrine Falcons, a rare avian species within the County. Traffic along the Pueblo Canyon road is carefully managed during the nesting season.
- Maintenance of the weir would continue disturbances in the canyon. Not only is the presence of a low-head weir disruptive of the canyon's recreational uses, but the continued disturbances required to maintain the structure threaten to further affect the values that the County's residents place on the canyon.
- We believe there are more appropriate and less environmentally destructive measures that can be taken to reduce peak flows and sediment transport in the canyon. NMED may be unaware of many County programs and initiatives that we have undertaken in the last two years within our canyons. We would appreciate the opportunity to meet with your staff to discuss the following County documents and these on-going projects
- The County's Engineering Standards have been revised to reflect a growing need to better manage stormwater. Commercial and residential developments are now required to submit drainage plans that address peak flows off of the property and possibly capture some water for use on landscaping; larger developments are required to detain stormwater for slow release.
- Changes to the County Development Code have been proposed that will permit County designees to more effectively enforce state stormwater management requirements to reduce flow velocity and sediment transport from construction sites and developed areas.
- The outfall of the new Los Alamos Wastewater Treatment Plant was moved about one-half mile upstream from the closed Bayo Wastewater Treatment Plant's outfall.
- Additional projects to reduce peaks flows have been developed and implemented through a Clean Water Act Section 319 Grant to the Pajarito Plateau Watershed Partnership.

We would also like to discuss some engineering alternatives with DOE that we believe are viable. For example, a low-head weir installed at the foot of the wetlands seems an appropriate method for stabilizing the wetlands and reducing contaminant migration. In addition, we would like to remind the DOE of actions that we undertook in the canyon some time ago regarding the outfall move project mentioned above. That project was accomplished with DOE assistance, specifically to stabilize a larger stretch of Pueblo Canyon, increase the length of the ~~watershed~~ section of the canyon, and to retard the mobilization of possibly contaminated sediments. ~~After~~ construction of the new treatment plant, the longer-term plan was to do ~~some stream~~ channelization work and construct some relatively unobtrusive structures of ~~earth~~ that would

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promote development of a riparian area. Moderate earthwork, coupled with planting riparian vegetation in selected places was viewed to be an environmentally friendly, low cost method of naturally controlling sediment transport. However, after funding the move of the outfall, DOE has not pursued the streambed work that would make the new outfall location really beneficial. We would like to suggest that DOE pursue this more natural alternative. We plan to begin native tree and grass planting within the new riparian area in the spring of 2008.

As you can see from this letter, we have given this project our most serious attention and consideration. It's very important to us. I've asked County Open Space Specialist Craig Martin, Deputy Utilities Manager Tim Glasco, and Engineering Manager Ted Garcia to cooperate fully with your office and NMED in researching other options that the County would favor over the proposed weir.

In closing, I would like to thank you for giving us this opportunity to review the NMED proposed remediation plans, and ask that you continue to keep us informed and involved as the project moves forward. Our canyons are an important part of the natural heritage of our community. I urge you to work with NMED and the County to find alternatives to the proposed weir project. Please feel free to share this letter with NMED and emphasize our strong opposition to their proposed solution, and let me know if I can offer further assistance.

Sincerely,



Max H. Baker  
Los Alamos County Administrator

MHB/gc

Cc: Robert Beers, LANL  
Danny Katzman, LANL