

Review Comments Matrix Due Date:

PROJECT: Ajo Housing Development EA Draft Environmental Assessment

DATE: Updated September 23, 2010

PROJECT MILESTONE:

RESPONSE LEGEND:

A - Concur D - Do Not Concur E - Exception X - Delete Comment
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REVIEWER	Line #	Page #	REVIEW COMMENT	RESPONSE BY DESIGNER
P. Bienenfeld		6	Need a consistent header; this page doesn't have the header.	D. Headers are only on first page of a chapter. No change needed.
P. Bienenfeld	Last para.	15	There is a 39% poverty rate in the BG. What about the displacement of the people that will be permanently relocated? That will have an adverse effect I assume. This needs to be discussed in much more detail.	D. discussed on 10/6/10 conference call. No change needed.
P. Bienenfeld		19	Where is the discussion on the consultation with USFWS? This needs to be discussed, and the letter sent to USFWS and any response needs to be in the appendix. The 'Record of Conversation' from June 9, 2010 does not indicate that the USFWS was ever told about this project or queried for the usual information about any T&E species. There needs to be a letter to USFWS and indication of correspondence, esp. about removal of habitat of the endangered lesser long-nosed bat.	D. No requirement to consult. USFWS was scoped (page 34). No response to letter, and phone conversation noted no issues (see page 34).
P. Bienenfeld	1st para	24	Need to state the level of impact.	D. See Sections 4.4.1 and 4.4.4 noting the cacti present were planted as part of homeowner landscaping. The EA also states that nearly all native vegetation on the property has been removed. No change required.
P. Bienenfeld		26	The Ajo Townsite Historic District is listed on the National Register of Historic Places. This discussion is insufficient. The letters from the county refer more than once to the economic and social importance of the Historic District. As the proposed housing is adjacent, there could be important adverse impacts. The discussion needs to be in this section.	A. Issue discussed with GSA. Jane Lehman provided Section 106 consultation letters. Cultural Chapter has been updated and letter added to Appendix B.
P. Bienenfeld		26	Architectural history surveys and archaeological surveys must be completed and discussed in this document.	A. See previous response.

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P. Bienenfeld		26	Where are the required SHPO and tribal consultation letters complying with Section 106 which are required as part of NEPA? This document cannot go forward until consultation has been initiated. The Native American Consultation Database identifies these tribes that must be contacted with consultation letters that need to be sent and included in this document. (This list may not be complete or current, please make sure the list of tribes consulted is current and completed.) Pascua Yaqui Tribe of Arizona San Carlos Apache Tribe of the San Carlos Reservation, Arizona Tohono O'odham Nation of Arizona White Mountain Apache Tribe of the Fort Apache Reservation, Arizona Papago Tribe of Arizona Western Apache Tribe	A. See above.
P. Bienenfeld	Section 4.5	25-26	There needs to be a discussion of the historic context in the baseline section.	A. See above.
P. Bienenfeld	Section 4.5	25-26	There needs to be a map showing the location of the NR District and the proposed project location.	A. See above. Map included in Appendix B letter.
P. Bienenfeld	Section 4.5	25-26	This section needs these subsections: 1. Historic Context 2. Previous Section 106 Studies 3. Archaeological Resources 4. Architectural History Resources 5. Native American Resources	D. Chapter was revised however the breakout of subsections is not required.
P. Bienenfeld		29	Re: ‘Jurisdictional Delineation’ should this be ‘Jurisdictional Determination?’	D. Jurisdictional Delineation is correct as applied by ACOE.

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P. Bienenfeld	Section 4.9.3	29	What is the impact? This text is unclear. Please be clear about impacts in these sections.	A. Impacts not determined until detailed site plans are produced. This section notes expectation that > 1 acre of land will be disturbed and Section 402 needs to be addressed. Text revised.
P. Bienenfeld	1	36	Change ‘Historic District is in close...’ to ‘Historic District, which is listed on the National Register of Historic Places, is in close...’	A. Text revised.
P. Bienenfeld		36	Re: ‘Pima County Cultural Resources and Historic Preservation Office;’ need more information on this call. What was the response of the OCRHP?	A. Issue discussed with GSA. Jane Lehman provided Section 106 consultation letters. Cultural chapter has been updated and letter added to Appendix B. GSA did not elect to consult with OCRHP.
P. Bienenfeld	Last line	36	Re: question regarding stating which agencies, tribes, and orgs. were contacted, to be found in Ch. 6, Public Involvement, where are they? This question needs to be answered.	D. This question is answered throughout Chapter 6. Added the date of the scoping letter distribution.
P. Bienenfeld	Table 6	40	Re: Cultural Resources, the evaluation must be in this NEPA document. Do the analysis and replace ‘to be evaluated’ with the impacts assessment.	A. Issue discussed with GSA. Jane Lehman provided Section 106 consultation letters. Cultural chapter has been updated and letter added to Appendix B.
P. Bienenfeld	Section 7.3	41	Where are mitigation measures for construction adjacent and within the viewshed of a National Register Historic District? Please add a section discussing this.	D. GSA determined no impacts to Historic District. No mitigation required.
P. Bienenfeld			There needs to be a section on ‘Sustainability and Greening’ per the Federal Leadership in High Performance and Sustainability MOU of January 2006.	A. Included MOU summary in Section 3.2.1.

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R. D'Hondt	Section 2.1	5	<p>Revise the first sentence to remove “<i>current</i>” from the first sentence. The use of “current” narrows the focus and is inconsistent with the verbiage in the second paragraph. Fifty six housing units will not support the long range staffing requirements for the projected of 410 CBP personnel. This will raise questions regarding where the residual personnel will find accommodations when the full staffing levels are achieved.</p> <p>Recommend revising to read “...to address the immediate need for approximately 56 additional housing units to support the initial surge of the projected staffing of 410 personnel.”</p> <p>How will the housing needs for the additional 120 CBP personnel proposed for this location will be addressed, will it be by community rentals, another GSA housing project, or implementation of a commuter bus service to transport CBP personnel to out of area housing. Failure to address this may lead to a court challenge due to “segmentation.”</p>	<p>A. Replaced the word “current” with “immediate.”</p> <p>A. revised text.</p> <p>A. Section 2.1 was revised to add clarity. Revisions agreed to during conference call.</p>
R. D'Hondt	Section 2.2	5	<p>This is a public document is it appropriate to have the following statement in the EA “...due to its proximity to the US/Mexico border, available housing in Lukeville does not provide adequate security for CBP employees and their families”?</p>	<p>A. All references to security removed from EA as agreed during conference call.</p>

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R. D'Hondt	Section 3.1	7	<p>The referenced CBP Housing Program Feasibility Study identified site evaluation criteria that had to be considered in sites for the proposed housing. The failure to address the need for potable water and sewage disposal are critical items must be fully addressed with the EA analysis.</p> <p>Recommend that EA and analysis be revised to address the site-specific hydrological conditions that are relevant to potable and waste water disposal requirements in each of the alternatives.</p>	<p>A.. The availability of utilities (including water and sewage) was addressed in the Garrison report for each alternative. To keep the EA succinct, only the more notable concerns/deficiencies (those that affected alternative selection) of each site were noted in the EA rather than reiterating information on each criterion for each alternative. Later, during project design, water and sewer design and capacity will be addressed in greater detail for the Preferred Site.</p> <p>Section 3.2.1 revised to clarify existing utilities.</p> <p>D. Site-specific hydrological condition information is not available in the Garrison reports. We are unclear on the intent of this comment and the connection between hydrological conditions and potable/waste water disposal requirements at this site. Issue to be discussed with CBP.</p>

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R. D'Hondt	Section 3.1.1	7	<p>The referenced CBP Housing Program Feasibility Study Item 11 Security: The description is poorly defined and should be revised to be less “alarmist” to the public in the project area who may read the EA and assume that the project area could be a “target” for future violence.</p> <p>Note: The discussion of security for CBP personnel and families is a recurring discussion in Section 3.1. This will possibly raise a community issue of concern for the potential additional violence in their community that may come from this project.</p>	A. All references to security removed from EA.
R. D'Hondt	Section 3.1.1	8	<p>Lukeville Alternatives 1, 2, and 3 have all been discarded for the same reason. Consider revising the narrative to only one Lukeville Alternative with three possible sites with one outcome.</p>	<p>A.. The conclusions on the alternatives came from the Garrison reports. To be consistent with the Garrison reports and avoid confusion, the alternative numbering system was retained for the EA.</p> <p>Section 3.1 revised to note numbering system.</p>
R. D'Hondt	Section 3.1.4 and 3.15	10	<p>The numbering of the Ajo alternatives is confusing and hard to follow when the Alternative Considered start with 2 and end with 3 and then the Preferred Alternatives is listed as 1. Recommend revising the numbering to make the Preferred Alternative #3 vice #1.</p>	A. Refer to previous response.
R. D'Hondt	Section 3.2.1	11	<p>The Preferred Alternative, third bullet addresses the specific components of the alternative which alludes to upgrading existing water and sewer systems. Will the existing public water and sewage systems accommodate the increased number of housing units to be installed?</p> <p>Clarify whether or not the public water and sewage systems will support the increased number of housing units that are proposed under this project.</p>	<p>A. Third bullet revised.</p> <p>E. No information available from Garrison report. GSA to determine during design. Agreed in conference call that no change to EA required.</p>

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R. D'Hondt	Section 3.2.1	11	The referenced CBP Housing Program Feasibility Study Item 11 discusses Security. Clarify how this will be overcome by the choice of the Preferred Alternative.	A. All references to security removed from EA.
R. D'Hondt	Section 3.2.1	11	The EA states that the site currently has capacity for 40 mobile homes with out the addition of the adjoining lots and the easement behind the lots. The proposed action does not appear to be feasible based on the specific site development components. Clarify whether the proposed project is consistent with the existing Pima County Development Plan for this area. Provide a new graphic showing a proposed site plan for the development locating the initial 28 and final 28 residences proposed for this location. Place this new figure to follow the existing Figure 4.	A. Revised “The 55 S. Sahuaro St. parcel is intended to have 40 mobile home units and currently has all utilities in-ground and ready for hookup.” A. Yes. Medium intensity Urban per Pima County Development Plan. Added to 3.2.1 “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).” D. Construction plan layout is not yet available from GSA.
R D'Hondt	Section 3.2.1	11	The last sentence states “...a sense of community within CBP, would allow for adequate security...” will this be through controlled, limited, or no access the adjacent residents of Ajo? This is likely to raise concerns within the community regarding their security if the project is built. Clarify what is “adequate security.”	A. All references to security removed from EA.

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R. D'Hondt	Section 3.2.1	12	Revise Figure 4, Preferred Alternative Site to move all descriptive language outside of the lines that delineate the project area. This will provide the reader with a clear view of the project area.	A. Revised as noted.
R. D'Hondt	Section 4.2	16	Table 1 is hard to understand. Recommend removing discussion of overall Pima County demographics from the table and using the data as an introductory narrative for the Ajo area demographics shown in the accompanying table. Split the single table into two tables showing Total Minority and Below Poverty Level as separate tables. Make sure that the total population numbers in the tables are consistent.	A/D. The inclusion of data for Pima County is important for two reasons: our study area encompasses a portion of Pima County outside of Ajo, and Pima County data are used to determine if potential impacts would affect minorities or low income populations “disproportionately.” Total population numbers are from the Census 2000 data. These are different for minority vs. poverty levels. Numbers were confirmed from Census 2000. Minority population header revised to “ Total Population for Whom Total Minority is Determined ”
R. D'Hondt	Section 4.4.3	19	Provide copies of all communications between EcoPlan and USFWS to support the data provided in Table 3 and the presence/absence of all referenced T&E species cited.	D. USFWS was scoped with agencies, and the phone transcript is attached as Appendix B. No other correspondence was received from USFWS. Table 3 data is from USWFS online. The first step in the review process is to review the USFWS list online. Determination of no effect was made; therefore, no Section 7 consultation is required. There will be no future correspondence from USFWS.

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R. D'Hondt	Section 4.4.4	22	<p>The AGFD On-Line Environmental Review Tool as the source of data regarding two BLM sensitive species. BLM sensitive species to my knowledge do not have special standing beyond the ESA.</p> <p>Clarify whether the two unidentified species are species of state concern.</p> <p>Revise Table 4 to identify the two specific species of BLM concern.</p> <p>Clarify whether the two species of BLM concern are found or likely to be found on the project site.</p> <p>Additionally, spell out Arizona Game and Fish Department and then abbreviate to AGFD.</p>	<p>For clarification, the BLM sensitive species do not have standing under the ESA.</p> <p>Section 4.4.3 and Table 3 relate to federally listed threatened and endangered species protected under the ESA.</p> <p>A. Section 4.4.4 and Table 4 relate to other special status species of interest to various agencies (e.g., AGFD, Forest Service, and BLM) but not protected under the ESA. One of these, the Sonoran Desert tortoise, is also identified as a state listed species of concern by the AGFD. The text was revised to make this clearer to the reader.</p> <p>A. Revised potential effect column to indicate potential for occurrence.</p> <p>A. AGFD has been spelled out as requested.</p>
R. D'Hondt	Section 4.4.4	22	<p>Preferred Alternative, Vegetation: The first sentence is awkward.</p> <p>Recommend revising the sentence to remove the second discussion of “<i>Preferred Alternative</i>” and insert “<i>existing</i>” before vegetation.</p>	<p>E. Added “existing vegetation” but retained Preferred Alternative site to be consistent to how the site is identified throughout the EA.</p>

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R. D'Hondt	Section 4.4.4	22	Preferred Alternative, Wildlife, Table 4: Clarify whether the species shown in Table 4 are Arizona State Listed Species of Concern rather than Federally listed T&E species. If the basis for BLM listing is based on State policy and guidance, clarify that point for the reader.	A. Chapter 4.4.4 revised to “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.”

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R. D'Hondt	Section 4.5	25	<p>The Preferred Alternative addresses the Ajo Town site Historic District but does not provide a graphic showing the boundary of the site.</p> <p>Recommend moving Figure 2 from Appendix A into this location to define the boundaries of the Ajo Historic District.</p> <p>Verify that the proposed action will not adversely impact any historic structures, markers, viewsheds, or similar articles located within the project area.</p>	<p>E. Consultation has been initiated by GSA. Once letters are received, cultural section will be updated.</p> <p>A. Figure depicting the boundaries of the historic district has been included in Appendix B.</p>
R. D'Hondt	Section 4.9	28	<p>Water resources section identifies two unnamed ephemeral washes within or adjoining the north and south borders of the project area.</p> <p>Recommend providing a graphic in Section 4.9.1 showing the locations of the two unnamed ephemeral washes as they relate to the proposed project area.</p>	<p>D. 4.9.1 references Figure 4, which depicts the washes. Agreed in conference call no changes needed.</p>
R. D'Hondt	Section 4.11.1	30	<p>Recommend providing a copy of the referenced Phase 1 Environmental Site Assessment as an appendix to the EA.</p>	<p>D. The ESA will not be added to the Appendix per conference call agreement.</p>
R. D'Hondt	Section 5	33	<p>The third paragraph is inconsistent with the stated need in Section 2.2 and the public notification letter provided in Appendix A stating the proposed project is being conducted in multiple phases and the number of housing units for each phase.</p> <p>Recommend that the discussion throughout the EA be refined to consistently and uniformly address the number of housing units that will be constructed and whether there will be multiple phases of construction for this project.</p>	<p>D. We recognize the letters are different. Project plans have changed since the initial scoping. No change recommended in conference call.</p> <p>A. Adjustments made to have numbers consistent.</p>

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R. D'Hondt	Section 6.1	34	<p>Agency coordination letters were sent to 17 federal, state, and local organizations. No notification was sent to any tribal or state historic preservation office in Arizona.</p> <p>Recommend, at a minimum, that the Tohono O'odham Tribal Historic Preservation Officer be notified of the proposed project as well as the State Historic Preservation Office. Provide copies of the notification the notification letters in Appendix B.</p>	E. Consultation has now been initiated by GSA to tribes, Appendix B.
R D'Hondt	Section 7.1	40	<p>Table 6 Results of Environmental Analysis, the analysis of water impacts is identified as having no significant impact, based on the impacts of only construction. The analysis never addresses the impact associated with adding up to 58 new residences for either potable water or sewage disposal.</p> <p>Revise the EA to address potable water and sewage impacts on the local community and the sources of both potable water and the method for disposal of sewage generated by the project. Clarify whether the site will use existing public water and sewage systems. If not, what additional improvement must be made to the existing water and sewage system to support this project?</p>	A. Text revised to note further analysis by GSA during design would occur, as agreed in conference call.
R D'Hondt	Appendix A	GSA Letter	The letter sent to the public states that the project will be constructed in two phases. The EA never states that, clarify if this is a two-phase project or not.	E. As previously stated, the scope has changed since the initial scoping submittal. The EA text reflects the up-to-date construction details as provided by GSA.
R D'Hondt	Appendix B		<p>Correspondence does not provide verification that any response was received from the BLM. Clarify why that is not provided.</p> <p>No correspondence is provided that verifies that the local tribal agencies have been contacted regarding this project.</p>	<p>E. BLM was scoped and did not respond. See Section 6.1 and Section 6.1.1.</p> <p>Consultation has now been initiated by GSA, Appendix B.</p>