Final Environmental Assessment

for the

Proposed Construction, Alteration, and Maintenance
for U.S. Customs and Border Protection
Ajo Housing Development Project

Ajo, Arizona

Prepared for:

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ACHP	Advisory Council on Historic Preservation
ADEQ	Arizona Department of Environmental Quality
AGFD	Arizona Game and Fish Department
APE	Area of Potential Effects
ASTM	American Society for Testing and Materials
AZDA	Arizona Department of Agriculture
AZPDES	Arizona Pollutant Discharge Elimination System
BG	Block Group
BLM	Bureau of Land Management
CBP	U.S. Customs and Border Protection
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
Corps	U.S. Army Corps of Engineers
CT	Census Tract
CWA	Clean Water Act
DWID	Domestic Water Improvement District
EA	Environmental Assessment
EcoPlan	EcoPlan Associates, Inc.
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FM&E	Facilities Management and Engineering Division
GSA	U.S. General Services Administration
HDMS	Heritage Data Management System
LEED	Leadership in Energy and Environmental Design
MOU	Memorandum of Understanding
mph	miles per hour
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NHPA	National Historic Preservation Act
NRHP	National Register of Historic Places
OBP	Office of Border Patrol
OCRHP	Office of Cultural Resources and Historic Preservation
OFO	Office of Field Operations
OMB	Office and Management and Budget
OPCNM	Organ Pipe Cactus National Monument
PDEQ	Pima County Department of Environmental Quality
PM_{10}	particulate matter less than 10 microns in diameter
POE	Port of Entry
RACM	Regulated Asbestos-Containing Material
SHPO	State Historic Preservation Office

SR 85	State Route 85
SWPPP	Storm Water Pollution Prevention Plan
U.S.	United States
U.S.C.	U.S. Code
USFWS	U.S. Fish and Wildlife Service

1.1 Explanation of an Environmental Assessment

This Environmental Assessment (EA) is being prepared to comply with the National Environmental Policy Act (NEPA) of 1969, as amended (42 U.S. Code [U.S.C] 4321), as implemented by Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations [CFR] 1500–1508), and policies of the U.S. General Services Administration (GSA) and the U.S. Customs and Border Protection (CBP) as the lead federal agencies. The EA process provides steps and procedures to evaluate the potential social, economic, and environmental impacts of a Preferred Alternative while providing an opportunity for local, state, or federal agencies to provide input and/or comment through scoping, public information meetings, and/or a public hearing. The social, economic, and environmental considerations are evaluated and measured, as defined in the CEQ regulations, by their magnitude of impacts.

1.2 Location

The proposed CBP housing is in Ajo, Arizona, in southwestern Arizona, approximately 40 miles north of the U.S.–Mexico international border and the Lukeville Port of Entry (POE). The Lukeville POE at Lukeville, Arizona, is situated on the U.S.–Mexico border in southwestern Arizona about 122 miles east of the San Luis POE at Yuma, Arizona, and 116 miles west of the Mariposa POE in Nogales, Arizona (Figure 1). Lukeville, Why (a small community between Lukeville and Ajo), and Ajo are unincorporated communities under the jurisdiction of Pima County, Arizona. Across the U.S.–Mexico border is the town of Sonoita, Sonora, Mexico. The communities of Lukeville, Why, and Ajo are served by Arizona State Route 85 (SR 85), which connects the metropolitan Phoenix area to the U.S.–Mexico border, and State Route 86, which connects the Tucson metropolitan area to the U.S.–Mexico border.

Organ Pipe Cactus National Monument, under the jurisdiction of the U.S. Department of the Interior National Park Service, essentially surrounds Lukeville, and the Cabeza Prieta National Wildlife Refuge, under the jurisdiction of the U.S. Fish and Wildlife Service (USFWS), is in proximity to the communities of Lukeville, Why, and Ajo. The Barry M. Goldwater Gunnery Range, under the jurisdiction of the U.S. Department of the Interior Bureau of Land Management (BLM) and the U.S. Department of Defense Air Force, is north, east, and west of Ajo. The Tohono O'Odham Nation boundary is east of Why and Ajo. The Lukeville POE and supporting communities are isolated by distance from the major population centers of Tucson, Gila Bend, and Phoenix (Figure 2).

1.3 Background and Overview

The POE facility in Lukeville and Ajo Station in Why employ approximately 280 total staff members. The Lukeville POE is known for its traffic entry into and from Mexico because of the Mexican resort town of Rocky Point, where U.S. citizens vacation year-round. The amount of non-commercial traffic makes this POE unique. The amount of non-commercial traffic has increased over the years, causing major inbound traffic delays from Mexico to the United States, with wait times of up to four hours. This problem used to exist only on holidays; now it has increased to four to five times a week.

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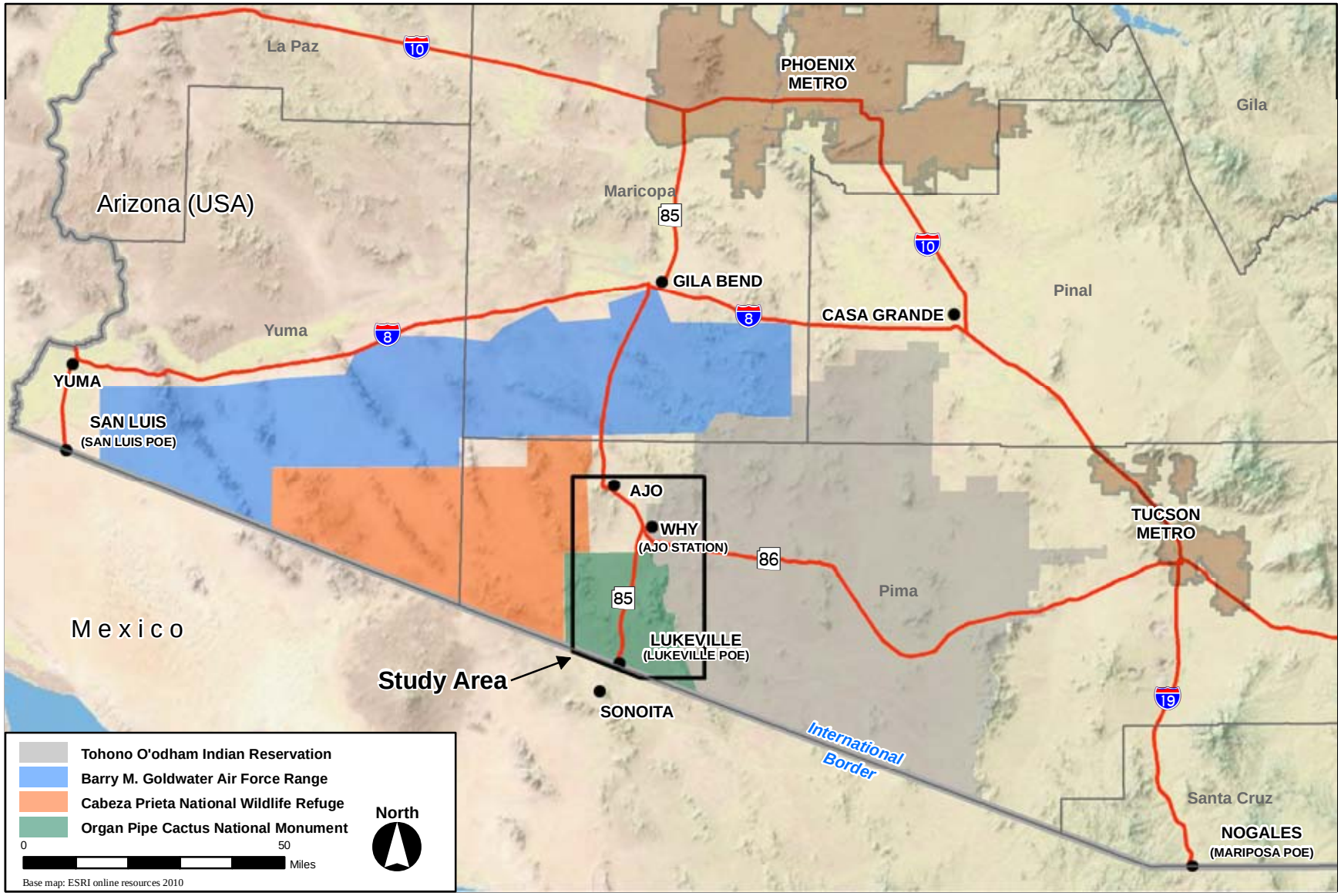
Figure 1. Project location.



W\07-033013\NEPA\EA\Fig2

Figure 2. Project vicinity.

The need to staff the POE for 24-hour service has been the driving factor behind the expansion of the POE. The former operation schedule at this POE was from 8 a.m. to 6 p.m. The POE has a requirement to expand its operation to help the traffic and allow for 24-hour processing and screening of passengers and vehicles, which cannot happen until the POE can be properly staffed.

Improvements to the POE to add two inbound lanes and an outbound canopy are under construction and are scheduled to be completed by the end of 2011. The Ajo Station in Why is scheduled for an approximately 68,000-square-foot expansion/addition, with an estimated completion date of December 2011. The expanding capabilities and facilities will result in increased staffing of up to 410 employees in the near future. This staffing will consist of Office of Border Patrol (OBP) and Office of Field Operations (OFO) personnel (Coachman 2010).

The OFO field office in Tucson, Arizona, submitted a request to the CBP Facilities Management and Engineering Division (FM&E) in 2007 for a solution to resolve the limited availability of housing at the Lukeville POE. The FM&E, the OBP, and the OFO partnered to conduct a Housing Program Feasibility Study completed by Garrison Architects in 2009. The study evaluated the existing conditions and needs, possible alternatives, and viable alternatives, and recommended a Preferred Alternative. The study is documented in *CBP Housing Program Feasibility Study, Ajo, Arizona—Complete Report* (Garrison Architects 2009). The alternatives and the evaluation of social, economic, and environmental impacts in this EA are based on the data developed in the 2009 CBP Housing Program Feasibility Study and a subsequent market survey, *U.S. Customs and Border Protection Market Survey of Housing for the Area of Ajo and Why, Arizona*, May 2010 (CBP 2010).

The existing government-owned housing is limited to 17 units: four three-bedroom single-family mobile homes in Ajo owned by the CBP, three three-bedroom single-family homes at the Lukeville GSA Housing Complex owned by the CBP, and 10 three-bedroom single-family homes at the Lukeville GSA Housing Complex owned by the GSA. There is a waiting list of CBP officers seeking rental properties that has not been met by the local market. Less than 30 percent of the Border Patrol personnel use the local Why or Ajo rental markets. Most personnel use distant housing markets in Gila Bend, Casa Grande, Tucson, and the metro Phoenix area. The lack of available or suitable housing in the area results in staff commuting more than 100 miles one way to the metro Tucson area or up to 175 miles one way to the metro Phoenix area. The unreasonably long commute has resulted in staff retention issues (CBP 2010).

Due to the current construction of a border fence in the Ajo/Lukeville area and other projects, including the Ajo Solar Energy Project, numerous contractors in the area are renting available apartment and hotel accommodations, temporarily contributing to the lack of available housing in the area. The Ajo–Why–Lukeville area currently includes four apartment complexes (three in Ajo, one in Lukeville). There are typically no vacancies. A housing market review in July 2009 (Garrison Architects 2009) found 10 homes for sale and 19 in foreclosure. In May 2010, a follow-up market review (CBP 2010) located 13 listings, most in foreclosure or being auctioned. A number of the listings noted “fixer upper special” or indicated substantive work would be required. The present Ajo area market is insufficient for the CBP housing demand and is not supplying quality housing desired by CBP employees.

2.1 Purpose of the Project

The purpose of the project is to address the immediate housing needs for mission-critical CBP personnel on the U.S.–Mexico border at Lukeville, Arizona. The goal is to provide safe, comfortable, and affordable housing for CBP personnel and their families within a reasonable distance of the CBP employee assignments at the Lukeville POE in Lukeville, Arizona, and Ajo Station in Why, Arizona.

The ability to provide quality housing options to CBP personnel is important to the recruitment and retention of staff. The number of housing units proposed in the current project is limited by available funding and is thus focused on immediate needs. This project is not intended to satisfy the needs of the projected 410-personnel staffing level; it is intended to provide housing in sufficient quantity to meet immediate needs—approximately 56 total units to be constructed in phases. The local development and real estate community has been encouraged to meet the longer-term projected housing demand.

Housing provided by this project would be available to CBP staff at market rental rates. The housing makeup would be a mix of one-, two-, and three-bedroom homes. The majority would be one-bedroom homes, consistent with the staff demographic of single employees. There would be no requirement or mandatory directive for personnel to rent government-owned housing. The CBP does not designate where staff members reside or require staff members to occupy government-owned housing. Should any government-owned housing be unoccupied, the units would not be available to the general public for rent.

2.2 Need for the Project

There is insufficient nearby housing available to accommodate CBP personnel who currently work at the Lukeville POE and Ajo Station in Why, Arizona. With the projected increase of additional personnel, the demand for suitable housing will also increase. Existing government-owned housing available for CBP employees is substandard and is scheduled for demolition or replacement. Other housing options for CBP employees in the vicinity of the Lukeville POE are limited due to a scarcity of quality available rental properties and limited by their distance from basic amenities such as shopping and health care (Garrison Architects 2009 and CBP 2010).

Approximately 280 CBP personnel currently staff the Lukeville POE and Ajo Station. The combined OFO and OBP staffing projections for the next several years are expected to approach approximately 410 employees. With only 30 percent of current CBP agents using the existing area housing market, the majority of staff members commute long distances (100 to 175 miles one way) across remote desert areas. This has resulted in staff retention issues, financial costs, and additional stress from 3- to 4-hour round-trip commute times (Garrison Architects 2009).

The CBP Housing Program Feasibility Study (Garrison Architects 2009) notes the following needs:

1. Add housing in sufficient numbers and type to accommodate OFO staff growth at Lukeville POE.
2. Add housing in sufficient numbers and type to relieve and accommodate the existing and growing OBP staff at Ajo Station.
3. Locate new housing within a short commute of both the Lukeville POE and Ajo Station.
4. Specify housing to be rapidly deployable, durable, locally serviceable, climate appropriate, and affordable.

Interviews with CBP staff members indicated that up to 90 percent of the OFO personnel would desire CBP housing, and about 30 percent of the OBP personnel would desire CBP housing. The staffing demographics of the OFO personnel were 80 percent single men and women and 20 percent couples or families. Demographics for OBP staff is not known but is assumed to be of similar proportions. Therefore, the recommended housing was predominantly one-bedroom units (60–70 percent) and the remainder two- and three-bedroom units (CBP 2010).

The immediate housing needs of additional personnel cannot be met by the existing availability of housing in the private sector. The available rental properties in the area are limited or of poor quality. The majority of the houses sampled by the CBP meet the minimum requirements that the CBP would rate under a “Poor” condition code (U.S. Department of the Interior 2008). Fewer than 10 of the houses sampled would require no alterations or modifications if purchased by the government. The majority of the houses surveyed in these markets are substandard. Based on the Feasibility Study (Garrison Architects 2009), the CBP determined that acquisition and use of scattered parcels for the development of government housing would not be practical and would result in a notable delay in the provision of government housing.

The CBP found that the availability of adequate one- and two-bedroom housing units in Ajo is nonexistent. Short-term rental properties were also nonexistent at the time of the survey (spring 2010) due to use by contractors from the border fence construction. In addition, CBP staff would prefer long-term residential housing as opposed to short-term housing such as hotels or boarding houses. The communities of Lukeville and Why also did not have adequate housing available at the time of the survey (CBP 2010).

3.1 Alternatives Considered but Eliminated from Further Study

The CBP Housing Program Feasibility Study (Garrison Architects 2009) examined the best sites to place new housing in the Lukeville/Ajo areas. The option of the government purchasing existing housing was eliminated based on the results of the study. As noted earlier, there was a limited supply of available properties in fair or good condition, and due to efforts needed to bring the properties up to acceptable condition, the project need of rapidly deployable and affordable homes could not be met. The May 2010 Market Survey (CBP 2010) results confirmed the 2009 study. The survey concluded that the communities of Lukeville, Why, and Ajo did not have enough existing available quality housing to accommodate the CBP personnel needs.

The CBP Housing Program Feasibility Study (Garrison Architects 2009) looked at a number of potential sites in Lukeville, Why, and Ajo. Each site was subject to evaluation based on the following criteria:

1. *Property Acquisition*–the potential ease of acquisition, willing seller, lack of encumbrances on the property
2. *Site Usability*–constraints or limitations due to geography, floodplains, and adjacent land use
3. *Exposure to Environmental Hazards*–this could include air quality, water quality, water supply, and soil contamination
4. *Site Access*–access during construction and connectivity to the local road network
5. *Adjacency*–related to land use, classification of nearby properties
6. *Access to Utilities and Resources*–availability of water, power, gas, telecommunications, sewer or septic systems, and waste disposal
7. *Expansion*–the ability to expand the housing facilities through additional property acquisition or phasing on-site
8. *Sustainability*–the ability to develop within the local infrastructure and opportunities to develop housing with renewable energy sources and water harvesting, and potentially achieve a Leadership in Energy and Environmental Design (LEED) rating
9. *Community Interests*–provide housing that reinforces local identity or is compatible with regional building styles
10. *Resident Interests*–locating housing in a desirable area, providing amenities, establishing a sense of community, and minimal disruption if built in phases
11. *Security*–the ability to provide a secure location
12. *Cost*–includes acquisition, site development, housing construction, maintenance, and tenant-borne costs
13. *Schedule*–impacts to a start date and duration of construction

Because the surveys concluded that existing housing could not meet the needs of CBP personnel, six action alternatives were formulated that would develop new housing supplies in the

Lukeville, Why, and Ajo areas. Three of the alternatives were in Lukeville, one alternative was in Why, and two alternatives were in Ajo. Five of the six alternatives were eliminated from further study and are discussed below. The alternatives and Preferred Alternative numbering reflects the alternatives numbering used in the CBP Housing Program Feasibility Study (Garrison Architects 2009), and while not sequential in this EA, is preserved for clarity in reference to the CBP Housing Program Feasibility Study.

3.1.1 Lukeville Alternative 1

Lukeville Alternative 1 is adjacent to and east of the Lukeville POE on an abandoned, privately owned recreational-vehicle-park property (Figure 3). This alternative would provide new housing contiguous to the POE and allow for the greatest flexibility in the configuration of new housing through phased construction on generally level land. Development of the site would include 19 one-bedroom attached units initially and a future phase adding 16 one-bedroom units. Several existing buildings (abandoned) would require demolition. A new septic system would be needed as well as new connections to power and communications. Costs were deemed to be relatively high due to lack of infrastructure, and the acquisition would include undevelopable land as a buffer between the U.S.–Mexico border and housing.

Lukeville Alternative 1 was eliminated from further consideration because of the potential difficulty in property acquisition, the high cost of the land and development, and the remoteness of the location from the nearest town where goods and services for personnel are available.

3.1.2 Lukeville Alternative 2

Lukeville Alternative 2 is on Lukeville POE property, which currently includes 10 single-family homes leased to CBP personnel (Figure 3). This alternative would not require the acquisition of property and would provide new housing contiguous to existing POE housing. This site would require demolishing the existing homes, temporarily relocating the occupants, and constructing 32 units in two phases. The units would be studio and one-bedroom units. Utilities are available; however, a new septic system would be needed. Costs were determined to be relatively low due to the property already being in government ownership and utilities being present.

Lukeville Alternative 2 was eliminated from further consideration because of the negative impact of using POE property for housing when proposed expansion needs for the POE are currently unknown, and the remoteness of the location from the nearest town where goods and services for personnel are available.

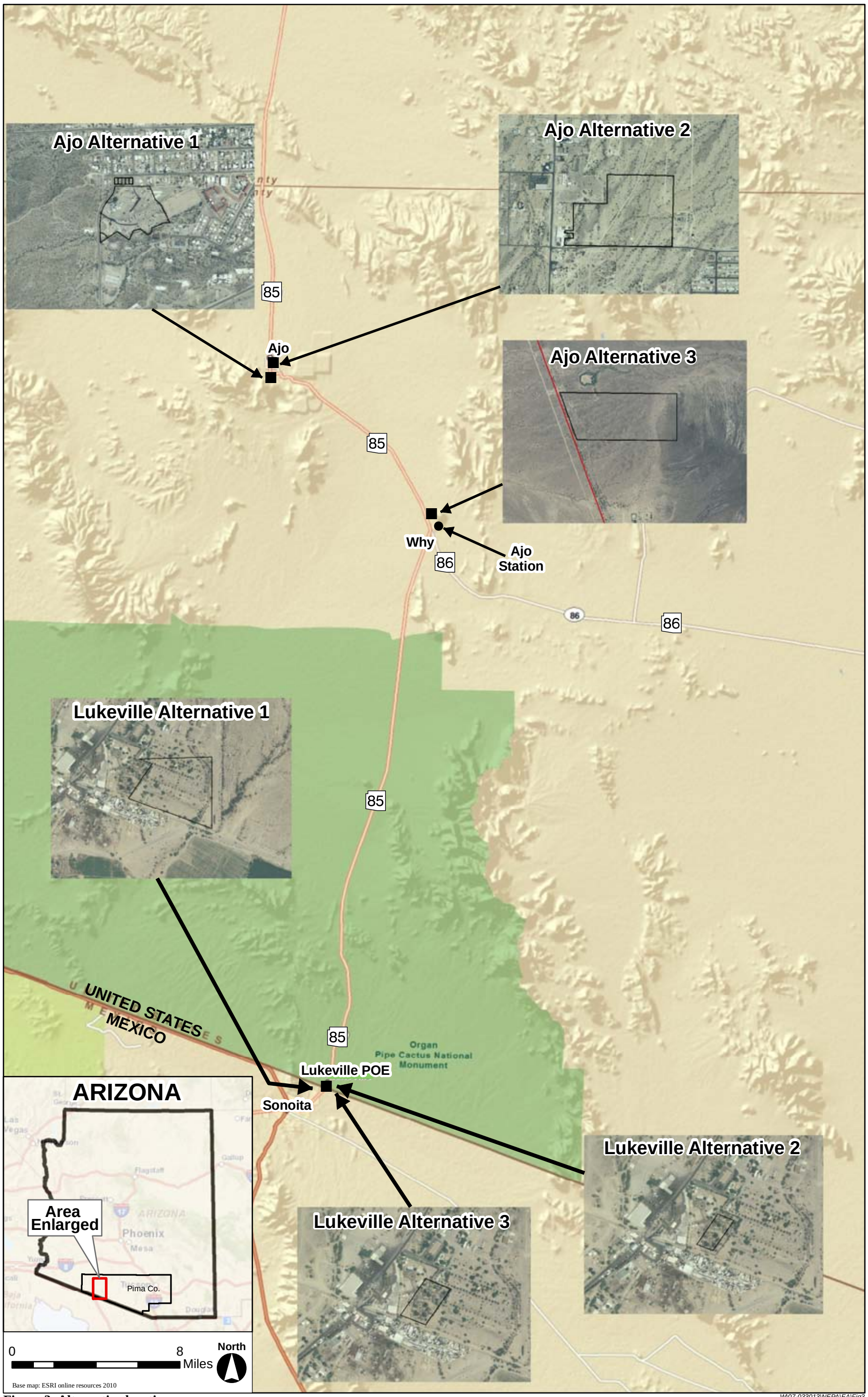


Figure 3. Alternative locations.

3.1.3 Lukeville Alternative 3

Lukeville Alternative 3 is at the same location as Lukeville Alternative 2. Instead of demolishing the 10 existing GSA-owned units, the units would be completely renovated into 20 one-bedroom duplexes within the existing house shells (Figure 3). This alternative would take advantage of existing infrastructure and utilities of the POE and provide new housing that is contiguous to existing POE housing. It would be built in one phase. This alternative restricts opportunities for future Lukeville POE expansion due to the limited size of the POE. Costs were determined to be comparatively low due to government ownership of the parcel, but the site could only accommodate 20 units, which is fewer than other alternatives.

Lukeville Alternative 3 was eliminated from further consideration because of the negative impact of using POE property for housing when proposed expansion needs for the POE are currently unknown, and the remoteness of the location from the nearest town where goods and services for personnel are available.

3.1.4 Ajo Alternative 2

Ajo Alternative 2 proposes to use several adjacent and currently vacant, unimproved, privately owned and for-sale properties on Rasmussen Road in Ajo immediately east of the commercial strip along SR 85 (Figure 3). This alternative has convenient access to the local road network and is within easy walking distance of retail and commercial outlets in Ajo. This site is the largest property considered and could accommodate up to 100 units (a mixture of one-, two-, and three-bedroom homes). The majority of development could occur in the initial phase. Due to the size of the proposed development and terrain, a sanitary waste pump station would be required. The unimproved properties would require extensive site drainage improvements that would reduce the area available for development. Utility infrastructure is available at the property lines but would have to be extended to serve the development. Environmental concerns are present due to extensive use as an illegal dump; the site is essentially natural, with extensive native vegetation, including the potential for the endangered Acuña cactus. Costs would be higher than the other alternatives due to topography, drainage issues, and need for a sanitary waste pump station.

Ajo Alternative 2 was eliminated from further consideration because of the substantial costs to install drainage and utility infrastructure as well as potential additional environmental permitting associated with Clean Water Act Sections 401 and 404, potential impacts to endangered plant species, and cleanup of multiple unauthorized dump sites.

3.1.5 Ajo Alternative 3

Ajo Alternative 3 proposes the acquisition of 30 acres of undeveloped BLM-owned land adjacent to the Ajo Station in Why (Figure 3). The location would allow convenient access to work for the agents, a sense of community, and a relatively short drive to the schools, commerce, and culture of Ajo. The site could accommodate up to 100 units (mix of one-, two-, and three-bedroom units). No utilities are present at the site; utilities would need to be extended from the expanded Ajo Station to the south.

Availability of water is a primary concern because the capacity of the Why well may not support 100 housing units. If the Why system cannot meet the capacity, a new well, storage system, and reverse osmosis system would need to be constructed. Land acquisition would require a land grant from the BLM, which could take 6 months to 2 years. The unimproved nature of the property would require installation of all utility infrastructure, including on-site septic systems. Costs were considered to be high for this site due to lack of utilities and the need to factor in the cost of a new water system.

Ajo Alternative 3 was eliminated from further consideration because of the application and approval requirements for a BLM land grant, the unimproved nature of the property requiring new infrastructure, and the potential requirement to drill a new well.

3.2 Alternatives Considered in Detail

Through the preceding evaluation, five of the six action alternatives were eliminated from further consideration. The remaining action alternative and the No Action Alternative are described in this section.

3.2.1 Preferred Alternative

The Preferred Alternative is Ajo Alternative 1 (Figure 3). This alternative proposes acquiring seven contiguous parcels in Ajo. The first parcel is addressed as 55 S. Sahuaro St. and currently supports a partially occupied mobile home park. The next is a small, unaddressed parcel immediately adjacent to the southwestern corner of the 55 S. Sahuaro St. parcel. The remaining five parcels consist of vacant parcels addressed as 801, 811, 821, 831, and 841 W. Esperanza Ave., immediately north of the 55 S. Sahuaro St. parcel (Figure 4). The 55 S. Sahuaro St. parcel was originally intended to have 40 mobile home units and currently has utilities in-ground and ready for hookup. Though utility service lines exist to the site boundary, it is assumed that the Preferred Alternative would require adjustments to the on-site utility infrastructure. Four lots are currently leased by the GSA at this site, each with a CBP-owned mobile home, and eight lots are occupied by private tenants. The location has convenient access to local roads, is within walking distance to amenities in Ajo, is in a location that would foster a sense of community within the CBP, and requires the lowest amount of development costs of the Ajo alternatives (Figure 4).

Three water companies serve the town of Ajo. The largest system is the Ajo Improvement Company owned by the Phelps Dodge Corporation. It pumps water from two active wells in the Child's Well Field, 7 miles north of Ajo, at a depth of 1,170 to 1,350 feet. The Ajo Improvement Company delivers groundwater to two other water systems: Arizona Water Company–Ajo System and Ajo Domestic Water Improvement District (DWID), neither of which operates its own wells to serve customers.

Water is currently provided to the site of the Preferred Alternative by the Ajo DWID. The existing mobile home park has 40 hookups for domestic water, though not all of them are currently being used. With the proposed new housing, these 40 hookups would ultimately be replaced with services for 56 residential units, an increase of 16 units. Agreements between the GSA and the Ajo DWID would be secured during the design phase. In 2006, the Ajo DWID received about 40 acre-feet of water from the Ajo Improvement Company and served about 405 residents.

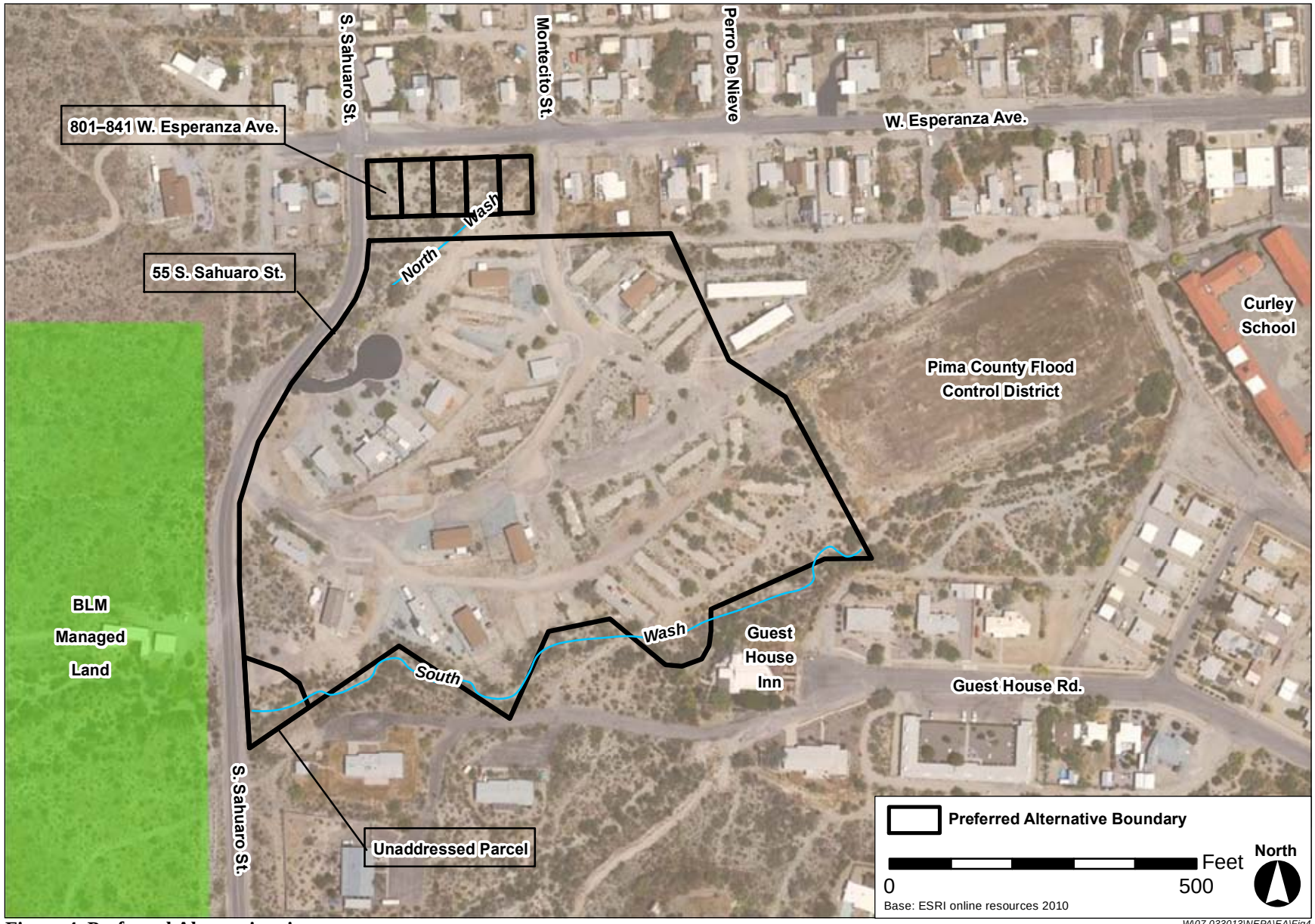


Figure 4. Preferred Alternative site.

The 2009 Pima County Planned Land Use indicates that the Preferred Alternative site is located in a Medium Intensity Urban planned area (Pima County Development Services 2010a). The Pima County zoning allows mobile homes and modular homes on this site.

Specific components of this alternative include:

- Construction of up to 56 total units if development funding becomes available. Housing would be of a modular type. Upon selection of an architect, the design, materials, and color selection of the housing will be developed. The units would feature energy-efficient orientation (east–west alignment), an all-electric heating, ventilating, and air conditioning system, metal roofing, ceiling assembly with R-36 insulation, Low-E high-performance windows, R-30 wall insulation, and R-35 floor insulation.
- Construction in the initial phase of 12 one-bedroom units, eight two-bedroom units, and two three-bedroom single-family modular homes.
- Modification of existing water, sewer, power, and communications utilities. Site design will include detailed analysis of existing utilities.
- Construction of 25-foot-wide paved internal circulation roads with concrete curbs and 5-foot-wide paved sidewalks.
- Development of landscaping using indigenous low-water use plants and decomposed granite ground cover.
- Placement of overhead street lighting.
- Construction of a common area with picnic tables, barbeque pit, and shade structure.
- Maintenance, repair, and alternations to the housing and grounds. This may, at a minimum, consist of the following activities: repair, maintenance, or replacement of plumbing, lighting, and electrical systems or components; repair, maintenance, or replacement of landscaping elements, including vegetation, walls, lights, and irrigation systems; repair, maintenance, or replacement of building structural components (i.e., roof, doors, windows, or painting).

Project construction is proposed to begin in 2011.

Construction of the Preferred Alternative would occur in conformance with the Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding (MOU) of January 2006. The MOU seeks to establish and follow a common set of sustainable Guiding Principles for integrated design, energy performance, water conservation, indoor air quality, and materials aimed at helping federal agencies and organizations:

- Reduce the total ownership cost of facilities;
- Improve energy efficiency and water conservation;
- Provide safe, healthy, and productive built environments; and
- Promote sustainable environmental stewardship.

3.2.2 No Action Alternative

Under the No Action Alternative, the GSA would not construct new housing for CBP employees. Housing opportunities in the nearby communities of Lukeville, Why, and Ajo would continue to be limited and in short supply. The existing housing locations of personnel would continue to be in near and distance communities, including one-way commutes of 100–175 miles. Recruitment and retention of employees would continue to be hampered by the unavailability of local housing options. Lower success rates in recruitment and retention may affect the timetable to extend the hours of operation at the Lukeville POE. Lines to reenter the United States would continue to occur, causing substantial delays to motorists.

The No Action Alternative does not meet the project purpose and need to provide housing in sufficient numbers and types to accommodate the existing OFO and OBO staff growth and to locate new housing within a short commute of Lukeville and Why. In addition, this alternative does not meet the need that housing be rapidly deployable, durable, locally serviceable, climate appropriate, and affordable.

4.1 Ownership, Jurisdiction, and Land Use

The Preferred Alternative site is within the jurisdictional boundaries of Pima County in the unincorporated town of Ajo. Nearby land uses include residential single-family and multi-family housing to the north and south, a bed and breakfast to the south, a Pima County Regional Flood Control District detention basin to the east, and BLM-managed land to the west. The Preferred Alternative site is approximately one-half mile west of Ajo center (downtown) and approximately one-third mile from commercial businesses to the north along SR 85. The nearest school is approximately one-half mile east of the Preferred Alternative. The former Curley School, approximately one-quarter mile to the east, has been converted to apartments and art studios. No institutional or public service facilities (government services, police, fire) are adjacent to the Preferred Alternative (Pima County Assessor's Office 2010) (Figure 4).

Preferred Alternative

The Preferred Alternative would require the acquisition of approximately 12.74 acres of land from private owners. Twelve mobile home residences are on the Preferred Alternative site. Eight of the 12 existing mobile home residences are privately owned, and the ground space is leased to the individual tenants by the property owners. The remaining four mobile homes are leased by the CBP. The Preferred Alternative would require the acquisition of eight residences on the property, the relocation of the current residents, and the relocation of the four CBP tenants. The Preferred Alternative would not have an effect on land use because the property is currently used as residential housing and is zoned as mixed-dwelling by Pima County (Pima County Development Services 2010b). The CBP and the selected architectural firm will consult with Pima County Development Services during the design process. No change to surrounding transportation or circulation patterns would be required with the Preferred Alternative. There would be no encroachment on the adjacent BLM-managed lands. The Preferred Alternative would have no adverse impacts on land ownership, jurisdiction, or use.

No Action Alternative

The No Action Alternative would have no effect on current land ownership, jurisdiction, or land use at the Preferred Alternative site because no property acquisition would occur.

4.2 Title VI/Environmental Justice

Title VI of the Civil Rights Act of 1964 and related statutes ensure that individuals are not excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance on the basis of race, color, or national origin. Executive Order 12898 *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (1994) directs that federal programs, policies, and activities do not have disproportionately high and adverse human health and environmental effects on minority and low-income populations.

The 2010 Census is currently in progress. Census data will not be available to the public until April 2011, and reports for various data sets will be released from April 2011 through September 2013. Therefore, data from the 2000 U.S. Census (Census 2000a) were used for the analysis of

environmental justice concerns. Data specific to the area were evaluated to assess the demographic composition at the Census Tract (CT) and Block Group (BG) levels and were compared with the percentages of corresponding community, town, and county occurrences. The Preferred Alternative is in CT 50, BG 4.

Table 1 summarizes the demographic data obtained from the 2000 Census for the BG of interest (BG 4), the town of Ajo (CT 50), and Pima County. Demographic data are included for racial and ethnic minorities and persons living below the poverty level.

For environmental justice evaluations, a racial or ethnic minority population is an aggregate composed of the following categories: Black/African American, American Indian and Alaska Native, Asian, Native Hawaiian and Other Pacific Islander, Other Races, Two or More Races, and Hispanic. Table 1 lists the aggregate of these minority populations in the selected BG, Ajo and Pima County (Census 2000a).

In following Office of Management and Budget Directive 14, the Census Bureau uses a set of income thresholds that vary by family size and composition to determine the poverty level. If the total income for a family or unrelated individual falls below the relevant poverty threshold, the family or unrelated individual is classified as being "below the poverty level" (Census 2000b).

Data from the 2000 Census indicate that minority populations and persons living below the poverty level occur in the study area. Minority populations and persons living below the poverty level, however, do not represent a majority in the BG. The data indicate that the percentage of minority populations and persons living below the poverty level for the BG (39.1 percent) is slightly lower than the corresponding percentage for the town of Ajo (46.5 percent) and similar to the corresponding percentage for Pima County (38.9 percent). The percentage of minority or low-income citizens in the Preferred Alternative BG (15.7 percent) is slightly lower than the corresponding percentage for the town of Ajo (22.2 percent) and similar to the corresponding percentage for Pima County (14.7 percent).

Preferred Alternative

The Preferred Alternative would replace the 12 existing units on the property. Eight of the 12 units are not CBP-owned and would face permanent relocation, while the occupants in the remaining four units would only require temporary displacement. Relocating the population in eight units may slightly decrease the minority population during construction; however, upon completion, it is assumed that the minority population percentages would remain similar with the addition of CBP personnel. On the other hand, the percentage of the population living below the poverty level could be expected to decline because CBP personnel pay rates exceed the poverty level. Therefore, the Preferred Alternative is expected to have no adverse impacts on minority populations and a slight positive impact on the percentage of people living below the poverty level.

Table 1. 2000 total minority and total below poverty level.

Area	Total Population for Whom Total Minority Is Determined	Total Minority[a]		Total Population for Whom Poverty Is Determined	Below Poverty Level	
		#	%		#	%
CT 50, BG 4	1,080	431	39.9	1,080	170	15.7
CT 50, Ajo, Arizona	3,720	1,730	46.5	3,710	827	22.2
Pima County	843,746	325,764	38.6	823,638	120,778	14.7

Source: Census 2000a.

BG = Block Group, CT = Census Tract, # = No., % = Percentage.

[a] "Total Minority" is composed of all people who consider themselves Non-White racially plus those who consider themselves White Hispanic.

No Action Alternative

The No Action Alternative would have no impact on environmental justice populations because it would not involve any development of the Preferred Alternative site and would not cause any changes in minority population or the percentage of people living below the poverty level to occur in the project area.

4.3 Social and Economic Resources

Ajo had a population of approximately 4,350 in 2007, an increase of 16.9 percent since 2000 (3,720). Ajo was formerly a substantial mining town, with Phelps Dodge (formerly the New Cornelia Copper Co.) operating mining activities from the early 1910s until 1983. Since the end of mining operations in Ajo, the community has experienced a decline in population and economic base (Parkhurst 2001). The population of Ajo has declined from approximately 6,000 in the mid-1980s to approximately 4,350 in 2007 (City Data 2010). With the closing of the Ajo copper mine in 1983, the Ajo community and Pima County have worked in partnership to achieve the following goals: to redefine a vision for Ajo, to help create a new economic base, to attract new residents and visitors to build the community, and to find new funding and investment interests to reinvigorate this small, diverse, and dynamic town in unincorporated Pima County (Huckelberry 2010).

The economic base of Ajo is a mix of education, health and social services, arts and entertainment, recreation, accommodation and food service, public administration, retail trade, real estate, and rental and leasing.

Table 2 illustrates the six categories representing a majority the economic employment structure of Ajo compared with the same categories in Pima County and the State of Arizona (Census 2000a).

Table 2. Economic structure comparison.

Category*	Ajo	Pima County	Arizona
Education, health and social services	16.9	22.5	18.0
Arts and entertainment, recreation, accommodation and food service	15.3	10.5	10.1
Public administration	13.1	5.8	5.4
Retail trade	12.8	12.0	12.3
Real estate, rental and leasing	1.7	2.6	2.6

* Economic structure categories do not total 100 percent because not all U.S. Census 2000 industry categories were included.

The median household income of Ajo was $32,477 in 2008. By comparison, the median household income of Pima County was $46,599, and the median household income of the State of Arizona was $50,958 in 2008 (City Data 2010).

Preferred Alternative

The addition of up to 56 housing units in Ajo would contribute positively to the local economy. New residents would contribute economically to the Ajo business base by purchasing goods and services locally. Construction of the housing is expected to use local and outside contractors, though the extent of the distribution of labor and equipment is unknown at this time. The GSA will use a bid process to secure contractors for site preparation, infrastructure, construction, and housing/landscaping elements.

Upon completion of construction, the Preferred Alternative may reduce the number of CBP/OFO employees seeking to rent or purchase existing homes in Ajo. However, because CBP does not mandate housing requirements for its employees, employees are free to rent or purchase housing from private individuals regardless of the construction of CBP/OFO housing. The Preferred Alternative housing would be offered to CBP/OFO personnel at fair market rates and not discounted. With the near-term CBP/OFO staffing needs reaching approximately 410, the potential of 56 GSA/CBP-owned housing units will only satisfy a portion of overall demand. The Ajo real estate market would continue as an option for CBP personnel.

The Preferred Alternative would result in the displacement of the existing residents in eight units at the development site. Residents to be displaced would be compensated through the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. The GSA provided assistance in locating suitable replacement housing and compensated moving costs and other related expenses. All eight non-CBP residents have accepted relocation benefits and have found alternative housing.

In summary, the Preferred Alternative is expected to result in positive impacts to the local economy through construction activities and the attraction of long-term residents. A slight adverse impact is expected to the local housing market through the increase of additional units in the area. Minor adverse impacts are also expected due to the displacement of eight housing units; however, these impacts will only be temporary and will be offset through monetary compensation. In addition, the full brunt of this action would be attenuated through phasing the construction of the 56 units.

No Action Alternative

The No Action Alternative would not impact the local business economy of Ajo because no housing units would be constructed. CBP/OFO employees would still have the option to rent or purchase private properties in Ajo; however, there would be no guarantee that any CBP/OFO employees would choose to purchase or rent properties in Ajo. No housing units would be displaced.

4.4 Biological Resources

The biological resources study area consisted of the Preferred Alternative site and a visual survey of surrounding properties. Biological resources information was collected during a pedestrian

survey of the Preferred Alternative site on January 20, 2010. During the pedestrian survey, photos were taken, vegetation was recorded, and the likelihood for special status species occurrence was assessed based on habitat characteristics. Additional background information on the project area was obtained from aerial photos, topographic maps, Geographic Information System data, various natural history/biological texts, unpublished technical documents, and state and federal agency coordination and websites (EcoPlan Associates, Inc. 2010a).

The project area lies between approximately 1,800 feet and 1,840 feet in elevation[1] on terrain that descends to the northeast among rolling hills and low mountains on the southwestern edge of, but within the developed extent of, Ajo. Ajo lies at the northeastern foot of the Little Ajo Mountains, a low desert range in western Pima County. The project area lies at the northeastern foot of Camelback Mountain, one of the peaks that make up the Little Ajo Mountains, which rises to an elevation of nearly 2,440 feet within a half-mile to the southwest.

Soils in the project area are of the Lithic Camborthids–Rock Outcrop–Lithic Haplargids Association. This association consists of well-drained, shallow, gravelly and cobbly, moderately coarse to moderately fine-textured soils on gentle to steep slopes and rock outcrops on hills and mountains formed of residual materials weathered from granitic rocks, schists, volcanic tuffs and conglomerates, basalt, and some shale and sandstone (Hendricks 1985, Richard et al. 2000).

4.4.1 Vegetation

The native plant community of the project area is foothill paloverde–triangle-leaf bursage–brittlebush–dominated Arizona upland subdivision of Sonoran desertscrub (Turner and Brown 1994). Other common trees, shrubs, and cacti in the project area include saguaro, golden cholla, jumping cholla, Engelmann's hedgehog cactus, ocotillo, sangre de drago, creosote bush, desert wolfberry, desert ironwood, blue paloverde, organpipe cactus, and graythorn.

Nearly all of the native vegetation formerly occupying terrain within the limits of the original mobile home park was removed, probably at the time of initial construction in the late 1930s. Several ironwood trees persist as large, healthy trees. Some previously disturbed areas are reverting to native vegetation, including paloverde, creosote bush, and triangle-leaf bursage. Blue and foothill paloverde and velvet mesquite trees are common as native landscaping within the Preferred Alternative site. Small saguaros, organ pipe cacti, Leconte's barrel cacti, and ocotillo have also been incorporated into the landscaping of some occupied residences. Also occurring on disturbed terrain in the project area are scattered desertbroom and clumps of exotic buffelgrass.

4.4.2 Wildlife

No mammals or reptiles were observed during the January 20, 2010, survey. Mammals and reptiles that may be present include, but are not limited to, pocket mice, kangaroo rats, squirrels, woodrats, mule deer, javelinas, coyotes, side-blotched lizards, whiptail lizards, tree lizards, desert spiny lizards, zebra-tailed lizards, desert tortoises, gopher snakes, and rattlesnakes. Birds commonly seen in the area include ash-throated flycatchers, cactus wrens, Gambel's quail,

[1] Elevations in this document are referenced to mean sea level.

Gila woodpeckers, ravens, roadrunners, various sparrows, verdins, red-tailed hawks, and turkey vultures. No signs of nesting activity were observed during the survey.

4.4.3 Threatened and Endangered Species

The U.S. Fish and Wildlife Service (USFWS) list of endangered, threatened, proposed, and candidate species for Pima County, Arizona, was reviewed by a qualified biologist (EcoPlan Associates, Inc. 2010a) to determine which species may occur in the Preferred Alternative area.

The USFWS list of federally threatened, endangered, proposed, candidate, and conservation agreement species potentially occurring in Pima County are included in Appendix A. Appendix A also includes a brief assessment of each species' likelihood of occurrence in the Preferred Alternative area based on the species' range/distribution and habitat requirements. With the exception of the Acuña cactus and the lesser long-nosed bat, which are discussed in Table 3, these species are not expected to occur in the Preferred Alternative area.

Table 3. USFWS threatened, endangered, and candidate species with potential to occur in the Preferred Alternative area.

Name	Status	Habitat Requirements	Potential for Occurrence
Acuña cactus *Echinomastus erectocentrus* var. *acuñensis*	C	Restricted to granite substrates, well-drained knolls, and gravel ridges between major washes in Sonoran desertscrub habitat. Elevation: 1,300 to 2,000 feet.	The project area lies within the known distribution of this cactus. There are known locality records for the species within one mile of the project area. However, much of the project limits is disturbed, and no individuals of the species were detected during a survey of the project limits.
Lesser long-nosed bat *Leptonycteris curasoae yerbabuenae*	E	Desertscrub and semidesert grassland habitat with agave and columnar cacti present as food plants. Elevation: 1,600 to 11,500 feet.	Known maternity roost sites lie within the foraging range of the project area. The project area lies within suitable foraging habitat for the species including organ pipe and saguaro cacti representing, known food resource plants of the species. The species is likely to forage in the project area.

C = Candidate, E = Endangered (USFWS 2010)

4.4.4 Other Special Status Species

The Arizona Game and Fish Department (AGFD) On-line Environmental Review Tool was accessed to determine special status species known to occur within 3 miles of the Preferred Alternative site. Two special status species occur in the area and are evaluated in Table 4. Special status species are identified by federal and state agencies to conserve rare species, avoid future federal threatened or endangered status, and avoid impacts during construction activities. These species are not listed as federally threatened, endangered, proposed, or candidate species.

Preferred Alternative

Vegetation

The Preferred Alternative would result in removal of most of the existing vegetation at the Preferred Alternative site. The exception will be the vegetation adjacent to the two washes on the north and south sides of the property. No vegetation removal is anticipated in or adjacent to these

washes. Other than the native vegetation along the two washes that border the site, the remaining vegetation on the site is limited, and much is associated with landscaping. For this reason and because there are no plans to remove the native vegetation that line the two washes, native plant removal resulting from implementation of the Preferred Alternative would be limited.

No threatened or endangered plants are known to occur at the Preferred Alternative site. Removal of mature native tree and cactus species would be subject to the Arizona Native Plant Law administered by the Arizona Department of Agriculture (AZDA) and the Pima County Protected Plant Ordinance. Native plant removal would be minimized to the extent practicable. The construction contractor would be required to contact AZDA at least 60 calendar days prior to construction to arrange for proper native plant treatment. The Preferred Alternative is expected to have no adverse impacts to any threatened or endangered plants.

Wildlife

Clearing and grading of the Preferred Alternative site is likely to result in some displacement of small reptiles, mammals, and birds, and could injure or kill small reptiles and mammals if present during these activities. Species likely to be displaced, injured, or killed are common and widely distributed and, as a result, construction of the Preferred Alternative would not appreciably impact the size or future viability of their populations. The Preferred Alternative is unlikely to alter existing wildlife movement patterns or result in substantial fragmentation of habitat.

Table 4. Other special status species occurring within 3 miles of the project area and the potential effects of the Preferred Alternative on these species.

Species	Habitat	Potential Occurrence	Potential Effect
Reptiles			
Sonoran Desert tortoise *Gopherus agassizii*	Prefer terrain above the valley floor on rocky bajadas and hillsides within Sonoran desertscrub where natural shelter sites (caves, rock piles, pack rat nests, dense vegetation) provide suitable retreats and hibernation sites. (Brennan and Holycross 2006). Elevation: 500–5,300 feet.	The project area lies in foothill paloverde–triangle-leaf bursage–brittlebush–dominated rolling to low mountainous terrain within the known distribution of the species. AGFD (2010) indicates that HDMS has numerous records of desert tortoises within 1 mile of the subject property. Peter Holm (OPCNM, personal communication), whose residence in Ajo lies within one-half mile of the project area, has observed tortoises on undisturbed BLM lands southwest of Ajo. He estimates that adjacent BLM lands support a "normal" population (i.e., sufficiently dense to support a reproductive population) of desert tortoises right up to the edge of town.	The Preferred Alternative is highly disturbed and would not be expected to support desert tortoises. However, the proximity of the property immediately adjacent to undisturbed BLM land where tortoises are known to occur indicates the potential that foraging tortoises could travel from adjacent habitat to the Preferred Alternative site, perhaps using natural and artificial objects and structures as shelter sites. Project construction may impact individual desert tortoises but will not lead to a trend toward federal listing or loss of viability.

Species	Habitat	Potential Occurrence	Potential Effect
Mexican rosy boa *Lichanura trivirgata trivirgata*	Prefer rocky or boulder-strewn slopes in rolling to low mountainous, often rocky terrain within Sonoran and Mohave desertscrub, and Interior Chaparral (Brennan and Holycross 2006). Elevation: 200 to >5,000 feet.	The Preferred Alternative site lies in foothill paloverde–triangle-leaf bursage–brittlebush–dominated rolling to low mountainous terrain within the known distribution of the species. Sabra Schwartz (AGFD, personal communication) indicates that HDMS has numerous records of Mexican rosy boas within one mile of the Preferred Alternative site. An OPCNM (2010) employee whose residence in Ajo lies within one-half mile of the project area has observed boas on roads within residential neighborhoods in Ajo near his house. He estimates that adjacent undisturbed BLM lands support a "normal" population (i.e., sufficiently dense to support a reproductive population) of rosy boas right up to the edge of town.	Proximity of the Preferred Alternative site immediately adjacent to undisturbed BLM land where boas are known to occur and observations of boas crossing roads within residential neighborhoods within Ajo near the Preferred Alternative site indicate the potential for foraging boas to travel from adjacent habitat to the Preferred Alternative site, perhaps using natural and artificial objects as shelter sites. Despite the highly disturbed nature of the Preferred Alternative site, boas using rodent burrows and artificial shelter sites may potentially occur on the Preferred Alternative site. Project construction may impact individual Mexican rosy boas but will not lead to a trend toward federal listing or loss of viability.

AGFD = Arizona Game and Fish Department, BLM = Bureau of Land Management, HDMS = Heritage Data Management System, OPCNM = Organ Pipe Cactus National Monument

Threatened and Endangered Species

The Preferred Alternative would result in removal of most vegetation at the Preferred Alternative site (except along the previously noted washes), including potential foraging habitat of the lesser long-nosed bat. Only minimal foraging habitat was observed during a survey of the Preferred Alternative site. Saguaro or organ pipe cacti observed on the Preferred Alternative site appear to be part of residential landscaping.

As mitigation for the lesser long-nosed bat, any saguaros and organ pipe cacti occurring within areas disturbed by project construction shall be salvaged and incorporated into landscaping of the Preferred Alternative site. The Preferred Alternative would not adversely affect the lesser long-nosed bat or its habitat.

No Acuña cactus was observed at the Preferred Alternative site. The Preferred Alternative would not adversely impact the Acuña cactus.

BLM Sensitive Species and USFWS Species of Concern

The Preferred Alternative may have minor adverse impacts to individual Mexican rosy boas and Sonoran Desert tortoises but will not lead to a trend toward federal listing or loss of viability.

The AGFD provides "Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects." These guidelines include the following recommendations:

- The contractor shall employ a qualified biologist to complete preconstruction surveys for Sonoran Desert tortoises and to conduct a Sonoran Desert tortoise awareness program. Preconstruction surveys for Sonoran Desert tortoises shall be conducted within 48 hours prior to construction in areas that will be disturbed.
- If any Sonoran Desert tortoises are encountered during construction, the contractor shall adhere to the AGFD "Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects," revised October 23, 2007.

No Action Alternative

Vegetation

The No Action Alternative would not have any impact on vegetation because it would not involve any development.

Wildlife

The No Action Alternative would not have any impact on wildlife because it would not involve any development.

Threatened and Endangered Species

The No Action Alternative would not have any impact on threatened and endangered species because it would not involve any development.

BLM Sensitive Species and USFWS Species of Concern

The No Action Alternative would not have any impact on BLM sensitive species because it would not involve any development.

4.5 Cultural Resources

Cultural resources are sites, buildings, structures, districts, and objects as defined by the National Historic Preservation Act (NHPA), as amended. Cultural resources included in, or eligible for inclusion in, the National Register of Historic Places (NRHP) are termed "historic properties" regardless of their age. "Traditional cultural properties" having heritage value for contemporary communities (often, but not necessarily, Native American groups) also can be listed in the NRHP because of their association with historic cultural practices or beliefs that are important in maintaining the cultural identities of such communities.

Section 106 of the NHPA requires federal agencies to take into account the effects of their activities and programs on NRHP-eligible properties. Regulations for *Protection of Historic Properties* (36 CFR Part 800) define a process for federal agencies to consult with the State Historic Preservation Office (SHPO), Native American groups, other interested parties, and when appropriate, the Advisory Council on Historic Preservation (ACHP) to ensure that historic properties are duly considered as federal projects are planned and implemented. The steps in the "Section 106 consultation process" involve:

- Identifying the area where a proposed undertaking could affect cultural resources—the area of potential effects. (Undertakings can include approvals, funding, issuance of permits, and so forth.)
- Identifying and evaluating the eligibility for listing in the NRHP of properties that might be affected by the proposed undertaking.
- Assessing the potential effects of the undertaking on eligible properties.
- Consulting with SHPO, Native American groups, other interested parties, and the ACHP, as appropriate, to determine ways to avoid or reduce any adverse effects (impacts) if such are anticipated.
- If necessary, providing the ACHP a reasonable opportunity to comment on the proposed undertaking and the effects on properties determined to be eligible for NRHP listing.
- Proceeding with the undertaking under the terms of a Programmatic Agreement, a Memorandum of Agreement, or in consideration of ACHP comments, if required. If a federal agency decides a proposed action is an "undertaking," the agency has an obligation to determine the undertaking's effect on historic properties and to consult with SHPO (and sometimes the ACHP) regarding that determination. There are three possible effect determinations:

  – "No historic properties affected"

  – "No adverse effect"

  – "Adverse effect"

Executive Order (EO) 13006 mandates that "the Federal government shall utilize and maintain, wherever operationally appropriate and economically prudent, historic properties and districts, especially those located in our central business areas." The EO also directs that federal agencies "shall give first consideration to historic properties within historic districts."

Based on the GSA Public Building Service—Urban Policy Update, Issue 1, May 2000, the GSA has concluded that EO 13006 is not applicable to this project. The focus of this EO is on our nation's central cities and "urban areas." The Office of Management and Budget defines an urban area as (1) within the jurisdiction of any incorporated city, town, etc., with a population greater than 10,000 or (2) within or adjacent to a city, town, etc., with a population density of 1,500 inhabitants or more per square mile. The community of Ajo meets neither criterion.

Preferred Alternative

A review of a historical and archaeological records database maintained by the Arizona State Museum was conducted. No archaeological or architectural surveys have been conducted at the Preferred Alternative site and, as such, there are no known archaeological or historical resources on the properties. The Ajo Townsite Historic District, which is on the National Register of Historic Places, was identified as near the Preferred Alternative site (GSA 2010, Huckelberry 2010). The GSA determined the undertaking (project) will not have an affect on the Ajo Townsite Historic District and is therefore not included in the Area of Potential Effects (APE). The GSA also determined there are no historic properties within the APE. Except for one outbuilding, current structures are modern modular homes. The outbuilding is a previous office associated with prior military housing dating to the 1940s. The building is not associated with the Ajo Townsite, has been abandoned for decades, and has no integrity of design, setting, materials, workmanship, feeling, or association; therefore, no further evaluation of eligibility is warranted.

Consultation under Section 106 of the National Historic Preservation Act was initiated with a determination that there are no historic properties present within the APE (see consultation letter and consulted parties in Appendix B). SHPO concurred with the finding of "no historic properties present" on November 23, 2010 (letter attached in Appendix C). Consultation also included the Pascua Yaqui Tribe, the Tohono O'odham Nation, the Hopi Tribe, the San Carlos Apache Tribe, the White Mountain Apache Tribe, the Advisory Council on Historic Preservation, U.S. Customs and Border Protection, and the Ajo Historical Society Museum. No responses were received from noted parties other than SHPO.

No Action Alternative

The No Action Alternative will have no impacts on archaeological or historic properties because no development will occur.

4.6 Air Quality Analysis

The 1990 Clean Air Act, its amendments, and NEPA require that air quality impacts be addressed in the preparation of environmental documents. The U.S. Environmental Protection Agency (EPA) established National Ambient Air Quality Standards (NAAQS) for six "criteria" pollutants: carbon monoxide, nitrogen dioxide, ozone, particulate matter, sulfur dioxide, and lead. Primary and secondary standards for NAAQS have been established for most of the criteria pollutants. The EPA is authorized to designate those locations that have not met the NAAQS as nonattainment and to classify these nonattainment areas according to their degree of severity.

The Ajo area is classified as nonattainment for particulate matter less than 10 microns in diameter (PM_{10}) due to unstable mine tailings and paved and unpaved roads in the dry climate. In 2006, the EPA issued a Clean Data Finding (71 Federal Register 6352, February 8, 2006) for Ajo. The Arizona Department of Environmental Quality (ADEQ) is currently developing an attainment demonstration and maintenance plan in support of redesignation to attainment (ADEQ 2010). In 2004, the EPA redesignated the Ajo area as an attainment area for sulfur dioxide (68 Federal Register 62239).

Federally funded projects are subject to the General Conformity Rule. The General Conformity Rule requires that actions taken by federal agencies in nonattainment and maintenance areas do not interfere with a state's plans to meet national standards for air quality.

Preferred Alternative

The Preferred Alternative would have some short-term deterioration of air quality due to construction activities. Construction-related effects of the project would be limited to short-term increased fugitive dust and mobile-source emissions during construction. Short-term increases in fugitive dust would not be expected to affect the area PM_{10} nonattainment status. The moving and handling of soil during construction would increase the potential for emissions of fugitive dust; however, any deterioration of air quality would be a localized, short-term condition that would be discontinued when the project is completed and disturbed soils have been stabilized or permanently covered. The addition of residential housing does not constitute a point source, and the small scale of the Preferred Alternative would not result in substantial traffic generation. All internal circulation roads would be paved, and undeveloped areas would be stabilized with landscaping or decomposed granite.

Construction vehicle exhaust and dust generation would be expected. Proper construction control measures, including site watering, using a gravel pad to reduce carrying material off-site, limiting access points, limiting construction vehicle speed, and ensuring a limited disturbed surface area at one time, are typical dust abatement measures. Long-term air quality impacts would not be expected as a result of the Preferred Alternative. Under the Preferred Alternative, the project would be subject to Pima County Air Quality Control Ordinances and require completion of an Air Quality Activity Permit Application for construction (Pima County Department of Environmental Quality 2010). The Preferred Alternative is expected to have short-term minor adverse impacts for fugitive dust and slightly positive long-term impacts for fugitive dust due to paving and stabilizing much of the development site.

Another potential contribution to air emissions would result from vehicle miles traveled for employees commuting from Ajo to Lukeville. The number of CBP employees that would occupy the proposed housing would range from 22 to 56 if the project were fully built. Because many employees currently commute to work from much greater distances than Ajo (e.g., Phoenix, Tucson, and Gila Bend), the project would be expected to result in fewer miles traveled by CBP personnel, reducing associated air emissions. A quantitative analysis of vehicle miles traveled and air quality emissions generated is not warranted because the impact of the project would be beneficial.

No Action Alternative

The No Action Alternative would have minimal to no effect on air quality because it would not involve any development. Currently undeveloped portions of the Preferred Alternative site contain open, exposed soil areas and deteriorated pavement subject to dust generation.

4.7 Noise Analysis

The Noise Control Act of 1972 (42 U.S.C. 4901) found "that inadequately controlled noise presents a growing danger to the health and welfare of the Nation's population, particularly in urban areas; that the major sources of noise include transportation vehicles and equipment,

machinery, appliances, and other products in commerce; and that, while primary responsibility for control of noise rests with State and local governments, Federal action is essential to deal with major noise sources in commerce control of which require national uniformity of treatment." The Noise Control Act of 1972 was amended by the Quiet Communities Act of 1978 (42 U.S.C. 4913) to promote the development of effective state and local noise control programs, to provide funds for noise research, and to produce and disseminate educational materials to the public on the harmful effects of noise and ways to effectively control it.

Noise-sensitive receptors are land uses associated with indoor or outdoor activities that may be subject to stress or substantial interference from noise. These generally include residences, hotels/motels, nursing homes, schools, and libraries.

Noise-sensitive receptors identified in the area of the Preferred Alternative site include a bed and breakfast adjacent to the south side of the site and residential dwellings north, south, east, and west of the site. No schools, libraries, hospitals, or public facilities (parks, recreational areas, and service offices) are in the vicinity of the Preferred Alternative site.

Preferred Alternative

The Preferred Alternative would not result in the generation of noise other than short-term increases in noise levels from construction equipment and activities. Construction activities would be limited to daylight hours and, therefore, would not affect ambient noise levels at night in surrounding residential areas. Noise levels related to construction would be temporary and only last for the duration of construction activities. Residential construction activities in the State of Arizona and Pima County are not governed by any noise-related ordinances. Internal combustion engines used for any purpose on the Preferred Alternative or related to work on the Preferred Alternative shall be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine shall be operated without its muffler being in good working condition. The Preferred Alternative would have minor adverse impacts on noise that would last only during construction. With the Preferred Alternative, future land use at the site would be similar to the existing land use, and no increase in residential density is anticipated. Any noise generated by future occupants of the housing development would be expected to be similar to that generated in nearby residential neighborhoods.

No Action Alternative

The No Action Alternative would not have noise impacts because it would not involve any development.

4.8 Visual Resources

Visual resources consist of the natural and man-made landscape features that give a particular environment its visual characteristics. The Preferred Alternative site is not in an area subject to any local, state, or federal agency visual quality objectives. BLM-managed land adjacent to the west side of the Preferred Alternative site is subject to visual quality objectives. The BLM-managed land adjacent to the Preferred Alternative site is classified as Class IV (BLM 2005). The level of change to the characteristic landscape can be high in Class IV and remain consistent with the BLM visual quality objectives. This class is typically adjacent to urban areas and

recognizes that major modifications to visual landscapes are expected. No additional visual resources were identified in the Preferred Alternative site area.

Preferred Alternative

The Preferred Alternative would not have an impact on visual resources. The Preferred Alternative site is currently developed and zoned as residential. The addition of a housing development is in keeping with the current and former uses of the property. Development of the site is not in conflict with the adjacent BLM visual quality objectives. The Preferred Alternative would not result in adverse impacts to visual resources.

No Action Alternative

The No Action Alternative would not have an effect on visual resources because no visual resources were identified and no development or changes to the current land use would take place.

4.9 Water Resources

4.9.1 Clean Water Act Section 404

The U.S. Army Corps of Engineers (Corps) regulates the discharge of fill material to Waters of the United States, pursuant to Section 404 of the Clean Water Act (CWA), and issues permits for actions proposed within such waters. Jurisdictional, non-tidal Waters of the United States regulated by the Corps are defined in 33 CFR 328.4 (c) as those that compose the area of a water course that extends up to the ordinary high water mark in the absence of wetlands.

The Preferred Alternative site is bordered on the north and south by two unnamed ephemeral washes. The drainages are dry except during times of heavy rainfall. The northern wash (running southwest to northeast along the northern portion of the 801–841 Esperanza Avenue parcels) drains to a culvert passing under Montecito Street on the east side of the property. The southern wash (running west to east along the southern boundary of the 55 S. Sahuaro St. parcel) drains to a Pima County Flood Control District retention basin adjacent to the east side of the Preferred Alternative site (Figure 4).

According to the Pima County Regional Flood Control District, the wash along the southern boundary of the Preferred Alternative site supports Xeroriparian D habitat regulated by the county (Ruther 2010).

Preferred Alternative

A formal assessment of the potential jurisdictional limits of the two washes on the Preferred Alternative site would be required prior to construction activities if construction activities are proposed to encroach on or impact the washes. Based on planning level site development information, no construction has been identified within the washes. Through the development of detailed site plans and engineering, a review of potential encroachment on the washes would occur. If encroachment is proposed the preparation of a Jurisdictional Delineation and evaluation of the need for a CWA permit will be required.

No Action Alternative

No assessment of Section 404 of the CWA would be required under the No Action Alternative because no development would take place.

4.9.2 Clean Water Act Section 401

Under Section 401 of the CWA, the ADEQ reviews activities for water quality compliance. Section 401 establishes a framework through which states and tribes can develop a water quality certification process to ensure that standards will not be violated by discharge activities. Section 401 certification is required for any action regulated under Section 404. State water quality certification is not required if no Section 404 permit is needed. As noted above, Section 401 would apply only if a Section 404 permit is needed.

4.9.3 Clean Water Act Section 402

CWA Section 402 authorizes the national and state pollutant discharge elimination system programs. These permit programs are intended to maintain water quality by regulating discharges of pollutants into surface waters, including sediment and pollutants that can be generated during ground-disturbing activities and transported by storm water runoff.

Preferred Alternative

The Preferred Alternative would disturb more than one acre of land. The contractor would be required to complete an Arizona Pollutant Discharge Elimination System (AZPDES) Construction General Permit, including a Notice of Intent and a Notice of Termination. In accordance with AZPDES, a Storm Water Pollution Prevention Plan (SWPPP) would need to be developed and implemented for the project. The SWPPP would specify control measures to reduce soil erosion while containing and minimizing the release of construction pollutants.

No Action Alternative

No AZPDES permit or SWPPP would be required under the No Action Alternative because no development would take place.

4.10 Floodplains

EO 11998 (Floodplain Protection) requires federal agencies to avoid or minimize development in the floodplain except where there are no practicable alternatives. Federal Emergency Management Agency (FEMA) regulations related to the implementation and enforcement of EO 11998 are set forth in 44 CFR Chapter 1 (10-1-03 Edition). A review of the FEMA Flood Insurance Rate Map (FIRM) for the Preferred Alternative site indicates that the Preferred Alternative site is not in a 100-year or 500-year floodplain. FIRM Map Number 04019C1255K (FEMA 1999) encompasses the Preferred Alternative site.

Preferred Alternative

The Preferred Alternative would have no impact on floodplains because the Preferred Alternative site is not in a 100-year or 500-year floodplain.

No Action Alternative

The No Action Alternative would have no impact on floodplains because no development would occur.

4.11 Hazardous Materials

4.11.1 Phase I Environmental Site Assessment

A Phase I Environmental Site Assessment (ESA) was prepared for the Preferred Alternative site in February 2010 by EcoPlan Associates, Inc. (EcoPlan 2010b). The main objective of the ESA was to identify *recognized environmental conditions* in connection with the site, defined in the American Society for Testing and Materials (ASTM) Standard Practice E1527-05 (ASTM International 2005) as the presence or likely presence of any hazardous substances or petroleum products that indicate an existing release, a past release, or a material threat of a release.

The ESA includes a summary of state and federal environmental databases, including the Arizona Superfund Program; the Comprehensive Environmental Response, Compensation, and Liability Act; leaking underground storage tanks; the National Priority Lists (for Superfund); and the Water Quality Assurance Revolving Fund. A review of these and additional databases revealed no hazardous materials concerns for the Preferred Alternative site or its immediate surroundings.

From at least the late 1930s or the early 1940s, the Preferred Alternative site was developed with a federal government housing project for military housing. Surrounding properties to the north were primarily occupied by residential development from the late 1800s or early 1900s. Residential development to the south dates from at least the 1960s. Properties to the west were primarily undeveloped until the 1990s. The federal government housing project residences were razed in portions beginning in the 1970s. The current residential mobile homes at the site were constructed between 1997 and 2005.

The ESA identified no evidence of *recognized environmental conditions* in connection with the Preferred Alternative site.

Preferred Alternative

Construction of the Preferred Alternative would not adversely impact any known *recognized environmental conditions* or any potential hazard to human health. If *recognized environmental conditions* are encountered at the Preferred Alternative during construction, appropriate measures for the proper assessment, remediation, and Preferred Alternative site management of the contamination would be initiated in accordance with applicable federal, state, and local regulations. The contractor would take appropriate measures to prevent, minimize, and control hazardous materials, if necessary, during construction.

No Action Alternative

The No Action Alternative would have no impact on areas of *recognized environmental conditions* or create any potential hazard to human health because no development would occur.

4.11.2 Asbestos-Containing Material

The purpose of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) program is to protect public health from exposure to Regulated Asbestos-Containing Material (RACM) during NESHAP facility renovation/demolition activities, asbestos removal, and transport and disposal, and closely monitor those activities for proper notification and asbestos emissions control. Asbestos is known to cause cancer and other respiratory diseases in humans. Asbestos is not considered a *recognized environmental condition* under ASTM Standard Practice E1527-05.

Under Section 112 of the Clean Air Act, Congress gave the EPA the responsibility for enforcing regulations relating to asbestos renovations and demolitions activities. The Clean Air Act allows the EPA to delegate this authority to state and local agencies. The asbestos NESHAP program in Arizona is enforced by federal, state, and county agencies.

The Pima County Department of Environmental Quality (PDEQ) has NESHAP jurisdiction for asbestos in Pima County. The PDEQ administers the asbestos program under Title 17 of the Pima County Code. The asbestos NESHAP has been adopted by reference in Section 17.16.530. The program's intent is to minimize the release of asbestos fibers during activities involving the processing, handling, and disposal of asbestos-containing material. Accordingly, the asbestos NESHAP specifies work practices to be followed during demolitions and renovations of all structures, installations, and buildings. A survey for potential RACM was not conducted at the Preferred Alternative site. Potential RACM at the Preferred Alternative site could include, but is not limited to, building foundations, structures, culverts, and utility installations.

Prior to beginning renovation or demolition activities of a facility, a certified Asbestos Hazard Emergency Response Act building inspector must thoroughly inspect the facility or part of the facility where the renovation or demolition operation would occur for the presence of asbestos, including friable and non-friable asbestos-containing materials. For all demolitions (even when no asbestos is present) and renovations activities involving threshold amounts of RACM, the operator will provide PDEQ with a NESHAP notification at least 10 working days prior to the demolition or renovation activity.

Preferred Alternative

A survey for potential RACM was not conducted at the Preferred Alternative site. As such, the potential presence of RACM is unknown. Under the Preferred Alternative, potential RACM should be tested prior to demolition, and an asbestos NESHAP notification should be provided to the PDEQ 10 days prior to demolition activities.

No Action Alternative

Under the No Action Alternative, a NESHAP notification would not be required because no demolition or renovation would occur.

Cumulative impacts are defined in 40 CFR 1508.7 as "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time."

The level and scale of the cumulative analysis should be commensurate with the proposed project's potential impacts, scale, and other factors. NEPA documents consider those past, present, and future actions that incrementally contribute to the cumulative effects on resources affected by the proposed action.

There are currently no additional GSA or CBP plans or funding to acquire land or provide housing in the Ajo area beyond the Preferred Alternative. The maximum number of residential units that could be built at the Preferred Alternative site is 56. The units beyond the initial proposed 22 units could be built over an extended period of time, depending on funding availability.

Other known federal projects in the area include improvement to the Lukeville POE (adding traffic flow lanes and inspection booths), planned for 2010–2011; expansion of Ajo Station in Why, planned for 2011; and the ongoing U.S.–Mexico border fencing projects. The Lukeville POE and Ajo Station expansions contribute to the need for housing that could not be met by the 56 total units. Those projects are 7 to 40 miles from the Preferred Alternative site.

The Pima County Department of Transportation is planning an Ajo Historic Depot Restoration Project for 2010–2011. The depot is approximately one-half mile east of the Preferred Alternative site. There are no known subdivision plans or building permits in the vicinity of the Preferred Alternative site (Pima County Development Services 2010).

The above actions are all subject to individual environmental review and analysis, are dispersed in location, and feature a wide range of improvement types (roads, government complexes, fences, and building renovations).

There are no reasonably linked past actions associated with the Preferred Alternative. The Pima County Regional Flood Control District project to construct the detention basin adjacent to the Preferred Alternative site occurred circa 2008. Conversion of the closed Curley School to apartments and art studios occurred in 2007. Former government housing on the Preferred Alternative site was demolished in the 1970s.

The project would not affect sensitive or critical resources, lead to a wide range of effects, induce population growth, lead to further development, or require expansion of development infrastructure. Impacts from implementation of the Preferred Alternative are expected to be negligible on a cumulative basis, except for the minor localized effects on air quality, noise, and visual resources during construction.

6.1 Agency Coordination

Letters were mailed to the following 17 federal, state, and local organizations on April 20, 2010 (see Appendix B, Scoping Letter and Mailing List):

- Bureau of Land Management
- U.S. Fish and Wildlife Service
- Arizona Department of Public Safety
- Arizona Game and Fish Department
- Pima Association of Governments
- Pima County Administrator
- Pima County Board of Supervisors
- Pima County Department of Community Development and Neighborhood Conservation
- Pima County Department of Environmental Quality
- Pima County Department of Natural Resources, Parks and Recreation
- Pima County Development Services
- Pima County Regional Flood Control District
- Pima County Sheriff's Department
- Ajo Fire Department
- Ajo Unified School District #15
- Ajo Historical Society Museum
- International Sonoran Desert Alliance

6.1.1 Agency Responses

See Appendix C for copies of agency responses to the GSA.

USFWS

The USFWS contacted EcoPlan by phone on June 9, 2010, and stated that its only comment on the housing project is that no nonnative or invasive species should be used in landscaping the Preferred Alternative.

GSA response: Landscaping plans have not been developed to date. The GSA intends to use native plants in landscaping.

Arizona Game and Fish Department

The AGFD contacted the GSA via letter on April 30, 2010, and stated that the Sonoran pronghorn, the Acuña cactus, and the Sonoran Desert tortoise may be within 3 miles of the project site.

GSA response: These species are discussed in Section 4.4.

Pima County Development Services

Pima County Development Services contacted EcoPlan via phone on April 26, 2010, and inquired whether the project was proposed to be constructed on government-owned land or whether it would purchase private land for the project.

GSA response: The Preferred Alternative would require purchase of private land.

The GSA received a letter from the Pima County Development Services Office dated May 19, 2010. The letter outlined the following Pima County concerns:

- Department of Transportation
  - Right-of-way use permits and air quality permits should be obtained from Pima County, as needed, for any construction extending into the right-of-way.

    GSA response: Design plans have not been developed to determine connection to the Pima County roadway system. During design, the GSA will coordinate with Pima County.

- Pima County Regional Flood Control District
  - A county-regulated wash runs along the southern boundary of the parcel, with associated Xeroriparian D habitat that is regulated by the county.
  - The district can provide the official riparian habitat maps and the drainage report prepared for the construction of the Curley School Basin to the east.

    GSA response: Based on planning-level project design, no encroachment on the south wash would occur. The GSA will coordinate design plans with the Pima County Regional Flood Control District.

- Pima County Planning
  - The design and architecture of the housing units should be compatible with the first and second historically platted additions to the Ajo Townsite Historic District.

    GSA response: The GSA will address this issue during the design process and coordinate with Pima County Planning.

- Cultural Resources Department
  - The proposed development is a federal undertaking and is subject to Section 106 of the NHPA.
  - Federal agencies are encouraged to coordinate compliance with Section 106 of the NHPA.

– EO 13006 directs federal agencies to use and maintain historic properties and districts wherever economically prudent and operationally appropriate.

– The Ajo Townsite Historic District, which is listed on the National Register of Historic Places, is in close proximity to the Preferred Alternative site. The effects of the proposed development, direct and indirect, must be assessed as part of NHPA and NEPA compliance.

– A portion of the Preferred Alternative site is within the second historically platted addition to the Ajo Townsite Historic District, and the remainder of the site is adjacent to the first and second historically platted additions. The GSA will need to evaluate the eligibility of the two additions and assess the effects of the proposed development on them should they be eligible.

– The Preferred Alternative site has not been inventoried for historic properties.

– The GSA is expected to initiate and conclude consultation with SHPO as part of its compliance requirements under NEPA.

– The county's Office of Cultural Resources and Historic Preservation (OCRHP) requests that GSA actively and comprehensively include OCRHP in the planning, review, evaluation of significance, and assessments of effects regarding historic properties within, adjacent to, and in close proximity to the Preferred Alternative site.

GSA response: The GSA determined that there are no historic properties present and that the undertaking will not have an effect on the Ajo Townsite. Section 106 consultation was initiated on October 27, 2010 (letter, Appendix B). EO 13006 is not applicable to this project. No acquisition within the historic district would occur, and it is not economically prudent or operationally feasible to purchase scattered single-family homes within the historic district to meet the purpose and need of the project.

Pima County Cultural Resources and Historic Preservation Office

The OCRHP participated in a conference call with the GSA on May 4, 2010, to discuss the project specifics and to supply information relating to the Ajo Townsite Historic District.

Pima County Administrator's Office

The GSA received a letter dated May 10, 2010, from the Pima County Administrator's Office. The letter outlined the following concerns:

- Under what mandate does the CBP provide housing to its employees?

  GSA response: Discussed in Chapter 2.

- How many CBP employees do you anticipate needing to accommodate?

  GSA response: Approximately 410 employees. Discussed in Chapter 2.

- Please provide any housing studies that demonstrate this shortage.

  GSA response: See Chapter 9 (Garrison Architects 2009 and CBP 2010).

- How have agencies, tribes, and the public been involved in the early planning process to identify the Ajo housing project as the proposed undertaking?

GSA response: Discussed in Chapter 6.

- Which agencies, tribes, and community organizations were contacted, and when did the early planning take place?

  GSA response: Discussed in Chapter 6.

- What is the cumulative scope of current, proposed, and future operations in western Pima County?

  GSA response: Discussed in Chapter 2.

- What alternatives are being considered?

  GSA response: Discussed in Chapter 3.

- Why are modular units the only housing type being considered?

  GSA response: The project needs require rapidly deployable housing. Discussed in Chapter 2.

- Why is the rehabilitation of existing historic buildings and other housing stock not being considered as an alternative?

  GSA response: Discussed in Chapter 3.

- EO 13006, Locating Federal Facilities on Historic Properties in Our Nation's Central Cities, states that federal agencies "shall give first consideration to historic properties within historic districts … or other developed or undeveloped sites within historic districts." How is the GSA complying with EO 13006?

  GSA response: EO 13006 is not applicable to this project. No acquisition within the Historic District would occur, and it is not economically prudent or operationally feasible to purchase scattered single-family homes within the Historic District to meet the purpose and need of the project.

- Should the Ajo location be selected, we feel direct investment in Ajo by the GSA has the potential to provide a large economic benefit to the community, bring new residents and employment opportunities to the town, and expand the community's economic base.

  GSA response: The GSA agrees.

- If historic homes and buildings within the Ajo Townsite Historic District are rehabilitated by the GSA, the built environment and fabric of the community will be greatly enhanced.

  GSA response: No acquisition is proposed within the Historic District.

- If new architecturally compatible housing is developed within the Ajo Townsite Historic District on undeveloped lots, the character of the surrounding Ajo Townsite Historic District and other properties will be greatly enhanced.

  GSA response: The GSA is not proposing any housing within the Historic District.

- How will the GSA expenditures for this project directly benefit the Ajo community? What economic assessments are planned?

  GSA response: Discussed in Section 4.3.

Office of Congressman Raul Grijalva

The Office of Congressman Grijalva contacted the GSA via e-mail on June 6, 2010. The e-mail outlined the following:

- GSA is in the process of acquiring property in Ajo that is to be used for manufactured homes for Border Patrol agents. Community members are concerned that these actions will keep Border Patrol agents in an enclave and prevent them from integrating into the Ajo community. In moving forward with the Ajo project, we encourage the GSA to continue prioritizing the integration of Border Patrol in the community. Furthermore, the idea of bringing manufactured homes to the City of Ajo is of concern. Ajo's unemployment rate is at an average 14 percent, significantly above the county, state, and national average. The need for local jobs is great, and we would urge the GSA to invest current efforts in the community. Instead of bringing manufactured homes, we encourage you to build homes or perhaps even renovate vacant homes.

  GSA response: See Appendix C for response letter.

6.2 Public Involvement

6.2.1 Scoping Process

Scoping outreach included notices in the general distribution newspaper serving the Ajo area, the *Ajo Copper News*, as well as a direct letter to leaseholders at the 55 S. Sahuaro St. property and adjacent property owners of the 55 S. Sahuaro St. and 801–841 W. Esperanza Ave. parcels. See Appendix B for a copy of the scoping letter and the mailing list.

6.2.2 Newspaper Notice

A notice to the public was published in the *Ajo Copper News* on February 17, 2010; February 24, 2010; and March 4, 2010. The notice summarized the purpose and need for the CBP housing in Ajo, contained a map depicting the location of the Preferred Alternative site, and invited interested parties to a 7 p.m. meeting on March 4, 2010, at the Ajo Community Center. See Appendix D for a copy of the notice published in the *Ajo Copper News.*

6.2.3 Public Scoping Meeting

A public, open house–style meeting was held at the Ajo Community Center in conjunction with the monthly Western Pima County Community Council meeting on March 4, 2010. The purpose of the meeting was to provide information on the proposed Ajo Housing Development Project, the NEPA process and associated timelines, and the project background, purpose, need, and alternatives, as well as to solicit input from the public. Figures of the proposed alternative locations and the Preferred Alternative site were displayed, and an informational handout and comment form were provided to attendees (Appendix E).

Approximately 60 people attended the public meeting. After a brief introduction to the project by the GSA, EcoPlan Associates, Inc., and the CBP, public comments were invited. Comments and issues raised included:

- Uncertainty of modular home design (i.e., are they equivalent to FEMA trailers?)
- Would modular homes fit into the community character?
- Would local contractors have the ability to bid on construction?
- Framed or "stick" built homes are better than modular construction.
- Use of existing, available homes in the Ajo market should be a priority for the GSA.
- What will be the economic impact to the real estate market if the GSA builds new homes?

One written comment was received during the meeting—a prepared letter from Jim Sharp. The letter objected to the proposed housing project based on a disproportionate amount of minority and low-income residents in Ajo and proposed that the GSA had prematurely identified and negotiated with property owners prior to involving the public in the process. The letter stated that the GSA should consider purchasing or leasing existing housing units in Ajo (see Appendix F for a copy of the letter).

The following table summarizes the public comments received as a result of the meeting. See Appendix F for copies of letters and comment forms received from the public.

Table 5. Public scoping comments.

Name	Comments/Concerns
Linda Sharp	• Local real estate agent • Ajo has a disproportionate number of minority and low-income residents • The GSA should focus on purchasing existing properties, not constructing new homes • The GSA has prematurely contracted with property owners
Gregory Brader	• Abutting property owner • Will the GSA units compete with his property in the open markets for rentals? • Will lighting be installed to the benefit of the neighboring property? • Will biological/archaeological studies be required? • Will there be a mechanism for the community to provide input?
Mike Walker	• Abutting property owner • Requested that a sight/sound barrier be constructed between his property and the proposed development
Sam Tucker	• Adjacent property owner • Commented that the southern arroyo should be protected from the planned development
Ronald Hurlburt	• The GSA proposal assumes incorrectly that there is insufficient housing available in Ajo • Opposes an "enclave of government-owned modular dwellings"
Edie and Char	• Local real estate agents • Plenty of housing available in Ajo • CBP agents would choose to live in the newer, more affordable housing • GSA housing would hurt individuals who purchased rental income properties in Ajo

GSA = U.S. General Services Administration

6.2.4 Public Hearing

A public hearing was held on November 22, 2010 in the Ajo Community Center. Letter invitations were sent to agencies, and two public notices were published in the Ajo Copper News on November 10th and November 17th. The hearing was attended by eight individuals. Copies of the Draft EA were available at the hearing and the Salazar–Ajo Public Library, and on-line at www.gsa.gov/nepalibrary.

Copies of the handouts provided are in Appendix E and comments received from agencies and individuals are in Appendix F.

Table 6. Summary of comments received on Draft EA and GSA responses.

Comment	Response
1. Provide copy of Garrison Housing Feasibility Study and Market Study.	U.S. Customs and Border Protection will release the documents, subject to redaction of any material that may be a sensitive border security issue or of a proprietary nature.
2. Community involvement has been minimal. More consultation with locals and community groups desired.	During the EA process, public input was solicited through scoping activities, public review of a Draft EA, two public meetings (a public information meeting and a public hearing on the Draft EA). The level of public involvement has been commensurate with the scope of the project and its anticipated impacts.
3. Obtain public input in the housing design process. Consider Southwest style and complement the adjacent Ajo Historic District.	The GSA has not yet selected an architect to design the development. Groups and individuals are welcome to submit comments and suggestions to the GSA relative to exterior design and landscaping.
4. Concerned decision to build housing was made early. Believe the government should work with the community to invest in their future.	During the EA process, public input was solicited through scoping activities, public review of a Draft EA, two public meetings (a public information meeting and a public hearing on the Draft EA). Should the project proceed, groups and individuals are welcome to submit comments and suggestions to the GSA relative to exterior design and landscaping.
5. Not opposed to project or location but desire architecture with aesthetic appeal.	The GSA has not yet selected an architect. The GSA believes the housing product will be an improvement over the existing partially occupied mobile home park, which includes vacant foundations/slabs, dilapidated outbuildings, debris, dirt roads, and limited landscaping. Groups and individuals are welcome to submit comments and suggestions to the GSA relative to exterior design and landscaping.
6. Desire long-lasting, energy-efficient homes.	The LEED Green Building Rating System is a third-party certification program and the nationally accepted benchmark for the design, construction, and operation of high-performance green buildings. LEED for new construction is a performance-oriented rating system where building projects earn points for satisfying criteria. The number of points a project earns determines the level of LEED certification (Certified: 40–49 points, Silver: 50–59 points, Gold: 60–79 points, and Platinum: 80 points or more). The CBP has committed to a LEED rating of Silver for the proposed project. Page 13 of the Draft EA provides an outline of the criteria that would be met with the proposed construction. The details would be developed by the architectural firm that would be selected for the project.

Comment	Response
7. Involve local developers and contractors; local jobs matter. Modular houses promote jobs elsewhere.	The project construction and related site preparation will be advertised as a GSA Small Business Set-Aside through GSA's FEDBIZOP contracting system. All qualified contractors will be allowed to apply and bid for this project. Local Ajo contractors will be encouraged to participate.
8. Integrate new housing into vacant lots throughout Ajo rather than in a single site.	Based on a Feasibility Study prepared for the project, the CBP determined early in the analysis that the acquisition and use of scattered parcels for the development of government housing would be impractical and would result in a notable delay in the provision of government housing.
9. Integrate new housing into vacant lots throughout Ajo to improve community ties with the CBP.	The proposed housing would not be set apart from nearby residential units; no walls or gates would be constructed around the development. The CBP personnel have been a part of the Ajo community for years and are integrated through daily activities—shopping, schools, recreation, and community events.
10. Integrate the first phase's 22 units into the community and encourage the market to provide the remaining need.	Based on a Feasibility Study prepared for the project, the CBP determined early in the analysis that the acquisition and use of scattered parcels for the development of government housing would be impractical and would result in a notable delay in the provision of government housing.
11. Inquired whether CBP employees receive housing allowance.	No housing allowance is paid to CBP staff, and there would be no requirement or mandatory directive for personnel to rent government-owned housing. Personnel choosing to live in Ajo may select from all available Ajo-area housing (privately owned and government-owned), including apartments, single-family homes, and other rentals.
12. Concerned with government competition with local housing/rental market. Fearful of subsidized rents to be offered by the GSA. The GSA is undercutting private rental business with low rents. Concerned with more subsidized housing in the future.	All rents for the proposed housing would be set at market rates and calculated in compliance with the OMB and the Department of Interior Housing Policy Office. The OMB Circular A-45 sets the policy and administrative guidance to set rental rates. No housing allowance is paid to CBP staff, and there would be no requirement or mandatory directive for personnel to rent government-owned housing. Personnel choosing to live in Ajo may select from all available Ajo-area housing (privately owned and government-owned), including apartments, single-family homes, and other rentals.
13. Avoidance of native vegetation desired, especially mesquite and ironwood trees on-site. No site map with species plotted was provided in the environmental document.	Section 4.4.1 provides a complete description of the limited native plants that remain within the parcel. The native plant community of the project area is foothill paloverde–triangle-leaf bursage–brittlebush–dominated Arizona upland subdivision of Sonoran desertscrub; however, nearly all of the native vegetation formerly occupying terrain within the limits of the original mobile home park was removed, probably at the time of initial construction in the late 1930s. Other than the native vegetation along the two washes that border the site, the remaining vegetation on the site is limited, and much is associated with landscaping. For this reason and because there are no plans to remove the native vegetation that line the two washes, native plant removal resulting from implementation of the Preferred Alternative would be limited. As noted in the Draft EA, any plant removal subject to the Arizona Native Plant Law would be coordinated with the Arizona Department of Agriculture.

Comment	Response
14. A detailed inventory of wildlife sitings and consultation with various specialists are desired. Concerns expressed about desert tortoise.	The biological resources study area consisted of a visual survey of the Preferred Alternative site and surrounding properties. Biological resources information was collected during a pedestrian survey on January 20, 2010. Photos were taken, vegetation was recorded, and the likelihood for special status species occurrence was assessed based on habitat characteristics. Additional background information on the project area was obtained from aerial photos, topographic maps, Geographic Information System data, various natural history/biological texts, unpublished technical documents, and state and federal agency coordination and websites. As noted in the Draft EA, clearing and grading of the Preferred Alternative site is likely to result in some displacement of small reptiles, mammals, and birds, and could injure or kill small reptiles and mammals if present during these activities. Species likely to be displaced, injured, or killed are common and widely distributed and, as a result, construction of the Preferred Alternative would not appreciably impact the size or future viability of their populations. The USFWS and the Bureau of Land Management sensitive species lists include the Sonoran Desert tortoise. Because that species has been sighted within 1 mile of the project area, mitigation measures have been included to complete a preconstruction survey for Sonoran Desert tortoises and to ensure the proper handling of the tortoise should one be encountered during construction. A qualified biologist coordinated with the USFWS and Arizona Game and Fish Department. No additional consultation was warranted.
15. What will be the source of water for this development? Concerns expressed if water source is the Ajo Well?	Three water companies serve the town of Ajo. The largest system is the Ajo Improvement Company owned by the Phelps Dodge Corporation. It pumps water from two active wells in the Child's Well Field, 7 miles north of Ajo, at a depth of 1,170 to 1,350 feet. The Ajo Improvement Company delivers groundwater to two other water systems: Arizona Water Company–Ajo System and Ajo DWID, neither of which operates its own wells to serve customers. Water is currently provided to the Preferred Alternative site by the Ajo DWID. The existing mobile home park has 40 hookups for domestic water, though not all of them are currently being used. With the proposed new housing, these 40 hookups would ultimately be replaced with services for 56 residential units—an increase of 16 units. Agreements between the GSA and the Ajo DWID would be secured during the design phase. In 2006, the Ajo DWID received about 40 acre-feet of water from the Ajo Improvement Company and served about 405 residents. Additional discussion on the existing utilities serving the project site has been added to Section 3.2.1.

Comment	Response
16. What is the cumulative impact of Freeport McMoRan mining operations, a proposed sustainable agriculture program, and the proposed CBP housing?	The level and scale of the cumulative analysis should be commensurate with the proposed project's potential impacts, scale, and other factors. Based on the Council of Environmental Quality guidance, NEPA documents should consider those past, present, and future actions that incrementally contribute to the cumulative effects on resources affected by the proposed action. Impacts of mining operations and agricultural programs would not likely be similar in nature to those of the Preferred Alternative, which would be located on previously developed land within a developed urban center. The project would not affect sensitive or critical resources, lead to a wide range of effects, induce population growth, lead to further development, or require expansion of development infrastructure. Impacts from implementation of the Preferred Alternative are expected to be negligible on a cumulative basis, except for the minor localized effects on air quality, noise, and visual resources during construction.
17. A cultural resources survey of the area should be completed and submitted to SHPO. Impacts are not fully evaluated.	The GSA concluded that an archaeological survey was not warranted. In the consultation letter to SHPO, the GSA noted that it had contacted the Arizona State Museum. The museum had noted that a search for the archaeological records retained at the museum found the proposed project area had never been inspected for cultural resources, and no sites are recorded within the project boundary. Consultation with SHPO was completed on November 23, 2010. SHPO concurred that no historic properties are present. This information was added to Section 4.5.
18. The GSA did not gather data and details on historic buildings in the 55 Sahuaro St. area.	The GSA inventoried the buildings and structures within the subject parcel, documented the results in its consultation letter to SHPO, and concluded that no historic properties are present within the Area of Potential Effects. Section 4.5 documents this determination. SHPO concurred with this determination on November 23, 2010. The SHPO concurrence letter has been added to the Final EA (Appendix C).
19. The Hia Ced O'odham people were not contacted.	The Tohono O'odham Nation is the official contact for the Hia Ced O'odham people. The GSA coordinated with the Tohono O'odham Tribe by letter and received no response.
20. States there is an "inherent concern" and "image" about CBP employees. Believes a "gated community" will further add to the "poor image." To build a more positive image, infill property development would enhance neighborhoods and businesses.	The intent of the comment is unclear. The GSA is not aware of image concerns for CBP employees within the community. No gated or walled community is proposed for the project site, and development of the mostly vacant mobile home park provides an infill opportunity.
21. Guest House Inn (bed and breakfast) may be subjected to noise interference by the occupants of the new housing, and a sight/sound barrier should be constructed.	The planned housing would be constructed on a previously developed residential development. The future land use would be similar to the existing land use, and no increase in residential density is planned. No new roadway access is planned that would bring traffic closer to the Guest House Inn. Noise generated by occupants would be expected to be similar to that generated today in surrounding residential neighborhoods.

Comment	Response
22. Public notices and public hearing were improper. Failed to contact and solicit comments from representative groups impacted by the project.	The NEPA process included a full scoping process, with letters mailed to all adjacent property owners and those agencies with jurisdiction (Appendix B). Two public meetings were held in Ajo: a public scoping meeting on March 4, 2010 (attended by 60 individuals) and a public hearing on November 22, 2010. Notices were mailed to agencies and adjacent landowners. Two public notices appeared in the local newspaper, the *Ajo Copper News*, for the scoping meeting and for the hearing. Articles about the project appeared in the *Ajo Copper News.*
23. There is sufficient existing housing available in Ajo to meet GSA needs.	Section 1.3 of the Draft EA notes that less than 30 percent of CBP personnel use the local real estate market due to a lack of available or suitable housing.
24. Insufficient representation of GSA's contractor present at meetings.	Intent of comment is unclear. The GSA Environmental Project Manager and the agency's contractor for the Environmental Assessment were represented at each of the two meetings.
25. Failed to adequately consider the environmental impact on 55 Sahuaro St. property.	Specific intent of comment unknown. The GSA concluded that the Draft EA document addresses the expected social, economic, and environmental impacts from the proposed action to a level commensurate with the project scope, consistent with NEPA, and in coordination with regulatory agencies.
26. Failed to adequately address socio-economic impacts, including low-income and minority populations.	Sections 4.2 and 4.3 provide data showing that the percentage of low-income and minority populations within the project Block Group are nearly identical to Pima County as a whole; therefore, no disproportionate impact would occur to low-income or minority populations. Economic analysis indicates a slight improvement in the local economy due to short-term construction hiring and the presence of additional residents.
27. The proposed project will create a boom/bust cycle similar to the copper mining industry in Ajo.	The construction of the proposed housing development within an existing 11.5-acre mobile home park would satisfy a portion of the housing needs for the CBP in this area. The need for housing would not be cyclical in nature; future reductions in CBP personnel are not anticipated.
28. The lack of housing in Why and Lukeville was not fully described in the Draft EA in light of the need to reduce commute distances.	The Draft EA references the Feasibility Study conducted by the CBP in 2009. Section 1.3 summarizes the conclusions from that study, noting that only 17 government-owned houses exist in Lukeville, Why, and Ajo combined. To further clarify, the Final EA provides additional supporting data on the limited housing resources in Lukeville and Why (Section 1.3).
29. Page 4 of the Draft EA states that "numerous contractors" currently in the area working on the border fence construction are contributing to the lack of available housing. Construction of the border fence is temporary and, therefore, following completion of the fence, housing will presumably become available. The transitory nature of this situation is not adequately addressed in the Draft EA.	The Draft EA identifies the presence of additional contractors in the area as simply a contributing factor. Section 1.3 of the Final EA clarifies this point and the general lack of adequate housing in the area.
30. The project as proposed is inadequate to meet the needs of a 410-person staffing level. The scope and purpose of the project are questioned.	Section 2.1 of the Draft EA states that the project is not intended to fully satisfy the future staffing needs of the border. This project would address the urgent need for housing due to substandard government housing in Lukeville scheduled for demolition or replacement (Section 2.2).

Comment	Response
31. Notes apparent contradictory statements with regard to housing resources when statements in Section 2.1 are compared with Section 4.3.	Section 2.1 of the Draft EA states that the potential 56 units are not intended to meet all housing demands by the CBP (page 5, second paragraph), but rather, the immediate needs. The reference in Section 4.3 was noting that broader, long-term needs for housing would not be met by the 55 Sahuaro St. parcel and that the private sector/local real estate market would continue to be an option for CBP personnel.
32. The proposed number of units will not be sufficient to resolve the housing shortage. The Draft EA states that the project is not intended to satisfy the needs of the projected 410-person staffing level.	Refer to response to Comment 30.
33. It is difficult to assess probable impacts, such as the total vehicle miles traveled, due to ambiguity in the number of personnel who will use the units compared with the estimated number of needed housing units for the number of projected employees.	The number of housing units would range from 22 to 56 should future funding be secured beyond the initial 22 units. The number of personnel would be commensurate with those unit numbers. A quantitative analysis of vehicle miles traveled resulting from project implementation is not warranted because the project would result in fewer miles traveled by CBP personnel. The impact on vehicle miles traveled from the project would be beneficial.
34. The Draft EA doesn't provide cost comparisons to substantiate the statement that the government would have to invest large sums of money to bring the existing housing stock up to CBP standards.	The reference to investing money to bring existing housing up to CBP standards will be replaced with the following statement: Based on the Feasibility Study, the CBP determined early in the analysis that the acquisition and use of scattered parcels for the development of government housing would not be practical and would result in a notable delay in the provision of government housing.
35. Thirteen criteria were used to evaluate each alternative, yet few are discussed in the Draft EA.	Though the Feasibility Study provides comprehensive information on the alternative rankings by each criterion, the Draft EA focuses on the relevant results, providing a summary of the particular criteria or criterion for which the alternative was eliminated from consideration.
36. The comment suggests that a high-income enclave would be created at 55 Sahuaro St. and that a workplace culture different from other residents would occur.	The Draft EA does not state, and the CBP has no reason to believe, that residents of the proposed housing would have income levels "much higher" than the Ajo average. The employees who choose to live in the proposed housing would be expected to include entry-level personnel with lower incomes. The proposed housing would not be set apart from nearby residential units. No walls or gates would be constructed around the development. CBP personnel have been a part of the Ajo community for years and are integrated through daily activities—shopping, schools, recreation, and community events. We do not believe further analysis of this issue is warranted.
37. The alternatives analysis should consider the amenities of Sonoita, Sonora, and Rocky Point, Mexico, when evaluating the merits of developing housing in Lukeville.	Though U.S. Department of Homeland Security and CBP personnel are not prohibited from traveling into Mexico as off-duty citizens, given the nature of the work conducted by CBP personnel, there are safety concerns with such visits. The U.S. Department of Homeland Security and the CBP are prohibited by law from residing outside of the United States.

Comment	Response
38. The Southern Border Style housing model is incompatible with local and regional styles and may negatively affect local identity.	The subject parcel at 55 Sahuaro St. is currently a partially occupied mobile home park with a mixture of single-wide and double-wide trailers and outbuildings. Pima County zoning for that location allows for mobile homes and modular homes. The example models shown in the Draft EA, Figures 5 and 6, are representative of modular-style housing. An architect has not been selected yet for the design. The CBP will work with the architect to select materials and colors appropriate for the location.
39. Infrastructure, utility costs, and long-range impact of additional housing on Ajo infrastructure have not been fully analyzed in the Draft EA.	The 55 Sahuaro St. parcel has all utilities in place for the existing 40-unit mobile home park (only 12 units are currently on-site). No additional utility or roadway infrastructure to the site would be required with the Preferred Alternative. Though detailed cost estimates are not yet available, the Preferred Alternative is the only site with all utilities present and, therefore, represents the least costly alternative in terms of infrastructure.
40. The development of architecturally inappropriate modular units and the creation of a wealthy enclave within the town will not foster Ajo's well-established sense of community.	Refer to the responses to Comments 36 and 38.
41. The issue of sustainable development techniques used in construction and site development has received insufficient attention. Regional concerns such as water conservation are ignored. It does not appear that alternative energy sources will be part of the project.	The LEED Green Building Rating System is a third-party certification program and the nationally accepted benchmark for the design, construction, and operation of high-performance green buildings. LEED for new construction is a performance-oriented rating system in which building projects earn points for satisfying criterion. The number of points a project earns determines the level of LEED certification (Certified: 40–49 points, Silver: 50–59 points, Gold: 60–79 points, and Platinum: 80 points or more). The CBP has committed to a LEED rating of Silver for the proposed project. Page 13 of the Draft EA provides an outline of the criteria that would be met with the proposed construction. The details would be developed by the selected architect.
42. The CBP should consult with Pima County Development Services.	The CBP and the selected architect will consult with Pima County Development Services.
43. Page 17 indicates that the percentage of the population below the poverty line is expected to slightly drop when CBP personnel move into new housing. Many assistance funding programs are based on percentages of persons below the poverty level. This impact on the community should be evaluated in the EA, focusing on the possible loss or reduction in program or assistance funding.	With the limited population that would be accommodated by the proposed housing, the proposed housing would not be expected to have a discernable impact on the percentage of the local population that falls below the poverty line. However, fully employed, tax-paying residents are generally considered a benefit to any community.
44. Page 19 states that residents in the eight existing units will be displaced by the project. However, the Draft EA makes the point that there is limited housing in the Ajo area. The proposal should be reexamined, possibly to increase the number of units to provide housing for CBP personnel and for displaced residents.	The residential relocations are not anticipated to be a notable issue. Four of the displacements are CBP staff members, and arrangements are being made to accommodate those renters. The eight non-CBP residents have all accepted relocation benefits and have found alternative housing.

Comment	Response
45. There is a clear misunderstanding of the concept of the APE and the range of potential effects regarding historic properties. Insufficient effort has been made to identify historic properties within the direct-impact APE. The Pima County Office of Cultural Resources and Historic Preservation has jurisdiction over the proposed-undertaking APE; however, the October 27, 2010, consultation letter from the GSA to the Arizona SHPO does not include Pima County as a copied recipient.	Given the geographic distance between the undertaking and the historic district and that this undertaking is removing and replacing existing one-story residential units, the GSA determined that this undertaking will not have any effect on the Ajo Townsite Historic District; therefore, it is not included in the APE. The October 27, 2010, letter from the GSA to SHPO included in Appendix B of the Draft and Final EA notes a determination of no historic properties present. Subsequent to publishing the Draft EA, SHPO concurred with the determination. The SHPO concurrence has been incorporated into the Final EA (Appendix C).
46. The Draft EA does not provide analysis of air quality.	Based on the proposed action, the CBP concluded that a qualitative air quality analysis is appropriate to assess vehicular emissions. Residents of the proposed housing would be commuting from Ajo to Lukeville for work, an 80-mile round-trip. Compared with the 200- to 350-mile round-trip associated with a commute from Phoenix or Tucson, this represents a considerable reduction in travel and a substantial reduction in air emissions generated.
47. Water quality issues have been ignored with respect to Section 404 of the Clean Water Act.	Though the Draft EA identifies two washes that border the site, it also notes that, based on planning-level site development, no construction is planned within these washes (Section 4.9). If changes in construction plans would require encroachment within either of these washes, a formal assessment of their potential jurisdictional limits would be required prior to construction activities, and the need for a Clean Water Act permit would be evaluated.
48. The cumulative effects analysis is inadequate. The Organ Pipe Cactus National Monument was not requested to comment.	The Draft EA notes that the level and scale of cumulative analysis should be commensurate with the project's potential impacts, scale, and other factors (Chapter 5). The CBP believes the cumulative analysis in the Draft EA is commensurate with the development of in-fill housing on property already zoned and occupied by such housing. Nothing is proposed on the 55 Sahuaro St. property that is not already permitted under county zoning. No additional government housing projects are proposed in Ajo. Currently, CBP personnel drive through Organ Pipe Cactus National Monument to commute to their duty station. Other than the small numbers of employees housed in Lukeville, all other employees must travel State Route 85 through Organ Pipe Cactus National Monument. The construction of housing in Ajo is not expected to affect the number of vehicle trips on State Route 85 though the monument.
49. Pima County was not included in Section 106 consultation. Responses to Pima County's comments are inaccurate because a determination of no historic properties present cannot be made without the results of an identification inventory survey.	Eight agencies were copied on the GSA letter to SHPO. The omission of Pima County was an unfortunate oversight. Refer to response to Comment 45.

Comment	Response
50. The statement that Executive Order 13006 is not applicable to this project indicates a misunderstanding of the intent of the EA.	Based on the GSA Public Building Service—Urban Policy Update, Issue 1, May 2000, the GSA has concluded that Executive Order 13006 is not applicable to this project. The focus of this Executive Order is on our nation's central cities and "urban areas." The Office of Management and Budget defines an urban area as (1) within the jurisdiction of any incorporated city, town, etc., with a population greater than 10,000 or (2) an area within or adjacent to a city, town, etc., with a population density of 1,500 inhabitants or more per square mile. The community of Ajo meets neither criterion.
51. No direct responses are provided to the citizen's comments in Table 5. Why?	The scoping process is used to develop the scope of the EA. The lead federal agency is ultimately responsible for determining the scope of an environmental document. During internal and external scoping, environmental issues identified by program specialists, other agency staff, and the public helped the CBP define the range of resource topics that are addressed in the EA. Table 5 is simply a summary of scoping comments received.
52. The scoping documents in Appendices D, E, and F state that the CBP proposes to construct housing at a specific property (the parcel at 55 Sahuaro St.). These documents appear to presume that the Preferred Alternative had already been selected and that this was the only alternative discussed.	Chapter 3 outlines the alternatives development process through the Feasibility Study. Multiple sites were initially evaluated, and all but the parcel at 55 Sahuaro St. were eliminated from consideration. With no other feasible sites identified, the public scoping announcements and the meeting focused on the 55 Sahuaro St. site and the No Action Alternative. The Draft EA compares the Preferred Alternative with the No Action Alternative.

APE = Area of Potential Effects, CBP = U.S. Customs and Border Protection, DWID = Domestic Water Improvement District, EA = Environmental Assessment, GSA = U.S. General Services Administration, LEED = Leadership in Energy and Environmental Design, NEPA = National Environmental Policy Act, OMB = Office and Management and Budget, SHPO = Arizona State Historic Preservation Office, USFWS = U.S. Fish and Wildlife Service

7.1 Summary of Impacts

The potential environmental impacts of the Preferred Alternative were evaluated based on both the context of the effects on the project area and the intensity or severity of impacts as defined in CEQ regulations. Table 7 summarizes the potential environmental impacts of the Preferred Alternative.

Table 7. Results of environmental analysis.

Environmental Consideration	Result of Alternative Evaluation
Ownership, Jurisdiction and Land Use	No significant impact
Title VI/Environmental Justice	No significant impact
Social and Economic Resources	No significant impact
Biological Resources	No significant impact
Cultural Resources	No significant impact
Air Quality	No significant impact
Noise Analysis	No significant impact
Visual Resources	No significant impact
Water Resources	No significant impact
Hazardous Material	No significant impact
Cumulative Impacts	No significant impact

7.2 Best Management Practices

- The contractor shall stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to inactive and active sites during workdays, weekends, holidays, and windy conditions.
- When hauling material and operating non-earthmoving equipment, the contractor shall prevent spillage and limit speeds to 15 miles per hour (mph).
- The contractor shall limit the speed of earthmoving equipment to 10 mph.
- The contractor shall reduce use, trips, and unnecessary idling from heavy equipment.
- Internal combustion engines used for any purpose on the Preferred Alternative or related to work on the Preferred Alternative shall be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine shall be operated without its muffler being in good working condition.
- If *recognized environmental conditions* are encountered during construction, appropriate measures for the proper assessment, remediation, and management of the contamination will be initiated in accordance with applicable federal, state, and local regulations. The contractor will take appropriate measures to prevent, minimize, and control hazardous materials, if necessary, during construction.

7.3 Mitigation Measures

The following mitigation measures would be implemented to ensure that the Preferred Alternative would have no significant impact on the quality of the human environment.

- Removal of mature native tree and cactus species will be subject to the Arizona Native Plant Law administered by the AZDA and the Pima County Protected Plant Ordinance. Native plant removal will be minimized to the extent practicable. The construction contractor shall be required to contact the AZDA at least 60 calendar days prior to construction to arrange for proper native plant treatment.
- The contractor shall employ a qualified biologist to complete preconstruction surveys for Sonoran Desert tortoises and conduct a Sonoran Desert tortoise awareness program. Preconstruction surveys for Sonoran Desert tortoises shall be conducted within 48 hours prior to construction in areas that will be disturbed.
- If any Sonoran Desert tortoises are encountered during construction, the contractor shall adhere to the AGFD "Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects" revised October 23, 2007.
- The contractor shall comply with Pima County Air Quality Control ordinances and shall complete an Air Quality Activity Permit.
- The GSA project manager will arrange for a formal assessment of the potential jurisdictional limits of the two washes on the Preferred Alternative site prior to construction activities if construction activities are proposed to encroach on or impact the washes. Should a CleanWater Act Section 401/404 permit be required, the GSA will obtain the permit prior to any construction in the washes.
- The contractor shall not disturb any of the drainages surrounding the project area until a determination has been made by the Corps that the project may proceed under a Nationwide Permit and an Individual Water Quality Certification from the ADEQ has been obtained.
- The contractor shall complete an AZPDES Construction General Permit, including a Notice of Intent and a Notice of Termination. In accordance with the AZPDES requirements, a SWPPP shall be developed and implemented for the project. The SWPPP will specify control measures to reduce soil erosion while containing and minimizing the release of construction pollutants.
- Because the Preferred Alternative will require demolition of existing structures, the GSA will engage an Asbestos Hazard Emergency Response Act–certified inspector to inspect all structures to be demolished. If RACM is present in the structure, the GSA shall develop a work plan to remove, transport, and dispose of these materials.
- At least 10 days prior to demolition of any structure, the GSA will provide the ADEQ NESHAP coordinator with a NESHAP notification form for each structure to be demolished.

General Services Administration

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Jane Lehman	Regional Historic Preservation Officer

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Michael R. Dawson	Senior Environmental Planner
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Tricia Balluff	Environmental Planner
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ADEQ. 2010. Air Quality Plans: Nonattainment Areas and Attainment Areas with Maintenance Plan. http://www.azdeq.gov. Accessed July 27, 2010.

AGFD. 2010. Sabra Schwartz, AGFD HDMS program supervisor, provided locality records for several federally listed and BLM sensitive species in the project area.

ASTM International. 2005. ASTM Standard Practice E1527-05, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.

BLM. 2005. Approved Amendment to the Lower Gila North Management Framework Plan and the Lower Gila South Resource Management Plan and Decision Record. July.

Brennan, T.C., and A.T. Holycross. 2006. A *Field Guide to Amphibians and Reptiles in Arizona.* AGFD, Phoenix, Arizona.

CBP. 2010. *U.S. Customs and Border Protection Market Survey of Housing for the Area of Ajo and Why, Arizona.* May.

Census. 2000a. U.S. Census Bureau data. http://www.census.gov. Accessed July 7, 2010.

_____. 2000b. http://factfinder.census.gov/home/en/epss/glossary_p.html. Accessed July 7, 2010.

City Data. 2010. http://www.city-data.com/city/Ajo-Arizona.html. Accessed July 28, 2010.

Coachman, Robin. 2010. CBP Project Manager. Personal communication. July.

EcoPlan Associates, Inc. 2010a. *U.S. Customs and Border Protection Ajo Housing Development Project Biological Evaluation.* March 2.

_____. 2010b. *U.S. Customs and Border Protection Ajo Housing Development Project Phase I Environmental Site Assessment.* February 19.

FEMA. 1999. FIRM Community Map Number 04019C1255K. Accessed February 8, 2010.

Garrison Architects. 2009. *CBP Housing Program Feasibility Study, Ajo, Arizona—Complete Report.* Sections 1 through 8. July 15.

GSA. 2010. Section 106 consultation letter, consulting parties, and APE figure. October 27.

Hendricks, D.M. 1985. *Arizona Soils.* University of Arizona Press, Tucson, Arizona.

Huckelberry, C.H. 2010. Letter to the GSA regarding U.S. General Services Administration: U.S. Customs and Border Protection Ajo Housing Development Project. May 10.

OPCNM. 2010. Peter Holm, wildlife biologist, provided information on federally listed and BLM sensitive species in the project area.

Parkhurst, Janet H. 2001. *Ajo: A Model Company Town—Architectural and Historic Context of a Planned Community in Arizona, An Updated Historic Resources Report.* Old Pueblo Archaeology Center, Tucson, and Janet H. Strittmatter, Inc., Tucson. Submitted to Pima County Cultural Resources Office, Tucson.

Pima County Assessor's Office. 2010. http://www.asr.pima.gov/. Accessed January 29, 2010.

Pima County Department of Environmental Quality. 2010. Air Program. http://www.deq.pima.gov/air/. Accessed June 2, 2010.

Pima County Development Services. 2010a. http://www.pimaxpress.com/planning/default.htm. Long Range Planning—Comprehensive Planning. Accessed in July 2010.

_____. 2010b. 201 N. Stone Ave., Tucson, Arizona. Records review July 2010.

Richard, S.M., S.J. Reynolds, J.E. Spencer, and P.A. Peachtree. 2000. Geologic map of Arizona. Arizona Geological Survey, Tucson, Arizona.

Ruther, Sherry. 2010. Letter to GSA regarding U.S. Customs and Border Protection Ajo Housing Development Project. May 19.

Turner, R.M., and D.E. Brown. 1994. Sonoran desertscrub. In *Desert Plants, Biotic Communities of the American Southwest–United States and Northwestern Mexico,* edited by D.E. Brown. University of Utah Press, Salt Lake City, Utah. 4(1–4):181–221.

U.S. Department of the Interior. 2008. *Housing Management Handbook*. April.

USFWS. 2010. Arizona federally listed species by county. Arizona Ecological Services Field Office Web site. http://arizonaes.fws.gov/. Updated February 5, 2010. Accessed February 17, 2010.

Appendix A. USFWS threatened, endangered, and special status species.

Name	Status	Habitat Requirements	Potential for Occurrence
California least tern *Sterna antillarum browni*	E	Open, bare, or sparsely vegetated sand, sandbars, gravel pits, or exposed flats along shorelines of inland rivers, lakes, reservoirs, or drainage systems. Elevation: <2,000 feet.	No suitable habitat is in the project vicinity. Breeding occasionally has been documented in Arizona. Migrants may be observed frequently. The nearest documented breeding site in Arizona is along the Salt River near Phoenix.
Chiricahua leopard frog *Lithobates chiricahuensis*	T	Springs, streams, rivers, backwaters, ponds, and stock tanks that are mostly free of introduced fish, crayfish, and bullfrogs. Elevation: 3,300 to 8,900 feet.	No suitable perennial stream habitat is in the project vicinity. The nearest known populations occur in the southern Baboquivari Mountains in southern Pima County, approximately 80 miles southeast of the project area.
Desert pupfish *Cyprinodon macularius*	E	Streams, backwaters, springs, marshes, and cienegas. Elevation: <5,000 feet.	No suitable habitat is in the project vicinity. Arizona Game and Fish Department (AGFD) Heritage Data Management System (HDMS) program supervisor indicates that examples of these fish are maintained in an artificial pond at the Cabeza Prieta Visitor Center within 3 miles of the project (personal communication). Because project activity will not affect this pond, this captive population will not be affected.
Gila chub *Gila intermedia*	E	Smaller creeks, cienegas, and, more recently, artificial impoundments. Elevation: 2,000 to 3,500 feet.	No suitable habitat is in the project vicinity. The nearest known population occurs in Sabino Canyon in the Santa Catalina Mountains near Tucson, approximately 100 miles east of the project area.
Gila topminnow *Poeciliopsis occidentalis occidentalis*	E	Warm waters with slow currents and abundant aquatic vegetation along shallow margins of main river channels, backwaters, tributaries, and associated natural springs. Elevation: <4,500 feet.	No suitable habitat is in the project vicinity. The nearest population occurs in eastern Pima County, at least 90 miles southeast of the project area.
Huachuca water umbel *Lilaeopsis schaffneriana recurva*	E	Cienegas and gentle perennial stream habitats. Elevation: 4,000 to 6,500 feet.	No cienegas or other perennial waters are in or near the project vicinity. The project area lies more than 2,000 feet below the known elevation range of the species. The nearest population occurs in Cienega Creek in eastern Pima County, approximately 120 miles east of the project area.

Appendix A. USFWS threatened, endangered, and special status species.

Name	Status	Habitat Requirements	Potential for Occurrence
Jaguar *Panthera onca*	E	Prefers areas near water in warm tropical savannah and forest habitats; rarely in extensively arid areas. Elevation: 1,600 to 9,800 feet.	No breeding populations are in Arizona. Occasional individuals cross into the state from Mexico. Migrant jaguars would not be expected to remain in the project vicinity due to the presence of humans, noise, traffic, and activity in the area. The nearest recent sightings were in the Baboquivari Mountains in 2002 and again in 2004, when two jaguars were photographed approximately 80 miles southeast of the project area.
Kearney's blue star *Amsonia kearneyana*	E	Species is restricted to stable, partially shaded coarse alluvium along a single west-facing dry wash in the Baboquivari Mountains. Elevation: 3,600 to 3,800 feet.	No suitable habitat. The project area does not lie in the known distribution of this species and is more than 1,500 feet below the known elevation range of the species. The known population is in the Baboquivari Mountains, approximately 70 miles southeast of the project area.
Masked bobwhite *Colinus virginianus ridgewayi*	E	Found in desert grassland habitat with a high diversity of moderately dense native grasses and forbs and adequate brush cover. Elevation: 1,000 to 4,000 feet.	No suitable habitat. Outside species' current known range. Current populations in Arizona are experimental captive-raised and are restricted to the Buenos Aires National Wildlife Refuge and vicinity in the southern Altar Valley, approximately 90 miles southeast of the project area.
Mexican spotted owl *Strix occidentalis lucida*	T	Mixed conifer or pine forest with multilayered foliage structure in steep canyons or on high mesas. Elevation: 4,800 to 9,000 feet.	No suitable habitat. No mixed conifer or pine forest with multilayered foliage structure is present in the project vicinity. The project area lies approximately 3,000 feet below the species' elevation range. The nearest known populations are in the Santa Catalina Mountains, approximately 120 miles east of the project area.
Nichol's Turk's head cactus *Echinocactus horizonthalonius* var. *nicholii*	E	Known from unshaded microsites in Sonoran desertscrub on dissected alluvial fans at the foot of limestone mountains and on inclined terraces and saddles of limestone mountains. Elevation: 2,400 to 4,100 feet.	No suitable habitat. The project area is outside the known distribution of the species. The nearest known populations are in the Vekol Mountains, approximately 40 miles northeast of the project area.
Northern Mexican gartersnake *Thamnophis eques megalops*	C	Cienegas, stock tanks, large-river riparian woodlands and forests, streamside gallery forests. Elevation: 130 to 8,500 feet.	Formerly widely distributed along, and mostly south of, the Mogollon Rim and in southern Arizona. Recent population declines and local extirpations have restricted the species to fragmented populations in the middle/upper Verde River drainage, middle and lower Tonto Creek, the Cienega Creek drainage, and several isolated wetland areas in southeastern Arizona. The nearest historic occurrence records and extant populations lie approximately 100 miles east in eastern Pima County.

Appendix A. USFWS threatened, endangered, and special status species.

Name	Status	Habitat Requirements	Potential for Occurrence
Ocelot *Leopardus pardalis*	E	Humid tropical forests, coastal mangroves, and swampy savannahs. In Arizona, it has been observed in desertscrub and Madrean evergreen woodland communities. Elevation: <8,000 feet.	No suitable habitat. The project is outside of the species' current known range. Breeding populations have been extirpated from Arizona, though several unconfirmed sightings have been noted from southern Arizona in recent years.
Pima pineapple cactus *Coryphantha scheeri* var. *robustispina*	E	Sonoran desertscrub and semidesert grassland communities. Elevation: 2,300 to 5,000 feet.	No suitable habitat. The project area is outside the known distribution of the species. The nearest known populations are approximately 80 miles east of the project area, at the northern end of the Baboquivari Mountains.
Sonoran pronghorn *Antilocapra americana sonoriensis*	E	Restricted to Lower Colorado River Valley and Central Gulf Coast subdivision of Sonoran desertscrub habitat. Elevation: 2,000 and 4,000 feet.	No suitable habitat is in the project area. The AGFD (2010) indicates that pronghorn occur south and west of the project and that although the project is within a mile or so of the "range" of the species, they are not often seen close to Ajo, remain in the valleys, and would not be expected in foothill habitat, where the project is located.
Sonoyta mud turtle *Kinosternon sonoriense longifemorale*	C	Restricted to pond and stream habitat at Quitobaquito Springs in Organ Pipe Cactus National Monument (OPCNM), Arizona, and in nearby Rio Sonoyta, Sonora, Mexico. Elevation: 1,000 to 1,100 feet.	No suitable habitat. The project does not lie in the known distribution of this subspecies. The nearest known populations lie approximately 30 miles south of the project area, at Quitobaquito Springs in the OPCNM.
Southwestern willow flycatcher *Empidonax traillii extimus*	E	Cottonwood/willow and saltcedar vegetation communities along rivers and streams. Elevation: <8,500 feet.	No suitable habitat. No dense thickets of vegetation are along perennial streams in the project vicinity. The nearest known seasonal populations occur along the Colorado River and in eastern Pima County, each 80 miles or more distant.
Yellow-billed cuckoo *Coccyzus americanus*	C	Large blocks of riparian woodlands. Cottonwood, willow, or tamarisk galleries. Elevation: <6,500 feet.	No suitable habitat is in the project vicinity. No large blocks of riparian woodlands, cottonwood, willow, or tamarisk galleries are closer than the Colorado River. However, one specimen record is from a site along the U.S.–Mexico border in southern Pima County, approximately 60 miles southeast of the project area.

C = Candidate, E = Endangered, T = Threatened (USFWS 2010)

U.S. Customs and Border Protection Ajo Housing Development Project
Scoping Distribution List

Affiliation	M	First	Last	Title	Agency	A1	City	ST	Zip
Agencies	Ms.	Sharon	Bronson	District 3 County Supervisor	Board of Supervisors	130 W. Congress St., 11th Floor	Tucson	AZ	85701
	Ms.	Elaine	Raper	Acting District Manager, Lower Sonoran Field Office	Bureau of Land Management	21605 N. 7th Ave.	Phoenix	AZ	85027
	Ms.	Ursula	Kramer	Director	Pima County Department of Environmental Quality	150 W. Congress St., Suite 109	Tucson	AZ	85701
	Mr.	Arlan	Colton	Planning Director	Pima County Development Services	210 N. Stone Ave.	Tucson	AZ	85701
	Mr.	Bill	Zimmerman		Pima County Regional Flood Control District	97 E. Congress St., 3rd Floor	Tucson	AZ	85701
	Mr.	C.H.	Huckelberry	County Administrator	County Administrator	130 W. Congress St., 10th Floor	Tucson	AZ	85701
	Mr.	Rafael	Payan	Director	Natural Resources, Parks, and Recreation	3500 W. River Road	Tucson	AZ	85741
	Ms.	Margeret	Kish	Director	Community Development and Neighborhood Conservation	2797 E. Ajo Way	Tucson	AZ	87516
	Lt.		Anderson	District 4	Arizona Department of Public Safety	2111 E. Gila Ridge Road	Yuma	AZ	85365
	Chief	David	Tibbett		Ajo Fire Department	400 E. Taladro Ave.	Ajo	AZ	85321
	Lt.	Billy	Clements	Ajo District	Pima County Sheriff's Department	1249 N. Ajo Well Road	Ajo	AZ	85321
	Mr.	Gary	Hayes	Executive Director	Pima Association of Governments	177 N. Church Ave., Suite 405	Tucson	AZ	85701
	Dr.	Robert	Dooley	Superintendent	Ajo Unified School District #15	P.O. Box 68, 111 N. Well Road	Ajo	AZ	85321
	Mr.	Steve	Spangle	Field Supervisor	U.S. Fish and Wildlife Service	2321 W. Royal Palm Road, Suite 103	Phoenix	AZ	85021
	Ms.	Sherry	Barrett	Assistant Field Supervisor for Southern Arizona	U.S. Fish and Wildlife Service	201 N. Bonita Ave., Suite 141	Tucson	AZ	85745
	Ms.	Laura	Canaca	Project Evaluation Program Supervisor	Arizona Game and Fish Department	5000 W. Carefree Highway	Phoenix	AZ	85086
	Ms.	Tracy	Taft	Executive Director	International Sonoran Desert Alliance	401 W. Esperanza Ave.	Ajo	AZ	85321
	Sir or Madam				Ajo Historical Society Museum	160 Mission St., Box 778	Ajo	AZ	85321
Adjacent Landowners	Mr.	James	Schneider			2040 N. Elliott Road	Ajo	AZ	85321
	Mr.	Michael	Zarecor			P.O. Box 8297	Spokane	WA	99203
	Mr.	Michael	Walker			700 W. Guest House Road	Ajo	AZ	85321
	Mr.	Sam	Tucker			86 Eastman Hill Road	Lebanon	NH	3766
	Sir or Madam			ATTN: Douglas R. and Janie Brader TR	Brader Living Trust	1580 W. North St.	Ajo	AZ	85321
	Ms.	Sally	Morrow			100 S. Sahuaro St.	Ajo	AZ	85321
	Mr.	Jodean	Morrow			100 S. Sahuaro St.	Ajo	AZ	85321
	Mr.	Gerado	Chi			911 W. Esperanza Ave.	Ajo	AZ	85321
	Mr.	Anthony	Kavanagh			606 Eucalyptus Way	Mill Valley	CA	95941
	Ms.	Kathie	Cumming			P.O. Box 162	Darrington	WA	98241
	Ms.	Anny	Junemann	ATTN: Jayson James Ouellette		731 W. Esperanza Ave.	Ajo	AZ	85321
	Mr.	Gerald	Luttmer			Box 1 Site, RR 2	Sundre	AB	T0M 1X0, Canada
	Mr.	Joaquin	Betancourt			711 W. Esperanza Ave.	Ajo	AZ	85321
	Ms.	Francisca	Munoz			6337 W. Chickasaw St.	Phoenix	AZ	85043
55 Sahuaro Lease Tenants	Vance and Patricia		Higdon			55 Sahuaro St., Lot #3	Ajo	AZ	85321
	Mr.	Bruce	Keith			55 Sahuaro St., Lot #32	Ajo	AZ	85321
	Ms.	Linda	Feidt			55 Sahuaro St., Lot #28	Ajo	AZ	85321
	Ms.	Phyllis	Williams			55 Sahuaro St., Lot #38	Ajo	AZ	85321
	Ramon and Rita		Salcido			55 Sahuaro St., Lot #37	Ajo	AZ	85321
	Ms.	Genny	Speckman			55 Sahuaro St., Lot #2	Ajo	AZ	85321
	Ben and Veronica		Hyink			55 Sahuaro St., Lot #30	Ajo	AZ	85321
	Joshua and Wendy		Hamilton			55 Sahuaro St., Lot #40	Ajo	AZ	85321
801 Esperanza	Ms.	Hilda	Alvarez			900 W. Esperanza Ave.	Ajo	AZ	85321
	Mr.	Jason	Slate			840 W. Esperanza Ave.	Ajo	AZ	85321
	Ms.	Sunia	Cox			492 W. 30 North	Burley	ID	83318
	Mr.	Victory	Salazar			701 N. Jefferson Ave.	Ajo	AZ	85321
	Sir or Madam			ATTN: Land and Water Department - S. Turton	Phelps Dodge Corp.	1 N. Central Ave.	Phoenix	AZ	85004
	Ms.	Karen	Hammett			800 W. Esperanza Ave.	Ajo	AZ	85321
	Ms.	Lynn	Terrell			740 W. Esperanza Ave.	Ajo	AZ	85321

On General Services Administration Letterhead

February XX, 2010

«M» «First» «Last»
«Title»
«Agency»
«A1»
«City», «ST» «Zip»

Re: U.S. Customs and Border Protection Ajo Housing Development Project

Dear «M» «Last»:

The General Services Administration (GSA) is planning to construct housing for U.S. Customs and Border Protection (CBP) employees. The GSA is proposing to develop seven parcels in south Ajo, in unincorporated Pima County, Arizona. The first parcel is at 55 S. Sahuaro St. and currently supports a partially occupied, 11.54-acre mobile home park. The next is a small unaddressed parcel, approximately 0.42 acre, immediately adjacent to the southwestern corner of the 55 S. Sahuaro St. parcel. The remaining five parcels consist of vacant parcels, addressed as 801, 811, 821, 831, and 841 W. Esperanza Ave., totaling approximately 0.78 acre immediately adjacent to, and north of, the 55 Sahuaro St. parcel. For the purposes of this project, all seven parcels will herein be referred to as the "subject property" (Figures 1 and 2).

This notice is being offered to allow early and meaningful participation in the National Environmental Policy Act (NEPA) review of this proposed housing development project. After the scoping period has ended, the GSA will prepare an Environmental Assessment to evaluate the potential environmental consequences of the proposed project. This letter is a request for comments, concerns, or issues relevant to the project.

There is currently insufficient housing available to accommodate CBP employees who work at the Lukeville Land Port of Entry (LPOE) and the Ajo Station in Why, Arizona. Existing housing that is available for CBP employees is poorly maintained and scheduled for demolition or replacement. Other housing options for CBP employees in the vicinity of the Lukeville LPOE are limited due to a scarcity of available rental properties. The GSA is proposing to address this need by constructing housing for CBP employees in Ajo, Arizona, at the subject property. Project construction of Phase 1 is proposed to begin in 2011.

The scope of work for this project consists of:

- Constructing 18 to 28 modular homes on the subject property (Phase 1)
- Constructing associated sidewalks, landscaping, and infrastructure, as needed
- Constructing up to 28 additional units at the subject property if funding becomes available in the future (Phase 2)

An agency and public scoping meeting will be held at 7 p.m. on March 4, 2010, at the Ajo Community Center, 290 5th St., Ajo. The meeting will be held in conjunction with a regular meeting of the Western Pima County Community Council.

If you have specific concerns, suggestions, or recommendations regarding this project and you cannot attend the above-mentioned meeting, please contact Michael R. Dawson at EcoPlan Associates, Inc., by e-mail at mdawson@ecoplanaz.com; by phone at 480.733.6666, extension 177; by fax at 480.733.6661; or by mail at:

GSA
c/o Michael R. Dawson
EcoPlan Associates, Inc.
701 W. Southern Ave.
Mesa, AZ 85210

We would appreciate receipt of your comments by March XX, 2010. Thank you for your time and assistance.

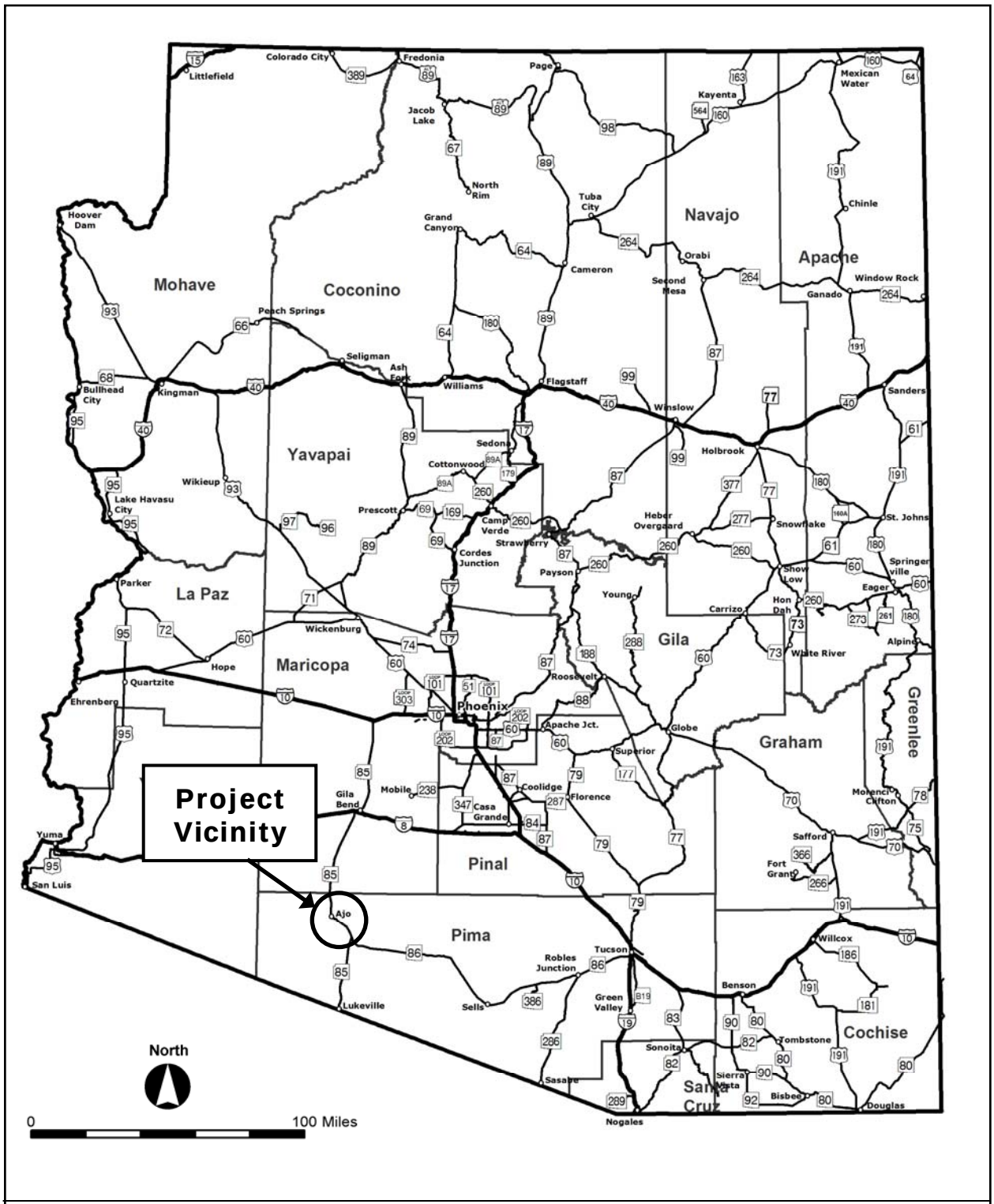
Sincerely,

Signature Pending

Mr. Osmahn Kadri
NEPA Project Manager
Portfolio Management Division
Pacific Rim Region

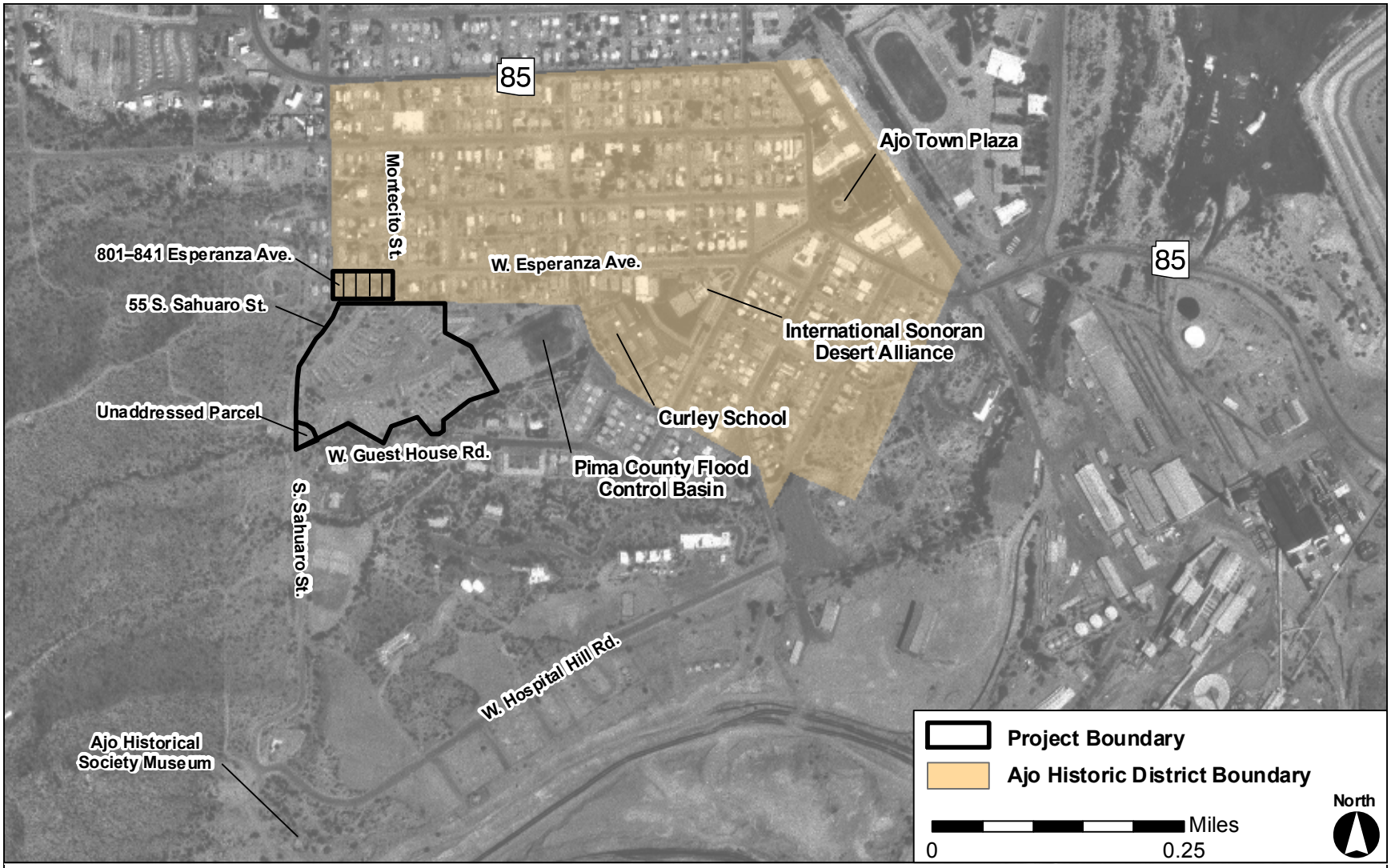
Enclosures: Figure 1–Project location
Figure 2–Project vicinity

c: Michael R. Dawson, EcoPlan Associates, Inc. (without enclosures)



U.S. Customs and Border Protection Ajo Housing Development Project

Figure 1. Project vicinity.



U.S. Customs and Border Protection Ajo Housing Development Project

W\07-033013\NEPA\Scope\Fig2

Figure 2. Project vicinity.

GSA

GSA Pacific Rim Region

October 27, 2010

Mr. Robert Frankeberger
Arizona Office of Historic Preservation
Arizona State Parks
1300 West Washington
Phoenix, AZ 85007

Re: Ajo Housing Development, Ajo, AZ

Dear Mr. Frankeberger,

The General Services Administration (GSA) has received funding through a Reimbursable Work Authorization (RWA) from Customs and Border Protection (CBP) for the design and construction of new modular housing in Ajo, Arizona (Undertaking) for the CBP officers and agents working at the Lukeville Land Port of Entry and the Ajo CBP Office of Field Operations. The proposed new modular housing will provide 20-22 one, two or three bedroom units with garages. There are possibly two additional phases of housing construction anticipated in the future, but these phases are neither scheduled, nor funded at this time and thus are not part of this determination letter.

GSA is purchasing property at 55 South Sahuaro Street, Ajo (Site) from a private individual on which to construct the new housing units. Once the construction is complete, GSA will transfer ownership and all other responsibilities for the project to CBP. The site, classified as a Mobile Home Park according to Pima County, currently has 42 lots, 13 lots have structures on them and the remaining lots are vacant.

GSA has determined that the Area of Potential Effects (APE) for this project is the boundaries of the Site (attachment 1). There is an existing National Register historic district, Ajo Townsite Historic District (attachment 2), located in the town. The Northeastern corner of the Site is approximately three blocks from the edge of the historic district at its closest point. Given the geographical distance between the Undertaking and the historic district, and the fact that this undertaking is removing and replacing existing one-story residential units, GSA has determined that this undertaking will not have an effect on the Ajo Townsite Historic District, therefore it is not included within the APE.

GSA has determined that there are no historic properties within the APE. Of the 13 existing structures on the Site, 12 are one-story, single or double-wide modular residences, constructed in

U.S. General Services Administration
450 Golden Gate Avenue
San Francisco, CA 94102-3434
www.gsa.gov

1997 or later (attachment 3). These buildings are not yet 50 years old, nor do they meet the exceptional significance criteria of the National Register.

One structure is a one-story brick building ("office") (attachment 4). The construction date is unknown, but it appears to date from the 1940s as an office (1941 Sanborn Map) associated with a military housing project previously located on the site. GSA has determined that the "office" is not significant under any of the National Register criteria. Its primary association is with the military housing development that occupied the site from the 1940s through the 1980s or 1990s, however all the other structures associated with this housing development are gone, leaving the "office" out of context. The "office" is not associated with the Ajo Townsite Historic District either, which draws its significance as a socially responsible, planned company town, significant for its City Beautiful inspired town site plan as well as architect-designed and vernacular buildings formerly owned by the company. The architecture of the "office" is not representative of any of the styles referenced in the Ajo Townsite nomination form. The "office" is currently unused, appears to have been abandoned for several decades, and suffers so much from a loss of integrity of design, setting, materials, workmanship, feeling and association, that further study on whether it meets eligibility criteria is unwarranted.

A search of the archaeological records retained at the Arizona State Museum (attachment 5) found the proposed project area had never been inspected for cultural resources and no sites are recorded within the project boundary.

GSA plans to begin Site design for the project in the near future. Once the design is complete, available funding will determine exactly how many units can be constructed, but it will most likely be between 20 and 22. The units will be constructed along the western and southern edges of the Site (attachment 6). Preliminary floor plans and perspectives are also included.

GSA has determined that there are no historic properties present within the APE. If you do not object to this determination within 30 days of receipt of this letter, GSA will consider its responsibilities fulfilled under section 106 of the National Historic Preservation Act. By copy of this letter we are notifying the Native American tribes listed below of our undertaking and our determination and soliciting any comments they may have.

If you have any questions or require additional information, please contact me at jane.lehman@gsa.gov or (415) 522-3098.

Sincerely,

Jane Lehman

Jane Lehman
Regional Historic Preservation Officer

Attachments

CC:

Kirsten Brinker-Kulis
Advisory Council on Historic Preservation
The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

Paul Baranowski, Chief, Housing Branch
Facilities Management and Engineering
U.S. Customs & Border Protection
1331 NW Pennsylvania Ave
Washington DC 20229

Herminia Frias, Chairperson
Pascua Yaqui Tribe
7474 S. Camino de Oeste
Tucson, AZ 85746
Attn: Ms Amalia Reyes, Cultural Preservation Spec

Wendsler Nosie, Chairperson
San Carlos Apache Tribe
San Carlos Ave
San Carlos, AZ 85550
Attn: Ms Vernelda Grant, THPO

Ned Norris, Chairperson
Tohono O'odham Nation
Main Tribal Building, Business Loop
Sells, AZ 85634
Attn: Mr. Peter Steere, Cultural Affairs Prog. Mgr.

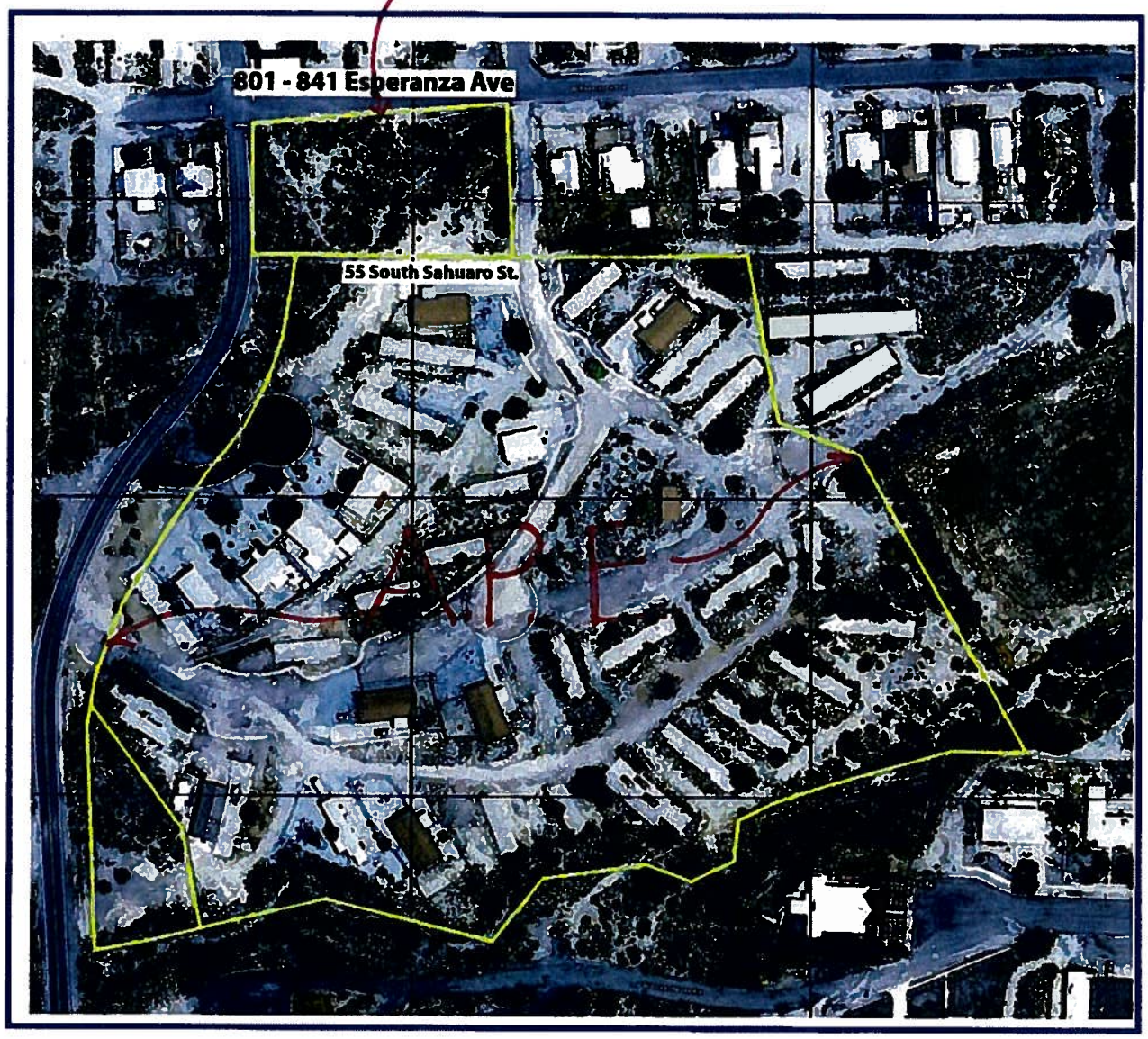
Ronnie Lupe, Chairman
White Mountain Apache Tribe
202 E. Walnut St.
Whiteriver, AZ 85941
Attn: Mr. Mark Atalha, THPO

Leigh Kuwanwisiwma, Cultural Preservation Office
Hopi Tribe
P.O. Box 837
Kykotsmovi, AZ 86039

Ajo Historical Society Museum
160 Mission St, Box 778
Ajo, AZ 85321

Acquisition Options for CBP Housing
55 South Sahuaro Street and Block 801-841 West Esperanza Avenue
Ajo, Arizona

Not Included

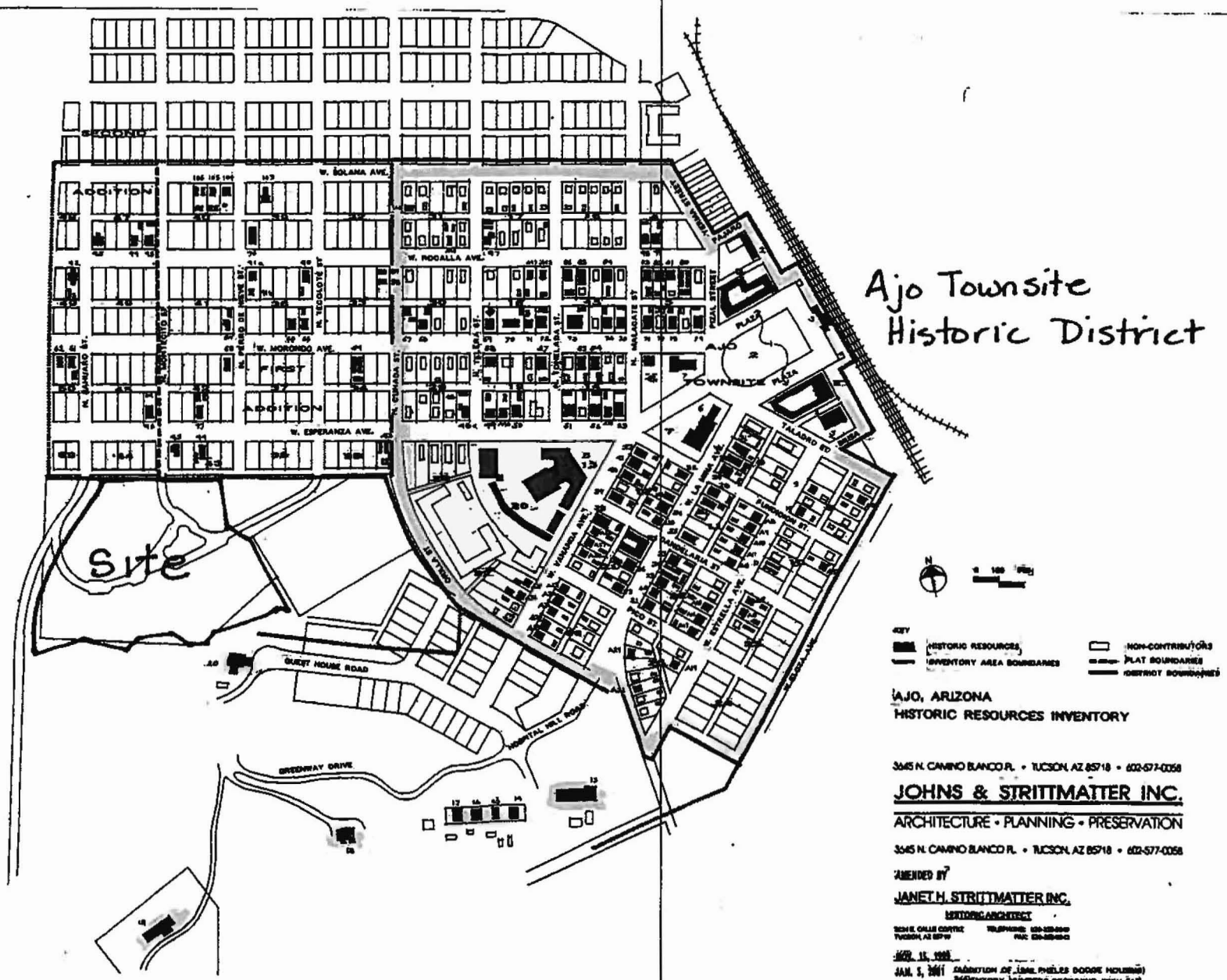


AREA OF POTENTIAL EFFECT

Prepared By: General Services Administration, Region 9
Prepared For: Customs and Border Protection

Attachment 1

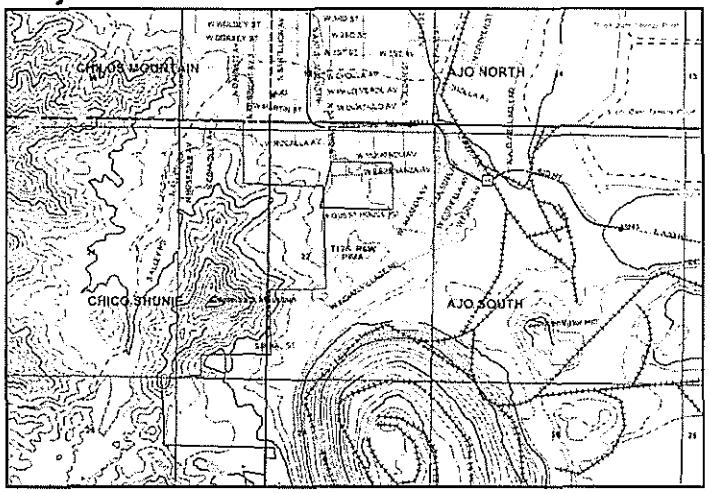
Ajo Townsite
Historic District



Attachment 2

Arizona's On-line Environmental Review Tool
Search ID: 20100430012069
Project Name: Border Patrol housing project
Date: 4/30/2010 9:04:55 AM

Project Location



Project Name: Border Patrol housing project
Submitted By: PEP Project Evaluation Program
On behalf of: OTHER FEDERAL
Project Search ID: 20100430012069
Date: 4/30/2010 9:04:51 AM
Project Category: Development Within Municipalities (Urban Growth),Residential subdivision and associated infrastructure,New construction
Project Coordinates (UTM Zone 12-NAD 83): 324175.092, 3583128.811 meter
Project Area: 31.733 acres
Project Perimeter: 1464.682 meter
County: PIMA
USGS 7.5 Minute Quadrangle ID: 1699
Quadrangle Name: AJO SOUTH
Project locality is currently being scoped

Location Accuracy Disclaimer

Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Receipt is solely responsible for the project location and thus the correctness of the Project Review Receipt content.

The Department appreciates the opportunity to provide in-depth comments and project review when additional information or environmental documentation becomes available.

Special Status Species Occurrences/Critical Habitat/Tribal Lands within 3 miles of Project Vicinity:

Name	Common Name	FWS	USFS	BLM	State
Antilocapra americana sonoriensis	Sonoran Pronghorn	LE			WSC
Echinomastus erectocentrus var. acunensis	Acuna Cactus	C			HS
Gopherus agassizii (Sonoran Population)	Sonoran Desert Tortoise	SC	S	S	WSC
Lichanura trivirgata trivirgata	Mexican Rosy Boa	SC		S	
Phyllorhynchus browni	Saddled Leaf-nosed Snake		PS		
Stenocereus thurberi	Organ Pipe Cactus				SR

 APPLICATION INITIALS: _____

Please review the entire receipt for project type recommendations and/or species or location information and retain a copy for future reference. If any of the information you provided did not accurately reflect this project, or if project plans change, another review should be conducted, as this determination may not be valid.

Arizona's On-line Environmental Review Tool:

1. This On-line Environmental Review Tool inquiry has generated recommendations regarding the potential impacts of your project on Special Status Species (SSS) and other wildlife of Arizona. SSS include all U.S. Fish and Wildlife Service federally listed, U.S. Bureau of Land Management sensitive, U.S. Forest Service sensitive, and Arizona Game and Fish Department (Department) recognized species of concern.
2. These recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation). These recommendations are preliminary in scope, designed to provide early considerations for all species of wildlife, pertinent to the project type you entered.
3. This receipt, generated by the automated On-line Environmental Review Tool does not constitute an official project review by Department biologists and planners. Further coordination may be necessary as appropriate under the National Environmental Policy Act (NEPA) and/or the Endangered Species Act (ESA).

The U.S. Fish and Wildlife Service (USFWS) has regulatory authority over all federally listed species under the ESA. Contact USFWS Ecological Services Offices: http://arizonaes.fws.gov/.

Phoenix Main Office
2321 W. Royal Palm Road, Suite 103
Phoenix, AZ 85021
Phone 602-242-0210
Fax 602-242-2513

Tucson Sub-Office
201 North Bonita, Suite 141
Tucson, AZ 85745
Phone 520-670-6144
Fax 520-670-6154

Flagstaff Sub-Office
323 N. Leroux Street, Suite 101
Flagstaff, AZ 86001
Phone 928-226-0614
Fax 928-226-1099

Disclaimer:

1. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area.
2. The Department's Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there.
3. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. HDMS data contains information about species occurrences that have actually been reported to the Department.

Arizona Game and Fish Department Mission

To conserve, enhance, and restore Arizona's diverse wildlife resources and habitats through aggressive protection and

 APPLICATION INITIALS: _____

management programs, and to provide wildlife resources and safe watercraft and off-highway vehicle recreation for the enjoyment, appreciation, and use by present and future generations.

Project Category: Development Within Municipalities (Urban Growth),Residential subdivision and associated infrastructure,New construction

Project Type Recommendations:

All degraded and disturbed lands should be restored to their natural state. Vegetation restoration projects (including treatments of invasive or exotic species) should have a completed site-evaluation plan (identifying environmental conditions necessary to re-establish native vegetation), a revegetation plan (species, density, method of establishment), a short and long-term monitoring plan, including adaptive management guidelines to address needs for replacement vegetation.

Based on the project type entered; coordination with Arizona Department of Environmental Quality may be required (http://www.azdeq.gov/).

Based on the project type entered; coordination with Arizona Department of Water Resources may be required (http://www.water.az.gov/adwr/)

Based on the project type entered; coordination with County Flood Control districts may be required.

Based on the project type entered; coordination with State Historic Preservation Office may be required http://azstateparks.com/SHPO/index.html

Based on the project type entered; coordination with U.S. Army Corps of Engineers may be required (http://www.spl.usace.army.mil/regulatory/phonedir.html)

Communities can actively support the sustainability and mobility of wildlife by incorporating wildlife planning into their regional/comprehensive plans, their regional transportation plans, and their open space/conservation land system programs. An effective approach to wildlife planning begins with the identification of the wildlife resources in need of protection, an assessment of important habitat blocks and connective corridors, and the incorporation of these critical wildlife components into the community plans and programs. Community planners should identify open spaces and habitat blocks that can be maintained in their area, and the necessary connections between those blocks to be preserved or protected. Community planners should also work with State and local transportation planning entities, and planners from other communities, to foster coordination and cooperation in developing compatible development plans to ensure wildlife habitat connectivity. The Department's guidelines for incorporating wildlife considerations into community planning and developments can be found at http://www.azgfd.gov/hgis/guidelines.aspx.

Development plans should provide for open natural space for wildlife movement, while also minimizing the potential for wildlife-human interactions through design features. Please contact Project Evaluation Program for more information on living with urban wildlife.

During planning and construction, minimize potential introduction or spread of exotic invasive species. Invasive species can be plants,

animals (exotic snails), and other organisms (e.g. microbes), which may cause alteration to ecological functions or compete with or prey upon native species and can cause social impacts (e.g. livestock forage reduction, increase wildfire risk). The terms noxious weed or invasive plants are often used interchangeably. Precautions should be taken to wash all equipment utilized in the project activities before and after project activities to reduce the spread of invasive species. Arizona has noxious weed regulations (Arizona Revised Statutes, Rules R3-4-244 and R3-4-245). See Arizona Department of Agriculture website for restricted plants http://www.azda.gov/PSD/quarantine5.htm. Additionally, the U.S. Department of Agriculture has information regarding pest and invasive plant control methods including: pesticide, herbicide, biological control agents, and mechanical control: http://www.usda.gov/wps/portal/usdahome. The Department regulates the importation, purchasing, and transportation of wildlife and fish (Restricted Live Wildlife), please refer to the hunting regulations for further information http://www.azgfd.gov/h_f/hunting_rules.shtml.

During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and should be contained within important wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a variety of wildlife.

Hydrological considerations: design culverts to minimize impacts to channel geometry, or design channel geometry (low flow, overbank, floodplains) and substrates to carry expected discharge using local drainages of appropriate size as templates. Aquatic wildlife considerations: reduce/minimize barriers to migration of amphibians or fish (e.g. eliminate falls). Terrestrial wildlife: washes and stream corridors often provide important corridors for movement. Overall culvert width, height, and length should be optimized for movement of the greatest number and diversity of species expected to utilize the passage. Culvert designs should consider moisture, light, and noise, while providing clear views at both ends to maximize utilization. For many species, fencing is an important design feature that can be utilized with culverts to funnel wildlife into these areas and minimize the potential for roadway collisions. Guidelines for culvert designs to facilitate wildlife passage can be found at http://www.azgfd.gov/hgis/guidelines.aspx.

Minimization and mitigation of impacts to wildlife and fish species due to changes in water quality, quantity, chemistry, temperature, and alteration to flow regimes (timing, magnitude, duration, and frequency of floods) should be evaluated. Minimize impacts to springs, in-stream flow, and consider irrigation improvements to decrease water use. If dredging is a project component, consider timing of the project in order to minimize impacts to spawning fish and other aquatic species (including spawning seasons), and to reduce spread of exotic invasive species. We recommend early direct coordination with Project Evaluation Program for projects that could impact water resources, wetlands, streams, springs, and/or riparian habitats.

Planning: consider impacts of lighting intensity on mammals and birds and develop measures or alternatives that can be taken to increase human safety while minimizing potential impacts to wildlife. Conduct wildlife surveys to determine species within project area, and evaluate proposed activities based on species biology and natural history to determine if artificial lighting may disrupt behavior patterns or habitat use.

The Department recommends that wildlife surveys are conducted to determine if noise-sensitive species occur within the project area. Avoidance or minimization measures could include conducting project activities outside of breeding seasons.

The Department requests further coordination to provide project/species specific recommendations, please contact Project Evaluation Program directly.

The construction or maintenance of water developments should include: incorporation of aspects of the natural environment and the visual resources, maintaining the water for a variety of species, water surface area (e.g. bats require a greater area due to in-flight drinking), accessibility, year-round availability, minimizing potential for water quality problems, frequency of flushing, shading of natural features, regular clean-up of debris, escape ramps, minimizing obstacles, and minimizing accumulation of silt and mud.

Trenches should be covered or back-filled as soon as possible. Incorporate escape ramps in ditches or fencing along the perimeter to deter small mammals and herptefauna (snakes, lizards, tortoise) from entering ditches.

Project Location and/or Species recommendations:

Heritage Data Management System records indicate that one or more listed, proposed, or candidate species or Critical Habitat (Designated or Proposed) have been documented in the vicinity of your project (refer to page 1 of the receipt). Please contact:
Ecological Services Office
US Fish and Wildlife Service
2321 W. Royal Palm Rd.
Phoenix, AZ 85021-4951
Phone: 602-242-0210
Fax: 602-242-2513

Heritage Data Management System records indicate that one or more native plants listed on the Arizona Native Plant Law and Antiquities Act have been documented within the vicinity of your project area (refer to page 1 of the receipt). Please contact:
Arizona Department of Agriculture
1688 W Adams
Phoenix, AZ 85007
Phone: 602-542-4373

Heritage Data Management System records indicate that Sonoran desert tortoise have been documented within the vicinity of your project area (refer to the species list on page 1 of the receipt). Please review the Tortoise Handling Guidelines found on the Environmental Review Home Page: http://www.azgfd.gov/hgis/guidelines.azpx.

Recommendations Disclaimer:

1. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project.
2. These recommendations are proposed actions or guidelines to be considered during **preliminary project development**.
3. Additional site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies.
4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
5. The Department is interested in the conservation of all fish and wildlife resources, including those Special Status Species listed on this receipt, and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.

 APPLICATION INITIALS: _____

6. **Further coordination requires the submittal of this initialed and signed Environmental Review Receipt with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map).**
7. Upon receiving information by AZGFD, please allow 30 days for completion of project reviews. Mail requests to:

Project Evaluation Program, Habitat Branch
Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, Arizona 85086-5000
Phone Number: (623) 236-7600
Fax Number: (623) 236-7366

Terms of Use

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1. This Environmental Review and project planning website was developed and intended for the purpose of screening projects for potential impacts on resources of special concern. By indicating your agreement to the terms of use for this website, you warrant that you will not use this website for any other purpose.
2. Unauthorized attempts to upload information or change information on this website are strictly prohibited and may be punishable under the Computer Fraud and Abuse Act of 1986 and/or the National Information Infrastructure Protection Act .
3. The Department reserves the right at any time, without notice, to enhance, modify, alter, or suspend the website and to terminate or restrict your access to the website.
4. This Environmental Review is based on the project study area that was entered. The review must be redone if the project study area, location, or the type of project changes. If additional information becomes available, this review may need to be reconsidered.
5. A signed and initialed copy of the Environmental Review Receipt indicates that the entire receipt has been read by the signer of the Environmental Review Receipt.

Security:

The Environmental Review and project planning web application operates on a complex State computer system. This system is monitored to ensure proper operation, to verify the functioning of applicable security features, and for other like purposes. Anyone using this system expressly consents to such monitoring and is advised that if such monitoring reveals possible evidence of criminal activity, system personnel may provide the evidence of such monitoring to law enforcement officials. Unauthorized attempts to upload or change information; to defeat or circumvent security measures; or to utilize this system for other than its intended purposes are prohibited.

This website maintains a record of each environmental review search result as well as all contact information. This information is maintained for internal tracking purposes. Information collected in this application will not be shared outside of the purposes of the Department.

If the Environmental Review Receipt and supporting material are not mailed to the Department or other appropriate agencies within six (6) months of the Project Review Receipt date, the receipt is considered to be null and void, and a new review must be initiated.

 APPLICATION INITIALS: _____

Arizona's On-line Environmental Review Tool
Search ID: 20100430012069
Project Name: Border Patrol housing project
Date: 4/30/2010 9:04:55 AM

Print this Environmental Review Receipt using your Internet browser's print function and keep it for your records. Signature of this receipt indicates the signer has read and understands the information provided.

Signature: _____

Date: _____

Proposed Date of Implementation: _____

Please provide point of contact information regarding this Environmental Review.

Application or organization responsible for project implementation

Agency/organization: _____

Contact Name: _____

Address: _____

City, State, Zip: _____

Phone: _____

E-mail: _____

Person Conducting Search (if not applicant)

Agency/organization: _____

Contact Name: _____

Address: _____

City, State, Zip: _____

Phone: _____

E-mail: _____

 APPLICATION INITIALS: _____

THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT
5000 W. CAREFREE HIGHWAY
PHOENIX, AZ 85086-5000
(602) 942-3000 • WWW.AZGFD.GOV

GOVERNOR
JANICE K. BREWER
COMMISSIONERS
CHAIR, JENNIFER L. MARTIN, PHOENIX
ROBERT R. WOODHOUSE, ROLL
NORMAN W. FREEMAN, CHINO VALLEY
JACK F. HUSTED, SPRINGERVILLE
J.W. HARRIS, TUCSON
DIRECTOR
LARRY D. VOYLES
DEPUTY DIRECTORS
GARY R. HOVATTER
BOB BROSCHEID

April 30, 2010

GSA
Michael R. Dawson
EcoPlan Associates, Inc.
701 W. Southern Ave.
Mesa, AZ 85210

Re: U.S. Customs and Border Protection Ajo Housing Development Project.

Dear Mr. Dawson:

The Arizona Game and Fish Department (the Department) has received GSA's letter dated April 20, 2010 regarding the above referenced project. We have used our On-line Environmental Review Tool (search receipt # 20100430012069 enclosed) to determine there is one Listed Endangered (Sonoran Pronghorn) and one Candidate (Acuna Cactus) species within 3 miles of the project area. **The Department recommends you or your client should contact the U.S. Fish and Wildlife Service to determine if your project may have any impacts on these species.**

The receipt also indicates the presence of Sonoran Desert Tortoise in proximity to your project. Although this species is not yet listed, the Department has "Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects". I have enclosed a copy of these guidelines. Please ensure your client and their work crews are familiar with and practice these guidelines.

The Department has no further comments at this time. If you have questions or concerns, please contact me at (623) 236-7513.

Sincerely,

Daniel E. Nelson
Project Evaluation Specialist

CC: Debra Bills, USFWS; Troy Smith, AGFD
M10-04225955

GUIDELINES FOR HANDLING SONORAN DESERT TORTOISES ENCOUNTERED ON DEVELOPMENT PROJECTS

Arizona Game and Fish Department
Revised October 23, 2007

The Arizona Game and Fish Department (Department) has developed the following guidelines to reduce potential impacts to desert tortoises, and to promote the continued existence of tortoises throughout the state. These guidelines apply to short-term and/or small-scale projects, depending on the number of affected tortoises and specific type of project.

The Sonoran population of desert tortoises occurs south and east of the Colorado River. Tortoises encountered in the open should be moved out of harm's way to adjacent appropriate habitat. If an occupied burrow is determined to be in jeopardy of destruction, the tortoise should be relocated to the nearest appropriate alternate burrow or other appropriate shelter, as determined by a qualified biologist. Tortoises should be moved less than 48 hours in advance of the habitat disturbance so they do not return to the area in the interim. Tortoises should be moved quickly, kept in an upright position parallel to the ground at all times, and placed in the shade. Separate disposable gloves should be worn for each tortoise handled to avoid potential transfer of disease between tortoises. Tortoises must not be moved if the ambient air temperature exceeds 40° Celsius (105° Fahrenheit) unless an alternate burrow is available or the tortoise is in imminent danger.

A tortoise may be moved up to one-half mile, but no further than necessary from its original location. If a release site, or alternate burrow, is unavailable within this distance, and ambient air temperature exceeds 40° Celsius (105° Fahrenheit), the Department should be contacted to place the tortoise into a Department-regulated desert tortoise adoption program. Tortoises salvaged from projects which result in substantial permanent habitat loss (e.g. housing and highway projects), or those requiring removal during long-term (longer than one week) construction projects, will also be placed in desert tortoise adoption programs. *Managers of projects likely to affect desert tortoises should obtain a scientific collecting permit from the Department to facilitate temporary possession of tortoises.* Likewise, if large numbers of tortoises (>5) are expected to be displaced by a project, the project manager should contact the Department for guidance and/or assistance.

Please keep in mind the following points:

- These guidelines do not apply to the Mojave population of desert tortoises (north and west of the Colorado River). Mojave desert tortoises are specifically protected under the Endangered Species Act, as administered by the U.S. Fish and Wildlife Service.

- These guidelines are subject to revision at the discretion of the Department. We recommend that the Department be contacted during the planning stages of any project that may affect desert tortoises.

- Take, possession, or harassment of wild desert tortoises is prohibited by state law. Unless specifically authorized by the Department, or as noted above, project personnel should avoid disturbing any tortoise.

COUNTY ADMINISTRATOR'S OFFICE
PIMA COUNTY GOVERNMENTAL CENTER
130 W. CONGRESS, TUCSON, AZ 85701-1317
(520) 740-8661 FAX (520) 740-8171

C.H. HUCKELBERRY
County Administrator

May 10, 2010

General Services Administration
c/o Michael R. Dawson
EcoPlan Associates, Inc.
701 W. Southern Avenue
Mesa, Arizona 85210

Re: US General Services Administration: US Customs and Border Protection - Ajo Housing Development Project

Dear Mr. Dawson:

Pima County appreciates the opportunity to provide comments on the proposed General Services Administration (GSA) project in Ajo, Arizona to provide housing for Customs and Border Protection (CBP) employees. We have some concerns and issues regarding the proposed project.

The National Environmental Policy Act (NEPA) process requires a statement of purpose and need, agency and public participation in the planning process, definition of alternatives, assessment and disclosure of the environmental impacts (natural, social and economic aspects) of the proposed action and alternatives, and mitigation measures to avoid significant impacts. It is also critical to ensure that all affected agencies and the public have the opportunity to comment on the project and NEPA documents. To this end, Pima County offers the following background information, comments, and questions pertaining to this proposed project.

With the closing of the Ajo copper mine in 1983, the Ajo community and Pima County have worked in partnership to achieve the following goals: to redefine a vision for Ajo, to help create a new economic base, to attract new residents and visitors to build the community, and to find funding and investment interests to reinvigorate this small, diverse, and dynamic town in unincorporated Pima County.

Ajo became a target community for Pima County's Community Development Block Grant program and was designated federal "colonia" by the US Departments of Agriculture and Housing and Urban Development (HUD). A comprehensive needs assessment and community study completed in 2002 resulted in the "Ajo Vision Plan."

A centerpiece of the vision is the Ajo Townsite Historic District, which Pima County nominated to the National Register of Historic Places to facilitate economic reinvestment in the community. There have been remarkable successes – most notably the Ajo Curley School project undertaken by the International Sonoran Desert Alliance (ISDA) that spearheaded the $11 million rehabilitation of the historic school into affordable housing units. Former Governor of Arizona Janet Napolitano, now US Secretary of Homeland Security, presided at the 2006 ceremony in Ajo to celebrate the rehabilitation effort. With funding from a variety of federal, state, county and private sources, the abandoned property was successfully converted into 30 affordable live/work rentals for artists and creative home businesses. Upon completion in 2008, this project received the national "HUD Secretary's Award for Excellence in Historic Preservation" at the National Trust for Historic Preservation award ceremony and conference in Tulsa, Oklahoma.

Pima County and the community of Ajo have enjoyed considerable successes in Ajo, and the GSA project has great potential to further those successes. Our comments and questions are intended to raise issues and concerns for consideration and to ensure there is meaningful participation in the NEPA review process that will result in the preparation of Environmental Assessment (EA) by GSA.

Purpose and Need.

The GSA scoping letter states there is a shortage of housing available to accommodate CBP employees who work at the Lukeville Port of Entry and the Ajo Station in Why.

- Under what mandate does the CBP provide housing to its employees?
- How many CBP employees do you anticipate needing to accommodate?
- Please provide any housing studies that demonstrate this shortage.

Agency and public participation in the planning process.

The GSA letter states that the notice "is being offered to allow early and meaningful participation in the National Environmental Policy Act (NEPA) review of this proposed housing development project." Clearly, GSA has been involved in much earlier planning, and the schedule notes that Phase 1 construction is planned in late 2010 or early 2011. The schedule provides minimal time for early and meaningful participation.

- How have agencies, tribes, and the public been involved in the early planning process to identify the Ajo housing project as the proposed undertaking?
- Which agencies, tribes, and community organizations were contacted and when did this early planning take place?

Definition of Alternatives.

We understand from your scoping letter that GSA has considered housing locations in Lukeville and Why and has identified its preferred alternative as purchasing land in Ajo and placing up to 56 modular housing units on the site. It appears that locations for housing in Lukeville, Why, and Ajo were considered but are not presented as alternatives.

- What is the cumulative scope of current, proposed, and future operations in western Pima County?
- What alternatives are being considered?
- Why are modular units the only housing type being considered?
- Why is the rehabilitation of existing historic buildings and other housing stock not being considered as an alternative?
- Executive Order 13006, *"Locating Federal Facilities on Historic Properties in our Nation's Central Cities"* states that Federal agencies "shall give first consideration to historic properties within historic districts...or other developed or undeveloped sites within historic districts." How is GSA complying with EO 13006?

Environmental impacts and Mitigation.

The scoping letter does not address how the effects (negative or positive) to the natural, social and economic environment will be considered in the EA.

- Should the Ajo location be selected, we feel direct investment in Ajo by GSA has the potential to provide a large economic benefit to the community, bring new residents and employment opportunities to the town, and expand the community's economic base.
- If historic homes and buildings within the Ajo Historic District are rehabilitated by GSA, the built environment and fabric of the community will be greatly enhanced.
- If new architecturally compatible housing is developed within the historic district on undeveloped lots, the character of the surrounding historic district and other properties will be greatly enhanced.
- How will the GSA expenditures for this project directly benefit the Ajo community? What economic assessments are planned?

Pima County looks forward to working with GSA and the CBP in bringing new reinvestment and residents to western Pima County. We hope you will consider these comments in the development of your project so as to provide the maximum public benefit to the region.

Sincerely,

C.H. Huckelberry
County Administrator

CHH/mjk

c: The Honorable Chairman and Members, Pima County Board of Supervisors

Pima County
Development Services

Carmine DeBonis Jr.
Director

Office: 520.740.6506
fax: 520.740.6878

May 19, 2010

GSA
c/o Michael R. Dawson
EcoPlan Associates, Inc.
701 W. Southern Ave.
Mesa, AZ 85210

Subject: U.S. Customs and Border Protection Ajo Housing Developemnt Project

Dear Mr. Dawson:

The following comments are supplemental to those you received from Mr. Huckelberry, Pima County Administrator dated May 10, 2010 (attached) regarding the Ajo Housing Development Project in Ajo, Arizona. Of particular note are the comments from Pima County Department of Transportation and our Cultural Resources Program.

DEPARTMENT OF TRANSPORTATION

Pima County has established and adheres to certain roadway development standards and regulations to preserve and protect natural cultural resources, to prevent and reduce air pollution and to insure safe public transportation facilities. The conditions of the approval should preserve and protect natural and cultural resources (plant survey and preservation plan cultural resources survey), prevent and reduce air pollution (paved roadway) and insure safe public transportation facilities (provisions for drainage and appropriate roadway design, width, horizontal and vertical alignment).

The parcels mentioned in the notice are served by existing paved, Pima County maintained roads and State Highway 85. County right-of-way varies from 50 to 80 feet. Right-of-way use permits and air quality permits shall be obtained from Pima County, as needed, for any improvements encroaching into the right-of-way. Offsite site improvements will require plan review by Development Review Division in Development Services Department.

The first parcel (401-55-472H) and second parcel (401-55-472N) are located east of Sahuaro St. which has 75 feet existing right-of-way. On the north side of the first parcel is 20 feet existing right-of-way for an alley that is partially disturbed but is not a continuous road and is not maintained by Pima County. The 5 described parcels (401-55-108A, 1070, 1060, 1050 and 1040) are surrounded on their perimeter by right-of-way. There is 75 feet for Sahuaro St. on the west, 70 feet right-of-way for Esperanza Av on the north, 44 feet right-of-way for Montecito St. on the east side and the same 20 feet right-of-way for an alley described above on the south side. Esparanza Av and Sahuaro St. are both paved and Pima County maintained. Montecito St. appears to be paved but is not County maintained, south of Esperanza Av. It is County maintained between Esperanza Av and Solana Av.

Access is via Esperanza Av and Sahuaro St. which ultimately connect to Indian Village Rd., Taladro St (State Hy. 85) and Solana Av (also State Hy. 85). The access is continuous but the street names change.

The Development Plan for 55 S. Sahuaro St. was approved in 1995 and some improvements appear to be completed for the mobile home development. There are two subdivision plats that apply-New Cornelia Addition (39057) and Second Addition to Ajo Townsite (06072).

PIMA COUNTY REGIONAL FLOOD CONTROL DISTRICT

1. A wash regulated by the County runs along the southern boundary of this parcel that has Xeroriparian D habitat regulated by the county associated with it. Most of the site drains in this direction.
2. Immediately downstream of the site there is a detention basin constructed by the District to protect the historic Curley School property and Ajo Historic District downstream from flows associated with the wash. The basin has been designed to accept nuisance flows from the site as well as the wash itself.
3. Numerous drainage complaints are on file in the historic residential area which the northern portion of the site drains toward.
4. The GSA is requesting input for consideration as they prepare an NEPA Environmental Assessment.
5. The District can provide both the official riparian habitat maps as well as the drainage report prepared for construction of the Curley School Basin which was prepared by AECOM (DMJM) for use in preparation of the EA.

PIMA COUNTY PLANNING

The design and architecture of the housing units should be compatible with the first and second historically platted additions to the historic Ajo Townsite.

CULTURAL RESOURCES DEPARTMENT

Cultural Resources has reviewed the document dated April 20, 2010, from Mr. Osmahn Kadri, GSA, to Supervisor Sharon Bronson regarding the proposed modular housing development in Ajo, Pima County. The purpose of Mr. Kadari's letter is to allow early and meaningful participation of Pima County in the National Environmental Policy Act review of the proposed housing development. The proposed project area is referred to as the subject property in Mr. Kadri's letter, and that is how it will be referred to in this report.

Staff has the following observations and comments regarding cultural resources and the proposed development.

1. The proposed development, as a federal undertaking, is subject to Section 106 of the National Historic Preservation Act (NHPA).
2. Under 36 CFR 800.8, federal agencies are encouraged to coordinate compliance with Section 1 06 of the NHPA and the requirements of the National Environmental Policy Act (NEPA).
3. In NEPA Congress declares that it is the policy of the federal government, in cooperation with local governments, to preserve important historic and cultural aspects of our national heritage.
4. Executive Order 13006 (EO 13006) directs federal agencies to utilize and maintain historic properties and districts wherever economically prudent and operationally appropriate.
5. The Ajo Townsite, which is listed in the National Register of Historic Places (NRHP) because of its national significance, is in close proximity to the subject property. The effects of the proposed development, direct and indirect, must be assessed as part of NHPA and NEPA compliance

activities. This is best concluded prior to making any decision regarding proposed project impact under NEPA.

6. A portion of the subject property is within the second historically platted addition to the historic Ajo Townsite, and the remainder of the property is adjacent to both the first and second historically platted additions to the historic Ajo Townsite. The GSA will need to evaluate the NRHP eligibility of these two Ajo Townsite additions and assess the effect of the proposed project on these additions should they be eligible. This is best concluded prior to making any decision regarding proposed project impact under NEPA.
7. Our records show that the subject property has not been inventoried for historic properties. This inventory and identification of historic properties, evaluation of significance, and assessment of effects, must be conducted per 36 CFR 800. This is best concluded prior to making any decision regarding the proposed project impact under NEPA.
8. We expect that the GSA will initiate and conclude consultation with the State Historic Preservation Office as part of its compliance requirements prior to making any decision regarding the proposed project impact under NEPA.
9. Given the importance of the NRHP listed Ajo Townsite to Pima County, the investment of the people of Pima County in the NRHP listed Ajo Townsite through the voter approval and expenditure of County bond funds, and the County's interest in the protection of historic properties, the County's Office of Cultural Resources and Historic Preservation (OCRHP) requests that GSA actively and comprehensively include OCRHP in the planning, review, evaluation of significance, and assessment of effects regarding historic properties within, adjacent to, and in close proximity to the subject parcel as required under NHPA and NEPA.

Thank you for the opportunity to comment.

Sincerely,

Sherry A. Ruther
Manager – Environmental and Long Range Planning Group
Pima County Development Services

CC: C. H. Huckleberry, County Administrator
Diana Durazo, Special Staff Assistant to the County Administrator

EcoPlan Associates, Inc.
Environmental Science & Resource Economics

Record of Conversation

Date:	June 09, 2010
Time:	10:45 a.m.
Federal Number:	
ADOT Number:	
Project Name:	07-033013 GSA Ajo Housing Development Project
Contact Initiator:	Steven Reuter of EcoPlan
Contact Recipient:	Erin Fernandez of USFWS
Copy:	
Regarding:	USFWS comments on GSA Ajo Housing

Conversation Summary

Ms. Fernandez of USFW requested on behalf of USFW that no non-native or invasive species be utilized in landscaping for the project. USFWS had no additional comments.

Action Items

- No non-native or invasive species be used in landscaping

701 West Southern Avenue, Suite 203 • Mesa, Arizona 85210 • (480) 733-6666 • Fax (480) 733-6661

06/22/2010 09:06 AM

Subject Ajo

Mr. Neely and Mr. Gibson,

I write to you today to express the concerns of community members from the City of Ajo.

GSA is in the process of acquiring property in Ajo that is to be used for manufactured homes for Border Patrol agents. Community members are concerned that these actions will keep Border Patrol agents in an enclave and prevent them from integrating into the Ajo community. In moving forwards with the Ajo project, we encourage GSA to continue prioritizing the integration of Border Patrol in the community. Furthermore, the idea of bringing manufactured homes to the City of Ajo is of concern. Ajo's unemployment rate is at an average 14%, significantly above the county, state and national average. The need for local jobs is great and we would urge GSA to invest current efforts in the community. Instead of brining manufacture homes we encourage you to build homes or perhaps even renovate vacant homes.

I thank you for your time and welcome feedback. I look forwards to working with you on the matter.

Sincerely,

Bertha A. Guerrero
Legislative Assistant
Congressman Raúl M. Grijalva
1440 Longworth House Office Building
Washington, DC 20515

Dear Representative Grijalva:

Thank you for your e-mail communication regarding the Department of Homeland Security, Customs and Border Protection (CBP) housing program.

GSA would like to take this opportunity to clarify some of the concerns expressed with regards to the CBP Housing Program. It's important we all understand this is a program that will begin to rectify the existing housing shortage along the southwestern border. There are over 250 CBP Officers, and Border Patrol Agents currently assigned in the Ajo and Lukeville areas. Over 50% of these Officers and Agents currently live within the community of Ajo. These employees have either purchased, or rent homes, apartments, and rooms that are not climate appropriate, energy efficient, durable, affordable, locally serviceable or well designed. A community housing survey was conducted recently, which confirmed that the majority of vacant houses in the Ajo area do not meet the current housing standards.

The CBP National Housing prototype allows the flexibility in its design for either modular or standard "stick built" construction. GSA will seek out the availability of Qualified Small Business Contractors that meet the required Government Security/Bonding Standards, along with their ability to comply with construction schedules, and price will always prevail. Due to the urgent need to provide housing for both existing and new agents, an expedited delivery process was determined to be the best fit. There was a consideration given to standard construction, however, the time needed did not seem reasonable. Finally, the emphasis on the manufactured housing allows us the flexibility to work with variable lot dimensions since the houses can be freestanding or attached to accommodate multiple site layouts.

At this point in time there is no way to determine the number of jobs that may be available to the Ajo community. As with any new development, there will always be a need for standard maintenance and operation of the houses and the development itself. The increased number of families to Ajo can only help benefit and further energize the community. This housing project is a new family and kid-friendly neighborhood, of which, the officers will be a part of for years to come.

With regards to the vacant rental properties available, there is no way to guarantee their availability for the officers now or in the future. In addition, CBP will have a significant increase in the number of officers in the Ajo area, however, they do not have control over the location their employees and their families chose to settle. The use of CBP Housing is not mandatory for CBP Employees. They always have the option to lease or own a property in the town or location of their choosing. This CBP housing project will provide the officers and their families a safe and more convenient residential community rather than residing at various locations throughout the Phoenix, Tucson or Lukeville areas.

We hope this helps clarify some issues. The CBP officers look forward to becoming a part of this community.

We appreciate your support of the CBP Housing Program and border security. We look forward to working with you in the future.

SHPO-2010-1532 (87934)

GSA

GSA REGION 9
10 NOV 29 PM 3:35
PROPERTY DEVELOPMENT DIV
9PC

GSA Pacific Rim Region

October 27, 2010

RECEIVED
NOV 05 2010
ARIZONA STATE PARKS S.H.P.O.

Mr. Robert Frankeberger
Arizona Office of Historic Preservation
Arizona State Parks
1300 West Washington
Phoenix, AZ 85007

Re: Ajo Housing Development, Ajo, AZ

Dear Mr. Frankeberger,

The General Services Administration (GSA) has received funding through a Reimbursable Work Authorization (RWA) from Customs and Border Protection (CBP) for the design and construction of new modular housing in Ajo, Arizona (Undertaking) for the CBP officers and agents working at the Lukeville Land Port of Entry and the Ajo CBP Office of Field Operations. The proposed new modular housing will provide 20-22 one, two or three bedroom units with garages. There are possibly two additional phases of housing construction anticipated in the future, but these phases are neither scheduled, nor funded at this time and thus are not part of this determination letter.

GSA is purchasing property at 55 South Sahuaro Street, Ajo (Site) from a private individual on which to construct the new housing units. Once the construction is complete, GSA will transfer ownership and all other responsibilities for the project to CBP. The site, classified as a Mobile Home Park according to Pima County, currently has 42 lots, 13 lots have structures on them and the remaining lots are vacant.

GSA has determined that the Area of Potential Effects (APE) for this project is the boundaries of the Site (attachment 1). There is an existing National Register historic district, Ajo Townsite Historic District (attachment 2), located in the town. The Northeastern corner of the Site is approximately three blocks from the edge of the historic district at its closest point. Given the geographical distance between the Undertaking and the historic district, and the fact that this undertaking is removing and replacing existing one-story residential units, GSA has determined that this undertaking will not have an effect on the Ajo Townsite Historic District, therefore it is not included within the APE.

GSA has determined that there are no historic properties within the APE. Of the 13 existing structures on the Site, 12 are one-story, single or double-wide modular residences, constructed in

U.S. General Services Administration
450 Golden Gate Avenue
San Francisco, CA 94102-3434
www.gsa.gov

1997 or later (attachment 3). These buildings are not yet 50 years old, nor do they meet the exceptional significance criteria of the National Register.

One structure is a one-story brick building ("office") (attachment 4). The construction date is unknown, but it appears to date from the 1940s as an office (1941 Sanborn Map) associated with a military housing project previously located on the site. GSA has determined that the "office" is not significant under any of the National Register criteria. Its primary association is with the military housing development that occupied the site from the 1940s through the 1980s or 1990s, however all the other structures associated with this housing development are gone, leaving the "office" out of context. The "office" is not associated with the Ajo Townsite Historic District either, which draws its significance as a socially responsible, planned company town, significant for its City Beautiful inspired town site plan as well as architect-designed and vernacular buildings formerly owned by the company. The architecture of the "office" is not representative of any of the styles referenced in the Ajo Townsite nomination form. The "office" is currently unused, appears to have been abandoned for several decades, and suffers so much from a loss of integrity of design, setting, materials, workmanship, feeling and association, that further study on whether it meets eligibility criteria is unwarranted.

A search of the archaeological records retained at the Arizona State Museum (attachment 5) found the proposed project area had never been inspected for cultural resources and no sites are recorded within the project boundary.

GSA plans to begin Site design for the project in the near future. Once the design is complete, available funding will determine exactly how many units can be constructed, but it will most likely be between 20 and 22. The units will be constructed along the western and southern edges of the Site (attachment 6). Preliminary floor plans and perspectives are also included.

GSA has determined that there are no historic properties present within the APE. If you do not object to this determination within 30 days of receipt of this letter, GSA will consider its responsibilities fulfilled under section 106 of the National Historic Preservation Act. By copy of this letter we are notifying the Native American tribes listed below of our undertaking and our determination and soliciting any comments they may have.

If you have any questions or require additional information, please contact me at jane.lehman@gsa.gov or (415) 522-3098.

Sincerely,

Jane Lehman

Jane Lehman
Regional Historic Preservation Officer

Attachments

CONCUR
Robert Frankeberger
ARIZONA STATE HISTORIC PRESERVATION OFFICER
ARIZONA STATE PARKS BOARD
23 NOV 10

U.S. GENERAL SERVICES ADMINISTRATION
Proposed U.S. Customs and Border Protection Ajo Housing Development Project
Public Meeting–7 p.m. March 4, 2010
Ajo Community Center, 290 5th St., Ajo, Arizona

The General Services Administration (GSA) is proposing to construct housing for U.S. Customs and Border Protection (CBP) employees in Ajo, Arizona. The subject property is generally described as 55 S. Sahuaro St. and parcels addressed as 801, 811, 821, 831, and 841 W. Esperanza Ave. The Sahuaro Street parcel currently supports a partially occupied mobile home park. The Esperanza Avenue parcels are currently undeveloped.

There is currently insufficient housing available to accommodate CBP employees who work at the Lukeville Land Port of Entry and the Ajo Station in Why, Arizona. Therefore, the GSA is proposing to:

- Construct 18 to 28 modular homes on the subject property (Phase 1)
- Construct associated sidewalks, landscaping, and infrastructure, as needed
- Construct up to 28 additional units if funding becomes available (Phase 2)

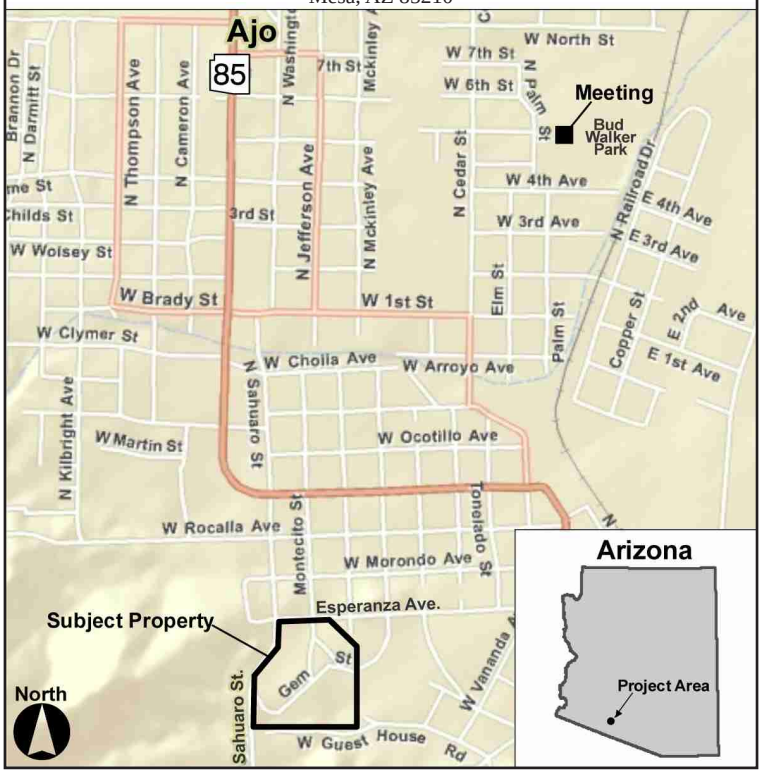
Public Meeting

The GSA will present the proposed project for public review and comment at 7 p.m. on March 4, 2010, at the Ajo Community Center. The meeting will be held in conjunction with a regular meeting of the Western Pima County Community Council.

This meeting is being offered to allow early and meaningful participation in the National Environmental Policy Act review of a housing construction project proposed by the GSA. The GSA will prepare an Environmental Assessment to evaluate the potential environmental consequences of the proposed project.

If you have specific concerns, suggestions, or recommendations regarding this project and you cannot attend the meeting, please contact Michael R. Dawson at EcoPlan Associates, Inc., by e-mail at mdawson@ecoplanaz.com; by phone at 480.733.6666, extension 177; by fax at 480.733.6661; or by mail at:

GSA
c/o Michael R. Dawson
EcoPlan Associates, Inc.
701 W. Southern Ave.
Mesa, AZ 85210



Ajo Copper News

Hollister David, Publisher
Gabrielle David, Editor
Michelle Pacheco, Office Manager

P. O. Box 39 • Ajo, Arizona 85321
Phone (520) 387-7688
FAX (520) 387-7505

STATE OF ARIZONA)
) **ss.**
COUNTY OF PIMA)

Hollister David deposes and says that he is the publisher of the *Ajo Copper News*, a weekly newspaper of general circulation and established character, published weekly at Ajo, Pima County, Arizona, and that

Notice of Availability of the Draft Environmental Assessment for U.S. Customs and Border Protection Ajo Housing Development Project

a correct copy of which is attached to this affidavit, was published in the said *Ajo Copper News* every week in the newspaper proper and not in a supplement for

Publ. November 10, 17, 2010

Hollister David, Publisher,
Ajo Copper News

Sworn to and subscribed before me, a Notary Public in and for the County of Pima, Arizona, this **17** day of **November, 2010.**

Notary Public

OFFICIAL SEAL
MICHELLE A. PACHECO
Notary Public - State of Arizona
PIMA COUNTY
My Comm. Expires Feb. 27, 2011

U.S. GENERAL SERVICES ADMINISTRATION
Notice of Availability of the Draft Environmental Assessment for
U.S. Customs and Border Protection Ajo Housing Development Project
Public Hearing–5 p.m. November 22, 2010
Ajo Community Center, 290 5th St., Ajo, Arizona

The General Services Administration (GSA) announces the availability of the Draft Environmental Assessment (EA) for the construction of housing for U.S. Customs and Border Protection (CBP) employees in Ajo, Arizona. The EA provides GSA, U.S. Customs and Border Protection and its stakeholders an analysis of the environmental impacts resulting from the proposed action.

There is currently insufficient housing available to accommodate CBP employees who work at the Lukeville Land Port of Entry and the Ajo Station in Why, Arizona. Therefore, the GSA is proposing to:

- Construct 22 modular homes on the subject property (Phase 1)
- Construct associated sidewalks, landscaping, and infrastructure as needed
- Construct up to 36 additional units if funding becomes available (Phase 2)

The preferred location is located at 55 S. Sahuaro St. and parcels addressed as 801, 811, 821, 831, and 841 W Esperanza Ave. The Sahuaro Street parcel currently supports a partially occupied mobile home park. The Esperanza Avenue parcels are currently undeveloped.

Written comments on the Draft EA are invited from the public and may be submitted during the comment period, which begins on November 10, 2010 and ends December 10, 2010. Comments must be postmarked by December 10, 2010 to ensure consideration. The GSA will use the comments received to help prepare the final version of the Ajo Housing Development EA.

A public hearing will be held on Monday November 22, 2010, from 5:00pm to 8:00pm at the Ajo Community Center, 290 5th Street, Ajo, Arizona. For more information call Gene Gibson at (415) 581-1788 or email at [illegible]gov/nepalibrary and at the Ajo Public Library 33 N. Plaza Street, Ajo, Arizona.

Comments may be submitted in writing to: Osmahn Kadri, NEPA Project Manager, Pacific Rim Division – General Services Administration, 880 Front Street #4236, San Diego, CA 92101 or via email to osmahn.kadri@gsa.gov.

EcoPlan – Public Hearing Notice 101110 Publ. Nov. 10 & 17, 2010 Gabrielle

GSA Public Building Service
Pacific Rim Region

General Services Administration
U.S. Customs and Border Protection
Ajo Housing Development Project

Agency and Public Scoping Meeting Information Sheet

Ajo Community Center, 290 5th St., Ajo, 7 p.m.

Thursday. March 4, 2010

Project Overview

The General Services Administration (GSA) is planning to construct housing for U.S. Customs and Border Protection (CBP) employees in Ajo, Arizona. There is currently insufficient housing available to accommodate CBP employees who work at the Lukeville Land Port of Entry (LPOE) and the Ajo Station in Why, Arizona. Other housing options for CBP employees in the vicinity of the Lukeville LPOE are limited due to a scarcity of available rental properties. The GSA is proposing to address this need by constructing housing for CBP employees in Ajo, Arizona.

The GSA is proposing to develop seven parcels in south Ajo, in unincorporated Pima County, Arizona. The first parcel is located at 55 S. Sahuaro St. and currently supports a partially occupied, 11.54-acre mobile home park. The next is a small unaddressed parcel, approximately 0.42 acre, immediately adjacent to the southwestern corner of the 55 S. Sahuaro St. parcel. The remaining five parcels consist of vacant parcels, addressed as 801, 811, 821, 831, and 841 W. Esperanza Ave., totaling approximately 0.78 acres immediately adjacent to, and north of, the 55 Sahuaro St. parcel. For the purposes of this project, all seven parcels will herein be referred to as the subject property.

The scope of work for this project consists of:

- Constructing 18 to 28 modular homes on the subject property (Phase 1)
- Constructing associated sidewalks, landscaping, and infrastructure, as needed
- Constructing up to 28 additional units at the subject property if funding becomes available in the future (Phase 2)

Project construction of Phase 1 is proposed to begin in late 2010 or early 2011. The homes would be 1, 2, and 3 bedroom modular homes.

This public meeting in conjunction with the Western Pima County Community Council is being offered to allow early and meaningful participation in the National Environmental Policy Act (NEPA) review of this proposed housing development project. After the scoping period has ended, the GSA will prepare an Environmental Assessment to evaluate the potential environmental consequences of the proposed project. This meeting provides the public an opportunity for comments, concerns, or issues relevant to the project.

Osmahn Kadri
U.S. General Services Administration
Portfolio Management Division
450 Golden Gate Ave., 3rd Floor East
San Francisco, CA 94102
Osmahn.Kadri@gsa.gov

General Services Administration
U.S. Customs and Border Protection
Ajo Housing Development Project

Agency and Public Scoping Meeting Comment Sheet

Comments, questions or input:

Please submit to:
GSA
c/o Michael R. Dawson
EcoPlan Associates, Inc.
701 W. Southern Ave.
Mesa, AZ 85210

Or by e-mail at mdawson@ecoplanaz.com; by phone at 480.733.6666, extension 177; by fax at 480.733.6661.

Pacific Rim Region

Public Hearing Agenda

U.S. Customs and Border Protection Housing Development Project – Ajo, Arizona

Date/Location
November 22, 2010, 5:00pm
Ajo Community Center, 290 5th Street Ajo, Arizona

5:00pm – Open House

5:15pm – Presentation

Overview of the Project – Osmahn Kadri, GSA NEPA Project Manager
Environmental Assessment Process – Mike Dawson, EcoPlan Associates, Inc.
Environmental Assessment Summary – Mike Dawson, EcoPlan Associates, Inc.
Question and Answer Session

6:15pm - Open House

7:30pm - Adjourn

Osmahn Kadri, NEPA Project Manager, Pacific Rim Division – General Services Administration, 450 Golden Gate Ave.3rd Floor East, San Francisco, CA. 94102 or via email to osmahn.kadri@gsa.gov

Pacific Rim Region

Project Fact Sheet

U.S. Customs and Border Protection Housing Development Project – Ajo, Arizona

OBJECTIVES

US Customs and Border Protection (CBP) has initiated a program to address the current and future housing needs for mission-critical personnel located at the United States borders.

BACKGROUND

CBP is currently seeking to increase security efforts along US borders. A key component of that effort is to increase the number of Border Patrol and Office of Field Operations personnel along the Southwestern Border. Given the remoteness and sparse development of these areas, one of the most significant barriers to increasing enforcement efforts in these areas is the lack of available housing for agents, officers, and their families. An appropriately sized housing development within reasonable proximity to the port or station minimizes commute times, saves officers both time and money, and would create a sense of community among the agents.

RECOMMENDATIONS

Recommendations are for the development of a comprehensive strategy for CBP housing. The objective is to develop a standard housing model to achieve consistent quality and performance. CBP has engaged GSA to manage the construction of the housing. CBP selected Garrison Architects (GA) from a pool of competing architectural/engineering (A/E) firms on GSA's indefinite delivery/indefinite quantity (IDIQ) contract.

SITE

The proposed sites at 55 S. Sahuaro Street and 801-841 W. Esperanza Avenue in the township of Ajo, Arizona, are seven parcels totaling approximately 13-acres. Completion of the appropriate environmental review and documentation is the first step in getting the project underway. GSA has prepared a National Environmental Policy Act (NEPA) Environmental Assessment (EA) to determine impacts to the social, economic, or natural environment. The 55 S. Sahuaro Street and 801-841 W. Esperanza Avenue sites were the viable sites after careful review of several alternative sites. The site is well-suited since the former military housing lots are laid out and utility-ready. The site is currently a partially occupied mobile home park. Ajo has schools and community services to offer CBP families.

PLAN

Depending on the availability of funding, current plans call for 22 single-family housing units with landscaping and all supporting infrastructure. Construction would begin in 2011. The EA is being presented for public review through December 17, 2010. Copies are available at the Ajo Public Library 33 N. Plaza Street or on the web at www.gsa.gov/nepalibrary. Upon final approval of the EA, site acquisition and development would begin. Relocation services will be provided for the current residents at the 55 S. Sahuaro Street site in accordance with federal regulations

BENEFITS

Ultimately the development of federal housing at 55 S. Sahuaro Street will result in a financial benefit to the retail businesses in the Ajo vicinity. The eventual relocation of U.S. Customs and Border Protection agents and families to the township will undoubtedly help invigorate commercial businesses that sell commodities and services in the community. The proposed project allows the CBP officers and their families to become an integral and active part of the community. The CBP officers and their families living in the Ajo housing will find the locale more convenient and safer than residing a greater distance from their job sites. With their families close by in a pleasant, nurturing community such as Ajo, overall officer morale and sense of community will improve. All of which are important factors in recruiting CBP officers.

FOR MORE INFORMATION: Ms. Gene Gibson, GSA Regional Public Affairs Officer at 415-264-9401 or gene.gibson@gsa.gov..

GSA Ajo housing letter one

March 4, 2010

Greg Smith, GSA Portfolio Mgt. Reg'l Environmental Quality Advisor
Oshman Kadri and Gene Gibson, GSA
880 Front Street #4236 San Diego, CA 92101 619-557-6169 or 890-4813
Michael Dawson, contractor to GSA with EcoPlan Associates
701 W. Southern Ave. Mesa, AZ 85201

RE: Ajo Housing Development Project for CBP
Ajo News, 2-16-10 p.6; and emails 2-24 through 3-3

Dear Mr.s Smith, Osmahn, Gibson and Dawson,
Please delay your plans until 2011 or later, as it relates to your intentions to bring into Ajo up to 28 new housing units in the near future and 28 in 2011 or when more funds are available. **A clear time-line of public information has failed to be disseminated and a lack of input from local property owners in a small community with high minority and low-income residents has occurred**.

Ajo is a tiny community without a solid base of year-round employment that supports young families and without good pensions for many low-income and minority residents and home owners. Ajo benefits from the presence of the Lukeville POE and the Why Border Patrol Station. Not only are the staff good neighbors, they are highly competent and protect our general area and do a fine job. With one of the smallest POEs along the border, they accomplish as much many weeks as the largest ones.

As with any small community from Alaska to Florida to Arizona, there is a tight market for housing and rooms three or four months a year. Tourism and half-year snow birds create that situation here in Ajo. It is important to support our POE and CBP offices with housing for temporary workers.

However, there are many methods to provide housing for temporary CBP and POE staff. One would be to advertise in the Ajo News for owners of homes, apartments and motels to provide specific information if they are interested in a long-term lease to the GSA. Another would be to similarly advertise for outright purchase of homes, residences or motels in the area. Either of these options, would not create additional new housing units in the Ajo area and thus have a small environmental justice impact.

In the early 1980's the closing of the copper mine created a complete financial and economic disaster in Ajo which still permeates a great deal of the community today. There was almost no work, and the majority who remained were either retired, disabled or perhaps not interested in work. The price of housing went to almost zero for years. A decade later, signs entering Ajo said something like 'welcome to Ajo where you can buy a house starting at $10,000'. Even into the 2000's housing was half or less of many small communities in AZ due to the devastating effects of the surplus housing and lack of jobs.

GSA has contracted prematurely with companies to announce locations and has prematurely begun conversations with owners and renters of properties. **By doing this, a lop-sided interest on the part of those property owners and renters occurs – creating support for GSA's interest but disregarding the most important interest – that of the local minority, low-income and others as a whole.**

GSA is creating an unjust imbalance in environmental justice by naming properties and negotiating with owners and tenants prior to having public input. We request that the EPA create an Interagency Working Group on Environmental Justice to address this matter. Please consider the attached suggestions for timing of the environmental justice necessary to protect the stability of Ajo home owners. Thank you.

Jim and Linda Sharp Box 865 Ajo, AZ 85321 Lsharp@alaska.net

Suggestions to properly inform Ajo residents of the proposed Ajo Housing Development Project and methods to ensure environmental justice by addressing disproportionately high adverse environmental effects on minority and low-income populations and Ajo residential owners as a whole:

Information gathering and dissemination: In all cases below, advertise, collect and disseminate information weekly through the Ajo News, spanning 6 months for each step and at least two weekly newspaper issues per month. Invite readers to add to the information pool that is being gathered through all possible means, for many Ajo residents are part-time, elderly, without computers, getting medical attention outside of Ajo, etc. Prior to beginning these steps, the Administrator of the EPA should create and convene the Interagency Working Group on Environmental Justice.

#1. Step one: Identify and disseminate information on the total number of residential units in Ajo, including motels, apartments, homes, casitas and list by category – i.e., number of bedrooms, bathrooms, size, age, etc. Approximate amount of time to do this properly: Up to 6 months.

#2. Step two: After step one is completed, identify the number of owners of each of the above who are willing to consider leasing or selling their residential units in Ajo to the GSA. Approximate amount of time to do this properly: Up to 6 months.

#3. Step three: Analyze by mainstream methods which of the housing units would provide the best economy for the GSA and best meet the needs of the CBP – POE temporary staff needing such housing. Approximate amount of time to do this properly: 3 to 6 months.

#4. Step four: Collect and disseminate from CBP and POE records the number of room nights each has had for temporary staff in 2009; 2008; 2007 and projections for 2010 and 2011 and 2012. Approximate amount of time to do this properly: 3 months or less. This can be done starting now and made public well in advance of final decisions needing to be made.

#5. Step five: Place RFP's in the Ajo News for owners of the said residential units to offer their property for lease or for sale to the GSA. Approximate time for this step: 3 to 6 months.

#6. Step six: Execute the leases or purchases of said units. Approximate time for this step: 3 months.

By using this method, or another thorough and environmentally just method of selecting housing for GSA needs, little adverse impact will occur in Ajo. The seniors, minority, low-income and general population who own homes will see very little negative impact on their property values and in the local economy as a result of the proposal above.

GSA Jim speech 3-4-10

March 4, 2010

Memo to: GSA Greg Smith, Oshman Kadri, Gene Gibson Environmental Quality
Ajo Housing Development Project for CBP re: Ajo News 2-16-10

From: James Sharp Box 865 Ajo AZ 85321 ~~Lsharp~~ jsharp@alaska.net

I wish to enter an objection to the proposed Ajo housing for CBP based on lack of information to the general Ajo public. I believe existing housing can meet the GSA / CBP needs. The first I heard that GSA officially was considering adding up to 28 new housing units soon and possibly 28 more in 2011 if funds are available was the Ajo News of February 16, 2010 when GSA placed the ad on page 6.

2/11/94 EO

GSA responsibilities in impacting a small community like Ajo with a high minority and low-income population extends to the greatest degree practicable and permitted by law (Sec 1-101 of the Executive Order) to consider the effectives on Ajo residents, particularly minority and low-income, who represent a much larger percentage in Ajo than many communities.

I recommend that GSA create a working group to identify any adverse human health or environmental effects on Ajo residents and minority and low-income groups (1-102). Holding meetings and giving property notice on the Ajo News of public meetings that meet or exceed 5-502d is an essential step.

Ajo residents have a right to know all the steps and information gathering methods GSA has used and plans to use for such a project. **At this time, for the GSA to have identified and publicly named certain properties for the proposed housing development appears premature and to be in violation of the Executive Order.** It appears to have excluded the general Ajo public from public hearings and public comments, with the effect of adversely impacting Ajo residents, minorities and low-income populations.

Ajo for almost 30 years has suffered a great economic depression in property values, since the mine closed. It's well-known that for more than a decade either no housing at all sold, or sold for $10,000 each. That depression had not made its recovery when the US economy burst with the housing bubble in 2007-08. Ajo again has experienced a second impact from the Arizona / US housing bubble bursting, with foreclosures, stagnant and vacant residences, and falling values of homes. Section 3-302 requires great detail in this area as well as it affects a community like Ajo. **Purchasing or leasing existing units would serve Ajo better than bringing in 28 new units or 56 new units.**

The Emergency Planning and Community Right-to-Know Act requires the GSA to collect and analyze all of the above information. I ask that it be made available at public hearings and in the newspaper.

My suggestion would be for the GSA to simultaneously consider proposals to lease or purchase existing housing for CBP in Ajo, rather than to create new housing. Since the 1970's no Ajo builder has constructed more than one or two homes at a time because of the great real estate crash that occurred in the early 1980's when the mine closed. Even with just one house for sale, builders have often had a hard time selling. **Please re-consider the required considerations for this small community and set aside any decisions to take action until all steps have been taken with clear public input and timelines that assure this small community no negative impact will occur.**

Jim Sharp
Box 865 Ajo, AZ 85321 ~~Lsharp~~ jsharp@alaska.net 907-351-1199

From: Mike Dawson
Sent: Thursday, March 11, 2010 7:20 PM
To: Steven Reuter; Osmahn.Kadri@GSA.gov
Subject: FW: Proposed US Customs & Border Protection -Ajo Housing Developement Project

Attachments: ATT50262.vcf
Email from an adjacent property owner.

Mike Dawson
Senior Environmental Planner
EcoPlan Associates
78 W. Cushing Street
Tucson, Az. 85701
520.624.4326 ext. 177 (Tucson office, New #)
520.882.0432 (fax)
520.403.9614 (cell)
480.733.6666 ext. 177 (Mesa office)

From: Gregory Brader [mailto:greg@zonarchitects.com]
Sent: Wednesday, March 10, 2010 8:34 AM
To: Mike Dawson
Subject: Proposed US Customs & Border Protection -Ajo Housing Developement Project

GSA
c/o Michael E Dawson
Eco Plan Associates Inc
701 W Southwrn Ave
Mesa, AZ 85210

Dear Mr Dawson,

I am writing to you concerning the Proposed US Customs & Border Protection -**Ajo Housing Developement Project** located at 801 Esperanza Ave in Ajo, Arizona, as posted in the Ajo Copper News.

My family owns property adjacent to the proposed project (553 W Esperanza- Montecito Manor Apartments - APN# 401-55-472E) but we were unable to attend the public meting held on March 4, 2010 in Ajo.

Could you add me to your mailing list for project updates? I am most interested in obtaining a copy of the preliminary plan, EIR, and time tables. Since our apartments are located so close to this proposed project, we are also very interested and concerned about such issues as:

1) Scope of the project - will these apartments be rented only to Border Patrol or government employees? Is there *any* possibility that unused units will be rented to the general public - thereby placing them in direct competition with the private sector?

2) Will additional lighting be installed to the benefit of neighboring properties?

3) Will biological /archeological/ studies (in addition to an environmental review) be required?

4) Will there be mechanisms for neighbors to provide community input and facilitate cooperation throughout the project (beyond the planning stage?)

Any information you can provide (email PDFs or regular email is fine) regarding this project would be greatly appreciated. My address information is shown below. We look forward to receiving detailed information about this project. Thank you for your assistance.

Sincerely,

Gregory Brader
greg@zonarchitects.com
(415) 287-0596 office
(415) 297-6900 direct
(415) 354-3502 fax

ZON Architects, Inc.
A California Corporation
660 4th Street #255
San Francisco, CA 94107

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the Guest House Inn
BED & BREAKFAST
700 Guest House Road
Ajo, Arizona 85321
(520) 387-6133

March 12, 2010

GSA
c/o Michael R. Dawson
EcoPlan Associates, Inc.
701 W. Southern Avenue
Mesa, AZ 85210

RE: 55 S. Sahuaro St., Ajo, AZ GSA Housing Project

It appears that my property, a Bed and Breakfast Inn, at 700 W. Guest House Rd. and the vacant land parcel at 740 W. Guest House Rd. are the only properties adjacent to the 55 S. Sahuaro property. All other surrounding properties are separated by a street. My property should warrant a sight/sound barrier to isolate the fairly dense housing project from this quiet, open rural desert area which guests from all over the world enjoy.

Starting Phase 1 on the northern half of 55 S. Sahuaro would delay the disruption of the wildlife corridor here. I do appreciate your proposed landscaping project. It will hopefully reduce the impact of housing on wildlife and guests.

Thanks,

Mike Walker

Mike Walker

Steven Reuter

From: Mike Dawson
Sent: Monday, March 22, 2010 11:23 AM
To: Osmahn.Kadri@GSA.gov; Steven Reuter
Subject: FW: 55 Saharo, Ajo

Project email from adjacent resident.

Mike Dawson
Senior Environmental Planner
EcoPlan Associates
78 W. Cushing Street
Tucson, Az. 85701
520.624.4326 ext. 177 (Tucson office, New #)
520.882.0432 (fax)
520.403.9614 (cell)
480.733.6666 ext. 177 (Mesa office)

From: sweepersam@aol.com [mailto:sweepersam@aol.com]
Sent: Monday, March 22, 2010 10:35 AM
To: Mike Dawson
Subject: 55 Saharo, Ajo

Dear Michael:

Thank you for coming to Ajo and explaining the above mentioned project to us.

My wife and I live on a nearly abutting property at 620 Guesthouse Road and have had an interest in this project.

Our biggest concern is protecting the arroyo that divides the Guesthouse Road properties and the new development. Since we have moved here, we have come to appreciate what a wildlife corridor that this arroyo is. Our nick name for it is the Javalina highway. I am hoping that in your planning you can take this corridor into account. It would be nice if the first phase of the project were on the northern side of the land and away from this arroyo.

Sincerely,

Sam Tucker

GSA

General Services Administration
U.S. Customs and Border Protection
Ajo Housing Development Project

Agency and Public Scoping Meeting Comment Sheet

Comments, questions or input: 03/23/10

We have concerns that if these houses are built... The current and future BP & customs agents who rent houses in Ajo will move into your newer and more affordable homes.

We have several people that have invested in Ajo Rental properties. These are mostly Retirees that use this rental income to subsidize their income. This housing project will hurt their investments and could hurt the economy in this town.

A lot of the agents just do not want to live in Ajo and those few that do choose to live here will then be renting from you.

The problem is not a lack of housing →

Please submit to:
GSA
c/o Michael R. Dawson
EcoPlan Associates, Inc.
701 W. Southern Ave.
Mesa, AZ 85210

Or by e-mail at mdawson@ecoplanaz.com; by phone at 480.733.6666, extension 177; by fax at 480.733.6661.

but a lack of jobs for spouses, lack of shopping & entertainment & our schools.

The Customs agents do not want to live in Ajo either, they want to be close to the Border. So as houses come available in Lukeville they will move leaving your houses vacant which then means you will rent them to BP.

Edie & Char
Arizona Copper Hills Real Estate
520 387 8787

March 4 2010

GSA c/o MICHAEL R. DAWSON
ECO PLAN ASSOCIATES, INC.
701 W. SOUTHERN AVE.
MESA AZ 85210

Dear Mr. Dawson:

I am writing to oppose the GSA's proposed Ajo Housing Development Project. The proposal assumes, incorrectly, that insufficient housing is available in Ajo for CBP employees. At present there are well over 100 houses for sale and a substantial number for rent. We do not need an enclave of government-owned modular dwellings. If GSA insists on such construction, put the project near the CBP station at Why, AZ.
Please enter my objection to the GSA's proposal in the official record. Ajo has more than enough vacant, available housing. We don't need a government modular park.

Sincerely,
Ronald E Hurlburt

RONALD E HURLBURT
1245 N. JARTILLION AV
AJO AZ 85321

GSA Pacific Rim Region

Public Hearing

U.S. Customs and Border Protection Housing Development Project - Ajo, Arizona

Date/Location
November 22, 2010, 5:00pm
Ajo Community Center, 290 5th Street Ajo, Arizona

1. Comments on the Environmental Assessment:

Please send or email a complete copy of the Housing Program Feasibility Study, Ajo, AZ and also the market survey US Customs & Border Protection Market Survey of Housing for the Area of Ajo, AZ & Why, AZ

Please ensure community input in the design process

Your process is flawed by failure to contact LOCAL developers & contractors. All the community input from scoping to now registers objections to the 55 Sahauro plan and suggests alternatives which have not been considered.

IMPORTANT! Please print the following information:

Name: Tracy Taft Telephone: 520 3873229
Address: ISDA 401 W Esperanza Ave
City: Ajo State: AZ Zip: 85321
E-mail: tracy@isdanet.org

Please mail or e-mail comments by December 17, 2010 to:

Osmahn Kadri, NEPA Project Manager, Pacific Rim Division – General Services Administration, 450 Golden Gate Ave. 3rd Floor East, San Francisco, CA. 94102 or via email to osmahn.kadri@gsa.gov

GSA Pacific Rim Region

Public Hearing

U.S. Customs and Border Protection Housing Development Project - Ajo, Arizona

Date/Location
November 22, 2010, 5:00pm
Ajo Community Center, 290 5th Street Ajo, Arizona

1. Comments on the Environmental Assessment:

PLEASE PROVIDE THE HOUSING FEASIBILITY STUDY FROM 2009 AND THE MARKET STUDY OF 2010

PLEASE MAKE THOSE DOCUMENTS AVAILABLE TO THE COMMUNITY BY PUBLISHING THEIR WEB LOCATION IN THE LOCAL NEWSPAPER, "COPPER NEWS"

IMPORTANT! Please print the following information:

Name: NICK FRANCIS Telephone: 520 954-5612
Address: 201 W ESPERANZA AVE
City: AJO State: AZ Zip: 85321
E-mail: NICKFRANCIS1896@YAHOO.COM

Please mail or e-mail comments by December 17, 2010 to:
Osmahn Kadri, NEPA Project Manager, Pacific Rim Division – General Services Administration,
450 Golden Gate Ave. 3rd Floor East, San Francisco, CA. 94102 or via email to
osmahn.kadri@gsa.gov

GSA Pacific Rim Region

Public Hearing

U.S. Customs and Border Protection Housing Development Project - Ajo, Arizona

Date/Location
November 22, 2010, 5:00pm
Ajo Community Center, 290 5th Street Ajo, Arizona

1. Comments on the Environmental Assessment:

I AM CONCERNED ABOUT THE LACK OF CONSULTATION WITH LOCAL FOLKS - RESIDENTS & COMMUNITY GROUPS IN AJO - AT THE EARLY PLANNING STAGES OF THIS PROJECT.

CLEARLY, THE PREDOMINANT RESPONSE FROM LOCALS AND ELECTED OFFICIALS RECOMMENDED INTEGRATING NEW HOUSING ONTO VACANT LOTS IN THE DENSELY SETTLED RESIDENTIAL SECTIONS OF AJO.

IF THE FIRST PHASE IS FOR 20 - 22 HOUSES, WHY NOT INTEGRATE THOSE & ENCOURAGE THE MARKET TO RESPOND TO PROVIDE THE REST? THIS IS MORE IN KEEPING WITH WHAT THE COMMUNITY NEEDS / WANTS..

IMPORTANT! Please print the following information:

Name: NICK FRANCIS Telephone: 520 951-5612
Address: 201 W ESPERANZA AVE
City: AJO State: AZ Zip: 85321
E-mail: NICKFRANCIS1896@YAHOO.COM

Please mail or e-mail comments by December 17, 2010 to:

Osmahn Kadri, NEPA Project Manager, Pacific Rim Division – General Services Administration, 450 Golden Gate Ave. 3rd Floor East, San Francisco, CA. 94102 or via email to osmahn.kadri@gsa.gov

Mike Dawson

From: osmahn.kadri@gsa.gov
Sent: Wednesday, November 24, 2010 10:50 AM
To: Mike Dawson
Cc: dennis.brasfield@gsa.gov; gene.gibson@gsa.gov
Subject: Fw: Draft EA for 55 Sahuaro Rd in Ajo, AZ
Follow Up Flag: Follow up
Flag Status: Red

Comments for record:

Osmahn Anthony Kadri
NEPA Project Manager
Portfolio Management Division
Pacific Rim Region
General Services Administration
Phone: 415.522.3617
Mobile: 415.760.9239

----- Forwarded by Osmahn A. Kadri/9P/R09/GSA/GOV on 11/24/2010 09:49 AM -----

Yvonne Burton <burtcoug@yahoo.com>

11/23/2010 08:10 PM

To osmahn.kadri@gsa.gov
cc
Subject Draft EA for 55 Sahuaro Rd in Ajo, AZ

Hello,

We have reviewed the draft EA for 55 Sahuaro Rd in Ajo, AZ. We are not opposed to the project, but do not like the design of the proposed buildings. They are down right ugly! They do They do not fit with the local architecture of our community. They add nothing to the aesthetic aesthetic appeal of the community of Ajo.

We are not opposed to modular buildings but believe they should be of high quality and fit in in esthetically with our community. We would urge you to consider alternative construction construction methods that are energy efficient as well as aesthetically pleasing. For instance, instance, there are now several residences in town contstructed using insulated concrete forms forms (ICF). These homes are energy efficient, attractive and improve the community.

Residents of Ajo are attempting to improve the community by removing and/or remodeling older older buildings. We feel that construction of buildings that will last over time and be attractive attractive to the rest of the community should be considered. Ajo has been around for a long long time and we hope to keep it going in a positive light! Please help us improve our community, NOT degrade it with the ugly homes shown in the preferred alternative. Would you you want them in your neighborhood??? Please continue your research for a better and lasting lasting alternative that will truly help to improve our community not degrade it.

Respectfully,

Greg & Yvonne Burton
221 W. Estrella Ave.
Ajo, AZ 85321

559-288-6175

From: osmahn.kadri@gsa.gov [mailto:osmahn.kadri@gsa.gov]
Sent: Tuesday, November 30, 2010 11:26 AM
To: Mike Dawson; gene.gibson@gsa.gov; dennis.brasfield@gsa.gov
Subject: Fw: Concern about Ajo, Arizona GSA project

FYI

(To be filed)

Osmahn Anthony Kadri
NEPA Project Manager
Portfolio Management Division
Pacific Rim Region
General Services Administration
Phone: 415.522.3617
Mobile: 415.760.9239

----- Forwarded by Osmahn A. Kadri/9P/R09/GSA/GOV on 11/30/2010 10:20 AM -----

"Robert Dooley" <BDooley@tabletoptelephone.com>

11/30/2010 06:18 AM

To <osmahn.kadri@gsa.gov>
cc
Subject Concern about Ajo, Arizona GSA project

Please respond to
<BDooley@tabletoptelephone.com>

To: Osmahn Kadri, NEPA Project Manager,

Pacific Rim Division

From: Robert F. Dooley, Ed.D.

Superintendent

Ajo Unified School District

Date: 11/30/10

Topic: Concern Regarding Ajo GSA Project

Thank you for taking the time to consider my concerns regarding the proposed GSA housing project scheduled to be constructed in Ajo, Arizona. My schedule did not permit me to attend the 11/22/10, public hearing which was held at the Ajo Community Center regarding the proposed construction of 22 modular homes to be built at 55 S. Sahuaro St. to house CBP employees.

Please be aware that there exists an inherent concern about CBP employees in the community of Ajo. The leadership of the CBP station has worked hard to improve the CBP image, but this has not been carried to fruition by the large majority of the employees. Placing CBP employees into a "gated community" will further exacerbate the poor image of this group and will not help this community embrace CBP as an addition to our community. The CBP staff who would live in this enclave will not have the opportunity to integrate with the established population and subsequently develop relationships and trust by living as described in this proposed housing.

Please be aware that there are numerous opportunities for the GSA project to build a positive relationship with the citizens of Ajo by utilizing "in fill" properties. This would be a benefit to many local property owners, local real estate businesses, and perhaps even enhance the neighborhoods in which this housing would be developed.

Would you want one of this proposed project built in your neighborhood? Would you want this type of housing built next to your real estate investment or home?

12/14/2010

---------- Forwarded message ----------
From: **judy denune** <jddenune@gmail.com>
Date: Sun, Dec 5, 2010 at 7:44 AM
Subject: Ajo housing
To: genegibson@gsa.gov

Mr. Gibson:

I did not realize there was a meeting concerning housing in Ajo until the Ajo Copper News of December 1st arrived in our mail. Perhaps it had been mentioned in a previous Copper News but if it was I missed it. My husband and I would have been there had we known.

We are certainly interested in what is happening in the housing market in Ajo. We own a home here in which we spend several months in the winter and so are considered "winter residents". We also own 4 "aluminums" as they are referred to in Ajo between Rasmussen and North Street. The 4 "aluminums" are rental houses we invested in several years ago. We have been fortunate to date with keeping them rented most of the time. The home we live is a nice Santa Fe style home in the 5 acres area. Our rentals are nice 3 bedroom/2 bath homes that are well maintained and managed by a local realtor in Ajo. My point in saying this is that we have made a substantial investment in Ajo and are concerned about the impact the GSA housing will have on our investment as well as other home owners in Ajo.

We believe in supporting the community in which we live, whether it is in Ohio where we spend the summers or here in Ajo where we spend the winters. We buy and do business here in Ajo almost exclusively trying to support the business owners in this small town that we love. Since buying our house here we have seen significant improvement in the looks of Ajo. Many people have done extensive work on their properties. We have a great little grocery store that is the backbone of Ajo. ISDA has been in the forefront of improving Ajo with the credit for renovating the Curley School to the beautiful landmark it is today. Many little establishments are trying to eke out a living in this small unincorporated community.

We understand that some private rentals have already been impacted by the GSA housing that seems to be undercutting the private rental business here.

While low rent for customs employees may be enjoyed by those employees, what is to become of the investments made by private individuals who have been providing rentals to these folks?

I know your response in the Copper News is that there will be many more new border employees coming to this area therefore still a need for private rental. Will our government continue to provide even more subsidized housing in the future?

My husband and I attended one of the first meetings in conjunction with the WPCCC earlier in the year. It seemed to us at the time that the decision had already been made to build this housing and the open forums were merely perfunctory. While some Ajo residents attending the meeting were fairly hostile, I also believed the hosts were defensive. This is our community and we are proud to live and invest here. Our government should be working with us in this venture.

Sincerely,

Judy Dixon Denune

Mike Dawson

From: osmahn.kadri@gsa.gov
Sent: Friday, December 10, 2010 3:08 PM
To: mike@guesthouseinn.biz
Cc: Mike Dawson
Subject: Re: 55 S. Sahuaro Ajo Housing Development Project

Dear Mr. Walker,

Thank you for your input, your comment will be considered and addressed in the Final EA.

Thanks,

Osmahn Anthony Kadri
NEPA Project Manager
Portfolio Management Division
Pacific Rim Region
General Services Administration
Phone: 415.522.3617
Mobile: 415.760.9239

"Mike Walker" <mike@guesthouseinn.biz>

12/10/2010 01:59 PM

To <osmahn.kadri@gsa.gov>
cc
Subject 55 S. Sahuaro Ajo Housing Development Project

Dear Mr. Kadri,

Draft Environmental Assessment

Chapter 4 Affected Environment and Environmental Consequences
4.7 Noise Analysis

Noise-sensitive receptors are land uses associated with indoor or outdoor activities that may be Subject to stress or substantial interference from noise. These generally include residences, Hotels/motels, nursing homes, schools, and libraries. This bed and breakfast should be included in hotels/motels and may be subject to stress or substantial interference from Noise created by the occupants of the new housing units at 55 S. Sahuaro. A sight/sound barrier Should be constructed to reduce/eliminate interference from noise.

Thanks,

Mike Walker
Guest House Inn
700 W Guest House Rd
Ajo, AZ 85321

RE: GSA Ajo Housing objection 12-2010

December 16, 2010

Ms. Gene Gibson, GSA Public Affairs, 450 Golden Gate Ave 3rd Fl E., San Francisco, 94102

Gene.Gibson@GSA.gov 415-264-9401 FAX 415-522-3226

Mr. Osmahn Kadri, GSA NEPA Project Mg.

Osmahn.Kadri@GSA.gov FAX 415-522-3215

Dear GSA, Ms. Gibson and Mr. Kadri:

Please consider this an official objection to the proposed Ajo housing project. Objections are enumerated below. The DEIS is totally inadequate and must be mitigated properly from scratch. The entire DEIS must be recirculated and reviewed in its entirety for adequate cross reference of subject matter and proper notice to the Ajo community.

Included, but not limited to, reasons for objections are:

#1. Illegal and/or improper and insufficient notices to public and improper public hearings in Ajo and area.

#2. Failure of GSA to properly survey rental housing and housing available for sale in the Ajo, Why and Lukeville communities prior to seeking to purchase land and house federal employees in Ajo. Many local business owners and individuals believe that there is more than sufficient existing housing available in Ajo for the GSA's goals to house federal workers in Ajo. Included among these individuals are owners of motels, lodging, real estate professionals, owners of rental properties, retail, construction and others.

#3. Failure of GSA to have sufficient representatives of (GSA's contractor) EcoPlan staff present at meetings.

#4. Failure of GSA to gather data and details on the historic building(s) in the 55 Sahuaro, Ajo area.

#5. Failure of GSA to adequately consider the environmental impact on the 55 Sahuaro, Ajo property.

#6. Failure of GSA to adequately address Social and Economic Impacts. Ajo has a far higher percentage of minority residents and low-economic status residents and they will be negatively and adversely impacted long-term.

#7. Failure of GSA to meet legal requirements to notice, contact and solicit comments from the representative groups that will be negatively, adversely impacted from the proposed project.

#8. Failure of GSA to properly notice, survey, conduct meetings and gather required documentation in Ajo, Why and Lukeville regarding the 55 Sahuaro project.

#9. Boom and bust has occurred in Ajo previously. The boom in 1980 and prior, when the copper mine was operating and more than 10,000 residents lived in Ajo. The bust occurred in the early 1980's when the copper mine closed, leaving Ajo economically, socially, and environmentally destroyed. GSA and the federal government will create a similar boom/bust cycle, leaving Ajo negatively and adversely impacted with this proposed project. GSA selectively said, for sample, that "Ajo had about 6,000 residents" but that was after the bust.

Linda Sharp Box 865 Ajo, AZ 85321 Lsharp@alaska.net

Mike Dawson

From: osmahn.kadri@gsa.gov
Sent: Thursday, December 16, 2010 1:52 PM
To: Mike Dawson
Cc: dennis.brasfield@gsa.gov; gene.gibson@gsa.gov; angela.lamonica@gsa.gov; william.stricklin@gsa.gov
Subject: Fw: DEIS Comments: USCBP Housing Development Project - Ajo, Arizona

For the record.

Osmahn Anthony Kadri
NEPA Project Manager
Portfolio Management Division
Pacific Rim Region
General Services Administration
Phone: 415.522.3617
Mobile: 415.760.9239

----- Forwarded by Osmahn A. Kadri/9P/R09/GSA/GOV on 12/16/2010 12:51 PM -----

Tina West <tinawest256@yahoo.com>

12/16/2010 11:52 AM

To osmahn.kadri@gsa.gov
cc
Subject DEIS Comments: USCBP Housing Development Project - Ajo, Arizona

15 December 2010

TO: Osmahn Kadri, NEPA Project Manager, Pacific Rim Division - General Services Administration (GSA)
450 Golden Gate Avenue 3rd Floor East
San Francisco, CA. 94102
(osmahn.kadri@gsa.gov)

FROM: Tina West
201 W. Esperanza #1003
Ajo, Arizona 85321

RE: Public Comments
Draft Environmental Impact Assessment (DEIS), U.S. Customs and Border Protection (USCBP) Housing Development Project
Ajo, Arizona

Please enter my comments into the record of the comments on the DEIS.

I am familiar with the proposed USCBP project site because I have been walking there every week for for over three years. In particular, I am familiar with the vegetation and wildlife on and immediately immediately adjacent to the site.

This DEIS is incomplete and inadeqate in its inventory, impact analysis, feasible alternative representation and proposed mitigation. Based on Responsible Agency and Public comments as well as as NEPA requirements, it must be revisited, rewritten and recirculated.

There was no Project Site Plan Map included in the DEIS showing existing vegetation and other natural natural and cultural features or the site of proposed housing units, utility lines or roads and their proximity to adjacent housing or riparian areas. The site specifications included ar brief and vague and vague and not possible to assess adequately as presented.

BIOLOGICAL RESOURCES

Vegetation

Inventory

Vegetation was not adequately inventoried and plotted on a site map. In particular, several very large, large, mature Ironwood trees and Mesquite trees
were not inventoried . This inventory, as well as the impact analysis of the proposed project on the trees the trees and suggested alternatives and mitigation measures must be conducted by a qualified Sonoran Sonoran Desert Arborist.
These mature Ironwood and Mesquite trees are vital lifelines for wildlife and people in the Sonoran Desert area, especially an unusually arid area such as Ajo. The trees provide habitat for numerous species which cannot be replaced by new, young trees. In addition, the seeds of the Ironwood trees, a trees, a traditional Native American food, have been found to be extremely important in reducing diabetes. There is a current attempt underway by the State of Arizona to restore these foods to peoples peoples diet. (Ethnobotanist Gary Nabhan- ISDA-Smithsonian Address, Ajo, Arizona, December 2010.) 2010.) Pima County, and the Ajo area specifically, has been given a large financial grant to carry to to carry out a national health program in this regard. These values must be addressed in the DEIS. DEIS.
Large mature trees also provide shade and aesthetic value to residents and visitors adjacent to the project the project site. Each one of these trees

in arid Ajo is very valuable. Retaining them, protecting them and adequately maintaining them will will greatly enhance the livablility and social health of proposed project residents.
A livable environment for nature and wildlife is a quality environment for people.

Impact

The site specifications state that all existing vegetation will be removed. There is no siting of proposed proposed utility lines or paved road extensions shown on the site map to analyze. This will have a significant adverse impact on the enviornment for which alternatives must be proposed and selected or selected or mitigation implemented.
Large, mature Ironwoods and Mesquites cannot be salvaged by digging them up and replanting them them elsewhere. Replacing them with new, young trees does not replace the wildlife habitat, human

human nutritive value, or aesthetic significance of these trees.
Large, mature Ironwoods and Mesquites are very sensitive to the monsoon rain desert environment. The environment. The trees that have survived the current drought on the site have devloped extensive root extensive root systems around and outward from their driplines to surivive. Any design of the project project must avoid leveling, cut and fill , utlity line construction and road paving around the driplines of driplines of these trees. Merely leaving a small open area at the trunk of the trees will not suffice, the the trees will die.

Feasible Alternatives and Mitigation Measures

Engineer outside the box. Design a project that conforms to the existing landscape and environment. environment. This is the way to stewardship required by federal policies of federal agencies.
Where mature trees exist next to existing sidewalks, roads or to proposed development, ensure the survival of the trees by leaving the roadway as existing compacted unpaved dirt the length of the dripline area around the tree and across the width of the existing roadway. Leave the dripline area area around the trees free of utility line or residential construction. These alternatives and mitigation mitigation measure must be adopted as condtitions of project site construction design and implementation in order to reduce the adverse impact of the project to a non-significant level.

Wildlife

Inventory

A detailed inventory, in consultation with adjoining resident sitings and with professional wildlife biologists at Cabeza Prieta Wildlife Refuge and Organ Pipe National Monument who ar familiar with wildlife species and wildlife habitat requirements in the A Mountain watershed must be conducted . In In addition, recognized professional Herptologist and Desert Tortoise Expert Betsy Wirt (bwirt@tabletoptelephone/520-6239396) must be contacted to inventory the site regarding prescence prescence and habitat of the Desert Tortoise. Adjacent wildlife corridors and possible use of the proposed project site as migration trails for wildlife species must also be inventoried. Arizona State State Department of Game and Fish request to address urban wildlife must be included in the inventory. inventory.
In 2010, a Desert Tortoise was seen crossing the road near the corner of Esperanza and Sahauro, (the (the project site northwest corner), by Ajo residents Adrian Vega and Pilar Hanson.
Again, a livable environment for wildlife is a quality environment for people. This is evident by letters letters submitted on the project by adjoining area residents.
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Impacts

Completely removing all the existing vegeation on the site will have a significant adverse impact on on wildlife by destroying valuabvle wildlife desert lifelines such as mature treees which are extrememly extrememly rare in the Ajo area. In addition, new construction, noise, street and safety lights, and traffic traffic will disrupt wildlife habitat and migration corridors on and adjacent to the site to a significant significant adverse level.
Consultation on site with local professional wildlife biologists from Cabeza Prieta Wildlife Refuge and and Organ Pipe National Monument must be carried out to determine the exact impacts to wildlife which may occur and whether or not these impacts are significant and adverse. In particular professional professional area herptologist Betsy Wirt must be consulted regarding the Desert Tortoise and impacts

impacts thereon.

Feasible Alternatives and Mitigation Measures

See Vegetation Section above.

Professional area wildlife biologists from Cabeza Prieta Wildlife Refuge and Organ Pipe National Monument as well as herptologist Betsy Wirt must be contacted to help develop Alternatives and Mitigation Measures needed to reduce significant adverse impacts to wildlife to a non-significant level. level.

Wildlife areas, cross site migration routes and adjacent wildlife corridors must be mapped on the Site Site Plan for the project. These areas must be designated for protection in the site development specifications and adopted as part of the conditions of approval for design implementation and construction.

Protection of wildlife values is necessary to maintain adjacent property values and contribute to ongoing viability of the site as a quality place to live.

PUBLIC UTILITIES

There is no Public Utilities section included in the DEIS. This is one of the reasons the DEIS must be be redone and recirculated.

Water

Inventory

The following questions must be answered, assuming the supplier of water to the site is Ajo Improvement Company or Arizona Water Company and the water source is the Ajo Well, (there was no no will serve or can serve letter included in the DEIS):

1. What is the capacity to serve the project from the Ajo Well based upon?

2. Is the Ajo Well a finite or recharging source of water?

3. If it is a recharged source of water, and the incoming source of water is underground, where does that does that water originate and water are the water rights at that point of origin?

4. If it is a recharged source of water, and the incoming water is Ten Mile Wash, what are the effects of effects of the current longtterm drought on the recharging ability of the well?

5. If it is a finite source, what is its cumulative capacity to continue to provide water to serve?

6. What does the past historical record show regarding the rechargability and drawdown capacity of the of the well? Changes in historical rates of rainfall must be included for drawdown and recharge comparison purposes.

7. At a recent presentation at the Ajo Public Library, a representative from the US Geological Survey

Survey stated that the Ajo Well and the Why Well are interconnected. If GSA and/or USCBP are planning to develop additional hookups to these wells in Ajo, Why, and Lukeville, what is the cumulative impact of the past, existing and proposed additions on the wells source and capacity to to serve?

8. Freeport McMahon Mining Corporation is in continuous mining operation in Ajo, they are not in a a closed reclamation status. What is the cumulative impact of additional multi unit residential development taken together with the mine? Again, any past capacity to drawdown and recharge must be must be shown in light of past rainfall levels.

9. Ajo Community Agriculture through the International Sonoran Desert Alliance has recently already already been awarded a large grant to develop a sustainable agricultural program here. What are the the cumulative impacts of existing use, proposed multi unit residential developments, and the community agriculture project and the possibility of resumed mining activity taken together on the Ajo the Ajo Well?

10. Which water use has precedence in the state of Arizona: Residential, Industrial or Agricultural ? Agricultural ?

11. What will happen in the case of water shortages to the lower ranking uses? Not just in first case case scenario, but in cases of professed residential hardship?

Impacts

The significant adverse impacts of the answers to the above questions by approval of the proposed project must be addressed.

If necessary, alternatives to the proposed project must be sought if these impacts cannot be reduced to a reduced to a non significant level.

CULTURAL RESOURCES

Inventory

The Cultural Resources site reconnaisance and inventory are inadequate because they did not include include consideration of the integrity of the site in terms of Native American history and pre history. history. That is, the geologic and natural setting of the site and its implications for cultural value.

The project sit sits near the base of A Mountain, itself a prominent triangular feature on the landscape. landscape. The watershed continues down through the center of the confluence of two arroyos on either either side with another arroyo at the base. Areas such as this are known to usually have been places of places of high cultural use by Native American people. This is further indicated by the preence of a a Meridian line crossing on or immediately adjacent to the site.

Intuitive site reconnaissance reveals the above stated information. The National Historic Preservation Preservation Act requires that a professional Cultural Resource Survey of the area noting or revealing revealing possible Native American use of this area be prepared and submitted to SHPO.

The Hia Ced O'odham people are believed to have been the predominant people who inhabited this area. area. The Hia Ced O'odham Tribal Council was not contacted during the scoping period or preparation preparation of the DEIS.

Protecting, maintaining, and monitoring the native landscape, vegetation and wildlife as well as the aesthetic vista of an area such as this is known to be regarded as a primary responsibilty of people living people living and using such an area by the native inhabitants of this area, past and present. Maintaining Maintaining this integrity of use was not addresssed in the cultural resource inventory.

Recent time revitalization of the project adjacent Ajo Historical District by the International Sonoran Sonoran Desert Alliance and private individuals such as the owners of the adjacent Guest House Inn, Inn, has attempted to complement the past with the present in carrying out development projects.

Past mining and military use of this site did not attempt this and the area fell into disrepair and abandonment as noted in the DEIS.

Impacts

The site specifications for the project indicate clearing the site of all natural vegetation and wildlife, wildlife, leveling and replacing the existing environment with a wasteland of blacktop, asphalt, concrete, concrete, and metal.

There appears to have been no attempt to obtain and coordinate constructive input from Native American keepers of history of this site or from those groups involved in revitalizing the Ajo Historical Historical District.

This comparatively shortterm military housing boom project, when cumulatively added to the mining mining boom and bust in the 20th century, is not providing a living enviroment that will meld with and with and sustain the Ajo community cultrually or economically or socially over the long term.

This prooject combines to create a significant adverse impact on the existing environemtnt which GSA GSA Regional Historic Preservation Officer Jane Lehman described in her October 27, 2010 DEIS input letter as: "suffers so much from a loss of integrity of design, setting, materials, workmanship, workmanship, feeling and association, that further study on whether it meets eligibility criteria is unwarranted". In otherwords, it will not be a good example of federal stewardship to pass on to the the future.

Alternatives and Mitigation Measures

GSA/USBCP project proponents must coordinate a constructive joint method of input with Ajo community groups such as the International Sonoran Desert Alliance, The Hia Ced O'odham Tribal Council, the Tohono O'odham Tribal Council, Ajo Community Agriculture, Cabeza Prieta National Wildlife Refuge, Ajo Improvement Company, Ajo Master Gardeners and Western Pima County The recommendations of this group must be adopted as conditions of project site design and construction implementation.

National Historic Preservation Act requirements are stricter for federal projects than private projects. It projects. It must be determined if there are any Native American values or artifacts on or near the

the property which can potentialy suffer significant adverse impacts from project implementation. This This includes impacts on the integrity of the site and its setting. If such impacts are found the site must site must be professionally recorded with SHPO and sensitive areas must be inventoried thoroughly thoroughly prior to development, avoided entirely, or protected through some other method approved approved by the NHPA

Completion of the above inventories, impact analysis and implementation of alternatives or or mitigation measures to reduce potential significant adverse impacts of the project to a level of insignificance cannot be dismissed merely on the basis of financial infeasibility. To do so denies the the purpose of the National Environmental Policy Act. If there are not enough funds to do an adequate adequate DEIS and if there are not enough funds to carry out a project which does not have a significant significant adverse impact on the environment, then perhaps the project just should not happen.

INTERNATIONAL SONORAN DESERT ALLIANCE • ALIANZA INTERNACIONAL DEL DESIERTO SONORENSE
401 W Esperanza Ave, Ajo, AZ 85321 • 520-387-6823 • www.isdanet.org

December 17, 2010

Osmahn Kadri
NEPA Project Manger
Pacific Rim Division
General Services Administration
450 Golden Gate Ave.
San Francisco, CA 94102

Dear Mr. Kadri,

The International Sonoran Desert Alliance (ISDA) is a community-based non-profit organization located in Ajo, Arizona. Our mission is to protect and enhance the environment, culture, and economy of the Sonoran Desert. To that end, we have restored multiple historic buildings in Ajo including many on the award-winning Curley School campus redevelopment. We are currently working on the restoration of the historic town plaza.

I am writing for two reasons.

First is to obtain your help in obtaining the feasibility study and housing market analysis promised us at the November 22 public hearing on the environmental assessment of GSA's proposed housing development project in Ajo that I, myself attended.

Second is to raise several concerns about the proposed development of this new CBP housing project. These are outlined below, but in sum: The proposed housing development is inconsistent with good urban design principles. As proposed, it is separate from the community physically, aesthetically, and functionally. It is an enclave in a small rural community. As such, we believe the proposed project, while meeting housing demands of Border Patrol agents, undermines the local housing market, introduces housing products that are not environmentally appropriate, and weakens the fabric of community relations between residents and agents who would be housed there.

More specifically:

1) Ajo is a remote, rural community where community matters. There is widespread perception that government employees working on the border, whether Border Patrol or Customs and Border Protection, do not wish to be part of the Ajo community. Creating a separate "enclave" of houses for these agents will only exacerbate this situation. On the other hand, if you were to build scattered site homes the location of the housing throughout our town would promote community—the agents would be far more likely to know their neighbors and participate in community affairs. This may seem "soft" or peripheral to the twin aims of addressing our porous border and adequately housing agents stationed here, but I can assure you the community of 3,500 year round residents here constitutes a valuable asset in the aims of CBP. It only makes sense to use every

opportunity there is to tighten not loosen the possible community ties among agents and residents, each of which desires an air-tight border.

2) Ajo has a very high rate of unemployment (16% last month)—local jobs matter. By bringing modular houses to Ajo, GSA is promoting jobs elsewhere. Our local community would benefit from a housing development project built by local qualified contractors who would provide local jobs during construction. ISDA is a local nonprofit developer. When we created 30 award-winning apartments in the Curley School (a $9.6 M project), our contractor was able to hire 29 people from Ajo on the project. Moreover, the multiplier on rehabilitated as well as infill housing development far surpasses new construction in the form of a planned unit development.

3) The project as proposed is adjacent to the Ajo Townsite Historic District, almost directly behind the historic Curley School Campus. Our District is listed on the National Register of Historic Places at the national level of significance, with many of our buildings such as the Curley School also listed individually. In this particular location, design matters acutely. With the completion of the restoration of the historic district, modular homes as GSA is proposing would be completely out of sync with the surrounding district. This undermines our local economic recovery trajectory that is based on eco-tourism. Moreover, the introduction of units responsive to agent demand today stands to become a blight on our market in the future. We are very concerned that the design of these units (whether modular or stick-built) fit in our rural southwest setting and that they complement the urban design framework of Ajo's historic district.

4) The proposed project is very far along, yet there has been little community process. There have been quite a few letters from community residents and from our representatives at the County and Federal level raising a number of concerns. None of the letters have been supportive of the proposed project. Zero. GSA has not provided substantive responses to these concerns—growing the local perception that GSA is steamrolling this project through with little regard for the local community, for the local economy, or for the environment

All of this seems a needless clash. There is legitimate demand for new housing in Ajo suitable for agent requirements. There is legitimate opportunity to meet this demand through a variety of creative ways, none necessarily more time-consuming or costly. In fact, demand for new housing appropriate for CBP agents and their families could be planned, sited, designed, constructed, and managed in ways that are mutually beneficial, strengthening the local economy, protecting the environment, and generating a substantial win-win opportunity for the community and the agents as we all take pride in coming together.

Though our own organization, ISDA, is well versed in all of these processes—from planning and design to market analysis—we need not be involved per se. We are not writing to seek *our* organizational participation in any part of this process, though we would be delighted to partner in any way.

What we are pressing for is a project that is mutually beneficial in the short and long term to Border Protection and the Ajo community, environment, and economy. What we are pressing for is a partnership from GSA and from CBP with the Ajo community, not what we presently have, which is a relationship defined by growing and needless antagonism.

We are reaching out to your office seeking a serious and genuine response to our serious and substantive concerns.

Respectfully,

Tracy Taft

Tracy Taft
Executive Director

cc: ISDA Board of Directors
Sharon Bronson, Pima County Board of Supervisors
Raul Grijalva, United States House of Representatives
Robert Peck, Public Buildings Commissioner, GSA

INTERNATIONAL SONORAN DESERT ALLIANCE • ALIANZA INTERNACIONAL DEL DESIERTO SONORENSE
ISDA 401 W Esperanza Ave, Ajo, AZ 85321 • 520-387-6823 • www.isdanet.or

Osmahn Kadri
U.S. General Services Administration
Portfolio Management Division
450 Golden Gate Ave., 3rd Floor East
San Francisco, CA 94102

Mr. Kadri:

At the last public meeting held in Ajo concerning the GSA CBP Ajo Housing Development Project, I requested copies of two documents that were referenced in the Draft Environmental Assessment dated November 2011. Those documents are:

1) *CBP Housing Program Feasibility Study, Ajo, Arizona - Complete Report* (Garrison Architects 2009)
2) *U.S. Customs and Border Protection Market Survey of Housing for the Area of Ajo and Why, Arizona, May 2010* (CBP 2010)

As I stated in my comments at the meeting, virtually all of the comments to the GSA's housing proposal - from the local level to the federal - asked why the construction of single-family, single-site infill homes was not considered. In each case, the draft environmental assessment referenced the two publications above and stated that due to findings contained within these documents a single-site infill strategy had been deemed infeasible.

To attach such weight and importance to these findings and *not* make them available with the environmental assessment I believe goes against the best interest of this project and of what you are trying to achieve. The community has information, knowledge and experience that in most cases *benefits* government projects. As a broad principle, it should be embraced, not ignored, stonewalled or worked around.

I am no expert in government law, but I am pretty sure that referring all community complaints to conclusions held in documents that are never released until after the decision is made or at least until after the public comment period ends, pretty much makes a mockery of the statutes that require public participation in the first place. I see this as a serious breach of project administration protocol.

Taking these points into consideration, I ask that the two documents above be made available to the public immediately, and that the public comment period be extended for three months so that the information presented within the draft environmental assessment can be considered in the proper context.

Sincerely,

Nick Francis
Economic Development Specialist

COUNTY ADMINISTRATOR'S OFFICE
PIMA COUNTY GOVERNMENTAL CENTER
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C.H. HUCKELBERRY
County Administrator

December 17, 2010

Mr. Osmahn Kadri
NEPA Project Manager
Pacific Rim Division – General Services Administration
450 Golden Gate Avenue
San Francisco, CA 94102

Re: **U.S. General Services Administration – Notice of Draft Environmental Assessment for U.S. Customs and Border Protection (CBP) for Ajo Housing Development Project**

Dear Mr. Kadri:

Pima County appreciates the opportunity to comment on the Ajo Border Patrol Housing Project Draft Environmental Assessment (EA) as submitted by the General Services Administration (GSA). It is my understanding the Draft EA has been prepared as required by the National Environmental Protection Act (NEPA) for the construction of up to 56 units of housing in Ajo, Arizona to address the housing needs that will be created by the expansion of the point-of-entry facilities in Lukeville and Why, Arizona. These expansions project staffing levels of 410 employees.

In general, Pima County does not believe the Draft EA adequately identifies nor analyzes the potential impacts associated with the proposed housing project. Information presented calls into question the basic need for the proposed project; fails to sufficiently examine impacts to the community and the cultural integrity of Ajo; and inadequately addresses comments the County previously offered. We also question why this project is being undertaken if, as the Draft EA indicates, funds are only available to construct a maximum of 56 units and cannot be expended on mitigating the effects of the expansion, such as providing architectural designs compatible with the community. We are concerned the project is insufficiently scoped inasmuch as the Draft EA on Page 5 states the project is not intended "...to satisfy the needs of the projected 410-personnel staffing level." If the 56-unit housing project is part of a larger strategy to address staffing needs, the project should be redefined to describe the full scope and analyzed accordingly.

An Environmental Assessment requires identification and discussion of existing and potential problems. This Draft EA does not adequately perform that function. Some of these inadequacies, discussed in greater detail in our attached comments, include:

1. Many of the items listed in the County's previous communication to GSA have not been adequately addressed or included.

2. Design issues related to the Ajo Historic District have been ignored.

3. Many of the NEPA required items have not been analyzed in depth, such as the effect on water quality.

4. Alternatives have not been fully evaluated based on the identified criteria.

5. Community's concern over the long-term future use and upkeep of government-owned modular housing development.

This project has the potential to provide important benefits and reinvestment to the Ajo area, as mentioned in my May 10, 2010 letter. However, Pima County feels the Draft EA fails to fully identify, analyze and present mitigation for problems identified in our comments and in the community's input. Again, I respectfully request that meaningful participation in the NEPA process is sought in order to bring the best possible project forward that will address not only your needs but that of the community in which you plan to build.

Sincerely,

C.H. Huckelberry
County Administrator

CHH/dr

Attachment

c: The Honorable Chairman and Members, Pima County Board of Supervisors
Diana Durazo, Special Staff Assistant, County Administrator's Office

For simplicity, specific comments are itemized according to the appropriate Chapters as presented in the Draft Environmental Assessment (EA).

Chapter 1.3 Background and Overview

One of the issues raised in this section of the Draft EA is the need to reduce the commute of personnel. Housing in Lukeville and Why would be more appropriate if one of the major issues is to reduce or eliminate personnel commuting distances. However, the inadequacies or shortage of housing in these two locations were not fully described in the EA, nor were housing studies provided to corroborate these statements.

Page 4 states that "numerous contractors" currently in the area working on the border fence construction are contributing to the lack of available housing. This is a temporary condition, as the fence construction will be completed in the near future. Once the fence construction ends, housing will presumably become available. The transitory nature of this situation is not adequately addressed in the Draft EA.

Chapter 2.1 Purpose of the Project

The project, as proposed, is inadequate to provide for the estimated housing needs of 410 personnel with a proposed initial 22 housing units in phase I and potential for 56 units total in the future. According to the EA, the private housing in Lukeville, Why and Ajo has been deemed inadequate or substandard by the EA, and therefore unable to meet the housing need to address the problem of personnel retention and commuting distances. However, under Chapter 4.3 Social and Economic Resources, this same private housing is listed as an alternative for CBP personnel to address the obvious housing gap. These contradictory statements bring into question the scope and purpose of this project, including the assessment behind the preferred alternative.

Chapter 2.2 Need for the Project

The Draft EA explains that the expansion of the border stations and lack of available housing units for the additional employees establishes the need for additional housing. However, the proposed number of units will not be sufficient to resolve the housing shortage. There is a statement on page 5 that the project is not intended "...to satisfy the needs of the project 410-personnel staffing level." The evaluation of existing and projected housing needs is incomplete, since the narrative lists only the percentages of employees who indicate they would use local housing, rather than the estimated number of needed housing units for the number of projected employees (410).

Additionally, because of the ambiguity in the number of personnel who will use the units, it is difficult to assess probable impacts, such as whether the total Vehicle Miles Traveled (VMT) will be reduced (as implied in the narrative) from current levels, without knowing the number of employees who will no longer make long distance commutes from places such as metro Phoenix and Tucson. An assumption can be made that, since only 30 percent of CBP employees will choose to use local housing, there will continue to be a significant number of employees traveling long distances to work.

The Draft EA does not contain any cost comparisons to substantiate the statement that the government would have to invest "large sums of money" to bring the existing housing stock to CBP acceptable conditions. A table showing the cost of rehabilitating existing stock versus the costs of constructing new units, including the basis for the costs, should be provided.

Chapter 3.1 Alternatives Considered but Eliminated from Further Study

Thirteen criteria were used to evaluate each alternative site location. Few, if any, of the criteria are discussed in the reasons for eliminating all but the preferred alternative.

Sustainability as a criterion is more than a LEED certification. Sustainability also includes the effect on existing community values and community interests.

Additional community considerations are that the proposal may potentially create additional issues related to income disparities within Ajo. The proposal will create a small enclave of CBP personnel with relative income levels much higher than the average income levels of most residents of Ajo. The personnel will also share a common workplace culture different from that of the current residents. One method to address this possibility may be to disperse the personnel housing throughout Ajo and the subject area in separated units to prevent areas of income and cultural stratification. The EA does not address these issues.

Chapter 3.1.1, 3.1.2, and 3.1.3 Lukeville Alternatives

These locations are closer to the workplace than the preferred alternative. In addition, the EA should consider amenities provided by Sonoita, Sonora, and Rocky Point, both within Mexico, in the evaluation of the alternatives, since NEPA does not restrict the evaluation to the United States. Providing amenities close to housing is one of the principal reasons for locating in Ajo.

Chapter 3.2.1 Preferred Alternative

The proposed Southern Border Style housing units presented in Figures 5 and 6 are incompatible with local and regional building styles and may negatively affect the local identity as expressed through its architecture.

This alternative also requires relocating residents.

Infrastructure and utility construction costs are not listed. Additionally, the long-range impact of additional housing on Ajo infrastructure has not been fully analyzed. There is no discussion regarding the adequacy of existing water and wastewater services.

Ajo has a well established sense of community, which GSA would like to include and foster within the CBP. However, a development consisting of architecturally inappropriate modular units, and the creation of a relatively wealthy enclave within the town (given that CBP annual income is stated elsewhere in the Draft EA to be substantially greater than the average in Ajo), will more than likely have the opposite effect.

Another issue that has not received sufficient attention is the use of sustainable development techniques used in construction and site development. Sustainable development has major impacts on all areas required to be assessed by NEPA, including biological, air and water quality, visual, floodplain, hazardous material, etc. This should be addressed. Regional concerns such as water conservation are ignored. It does not appear that alternative energy sources, such as solar power, will be part of the project. The narrative states that construction will comply with the Federal Leadership in High Performance and Sustainable Buildings Memorandum of Understanding (MOU) (Page 13). However it does not state how that will be accomplished.

Chapter 4.1 Ownership, Jurisdiction, and Land Use

The land use is compatible with allowed Pima County Zoning Code uses. We strongly recommend that the Customs and Border Patrol consult with Pima County Development Services to determine the applicability of a governmental exemption from the Zoning Code. Should exemptions be executed, we would request that the Customs and Border Patrol abide by the spirit and intent of exempted requirements as the project is brought to fruition

Chapter 4.2 Environmental Justice/4.3 Social and Economic Resources

According to the EA, Ajo has a high level of minority residents living below the poverty line at 46.5 percent. The effect of additional CBP personnel in the community may be to mask the visibility of problems related to low income levels. Statements on page 17 indicate that the percentage of the population below the poverty line is expected to slightly drop when CBP personnel move into new housing. The narrative presents this as a positive benefit. However, the impacts would probably be mixed. The number of persons below the poverty line who currently live in the area will remain the same. Their income levels will not be affected. The reduction in percentage of residents will drop only because the average income levels of the CBP personnel will be substantially above those of current residents. One aspect not addressed in the EA is the possible impact to access to assistance programs, as well as eligibility for community improvement grants, housing, and food assistance. Many assistance funding programs are based on percentages of persons below the poverty level. This impact on the community should be evaluated in the EA, focusing on the possibility of loss or reduction in program or assistance funding.

Page 19 states that residents in eight existing units will be displaced by the project. Assistance will be available for relocation funds. However, the EA makes the point that adequate housing is limited in the Ajo area, which begs the question whether these displaced persons will be able to find housing in Ajo. The residents who are affected may be long-term residents with family ties in the area. The entire proposal should be re-examined, possibly to increase the number of units to provide housing for both the CBP personnel and for displaced residents. Housing should be spread and dispersed throughout Ajo and the subject area to prevent both the appearance of, and actual separation of, CBP personnel; and to more fully integrate the new residents into the fabric of the community. Additional funding should be sought to address expected impacts.

Chapter 4.5 Cultural Resources

There is a clear misunderstanding of the concept of the Area of Potential Effects (APE) and the range of potential effects regarding historic properties. These are serious flaws in the Draft EA. To state that "GSA has determined that this undertaking will not have an effect on the Ajo Townsite Historic District, therefore is not included within the APE" indicates a lack of comprehension regarding APE and effect considerations under 36 CFR 800. Federal regulations at 36 CFR 800.16 state "Area of potential effects means the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." Federal regulations at 36 CFR 800.5(a)(2)(v) state that adverse effects on historic properties include the "introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features, and regulations in 36 CFR 800.5(a)(2)(iv) state that adverse effects on historic properties include "change of the character of the property's use or physical features within the property's setting that contribute to its historic significance." This APE in the Draft EA is the preferred alternative purchase area. That, however, is only a direct effect of the proposed undertaking. It is well established that the APE regarding indirect effects for many undertakings is much larger than the direct effect (or footprint) of a project when issues such as visual, audible, and atmospheric effects are considered. In the case of the preferred alternative, the visual, audible, and atmospheric effects of the proposed undertaking must be considered in the National Register listed Ajo Townsite, including the components of the listed property to the southeast of the proposed undertaking. In fact, the preferred alternative is essentially enclosed by the listed Ajo Townsite to its northeast, east and southeast. The Draft EA and the consultation with the State Historic Preservation Office (SHPO) completely fails to address the scale of the APE regarding indirect effects of the proposed undertaking and the nature of the potential effects of the undertaking on the listed Ajo Townsite, an omission that must be addressed to adequately comply with 36 CFR 800.

Another inadequacy of the Draft EA and the GSA consultation with the SHPO is that there has been insufficient effort made to identify historic properties within the direct impact APE. It is clearly stated in the two documents that no historic properties are present within this APE. However, this statement is made in the absence of a historic properties inventory identification survey. In the absence of such an identification survey, how can anyone know what historic properties may be present in this APE? Given the many thousands of years of Native American occupation in the area, it is entirely possible that Native American archaeological remains are present. If they are present, this may well be an issue of concern to the consulting Native American Tribes. In addition, the proximity to the listed Ajo Townsite and many mines may result in early 20th Century or 19th Century features in this APE. The lack of an adequate historic properties identification effort must be remedied through the conduct of an inventory survey and a report documenting the results. Until this identification effort is concluded, any finding of "no historic properties affected" is an unsupported and unfounded assertion.

There is also a misunderstanding of the role and involvement of local governments in the consultation process under 36 CFR 800. In 36 CFR 800.2(c)(3) it is stated that "a

representative of a local government with jurisdiction over the area in which the effects of an undertaking may occur is entitled to participate as a consulting party" and in 36 CFR 800.3((f)(1), under consultation, it is stated that "the [federal] agency official shall invite any local governments or applicants that are entitled to be consulting parties under 800.2" Pima County has jurisdiction over the proposed undertaking APE. Pima County specifically requested that the GSA actively and comprehensively include the Pima County Office of Cultural Resources and Historic Preservation (OCRHP) in the planning, review, evaluation of significance and assessment of effects regarding historic properties. This has not been done. The October 27, 2010, consultation letter from GSA to SHPO regarding these very topics does not include Pima County as a copied recipient. This deficiency must be remedied through the inclusion of Pima County OCRHP as a full and active participant in the consultation process as provided for under 36 CFR 800. I also note that the International Sonoran Desert Alliance is not copied on this correspondence, another deficiency in the consultation process.

Chapter 4.6 Air Quality

The preferred alternative ignores the effects on air quality caused by an 80-mile round trip commute from Ajo to Lukeville by automobile on air quality. The effects on air quality may be minimal or lower compared to longer distance commutes from Tucson, Casa Grande, and Phoenix, however no analysis has been provided.

Chapter 4.8 Visual Resources

The preferred alternative does not adequately address our previous comments requesting that the architectural building design be compatible with, and enhance the appearance of the adjacent historical district. The designs are generic, mass-produced structures without any attempt to provide enhancements or design features endemic to the culture and history of the local area.

The October 27, 2010 letter from Jane Lehman, GSA Regional Historic Preservation Officer to Robert Frankenberger, Arizona Office of Historic Preservation, Arizona State Parks (included in the Appendix), identifies the nearby Ajo Townsite Historic District as inspired by the City Beautiful movement. This is an important movement in the history of the Planning profession dating from the turn of the last century. The premise of the movement is that urban design is a strong influence on the health and well-being of the residents of a community. The Draft EA de-emphasizes the importance of the Historic District to the community and ignores the effects of this project on local urban design. The architectural and site designs should be revised to be more sensitive to the local area and to the Ajo Vision Plan referenced in my May 10, 2010 letter to Michael Dawson, with EcoPlan Associates (included in the EA Appendix). The final product should seek to enhance and add improvements to the community.

Chapter 4.9 Water Resources

Water quality issues have been ignored. Stating that an evaluation will need to be done to determine if the project is 404 compliant is not sufficient. If the project is found to be 404 compliant, additional requirements will be triggered. Determination of 404 compliance

should be done at the EA stage so that any additional impacts to water quality and wastewater treatment can be evaluated and the mitigation of those impacts should be presented in the EA.

Chapter 5 Cumulative Impacts

The assertion that cumulative impacts from implementation of the preferred alternative are expected to be negligible cannot be substantiated based on this chapter and, as noted above, the inadequacies of this analysis and document. Construction impacts are direct and indirect, and factor into the cumulative impacts. Other direct and indirect impacts are not addressed one by one as the basis for this concluding statement regarding cumulative impacts.

No mention has been made of the impacts to the Organ Pipe National Monument. CBP personnel will travel 80 miles daily through the monument. Officials from the Monument were not part of the Agency transmittal and should have had the opportunity to comment.

Note that it is the Pima County Office of Cultural Resources and Historic Preservation that is administering the Ajo Historic Depot Restoration, in collaboration with the International Sonoran Desert Alliance, not the Pima County Department of Transportation.

Chapter 6.1.1 Agency Responses (Pages 37 and 38)

The GSA responses are limited and incomplete, as addressed above.

Pima County was not included in the Section 106 consultation as we requested.

The responses to the Pima County Cultural Resources Department's comments are inaccurate because a determination of no historic properties present cannot be made without the results of an identification inventory survey and the statement that Executive Order (EO) 13006 is not applicable to this project indicates a misunderstanding of the intent of this EA. It is not that there is no acquisition with the historic district, it is a question of why has the acquisition of properties within the historic district not been given first consideration as stated in EO 13006.

Page 40. Table 5

No direct responses are provided to these citizens' comments. Why?

Page 41. Table 6

The results of the alternative evaluations are questionable given the inadequacies of the Draft EA. These results may well be rendered inaccurate when adequate analysis is conducted, as it should be for this Draft EA to meet a reasonable standard of adequacy.

Appendices D, E, and F

The two documents (Appendices D and E) regarding the March 4, 2010, scoping prior to the preparation of the EA exhibit an apparent serious flaw in the NEPA scoping process. Each document states that the CBP proposes to construct housing at a specific property, which happens to be the preferred alternative as identified some months later in this Draft EA. Scoping for NEPA and the EA is a consideration of alternatives, and perhaps a recommendation regarding a preferred alternative, not a statement of finality about what is proposed and exactly where. The scoping documents appear to presume that the preferred alternative had already been selected and that this was the only alternative discussed. Public comments resulting from this scoping meeting, as provided in the Draft EA, suggest that only the preferred alternative was discussed, as is clearly the intent indicated in the scoping meeting notice and information sheet. Scoping for the EA should be a consideration of the alternatives not a presentation of the details of the preferred alternative. If the other alternatives were not discussed in adequate detail at the scoping meeting, residents were not given an opportunity to consider and comment on all possible alternatives.