



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 bringing 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.



**EcoPlan Associates, Inc.**  
*Environmental Science & Resource Economics*

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## 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

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### 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

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 Development 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. Esperanza 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.

## U.S. CUSTOMS & BORDER PROTECTION AJO HOUSING DEVELOPMENT PROJECT

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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. Kadri'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 106 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

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- 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,



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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



## 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.

Mr. Michael Dawson

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

May 10, 2010

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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.

Mr. Michael Dawson

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

May 10, 2010

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- 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?

Mr. Michael Dawson

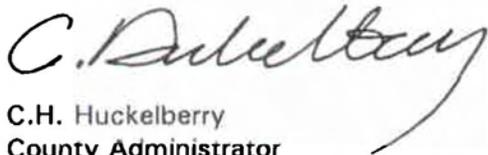
Re: US General Services Administration: US Customs and Border Protection - Ajo Housing  
Development Project

May 10, 2010

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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,

A handwritten signature in cursive script, appearing to read "C.H. Huckelberry".

C.H. Huckelberry  
County Administrator

CHH/mjk

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



THE STATE OF ARIZONA  
**GAME AND FISH DEPARTMENT**

5000 W. CAREFREE HIGHWAY  
PHOENIX, AZ 85086-5000  
(602) 942-3000 • WWW.AZGFD.GOV

**GOVERNOR**  
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**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.

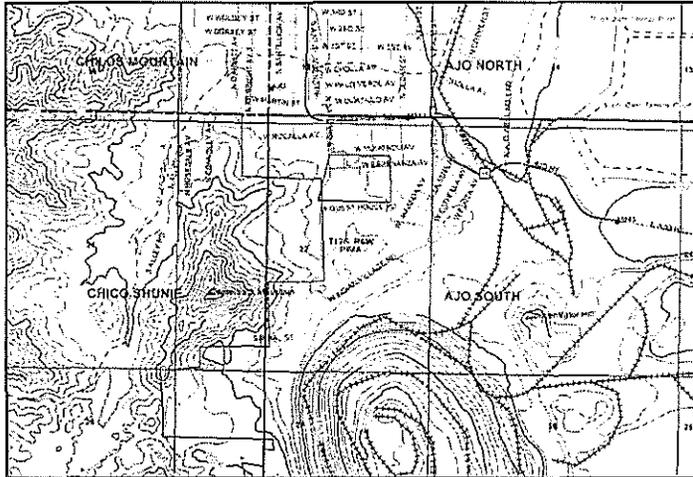
Arizona's On-line Environmental Review Tool

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

Arizona's On-line Environmental Review Tool

Search ID: 20100430012069

Project Name: Border Patrol housing project

Date: 4/30/2010 9:04:55 AM

**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**

*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,

Arizona's On-line Environmental Review Tool

Search ID: 20100430012069

Project Name: Border Patrol housing project

Date: 4/30/2010 9:04:55 AM

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/usd/home>. 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](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.

Arizona's On-line Environmental Review Tool

Search ID: 20100430012069

Project Name: Border Patrol housing project

Date: 4/30/2010 9:04:55 AM

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.

Arizona's On-line Environmental Review Tool

Search ID: 20100430012069

Project Name: Border Patrol housing project

Date: 4/30/2010 9:04:55 AM

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

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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.

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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.

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: \_\_\_\_\_



**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)

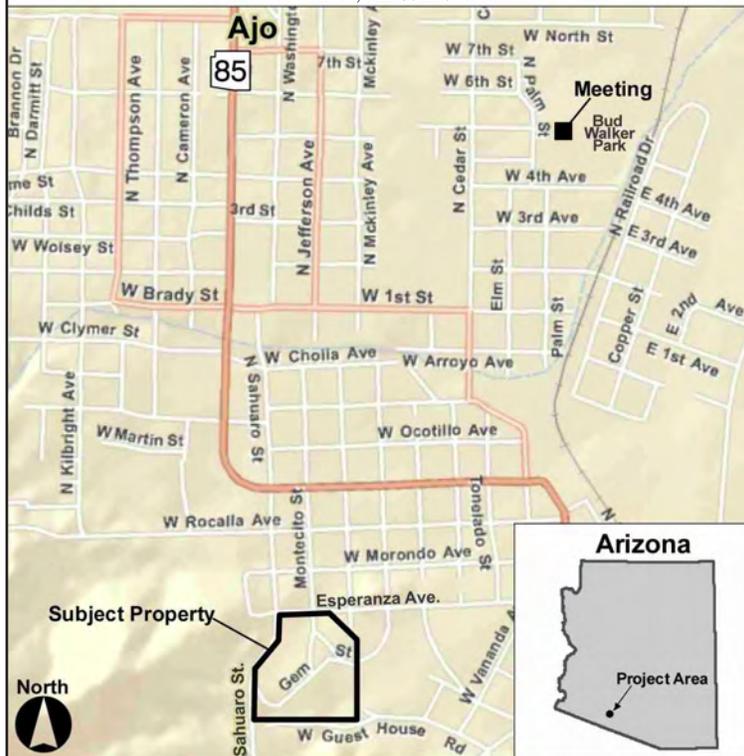
**Public Meeting**

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







**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., 3<sup>rd</sup> Floor East  
San Francisco, CA 94102  
[Osmahn.Kadri@gsa.gov](mailto:Osmahn.Kadri@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

Page two of two  
Jim and Linda Sharp  
March 4, 2010

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~~<sup>jsharp</sup>@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.

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. 2/11/10 EO

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~~<sup>jsharp</sup>@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 Development 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)

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**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 Development 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 Development 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](mailto: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*  
B E D ( - ) B R E A K F A S T

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)

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**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 CBP & 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](mailto: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  
ECOPLAN 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, incredibly, 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.

RONALD E HURLBURT  
1245 N. JANTILLION AV  
AJO AZ 85321

Sincerely,  
Ronald E Hurlburt