

APPENDIX G
Draft EA Public Comments and Responses

Notice of Availability and Public Open House

Announcement

Draft
Environmental
Assessment (EA)
for the Proposed
Construction,
Operation, and
Maintenance of
Tactical
Infrastructure
U.S. Border Patrol
(USBP) San Diego
Sector, California

The U.S. Department of Homeland Security (DHS), U.S. Customs and Border Protection (CBP), announces the availability of, and invites public comment on, the Draft EA. Pursuant to the National Environmental Policy Act of 1969, 42 U.S.C. 4321 et seq. (NEPA), CBP has prepared the Draft EA to identify and assess the potential impacts associated with the proposed construction, operation, and maintenance of tactical infrastructure, to include primary pedestrian fence, construction roads, access roads, patrol roads, and minor improvements to existing roads, along approximately 30 miles of the U.S./Mexico international border within USBP San Diego Sector, California (the Proposed Action). The Proposed Action would be implemented in 14 distinct sections. Individual sections would range from approximately 0.1 to 4 miles in length. The purpose of the Proposed Action is to assist USBP agents in gaining effective control of the U.S. border between Ports of Entry in the USBP San Diego Sector.

The Draft EA complies with NEPA, the Council on Environmental Quality (CEQ) regulations in 40 CFR Parts 1500-1508, and DHS Management Directive 5100.1 (Environmental Planning Program). Copies of the Draft EA can be downloaded from the project Web site at:

www.BorderFenceNEPA.com

or

<https://ecsp.swt.usdoj.gov/mil/Pages/PublicReview.cfm>

or can be requested by emailing: information@BorderFenceNEPA.com

To request a hard copy of the Draft EA, you may call toll-free (888) 275-9740. Hard copies of the Draft EA can be reviewed at the San Diego County Library, Rancho San Diego Branch, 11555 Via Rancho San Diego, El Cajon, California 92019, (619) 660-5370; and the Poirero Public Library, 24883 Poirero Valley Road, Poirero, California, 91963, (619) 470-5978.

CBP invites public comment on the Draft EA. A public open house will be held on January 16, 2008, from 4:30 p.m. to 8:00 p.m. at the Alpine Community Center, 1830 Alpine Boulevard, Alpine, California 91901, (619) 445-7330.

<http://www.alpinecommunitycenter.com>

Pursuant to the CEQ's regulations, CBP invites public participation in the NEPA process. In order for comments to be considered for inclusion in the Final EA, comments on the Draft EA must be received by February 5, 2008. Please provide comments using only one of the following methods:

(a) Attend and submit comments at the public open house to be held from 4:30 p.m. to 8:00 p.m. on January 16, 2008 at the Alpine Community Center, 1830 Alpine Boulevard, Alpine, California 91901

(b) Electronically through the Web site at: www.BorderFenceNEPA.com

(c) By email to: SDAEComments@BorderFenceNEPA.com

(d) By mail to: San Diego Sector Tactical Infrastructure EA, c/o Gulf South Research Corporation, Baton Rouge, Louisiana, 70820

(e) By Fax to: (225) 761-8077.

When submitting comments, please include your name and address, and identify your comments as for the San Diego Sector Draft EA. Requests for information may be submitted to: Charles McGregor, U.S. Army Corps of Engineers, Engineering and Construction Support Office, 819 Taylor Street, Room 3810, Fort Worth, Texas 76102; and by Fax to: (225) 761-8077.



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Palm Springs-South Coast Field Office

690 West Garnet Avenue

P.O. Box 581260

North Palm Springs, CA 92258-1260

(760) 251-4800 Fax (760) 251-4899



January 25, 2008

IN REPLY REFER TO:
2800 (CA660.02)P

Mr. Kirk Evans
United States Customs & Border Protection
1300 Pennsylvania Avenue NW
Washington, DC 20229-0001

Dear Mr. Evans:

The Bureau of Land Management Palm Springs-South Coast Field Office (BLM) has prepared comments for the Draft Environmental Assessment for the Proposed Construction, Operation and Maintenance of Tactical Infrastructure in San Diego County (ER 08/23).

Our comments on the Draft Environmental Assessment are enclosed. If you have any questions regarding our comments, please contact Janaye Byergo at 858-451-1767.

In order for the BLM to make an informative decision and issue authorization of the project on public lands outside the 60' Roosevelt Corridor, the final environmental assessment report must address or indicate the following:

- * Clearly identify the portion of the project that is proposed to take place on BLM administered lands outside the 60' Roosevelt Corridor. Identify and quantify the impacts that would occur on these public lands.
- * Demonstrate that cultural and biological surveys have been completed within the project area for the following actions: Upgrade of existing access roads, construction of new roads, construction of staging areas, fence construction. Address the findings of those surveys.
- * Identify mitigation actions for cultural and biological resources.
- * List Best Management Practices (BMP's) formulated for the project by the U.S. Fish and Wildlife Service for special status species.

- * In addition, BLM requires documentation which establishes the completion of Section 106 and formal tribal and SHPO consultation. The responsibility of this coordination lies with U.S. Customs and Border Protection-Border Patrol and U.S. Army Corps of Engineers as the lead agencies for the project. As part of the documentation, BLM must be provided the full cultural survey report for the project.

Thank you for the opportunity to comment. We look forward to continued coordination on this project.

Sincerely,

A handwritten signature in blue ink, appearing to read "John R. Kalish", with a long horizontal flourish extending to the right.

John R. Kalish
Field Manager

Enclosure

Subject: Comment Letter; Border Fence Project (San Diego Sector EA and EIS)

Sent to:

SDcomments@BorderFenceNEPA.com

San Diego Sector Tactical Infrastructure EIS, c/o e2M, 2751
Prosperity Avenue, Suite 200
Fairfax, Virginia 22031

By fax to: (757) 257-7643.

Mr. Charles McGregor, Environmental Manager,
U.S. Army Corps of Engineers (USACE),
Fort Worth District, Engineering and Construction Support Office, 814

We respectfully submit the following comments as follows.

This document has several fatal flaws:

1. This single and complete linear project cannot be analyzed in pieces. The cumulative environmental impacts must be analyzed as a whole. Currently the project is illegally piecemealed into several NEPA documents. In addition, cumulative effects to wildlife must be properly assessed, and mitigated.
2. Gloria, Horseshoe, Copper and Buttewig Canyons, among others, may all be within the Corps Clean Water Act (CWA) jurisdiction. However, there is no reference to this within the NEPA documents. The Corps' jurisdictional areas needed to be made clear within the NEPA document. Due to the 404 jurisdiction, the Corps has a regulatory role to play and has been included as a "cooperating agency", yet there is no 404b1 alternatives analysis within the document.

The Corps regulatory program should do everything it can to retain its autonomy and integrity in implement the Clean Water Act. USACE-regulatory should be responsible for creating their own EIS/404b1 alternatives analysis consistent with their regulations and the CWA. Regulatory should not be conscribed into a being a cooperating agency due to internal political pressures.

The Corps clearly has a conflict of interest overall due to the fact that the Corps at large is managing the project for DHS.

In accordance with the Clean Water Act and Federal Guidelines in 40CFR230, we are providing the following comments:

The Guidelines state dredged or fill material should not be discharged into the aquatic ecosystem, unless it can be demonstrated that there is no less environmentally damaging practicable alternative that achieves an applicant's project purpose. In addition, no discharge can be permitted if it will cause or contribute to significant degradation of the waters of the US. The applicant is proposing to fill Major Canyons which may contain special aquatic sites. Given the extent of the impacts associated with the proposed activities and the likely impacts to special aquatic sites, the applicant bears the burden of proof for clearly demonstrating that the preferred alternative is the Least Environmentally Damaging Practicable Alternative (LEDPA) that achieves the overall project purpose while not causing or contributing to significant degradation of the aquatic ecosystem.

Project Purpose and project alternatives:

The first step in completing an alternatives analysis is the project purpose statement. Allowing DHS to determine whether practicable alternatives exist for this project is emphatically not an acceptable approach for conducting the alternatives analysis review under the 404(b)(1) guidelines. The Corps is responsible for controlling every aspect of the 404(b)(1) analysis. While the Corps should consider the views of DHS regarding the project's purpose and the existence (or lack of) practicable alternatives, the Corps must determine and evaluate these matters itself, with no control or direction from DHS, and without undue deference to DHS's wishes (Paragraph 7 of Plantations Landing Guidance April 21, 1989).

"The Corps should consider the applicant's views and information regarding the project purpose and existence of practicable alternatives; this must be undertaken without undue deference to the applicant's wishes...the project purpose can not be so narrowly defined as to preclude the existence of practicable alternatives on the other hand, the Corps has some discretion in defining the "basic project purpose" for each Section 404 permit application in a manner which seems reasonable and equitable for that particular case....but can not give to much deference to the applicant's narrowly defined project purpose. ...the Corps determines the minimum feasibility size, circumstances, etc., which characterized a viable project. "(Hartz Mountains Development Corporation Permit Elevation Case Guidance dated August 17, 1989.)

Furthermore the project purpose (homeland security) is not a water dependant activity. The definition of water dependent as stated in the Guidelines is limited to "activities requiring access or proximity to or sitting within a special aquatic site to fulfill the basic project purposes." There are many ways to meet the overall and basic project purpose that do not involve the discharge of fill material to special aquatic sites or to any waters of the U.S.

A reasonable range of alternatives that meet the stated project purpose while avoiding and minimizing damage to waters of the U.S. should be evaluated in the alternatives analysis. Careful consideration of non-structural alternatives to filling in waters of the US is essential in completing an alternatives analysis and is sound planning for any floodplain area. Additionally, recognizing the function and economic value to society of active floodplains, Executive Order 11988 states that agencies proposing to allow an action to be located in a floodplain will consider alternatives that avoid adverse effects of incompatible development in the floodplain.

Clearly the level of environmental impacts to our aquatic environment and wildlife from filling in 100 to 900 foot-wide canyons is significant. Thus in these canyons, creeks, wildlife corridor areas, the alterative of having no boarder fence but instead increased man units, cameras or other technology must be seriously considered. As to date in the current NEPA document, the agency has failed to take a hard look at these non-structural alternatives. For example, in the current NEPA document DHS fails to seriously consider and analysis alternatives and instead disregards and inadequately excuses significantly high level impacts proposed to Gloria Canyon because filling it in and building a road across it would "Cut the drive time by ten minutes," We find this to simply be unacceptable and a vagrant disregard for environmental laws designed to protect our natural resources; it clearly is not the LEDPA. We recommend taking a hard look at alternatives to the proposed physical barrier (such as increase patrol units; cameras and other forms of technology) in waters of the US.

LEPDA:

Identification of the LEDPA is achieved by performing an alternatives analysis that estimates the direct, secondary, and cumulative impacts to jurisdictional waters resulting from each alternative considered. Project alternatives that are not practicable and do not meet the project purpose are eliminated. The LEDPA is the remaining alternative with the fewest impacts to aquatic resources, so long as it does not have other significant adverse environmental consequences.

In fact just one example of this project being out of compliance with the CWA 404b1 guidelines within the Corps jurisdiction is Copper Canyon. The proposed location of the boarder fence within Copper Canyon would bisect two types of

special aquatic sites (riffle pool complexes and wetlands); if the fence was moved 100 meters downstream of the proposed location, it would avoid these special aquatic sites. Also, please note that nowhere in the document are any of these facts addressed. This was knowledge that was given to us by others who have personally visited the site. Instead, the reader is left completely uninformed of what the proposed project's environmental impacts would be in these Canyons. Certainly, at the very least, it would be practicable to move the fence over 100 meters downstream to avoid sensitive habitat and special aquatic sites. The proposed location within Copper Canyon is clearly not the Least Environmentally Damaging Practicable Alternative and is thus not in compliance with the 404b1 guidelines. It, therefore, cannot be permitted to move forward as is.

Impact Assessment:

Secondary effects to be considered include: 1) changes in the hydrology and sediment regime with respect to water velocity, and channel dimensions; 2) increases in erosion potential of the channel banks, particularly at the transition points between native bank material and armored areas; 3) increases in impervious surfaces and the corresponding increases in the volume and velocity of polluted storm water; 4) decreases in water quality from the impairment of floodplain and ecosystem services including water filtration, groundwater recharge, and flood attenuation; 5) decreases in biodiversity and ecosystem stability; 6) decrease in wildlife migration and impacts to listed species; 7) introduction of invasive plants in disturbed areas. The negative impacts of channel modification have been illustrated often in Southern California. We are particularly concerned about the potential for significant impacts to wildlife movement, changes in water velocity, sediment transport, and erosion because they can lead to bank instability, property loss, and increased downstream flooding.

Significant Degradation:

The CWA guidelines prohibit granting of a CWA Section 404 permit if project activities will cause or contribute to the significant degradation of the Nation's waters including degradation to: 1) human health and welfare; 2) aquatic life and other wildlife; 3) aquatic ecosystem diversity, productivity, and stability; and 4) recreation, aesthetic, and economic values. This standard applies to the LEDPA, meaning that if the LEDPA caused or contributes to the significant degradation, the Corps is prohibited from granting a permit under CWA Section 404. We believe the proposed impacts to waters of the US and wildlife linkages represent a significant degradation.

Avoiding impacts and the mitigation sequence

From the Hartz Mountain Elevation Case guidance “The Army Corps of Engineers is serious about protecting waters of the United States, including wetlands, from unnecessary and avoidable loss...Corps should inform developers that special aquatic sites are not preferred sites for development and that non-water dependant activities will generally be discouraged in accordance with the guidelines.”

The Corps regulations require all applicants (including DHS) to demonstrate that they have avoided impacts to waters of the U.S., what can't be avoided must next be minimized and thirdly what impacts are remaining after the process must be mitigated for by replacing lost functions and values provided by the aquatic resource through compensatory mitigation. This mitigation sequence does not allow applicants to skip to the third step in the process regardless of the quality of the compensatory mitigation being offered without first demonstrating avoidance and minimization (33CFR320.4(r); 1990 DA-EPA Mitigation MOA).

It is premature to discuss in-depth compensatory mitigation plan for the proposed project because much work remains to be done toward formulating a LEDPA for the proposed project. DHS has not demonstrated avoidance and minimization of impacts to the aquatic ecosystem to the maximum extent practicable, and the DHS has not proposed a compensatory mitigation plan for unavoidable project impacts. In addition it has been brought to our attention that over one hundred acres of mitigation from other sections of this project have not been fulfilled to date.

In earlier sections of these comments, we have established that there are other alternatives to impacting waters of the US that do meet the overall and basic project purpose. However if the Corps identifies a LEDPA that includes unavoidable impacts to waters, we recommend that the Corps require DHS to develop a compensatory mitigation plan consistent with the requirements of the Regulatory Guidance Letter (RGL 02-2) issued jointly by the Corps and EPA on December 24, 2002. While a functional assessment for the potential impacts has apparently not been done by the applicant, the above sections of these detailed comments entitled Impact Assessment and Significant Degradation set forth our view on the types of functions that would be need to be addressed by any compensatory mitigation package.

3. The environmental impacts associated with the proposed project are not described. There is no information presented within the document to give the public the ability to assess what impacts would result from DHS' preferred project design which includes filling highly functioning Canyons and install culverts. In some cases the Canyons that proposed to be filled in are 900 feet wide yet this impact is not described. This impact must be identified and

alternatives to such a massive environmental impact must be seriously explored. The document also fails to identify biological impacts associated with the project; the extent of special aquatic sites and habitat types that would be impacted; Corps' CWA jurisdiction; and there is no hydrologic analysis to determine the size of the culverts. Wildlife corridors and species that are known to utilize the specific corridors proposed for impact are not identified. Instead the agency attempts to broadly identify species that can occur in all of Southern California leaving no possibility for meaningful public comment or analysis as to which species would be impacted by the project and how these impacts could possibly be mitigated via innovative BMPs. The biological section is inadequate. The document must properly identify, for each canyon, the species and habitat that would be impacted by the proposed project. These canyons are wildlife corridors and need to retain this function to allow the movement of wildlife. The failure of DHS and the cooperating agencies to properly identify the environmental impact is illegal; the impacts must be properly assessed by appropriate biological surveys conducted by qualified biologists, documented/disclosed and then re-circulated for public comment. In addition color photos of the sensitive areas proposed to be impacted by the project should be included within the NEPA document.

4. The Endangered Species Act (ESA) states that all Federal agencies shall, in consultation with and with the assistance of the Secretary, utilize their authorities in furtherance of the purposes of this act by carrying out programs for the conservation of endangered species and threatened species listed pursuant to section 4 of this act.

Sec 7(a)(1) (ESA, 1973) Section 2(b) Purposes: The purpose of the Act are to provide a means whereby the ecosystems upon which endangered species and threatened species depend may be conserved, to provide a program for the conservation of such endangered species and threatened species, and to take such steps as may be appropriate to achieve the purposes of the treaties and connections set forth in subsection a of this section. (c) policy –(1) It is further declared to be the policy of Congress that all Federal departments and agencies shall seek to conserve endangered species and threatened species and shall utilize their authorities in furtherance of the purposes of this Act. (2) It is further declared to be the policy of Congress that Federal agencies shall cooperate with State and local agencies to resolve water resource issues in concert with conservation of endangered species.

Federal agencies must fulfill their responsibilities under the ESA. Thus, Federal agencies should use their resources in an effort to further the biologically related beneficial uses designated to support, protect and enhance these canyons. Regulatory agencies responsible for implementing provision under the Federal

Clean Water Act have an increased obligation in implementing their program to recover these waters from impairments to the beneficial uses of these water bodies that support federally listed species, and designated critical habitat.

The fact that a species becomes listed as endangered or threatened officially recognizes that their population declined has already reached the level of cumulative significant impacts. A future population decline would therefore be considered significant, and if large enough, could threaten the continued existence of this listed species. In the Arid Southwest the recovery of many endangered and threatened species hinges on the overall health of the riparian, wetland and estuarine ecosystems in which their life cycle needs are met; foraging, spawning, nesting and or breeding.

Therefore DHS and the Corps have an obligation to avoid impacting federally listed species and their critical habitat. This further supports a basis for following our previous recommendation for a proper alternatives analysis that avoids filling and/or any construction in sensitive wildlife areas.

We look forward to your reply. If you have any questions or would like additional information, please contact us at 805-302-2509.

Sincerely,

Heather Wylie

Eric Morrisette



State of California - The Resources Agency

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF FISH AND GAME<http://www.dfg.ca.gov>

South Coast Region

4949 Viewridge Avenue

San Diego, CA 92123

(858) 467-4201



February 1, 2008

Loren W. Flossman, Program Manager
San Diego Sector Tactical Infrastructure EA
c/o Gulf South Research Corporation
8081 GSRI Avenue
Baton Rouge, LA 70820

**Re: Notice of Availability and Public Open House Announcement for the Draft
Environmental Assessment for Construction, Operation, and Maintenance of the
Proposed Tactical Infrastructure, U.S. Border Patrol San Diego Sector, California, U.S.
Department of Homeland Security, U.S. Customs and Border Protection,
U.S. Border Patrol**

Dear Mr. Flossman:

The California Department of Fish and Game (Department) has reviewed the above-referenced draft Environmental Assessment (EA) dated January 2008. The Department offers the comments and recommendations below to assist the U.S. Border Patrol (USBP) in avoiding or minimizing potential impacts to biological resources. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; Sections 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA) and other sections of the Fish and Game Code.

The proposed action involves the construction, operation and maintenance of tactical infrastructure at various locations along a 30 mile corridor of the U.S./Mexico international border, USBP San Diego Sector, San Diego County, California. The proposed infrastructure would include approximately 7 miles of new roads, 10 miles of primary pedestrian fence, and 10 miles of road widening, primarily situated within the 60-foot wide Roosevelt Reservation. The tactical infrastructure would begin at the Tecate Port-of-Entry and terminate at the eastern edge of O'Neill Valley (nearing the San Diego County line). The tactical infrastructure would consist of 14 discrete sections of pedestrian fence installed approximately 3 feet north of the U.S./Mexico international border (built 15 to 18 feet in height and extending below grade and ranging from 0.1 to 4 miles in length). Three types of roads (access, construction or patrol) would be constructed within these same locations, varying in distance from 0.09 to 2 miles. Some of the newly constructed roads would encroach into privately owned parcels and public lands managed by the Bureau of Land Management. Along with the construction component of this action the following routine maintenance and repair items would be required: repairing damage to the primary pedestrian fence; grading and leveling of road surfaces; re-application of road resurfacing material; and application of soil stabilizers to road surface to ensure longevity. In association with the infrastructure construction component, 10 staging areas (temporary impact areas) would be established to accommodate construction equipment and materials. All of the areas are proposed to be revegetated upon completing the construction activities. Implementation of this action would also require utilizing existing roads within proximity to the

Conserving California's Wildlife Since 1870

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construction corridor, with all roads returned to pre-construction conditions upon the completion of work.

The draft EA identifies three project design alternatives which include: (1) No Action Alternative (2) Proposed Action Alternative, and (3) Secure Fence Act Alternative. Under the No Action Alternative no road improvements or fence and road construction activities would occur. The Proposed Action involving the construction, maintenance, and operation of tactical infrastructure would result in a permanent project impact corridor of 60 feet at various locations along a 30-mile corridor (totaling 123 acres; 78 acres permanently impacted, and 45 acres temporarily affected). Under the proposed action Quino checkerspot butterfly and coastal California gnatcatcher (Federally listed endangered species), may be adversely impacted. Alternative 3 would involve the construction, maintenance, and operation of two layers of fence, access roads, patrol roads and lights. The alignment of the fence would be identical to that of the proposed action, with the secondary layer of fencing placed 130 feet apart from the primary layer. This action would have the most significant environmental impact compared to the proposed action alternative, resulting in a 130-foot-wide permanent impact corridor for approximately 10 miles (14 segments of construction, totaling 157 acres of impacted lands).

To enable Department staff to adequately review and comment on the proposed action we recommend the following information, where applicable, be included in any subsequent environmental documents.

1. The Department would reiterate the requirement for a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts as identified by cooperating agencies. Due to multiple phases of the regional border infrastructure that are slated or currently under construction, a more reasonable analysis of the cumulative impacts should be provided in the final EA. The current cumulative analysis reiterates direct impacts, however the totality of similar project-related impacts (e.g., reduction of multiple wildlife corridors, alteration of reproductive or behavioral patterns to wildlife, likelihood for increased wildlife mortality) associated with the long-term project goals of the San Diego/EI Centro USBP tactical infrastructure has not been discussed. The assertion that the loss of 78 acres of local/regional common plant communities would result in an insignificant cumulative impact has not been adequately supported when compared to the overall impact acreage that would occur with similar types border infrastructure actions. Further discussion should be provided as to the basis for concluding that the incremental effects (as are currently being referenced) is not cumulatively considerable.
2. Under section 3.2.2.2 Proposed Action Alternative, approximately 27 acres of privately-owned land would be impacted as a result of this action. In regards to lands that have been identified to extend outside of the Memorandum of Understanding between the Department of Homeland Security and the Department of Interior, please identify all relevant mitigation measures that would apply outside the jurisdiction of the lead agency or the cooperating agencies (Sections 1502.16(h), 1505.2 (c)).
3. The Department's Biogeographic Data Branch in Sacramento should be contacted at (916) 322-2493 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Area identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or Environmentally Sensitive Habitats (ESHs) or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area should be addressed.

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4. The surveys performed in October 2007 will not detect species that are found during other times of the year. Surveys should be undertaken at the appropriate times of year to actually detect species and not be done opportunistically. This survey period is inappropriate to detect spring plants or plants that die to the ground during summer, and are seasonally used by animals. Along with performing the necessary surveys for those areas previously identified as not being surveyed due to the lack of authorized rights-of-entry, updated sensitive plant survey (including host plants associated with Quino checkerspot butterfly) should be performed in accordance with standards identified by the cooperating agencies.
5. Temporary impacts to 45 acres of wildlife habitat (associated with proposed staging areas) was identified as not being a significant impact, however the draft EA indicates that those areas have yet to be surveyed. A completed biological assessment is required prior to making a determination on the significance of the specific resources being impacted (including the presence/absence of threatened and endangered species). Furthermore, the accompanying detailed project maps depict the placement of some staging areas within undisturbed habitat, with disturbed areas in close proximity (due to vehicle turnarounds or pullouts). The Department would reiterate that efforts should be directed at the placement of staging areas in the least environmentally intrusive area to further minimize the impact footprint.
6. Seasonal variations in use by fauna in the project area should be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable should be included in the impact analysis. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.
7. The proposed action should also be analyzed relative to its effects on the off-site habitats and associated wildlife. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas are of concern to the Department, particularly within any proposed fence alignments extending across canyons. The analysis should also include a discussion of the potential for impacts resulting from increased vehicle traffic associated with patrols (frequency/duration), artificial lighting, noise, and vibration. For example, the draft EA identifies a potential indirect beneficial effect of the fence in reducing illegal traffic, whereas the proposed action could result in increased traffic in the area from local users on the U.S. border side, resulting in an attractive nuisance and contributing to additional environmental impacts.
8. Section 3.12.2.2, Proposed Action Alternative, states that all construction and transportation activities would occur during daylight hours. Whereas section 2.3.5 Lighting, identifies work would possibly occur on a 24-hour basis. The EA should clearly define the proposed work schedule to ensure that potentially significant impacts are correctly assessed.
9. No reference sound levels for blasting activities have been included in the noise impact assessment section of the draft EA. Furthermore, no reference sound level for the proposed portable lights was provided. The EA identifies that it anticipates that no more than 10 lights would be operated at one time in one location to facilitate project construction. If this is correct, at a minimum the DNL dBA should be provided and discussion provided as to whether these levels constitute a significant impact to sensitive biological resources.

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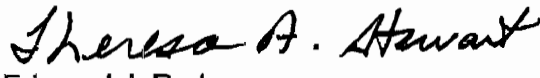
10. Impacts to migratory wildlife affected by this action should be fully evaluated, including proposals to remove/disturb native vegetation and other nesting habitat for native birds. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.3). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.
11. The proposed action (including disturbances to vegetation) should take place outside of the general avian breeding season [January 15 to August 15], as defined by the Department, to avoid impacts to nesting birds (including disturbance which would cause abandonment of active nests containing eggs and/or young). To avoid any direct and indirect impacts to raptors and/or any migratory birds, grubbing and clearing of vegetation that may support active nests and construction activities adjacent to nesting habitat, should occur outside of the breeding season. If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the breeding season, the USBP shall retain an approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 100-feet of the construction area, Federally- or State-listed birds (e.g., southern willow flycatcher, least Bell's vireo, coastal California gnatcatcher) on or within 300-feet of the construction area and nesting raptors within 500-feet of the construction area. The pre-construction survey must be conducted within 10 calendar days prior to the start of construction, the results of which must be submitted to the wildlife agencies for review and approval prior to initiating any construction activities. If nesting birds are detected by the approved biologist, the following buffers should be established: 1) no work within 100 feet of a non-listed nesting migratory bird nest, 2) no work within 300 feet of a listed bird nest, and 3) no work within 500 feet of a raptor nest. However, the wildlife agencies may reduce these buffer widths depending on site-specific conditions (e.g. the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If construction must take place within the recommended buffer widths above, the project applicant should contact the wildlife agencies to determine the appropriate buffer.

A bio-monitor shall be present on-site during all initial grubbing and clearing of vegetation to ensure that perimeter construction fencing is being maintained and to minimize the likelihood that nests containing eggs or chicks are abandoned or fail due to construction activity. A bio-monitor shall also perform periodic inspections of the construction site during all major grading to ensure that impacts to sensitive plants and wildlife are minimized. These inspections should take place once or twice a week, as defined by the wildlife agencies, depending on the sensitivity of the resources. The bio-monitor shall send weekly monitoring reports to the Department and notify the Department immediately if clearing is done outside of the permitted project footprint.
12. In regards to the vegetation rehabilitation proposal, plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site relative to the components of the tactical infrastructure; (b) the plant species to be used, container sizes and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria.

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We appreciate the opportunity to comment on the draft EA for this action and to assist the USBP in further minimizing and mitigating the proposed actions impacts to biological resources. If you have questions or comments regarding this letter, please contact Paul Schlitt of the Department at (858) 637-5510.

Sincerely,


for Edmund J. Pert
Regional Manager
South Coast Region

cc: Cara McGary, U.S. Fish and Wildlife Service

EP:ps



ERIC GIBSON
INTERIM DIRECTOR

County of San Diego

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

February 5, 2008

Loren W. Flossman
Program Manager
San Diego Sector Tactical Infrastructure EA
c/o Gulf South Research Corporation
8081 GSRI Avenue
Baton Rouge, Louisiana 70820

COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT PROPOSED CONSTRUCTION, OPERATION, AND MAINTENANCE OF TACTICAL INFRASTRUCTURE, U.S. BORDER PATROL SAN DIEGO SECTOR, CALIFORNIA, U.S. DEPARTMENT OF HOMELAND SECURITY, U.S. CUSTOMS AND BORDER PROTECTION, U.S. BORDER PATROL

The County of San Diego has received and reviewed the Draft Environmental Assessment (EA) for the Proposed Construction, Operation, and Maintenance of Tactical Infrastructure dated January 2008 and appreciates this opportunity to comment. The EA was reviewed by the County Department of Planning and Land Use (DPLU) and Department of Public Works (DPW) staff. Though most of the project is on public lands (Roosevelt Reservation) managed by the U.S. Bureau of Land Management (BLM), parts of the project are located within the unincorporated area of San Diego County.

To facilitate coordination, the County respectfully asks that the following items be addressed:

GENERAL COMMENTS

1. The technical information to support conclusions of significance or less than significance in the EA should be provided to the public, either in the text of the

EA or in appendices. It is difficult to review the EA because the information necessary for evaluating impacts has not been included.

2. Technical reports for determining the significance of impacts should be included in the EA for:
 - Aesthetics and Visual Resources
 - Air Quality
 - Biological Resources
 - Cultural Resources
 - Geology and Soils
 - Hydrology (the Hydrology Report, Appendix D to the EA, currently only addresses groundwater wells)
 - Noise
 - Socioeconomics
 - Traffic
3. The County would like to see the "Technology in Lieu of Tactical Infrastructure" be more fully explored in the EA as one of the alternatives for the project.

CUTS AND FILLS

4. The EA should provide details regarding the cut and fill activities that will be required in drainages that will be crossed by the roads and the pedestrian fence so that impacts can be adequately analyzed. Details should include the dimensions for each fill (as has been included for Horseshoe Canyon and La Gloria Canyon), amount of fill to be required for each canyon, from where the proposed fill will be excavated, and how far it will need to be transported.
5. The cuts and fills should be evaluated for their impacts to aesthetics, hydrology, surface water quality, and biological resources.

EROSION

6. The potential for erosion should be evaluated in the EA, and a conceptual revegetation plan designed to control erosion on steep cuts and fills resulting from construction of the project, particularly the fills in the canyons, should be included as an attachment to the EA.

BIOLOGICAL RESOURCES

7. Section 3.8.2 Environmental Consequences identifies the Thresholds of Significance for established wildlife resources. The Thresholds of Significance include "...conflicts with the provisions of an adopted...Natural Community Conservation Plan...." (p.3-28). The County of San Diego is working

with the United States Fish and Wildlife Service (USFWS) on this federally-funded Natural Community Conservation Plan for the eastern portion of the County. The area covered by this plan includes a significant portion of the land on the northern side of the Proposed Action. As noted in the EA, a range of species anticipated to be covered by the East County MSCP will be directly affected by the proposed action. The draft list of covered species is located at: http://www.sdcountry.ca.gov/mscp/ec_biology.html. The EA should identify mitigation to address associated impacts to sensitive biological resources to the extent feasible.

8. The Primary Pedestrian Fence would impact species mobility and reduce habitat connectivity. It is anticipated that the Proposed Action will have significant impacts to reptiles, amphibians and a range of other species including large mammals that are dependent upon water and other resources located directly to the north and south of areas affected by the Proposed Action. The EA should identify mitigation to address associated impacts.

AESTHETICS

9. Impacts to views from SR 94 in the areas where the fence can be seen from the highway should be evaluated and appropriate mitigation should be developed.
10. The EA should evaluate the impacts to aesthetics from the large fills in the various canyons. Mitigation for these impacts should include vegetating the huge slopes with San Diego County native plants.

ROADWAYS AND TRAFFIC

11. Page 3-1. The EA states that traffic will not be impacted from construction equipment traveling to and from the various work sites, however, the EA does not provide the analysis and results to substantiate this conclusion. The EA should provide the following data regarding the construction activity from the Proposed Action Alternative:
 - a. Hours and dates of operation for construction activity
 - b. Construction/truck routes along or connecting to public roads
 - c. Types of heavy vehicles to be used for construction
 - d. Estimated number of heavy vehicular trips needed for construction
12. The EA should identify and assess any project-related traffic that may be added to County maintained public roads (e.g. Thing Road, Humphries Road, Shockey Truck Trail, and Old Highway 80) upon completion of the Proposed Action Alternative. For example, Maps 2-5 appear to indicate that Humphries Road will be used as a project access road.

February 5, 2008

13. The EA should clearly identify locations where proposed project (construction / access / patrol) roads and/or the border fence would traverse and/or connect to County maintained public roads. For example, Figure 3-2 indicates that a project access road would connect to Thing Road, which is a County maintained public road.
14. The EA should clearly identify where proposed project roads would require a new driveway along County maintained public roads. For example, Map 19 appears to show a new project/construction road (Willow Access) that would connect from the border fence to Old Highway 80.
15. The EA should provide an operational assessment (e.g. sight distance) for any new driveways/access points created by the project along County maintained public roads.
16. The EA should note that the County will require construction and encroachment permits for any work performed within the County's right-of-way, such as driveways or temporary road access points onto County maintained roads.
17. The EA should identify if the proposed project will require improvements to County maintained public roads.
18. The EA should specify whether all new and improved project roads will be used for government purposes only, gated for restricted access, and maintained by the federal government.

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for the tactical infrastructure along the international border. We look forward to receiving any future environmental documents related to this project, or providing additional assistance at your request. If you have any questions regarding these comments, please contact Bobbie Stephenson at (858) 694-3680.

Sincerely,



ERIC GIBSON, Interim Director
Department of Planning and Land Use

Interim
Deputy
Director

For

cc: Adam Wilson, Policy Advisor, Board of Supervisors, District 2, MS A500
 Vince Nicoletti, CAO Staff Officer, DCAO, M.S. A-6
 Megan Jones, CAO Staff Officer, DCAO, M.S. A-6
 Francisco "Nick" Ortiz, Department of Public Works, Transportation Division, MS
 0334
 Campo/Lake Morena Community Planning Group
 Jacumba Community Planning Group
 Boulevard Community Planning Group
 Bobbie Stephenson, Land Use/Environmental Planner, Department of Planning
 and Land Use, MS 0650
 Priscilla Jaszowski, Administrative Secretary, Department of Planning and
 Land Use, MS 0650

Reference County Project IJN 08-020



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Pacific Southwest Region
1111 Jackson Street, Suite 520
Oakland, California 94607

IN REPLY REFER TO:
ER# 08/23

Electronically Filed

31 March 2008

San Diego Sector Tactical Infrastructure EA
c/o Gulf South Research Corporation
Baton Rouge, Louisiana, 70820
SDEAcomments@BorderFenceNEPA.com

Subject: Review of the Draft **Environmental Assessment (EA)** for Construction, Operation, and Maintenance of Tactical Infrastructure, U.S. Border Patrol, San Diego Sector, San Diego County, California

Dear Sir/Madam:

The Department of the Interior has received and reviewed draft Environmental Assessment (EA) for the above-referenced project, dated January 4, 2008. We recognize the importance of this project, and are committed to providing assistance as quickly and efficiently as possible.

In this initial review, we have identified potential effects of this project on trust resources and provide comments based on information provided in the EA, the Department's knowledge of sensitive and declining species and their habitats, and participation in regional conservation planning efforts.

Based on our review of the EA, we have concerns regarding the (1) adequacy of the project description, (2) adequacy of the analysis of direct, indirect, and cumulative effects on sensitive resources, (3) sufficiency of proposed mitigation measures, and (4) determination that environmental effects of proposed project are not significant.

The proposed project is to construct, maintain and operate approximately 30 miles of tactical infrastructure including five sections of fence, patrol roads, and access roads along the U.S.-Mexico border in San Diego County, California. The project would impact privately owned land and public lands managed by Bureau of Land Management.

The proposed project would be installed mostly within the Roosevelt Reservation with an approximate 60-foot wide impact corridor, with the exception of some roads occurring outside the reservation on Federal and private land. Per the EA, a total of 123 acres would be impacted, including 19 acres of chamise chaparral, 25 acres of mixed chaparral, 2 acres of mixed

chaparral/coast oak woodlands, 6 acres of coastal sage scrub, 13 acres of disturbed vegetation, and 45 acres of unspecified habitat for the construction of staging areas.

The project has potential to impact the following federally listed species: least Bell's vireo (*Vireo bellii pusillus*), coastal California gnatcatcher (*Polioptila californica californica*), southwestern willow flycatcher (*Empidonax traillii extimus*), Quino checkerspot butterfly (*Euphydryas editha quino*), arroyo toad (*Bufo californicus*), Otay tarplant [*Deinandra* (= *Hemizonia*) *conjugens*], willowy monardella (*Monardella linoides viminea*), Encinitas baccharis (*Baccharis vanessae*), and San Diego thornmint (*Acanthomintha ilicifolia*).

Due to incomplete project description, the EA is lacking necessary information to assess effects of the proposal on species mentioned above. The infrastructural appears to be undetermined for many segments. Since fence design is critical to determining effects on wildlife and plants, and focused surveys for the above species were either not conducted or were conducted at an inappropriate time of the year, the document's conclusions regarding environmental effects of the proposal are not substantiated.

Without complete information on final fence design, lay-down areas, and access roads, or relevant biological information, the EA does not adequately assess adverse effects of the proposal or mitigation measures needed to reduce impacts to a level of insignificance. Furthermore, the document references avoidance measures that do not appear feasible due to timing constraints of this project. Analyses of indirect and cumulative effects are not provided for most resources that would be impacted by this project.

We recognize the important nature of this project and offer to work expeditiously so that environmental review can be completed in a timely manner. We recommend that Department of Homeland Security (DHS) work with US Fish and Wildlife Service and Bureau of Land Management staff in an attempt to design the project in a way that avoids and minimizes adverse effects, and may potentially avoid the need to initiate formal consultation under section 7 of the Endangered Species Act. Without further information on project design and mitigation measures, it appears that initiation of formal consultation will be needed.

General Comments

1. The EA states numerous times that environmental effects of the proposed project are below a level of significance. However, direct, indirect, and cumulative impacts to listed/sensitive species were not fully analyzed within the EA (see additional comments below) and a clear, comprehensive mitigation proposal was not provided. Without additional information and analyses the determination that project impacts are less than significant cannot be substantiated. The FWS encourages DHS to continue more comprehensive discussions with our Ecological Services and Refuges divisions to minimize and compensate for effects of the construction and operation of the proposed fence to federally-listed species.
2. Throughout the document, the discussion and assessment of indirect impacts due to proposed construction of the fence should be expanded and clarified. Indirect impacts that should be assessed include, but may not be limited to: redirection of illegal traffic to unsecured areas of the border that may impact wildlife habitat, construction of access roads and use of staging areas that are not included in the proposed 60-foot wide right of

way (ROW), and downstream effects on habitats within the Tijuana River watershed. Indirect impacts should be accounted for in any compensation for impacts to threatened and endangered species and mitigation for any unavoidable impacts to jurisdictional wetlands or waters of the United States.

3. The project description does not provide sufficient information regarding impacts to listed species and sensitive habitats. No maps or spatial representation of plant communities and listed/sensitive species distribution within and surrounding the project area were provided in the EA. Project area aerial photographs with habitat/vegetation communities clearly identified should be included to assist in the effects analysis. In addition, the EA should clearly describe project related impacts (temporary and permanent) to each vegetation community and species habitat for all aspects of the project, including road widening, staging/lay down areas, new fence construction, and new road construction.
4. The EA contains an insufficient alternatives analysis. Project alternatives including options besides fencing should be analyzed. Technology may be available in lieu of or in addition to fencing that would result in reduced direct impacts to the natural resources. Such project alternatives should be clearly stated and analyzed in the EA.
5. The EA repeatedly stated that design criteria would be used to minimize adverse impacts on threatened or endangered species and their critical habitat. Please clarify where this has or will occur. If avoidance measures cannot be included in the design criteria, mitigation measures should be included to mitigate impacts to levels that are less than significant.
6. To accurately assess the impacts of the proposed project, the FWS recommends that wetland delineation for the project be verified by the U.S. Army Corps of Engineers and that natural resource agencies be provided with a mitigation plan for any unavoidable impacts to wetlands and waters of the U.S. for review and comment prior to a final decision. The mitigation plan should include a complete restoration plan for temporary impacts as well as mitigation for all permanent and indirect impacts to jurisdictional areas.
7. Statements used throughout the document that the fence will have beneficial effects to wetland/riparian areas, vegetation, wildlife, and federally listed species (by reducing human activity and trash) are not supported with data. To the contrary, impacts from operational vehicular activity and road maintenance would be likely to increase. We recommend that the decision documents include a thorough analysis of all direct, indirect, and cumulative impacts that is based on the best available scientific information, not unsupported assumptions.
8. The EA should provide the reader with current information on the existing barrier fence segments along the International Border in San Diego County so that assessment of cumulative effects is possible, including effects to unlisted species.
9. Clearly identify the portion of the project that is proposed to take place on BLM administered lands outside the 60' Roosevelt Corridor. Identify and quantify the impacts that would occur on these public lands.

10. Demonstrate that cultural and biological surveys have been completed within the project area for the following actions: Upgrade of existing access roads, construction of new roads, construction of staging areas, fence construction. Address the findings of those surveys.
11. Identify mitigation actions for cultural and biological resources.
12. List Best Management Practices (BMP's) formulated for the project by the U.S. Fish and Wildlife Service for special status species.
13. In addition, BLM requires documentation which establishes the completion of Section 106 and formal tribal and SHPO consultation. The responsibility of this coordination lies with U.S. Customs and Border Protection-Border Patrol and U.S. Army Corps of Engineers as the lead agencies for the project. As part of the documentation, BLM must be provided the full cultural survey report for the project.

Specific Comments

2.0 Proposed Action and Alternatives, pg. 2-1:

- “This section provides detailed information on USBP’s proposal to construct, maintain, and operate TI...” While the description of the proposed action includes construction, maintenance, and operation of the fence and associated roads, the DEA does not include an analysis of potential environmental impacts associated with maintenance and operation activities.

2.5 Other Alternatives Evaluated but Eliminated From Consideration, pg. 2-12:

- While the DEA considers several alternatives in addition to the proposed action (i.e., Secure Fence Act Alignment; additional agents in lieu of tactical infrastructure (TI); vehicle barriers in lieu of fence; fence only; technology in lieu of TI), an alternative incorporating the use of a combination of methods is not discussed. For example, potential use of TI in combination with additional agents and the use of technology should be considered. Such an alternative could include construction of new fence along existing roads. In areas where the existing road is somewhat north of the international border, the use of technology or additional agents should be analyzed. The use of multiple methods of detection in combination with each other may significantly reduce the environmental impacts of the proposed action, particularly in sensitive areas that will be significantly impacted, such as La Gloria and Horseshoe canyons.

Staging Areas:

- While the DEA maps depict the location of the staging areas, there is no site-specific discussion of the vegetation of each of these staging areas and subsequently no discussion of potential impacts. Also, it appears that several of these staging areas are being proposed in undisturbed habitat (e.g., staging area northwest of Cetus Hill and staging area northwest of Ag Loop). The relocation of staging areas to previously disturbed habitat would reduce impacts to sensitive species (i.e., habitat loss, fragmentation, and/or establishment of invasive species).
- The discussion in section 5.0 Mitigation Measures of how staging areas will be rehabilitated needs clarification. It is not clear if all staging areas will be rehabilitated (e.g., in previously disturbed and undisturbed habitat). Also, section 5.0 includes only

minimal discussion of how staging areas will be rehabilitated and states that rehabilitation methods would be developed in coordination with and approved by BLM.

- Without a detailed discussion of where each staging area will be located, the species and/or potential habitat that may occur in these areas, and how each staging area will be rehabilitated, potential impacts to sensitive species resulting from the construction, use, and rehabilitation of staging areas cannot be fully analyzed.

3.7 Vegetative Habitat, pg. 3-22:

- While the DEA discusses the presence of six potential jurisdictional ephemeral waters of the U.S. (pg. 3-15), including Campo Creek, Boundary Creek, and several small unnamed creeks, the presence of riparian habitat is not discussed in this section or in Table 3-3. Therefore, the calculations of altered vegetation are likely incomplete.
- The DEA does not include a specific discussion of the vegetative communities that would be impacted by filling LaGloria and Horseshoe canyons.
- Since coastal sage scrub and riparian habitats are considered sensitive or rare plant communities under local and State regulations, the finding that impacts to these plant communities are “not expected to be significant” is incorrect.

3.8 Wildlife and Aquatic Resources, pg. 3-29:

- Potential impacts to wildlife and aquatic resources should be discussed in terms of the life history and/or habitat requirements of the species that occur in and adjacent to the project corridor. For example, there’s no discussion of the potential impacts to wildlife of erecting movement barriers between habitats on either side of the international border. Beside the direct impacts of removing habitat, these gaps/barriers could prohibit movement thereby reducing gene flow. Also, the absence of vegetation in these large gaps could result in increased predation.
- The DEA should include a detailed discussion of the potential impacts of filling La Gloria and Horseshoe canyons to wildlife and aquatic resources. Filling these canyons could have substantial impacts, including but not limited to reducing species movement between habitats on either side of the international border and reducing seasonal water flows to the Tijuana River.
- Wildlife connectivity: Proposed filling of at least 2 canyons (Horseshoe and La Gloria) poses significant effects. The filling of canyons and the closing of existing gaps in the border fence would preclude general wildlife movement in one of three important dispersal zones recognized in *Las Californias Binational Conservation Initiative, A Vision for Habitat Conservation in the Border Region of California and Baja California* (2004), a report prepared by The Nature Conservancy, Conservation Biology Institute, and ProNatura, and supported by the California Biodiversity Council, a State and Federal interagency committee. The San Diego County border region is an internationally recognized biodiversity hotspot (IUCN 2000).
- The DEA should include a specific discussion of the mitigation measures that would be implemented to ensure consistency with the Migratory Bird Treaty Act.

3.9 Threatened and Endangered Species, pg. 3-32:

- To fully analyze project impacts to protected species, the EA should include maps of each project site that depicts the plant community type within and adjacent to the project area and occurrence data and potential habitat for protected species.

- While the EA acknowledges that indirect adverse impacts to potentially suitable habitat for protected species could result from illegal immigrants shifting their activities to the end of newly constructed fence segments to avoid apprehension, it does not include a thorough analysis of additional potential impacts to protected species and their habitats in these areas.
- The EA should include a detailed discussion of the potential impacts of filling La Gloria and Horseshoe canyons to threatened and endangered species. Filling these canyons could have substantial impacts, including but not limited to reducing species movement between habitats on either side of the international border and increasing predation.
- The EA should include a detailed discussion of the potential impacts of constructing low water crossings or similar drainage structures to riparian habitat and the protected species that may occur within these areas (e.g., least Bell's vireo, southwestern willow flycatcher, and arroyo toad). Given that the footprint of these structures is expected to extend approximately 25 to 40 feet on either side of the crossing to allow placement of rip rap (see page 2-4), the installation and use of these structures could have significant impacts to riparian habitat and associated species.
- Potential impacts to threatened and endangered species should be discussed in terms of the life history and/or habitat requirements of the species that occur in and adjacent to the project corridor. For example, there is no discussion of the potential impacts of increasing the gap between habitats on either side of the international border. Besides the direct impacts of removing habitat, these gaps could prohibit movement thereby reducing gene flow or increasing predation.
- *Least Bell's vireo, Southwestern willow flycatcher, and Arroyo toad:* While the DEA states that potential habitat for least Bell's vireo and southwestern willow flycatcher occurs adjacent to the 7 Gate/Railroad project site and that arroyo toad is known to historically and perhaps currently occur in Boundary Creek, upstream of the Willows project site, there is no detailed discussion of project impacts to these species and their habitats. Also, there is no discussion of potential habitat for any of these species along the other ephemeral waters of the U.S. (pg. 3-15), including Campo Creek and several small unnamed creeks that occur along the project corridor. Without a thorough analysis, the finding on page 3-38 that the proposed action may affect but is not likely to adversely affect the vireo or flycatcher is unsupported. Also, without a thorough discussion of arroyo toad occurrence data and habitat requirements, the finding that the project sites lack suitable habitat, and therefore would not affect this species, is unsupported.
- *Coastal California gnatcatcher:* The EA only analyzes impacts to coastal sage scrub (CSS) habitat. While the coastal California gnatcatcher is primarily associated with CSS during the breeding season, the species also occurs in non-CSS habitat (e.g., chaparral), which it uses for foraging and dispersing. The analysis of impacts to this species should include impacts to non-CSS habitat. Also, since wildfire is a natural component of the CSS/chaparral ecosystems, impacts associated with fire are considered temporary. Therefore, the acreage of the burned areas within the project sites should be included in the estimate of gnatcatcher habitat that would be permanently impacted by the project.
- *Quino checkerspot butterfly and critical habitat:* The EA acknowledges that the October 2007 biological surveys were conducted outside of the proper season to determine presence of listed species but later states that the primary host plant for Quino, *Plantago erecta*, was not observed at any of the surveyed areas. The EA should acknowledge that this host plant species is known to occur in the area but likely not found in the fall because it is an ephemeral annual plant. The EA should also discuss the other host plants known to be used by Quino and potentially present in the project corridor. Also, being a

low-flying species, the DEA also should include a discussion of the potential impacts to Quino movement between habitat patches on either side of the international border associated with the construction of new fence. Effects to Quino critical habitat were not adequately analyzed in the EA. The EA should recognize that disturbed habitat may still be functionally useful to the butterfly and should be analyzed as such.

- *Otay tarplant, willowy monardella, Encinitas baccharis, and San Diego thornmint*: The EA acknowledges that the October 2007 biological surveys were conducted outside of the proper season to determine presence of protected species, but later states that these plant species were not observed within the surveyed areas, implying that these species do not occur in the project corridor. Without a thorough discussion of species occurrence data and habitat requirements, the finding that the project sites lack suitable habitat and therefore would not affect these listed species is unsupported.
- *Peninsular bighorn sheep*: The endangered Peninsular bighorn sheep is likely to be affected by significant indirect impacts from the funneling of illegal immigrant traffic into the Jacumba Mountains, portions of which are designated as critical habitat. Alteration of the fence design with gaps or vehicle barriers only within one mile of sheep habitat would likely reduce the significance of the impacts and provide opportunity for connectivity with bighorn sheep in Mexico.
- *Tecate cypress and Thorne's hairstreak butterfly*: The EA states that up to eight Tecate cypress trees would be impacted by construction but it's not clear how these individuals will be impacted (e.g., destroyed during construction, indirectly impacted due to dust, adjacent soil disturbance, etc.). There is also no discussion of how impacts to this species would be minimized or mitigated other than avoidance. Also, while the EA acknowledges that the Thorne's hairstreak butterfly uses Tecate cypress as a host plant, there is no discussion of potential occurrence of this butterfly species or its suitable habitat (in addition to Tecate cypress) on the project site.

If you have any questions regarding these comments, please contact Janaye Byergo, Bureau of Land Management Palm Springs-South Coast Field Office (BLM), at 858-451-1767 or Kurt Roblek or Pete Sorensen, Fish and Wildlife, at (760) 431-9440.

Thank you for the opportunity to review this project.

Sincerely,

A handwritten signature in black ink, reading "Patricia Sanderson Port". The signature is fluid and cursive, with the first name "Patricia" being the most prominent.

Patricia Sanderson Port
Regional Environmental Officer

cc:
Director, OEPC
FWS, CNO



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

February 11, 2008

Robert F. Janson
Acting Executive Director
Asset Management
U.S. Customs and Border Protection
1300 Pennsylvania Avenue, NW
Room 3.4D
Washington, DC 20229

Subject: Draft Environmental Assessment and Draft Finding of No Significant Impacts for Construction, Operation, and Maintenance of the Proposed Tactical Infrastructure, U.S. Border Patrol San Diego Sector, California, U.S. Department of Homeland Security, U.S. Customs and Border Protection, U.S. Border Patrol

Dear Mr. Janson:

The U.S. Environmental Protection Agency (EPA) has reviewed the subject Draft Environmental Assessment (DEA) and draft Finding of No Significant Impact (FONSI) pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Thank you for agreeing to accept our comments late, per our telephone conversation with Dave Guzewich on February 5, 2008.

EPA feels strongly that the DEA does not provide sufficient information to support a FONSI determination. Specifically, the DEA does not analyze all reasonable alternatives, does not fully disclose impacts to soils and hydrology, or impacts to biological resources, including threatened and endangered species, and does not discuss how these impacts will be mitigated to a less than significant level. The DEA also does not include a detailed project description for each segment nor identify the type of primary pedestrian fence design that will be used, which will largely influence impacts. Finally, the DEA does not include a sufficient cumulative impacts assessment.

We understand from your office that the tight project schedule has resulted in incomplete NEPA documents being released to the public. While it is the intension of U.S. Customs and Border Protection (CBP) to have needed environmental analyses added to the Final EA, this approach does not provide the public with a meaningful opportunity to participate in the environmental review process. Incomplete project descriptions and impact analyses do not offer the level of information needed for decision-makers, agencies, or the public to effectively assess the proposed project and provide comments. Even if these deficits are resolved in the Final EA,

the pre-set schedule for completion of construction does not allow agencies the opportunity to review the more complete document and comment on the severity of the impacts or potential opportunities to avoid and minimize them.

Additionally, this approach of releasing incomplete NEPA documents is not consistent with the Council on Environmental Quality's Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act (CEQ Regulations), which state that agencies may prepare an environmental assessment and then make its determination whether to prepare an EIS or a FONSI (40 CFR 1501.4 (c) and (e) and 40 CFR 1508.9). The incomplete information in the DEA does not facilitate or enable public comment concerning the agency's determination that the project does not significantly affect the environment, and therefore does not provide sufficient evidence for making the FONSI determination at this time.

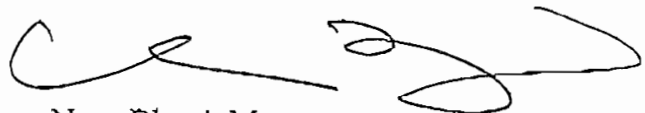
EPA is concerned that potentially significant environmental impacts are not analyzed in the DEA. EPA recommends that specifics regarding the project description, hydrology and wildlife impacts, alternatives to avoid or minimize these impacts, and a revised cumulative impacts assessment be included in a subsequent NEPA document, such as a revised EA or EIS. A firm commitment to mitigation and ongoing maintenance and monitoring is needed if a FONSI determination will be made.

EPA believes a comprehensive mitigation strategy should be developed for cumulative impacts resulting from the many border fence and infrastructure projects that are occurring along the border. We understand that preliminary discussions with U.S. Fish and Wildlife Service (USFWS) have occurred at a senior staff level regarding a comprehensive programmatic mitigation agreement to address wildlife impacts. We encourage such an approach and are available to assist in identifying comprehensive mitigation for impacts to watersheds and waters of the U.S.

We understand that the Secretary of the Department of Homeland Security has authority to waive environmental laws for these border fence projects in its mission to secure the homeland and protect it against conventional and unconventional attacks. We urge the Department to avoid the use of waivers and make every effort to comply with environmental laws, consistent with our national environmental policy (42 U.S.C. 4321).

We appreciate the opportunity to review this DEA. If you have any questions, please contact me at (415) 972-3846 or Karen Vitulano, the lead reviewer for this project. Ms. Vitulano can be reached at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,



Nova Blazej, Manager
Environmental Review Office

Enclosure: EPA's Detailed Comments

cc: Charles McGregor, U.S. Army Corps of Engineers, Fort Worth District
Patricia Sanderson Port, U.S. Department of the Interior
Kurt Roblek, U.S. Fish and Wildlife Service
Robert Smith, U.S. Army Corps of Engineers, Los Angeles District
Gulf South Research Corporation

DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL ASSESSMENT (DEA) AND DRAFT FINDING OF NO SIGNIFICANT IMPACTS (FONSI) FOR CONSTRUCTION, OPERATION, AND MAINTENANCE OF THE PROPOSED TACTICAL INFRASTRUCTURE, U.S. BORDER PATROL SAN DIEGO SECTOR, CALIFORNIA, FEBRUARY 11, 2008

Justification for Finding of No Significant Impacts

The DEA does not provide sufficient analyses or identify specific mitigation measures to support conclusions in the draft FONSI. An environmental assessment, in part, serves to: 1) briefly provide sufficient evidence and analysis for determining whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI), and 2) aid an agency's compliance with the National Environmental Policy Act (NEPA) when an EIS is not necessary (See 40 CFR 1508.9).

EPA is concerned that potentially significant environmental impacts are not analyzed in the DEA. We recommend that Customs and Border Patrol (CBP) address our comments below in a subsequent NEPA document, such as a revised EA or Environmental Impact Statement. A firm commitment to mitigation and ongoing maintenance and monitoring is needed if a FONSI determination will be made.

Alternatives Analysis

The subject DEA does not evaluate all reasonable alternatives. The DEA states that it considered but dismissed alternatives that evaluate additional agents in lieu of tactical infrastructure and various forms of technology in lieu of tactical infrastructure (p. 2-12) and determined additional agents or technology alone would not meet the purpose and need of achieving effective border control. The DEA did not evaluate the use of these alternative methods in conjunction with fencing and tactical infrastructure, such as their use in certain environmentally sensitive areas to avoid impacts. In fact, the DEA quotes a Congressional Research Service Report stating that a "rigid enforcement system that could integrate infrastructure, manpower, and new technologies to further control the border region" was needed (p. 2-14); yet such an integrated alternative was not included for analysis.

Recommendation: EPA recommends an additional alternative be evaluated in the subsequent NEPA document for this project that integrates infrastructure, manpower, and new technologies, consistent with the Congressional Research Service Report.

Impacts to Soils, Hydrology, and Waters of the U.S.

EPA has concerns regarding potentially significant impacts to soils and the watershed through erosion from the specific actions proposed. The DEA does not include detailed descriptions of the actions, but based on the limited information, it appears that a substantial amount of earth movement will occur. The project will level an entire hill, involve extensive cut and fill activities in minor drainages, and construct and widen roads on steep slopes (some greater than 18% grade) of highly erodible soils. The DEA did not provide sufficient information regarding soils (or other resources) in these project areas, instead incorporating information by reference

from a previous 2003 EA, which was not immediately available¹. The DEA did indicate that all the soils within the project corridor have a severe erodibility rating (p. 3-6).

The project will also create and operate new drag roads, which involve vehicles dragging tires or brushes behind to smooth the surface of an unpaved road so evidence of crossing is apparent. The DEA does not describe any impacts to the watershed from the expansion and operation of these roads. The hydrology section of the DEA only discusses impacts to groundwater yet concludes that the proposed action would not result in severe erosion or sedimentation nor substantially alter existing drainage patterns. The DEA states that areas of highly erodible soils will be given special consideration when designing the proposed project to incorporate erosion control measures such as straw bales, silt fencing etc., however the effectiveness of these standard construction site measures in these environments is not assured and would require diligent maintenance and monitoring, which are not clearly identified or committed to in the proposed action.

Impacts to potential waters of the U.S. are estimated for road crossings only. The DEA does not quantify acre impacts from fence crossings but only states that fence designs would be constructed in washes so that floodwaters would be conveyed without back-ups on either side of the border (p. 3-16). Without identifying and committing to ongoing maintenance and monitoring, including identifying maintenance that may be required on the Mexico side of the border, we do not expect these impacts to be less than significant.

Finally, the summary table of impacts (Table 2-4, p. 2-17) does not identify any adverse impacts to the watershed or surface waters and states only that the proposed action would result in beneficial impacts by reducing illegal traffic.

Recommendation: We recommend CBP prepare a revised NEPA document with complete project descriptions, which include specific activities for each project segment, all relevant resource information that is incorporated by reference, and full impact analyses based on this information. Include descriptions of areas used for soil storage or disposal and the impacts from soil storage on resources, including the soil removed from the leveling of Krutzch's Hill and other significant earth movement activities. Include impacts from fence construction in washes and identify maintenance and monitoring that will occur for these areas, including funding sources and responsible parties. Modify Table 2-4 to identify all impacts to hydrology and watersheds. We understand that the U.S. Army Corps of Engineers is working on wetlands delineations for some of the project areas. This information should be consulted when revising impact assessments and included in the revised NEPA document. This document should be made available for public and agency review.

We understand that the Secure Fence Act allows CBP to use means other than pedestrian fences to secure areas with elevation grades exceeding 10%. We strongly recommend

¹ We note that there is no provision in the CEQ Regulations allowing incorporation by reference into an environmental assessment, and courts do not generally allow incorporation (See *Sierra Club v. Babbitt*, 69 F. Supp. 2d 1202 (E.D. Cal 1999) and *Natural Res. Def. Council, Inc. v. Duvall*, 777 F. Supp. 1533 (E.D. Cal. 1991))

alternatives to fence and road construction for these high grade areas, including Rattlesnake Ridge and all high grade areas exhibiting highly erodible soils.

Cumulative Impacts

The DEA does not include a sufficient cumulative impact assessment. The assessment does identify other CBP projects and one Bureau of Land Management project, but does not attempt to include other projects occurring in the project areas that may affect similar resources, nor is there any discussion of past actions that have affected these resources and contributed to their current health. The resource-specific discussions largely repeat project impacts and do not provide an assessment of cumulative impacts to these resources that would reveal the ability of these resources to withstand additional stressors. A sufficient cumulative impact assessment is important for this project, especially considering the piecemeal nature of the impact assessments for this and other border fence projects.

Recommendation: EPA recommends substantial improvements be made to the cumulative impacts assessment and that this assessment be included in a revised NEPA document and made available for public and agency review. EPA recommends the *Guidance for Preparers of Cumulative Impact Analysis* (June 2005), (Available: http://www.dot.ca.gov/ser/cumulative_guidance/purpose.htm), as a useful methodology².

Impacts to Biological Resources

We have concerns regarding impacts to biological resources since it appears that the proposed project has the potential to impact several federally listed species. The DEA includes only a superficial impact assessment to these resources and cumulative impacts have not been assessed at all. We understand that CBP is coordinating with the U.S. Fish and Wildlife Service regarding project impacts to threatened and endangered species. The DEA relies on implementation of conservation and avoidance measures as mitigation for significant impacts and as a basis for a FONSI determination. We understand from USFWS however, that CBP's adherence to a preset schedule could eliminate the possibility of avoidance and mitigation, such as when a sensitive life stage interferes with construction timeline goals. The final decision document should clearly identify which mitigation and conservation measures CBP is committing to and using as a basis for a FONSI determination.

The DEA states that even with the completion of these segments, there would still be large remote areas along the border, within the San Diego Sector, that do not contain barriers; consequently, there will still be ample opportunities for transboundary migration of wildlife and exchange of genetic material (p. 4-5). CBP has not demonstrated that this is indeed the case, and there is no map in the DEA showing existing and proposed fence.

Recommendation: EPA recommends CBP comply with all avoidance and conservations measures identified by USFWS. If conservation measures will not be followed, it is important that they be identified so that the FONSI determination can be assessed based

² This guidance, developed jointly by Caltrans, FHWA, and EPA, focuses on transportation projects in California; however, it is useful for non-highway projects and will assist in identifying cumulative impacts and preparing an analysis that is sound, well documented, and compliant with requirements of Section 404 of the Clean Water Act.

on mitigation that CBP has committed to provide. Greater commitments to road abandonment and rehabilitation should occur for this project. We also urge continued talks regarding a programmatic mitigation agreement with USFWS, and that progress on any agreements is included in the final decision documents.

The CBP should ensure that corridors are available for transboundary migration. Include the map of all existing fence segments in the cumulative impacts section and clearly identify where these migration corridors lay. EPA strongly recommends the use of wildlife-friendly vehicle barriers in conjunction with virtual fencing components such as laser barriers, motion sensors, etc. at critical intervals to ensure transboundary wildlife migration.

Text Corrections

- Table 1-1 (p. 1-10) states that EPA would issue Clean Water Act National Pollutant Discharge Elimination System permits. The State of California issues construction stormwater permits.
- Page 2-4 refers to Table 1-1 as a table that lists specific actions for the project, but this table lists major permits and approvals

Hello,

The San Diego Public Library needs a copy of this EA for its collections. We already have the EIS.

Please send one copy to:

Science, Industry, and Govt. Publications Section
San Diego Public Library
820 E Street
San Diego CA 92101

Thank you.

Gary Klockenga
Government Publications Librarian

Dear ladies and gentlemen -

below I send you the comments from the San Diego Regional Board on the Border Fence NEPA EA.

Lilian Busse
Environmental Scientist
Southern Watershed Unit
San Diego Regional Water Quality Control Board
9174 Sky Park Court
San Diego, CA 92123
lbusse@waterboards.ca.gov

Page 5, line 23/24:

Impacts to waters of the U.S. and waters of the State need to be mitigated. The Regional Board usually asks for a 3:1 mitigation * 1:1 creation and 2:1 enhancement/restoration independent of the size of the impact.

Page 3-12, line 8-18:

The Regional Board will take jurisdiction over ephemeral streams in the project area. These ephemeral streams are waters of the State, and the applicant needs to enroll in the general WDR for isolated waters from the State Water Resources Control Board.

Page 3-15, line 8-23:

The impact of 0.142 acres needs to be mitigated (3:1, see comment above).

Page 3-17, line 6-12:

This project will increase the impervious surface in the watershed by building 7 miles of roads. Please make sure that the additional stormwater does not contain pollutants that affect the beneficial uses of the streams. Post-construction BMPs might be necessary.

Please let me know if you have any questions.

Thanks, Lilian Busse

Lilian B. Busse, Ph.D.
Environmental Scientist
Southern Watershed Unit

San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

phone: 858-467-2971

fax: 858-571-6972

lbusse@waterboards.ca.gov



Linda S. Adams
Secretary for
Environmental Protection

State Water Resources Control Board

Division of Water Quality

1001 I Street • Sacramento, California 95814 • (916) 341-5455
Mailing Address: P.O. Box 100 • Sacramento, California • 95812-0100
Fax (916) 341-5584 • <http://www.waterboards.ca.gov>



Arnold Schwarzenegger
Governor

February 5, 2008

San Diego Sector Tactical Infrastructure EA
C/o Gulf South Research Corporation
Baton Rouge, Louisiana, 70820

Dear Comment Reviewers:

SAN DIEGO SECTOR ENVIRONMENTAL ASSESSMENT (EA)

California Water Resources Control Board (California Water Board) staff has reviewed the San Diego Sector Proposed Tactical Infrastructure EA and has the following comments regarding this document.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) COMPLIANCE:
Section 5 states that this document is intended to provide compliance, in part, with both the National Environmental Policy Act (NEPA) and CEQA. Section 1.7 of this EA correctly states the following:

"For this project, CEQA is applicable because under Section 401 of the CWA (33 United States Code [U.S.C.] 1341), states and tribes are delegated authority to approve, condition, or deny all Federal permits or licenses that might result in a discharge to state or tribal waters, including wetlands. Projects that have a potential for resulting in physical change to the environment, and or that might be subject to several discretionary approvals by governmental agencies including construction activities, clearing or grading of land, improvements to existing structures, and activities or equipment involving the issuance of a permit, are required to go through the CEQA process. The California Code of Regulations (CCR), Title 14, Section 15063, allow the use of a NEPA document to meet the requirements for an Initial Study under CEQA."

However, the EA does not fully describe what additional steps would be taken to comply with CEQA beyond completing this Initial Study. Conducting the NEPA process does not automatically and simultaneously satisfy the CEQA process when a California permit is required. It is our understanding that project applicants must identify a lead agency for CEQA compliance. This lead agency, which must be a California agency, is then responsible for conducting a review, which includes

California Environmental Protection Agency



an opportunity for public comment. Until these steps are followed, we do not consider that the requirement for public involvement in the CEQA process discussed in Section 1.5 has been met.

2. **WATER QUALITY CERTIFICATION:** As noted in Section 1.4 (Framework for Analysis) and Table 1.1, a Clean Water Act (CWA) Section 401 State Water Quality Certification is required for the project. However, Table 1.1 requires correction since it lists the Regional Water Quality Control Board (Regional Water Board) as the permitting agency. The proposed project will occur within the boundaries of two Regional Water Boards. In cases where more than one Regional Water Board is involved, regulations require that the entity that issues the water quality certification is the State Water Resources Control Board.

We have not, to date, received an application for water quality certification (certification) for this project. The certification process routinely includes a review of the applicant's Stormwater Pollution Prevention Plan (SWPPP) and the operation and maintenance plan that details how the installed project will be maintained to prevent future discharge of pollutants from the project area. We will also review compliance with Section 404 of the CWA pertaining to wetland protection.

We strongly recommend that all the sections of road and fence be treated as a single project and be permitted as such under Sections 404 and 401 of the CWA. Thus, the sum quantity of lands and waters affected by the entire project should be considered as a whole.

3. **CUMULATIVE EFFECTS:** Section 4.0 concedes that cumulative impacts will occur if the preferred alternative is implemented, but makes no attempt at quantification of those effects. Quantification of cumulative effects is necessary for the development of appropriate mitigation measures.
4. **MITIGATION MEASURES:** Section 5.0 states that:

"It should be emphasized that these are general mitigation measures; development of specific mitigation measures would be required for certain activities implemented under the action alternatives. The proposed mitigation measures would be coordinated through the appropriate agencies and land managers or administrators, as required."

Section 5.0 also states that:

"It is CBP's policy to reduce impacts through the sequence of avoidance, minimization, mitigation, and finally, compensation."

Section 5.0 thus begins to address many of our concerns, but additional explanatory detail needs to be provided.

All potential adverse effects to water quality should be identified in the CEQA documentation to a level of detail that is adequate for the development of appropriate mitigation measures.

These potential water quality effects - whether from project construction, operation, or maintenance - should be avoided to the greatest extent feasible as a first step. When avoidance is not feasible, impacts should be minimized if possible. Otherwise, mitigation should be described such as on-site restoration or reclamation of the affected sites that includes a maintenance plan for the life of the installation. When avoidance and restoration/reclamation is not feasible and permanent effects are to occur, appropriate off-site mitigation should be considered. All of these mitigation steps should be detailed in a mitigation plan that is approved before project implementation begins. This mitigation plan should include a construction, operation, and maintenance plan that details how these mitigations will be followed during and after construction.

5. **MAPS AND FIGURES:** The maps and figures provided in Appendix A of this document do not provide adequate detail to allow California Water Board staff to certify the proposed project. The maps provided adequate detail for assessing general location and general project activities, but additional annotation of the physical features of the landscape will be required. Development of these details can be a part of the SWPPP preparation process, but the California Water Board staff should be consulted as this process occurs.

The construction details of elements of the proposed Tactical Infrastructure (i.e., the fence itself) are not presented as final drawings but only as examples. We cannot evaluate the effects of a design until it is presented. We will be concerned with the effects on surface and sub-surface drainage that may occur with all of the presented design examples.

The pages of example drawings are not enumerated in a way that allows for easy reference. These detail drawings should be clearly enumerated, and a list of figures should be provided.

California Water Board staff thanks the U.S. Department of Homeland Security – Customs and Border Patrol for this opportunity to comment on this EA.

If you have questions on the above, please contact me at (916) 341-5573 (vconnor@waterboards.ca.gov) or Cliff Harvey, the staff person most knowledgeable on this subject, at (916) 322-2514 (charvey@waterboards.ca.gov).

Sincerely,



Valerie Connor
Manager, Regulatory Section
Division of Water Quality

cc: Colonel Thomas H. Magness, IV.
U.S. Army Corps of Engineers
Los Angeles District
915 Wilshire Blvd., Suite 980
Los Angeles, CA 90017

Mr. Dave Smith, Chief
Wetlands Regulatory Office
U.S. Environmental Protection Agency, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Mr. Robert Perdue, Executive Officer
Colorado River Basin Regional Water Quality Control Board
73-720 Fred Waring Drive, Suite 100
Palm Desert, CA 92260

Mr. John Robertus, Executive Officer
San Diego Regional Water Quality Control Board
9174 Sky Park Court, Suite 100
San Diego, CA 92123-4340

February 5, 2008

San Diego Sector Tactical Infrastructure EA
c/o Gulf South Research Corporation
Baton Rouge, Louisiana, 70820
Via: SDEAcomments@BorderFenceNEPA.com

RE: Comments Draft Environmental Assessment for the Proposed Construction,
Operation, and Maintenance of Tactical Infrastructure, U.S. Border Patrol San Diego
Sector, California.

The Nature Conservancy (Conservancy) appreciates this opportunity to provide comments on the draft Environmental Assessment (EA) developed by the U.S. Department of Homeland Security (DHS), U.S. Customs and Border Protection (CBP) and U.S. Border Patrol (Border Patrol) to construct new tactical infrastructure within the San Diego sector. The mission of The Conservancy is to preserve the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. To achieve success in our mission, the San Diego project of the Conservancy has worked extensively over the last twenty years with public resource agencies and communities to protect many of the region's most ecologically significant natural areas.

The Conservancy has grown increasingly concerned about the threats posed by infrastructure development where it negatively and significantly impacts biological resources and compromises investments in public lands. It is in this context that The Conservancy is writing to express our concerns about the Proposed Action Alternative to construct, operate, and maintain additional roads and pedestrian fence in a 30-mile stretch of the border region that has been identified as a critical opportunity area for conservation (CBI, 2004).

The area where San Diego County and Baja California meet is an internationally recognized biodiversity hotspot that harbors an extraordinary number of plants and animals that occur nowhere else on Earth (Dobson et al. 1997, Mittermeier et al. 1999). Signature species include the federally-listed California gnatcatcher, Quino checkerspot butterfly, least Bell's vireo, arroyo toad and the Peninsular bighorn sheep. The Nature Conservancy, Conservation Biology Institute, and Pronatura, a Mexican non-governmental organization, have joined to conserve biodiversity in the borderlands as part of the *Las Californias Binational Conservation Initiative*. Our goals are to conserve large, intact wildlands and to maintain linkages between wildlands in order to safeguard genetic diversity and ensure the long-term health of the ecosystem.

Two priority cross-border linkages (CBI 2004) will be affected by the Proposed Action Alternative (map enclosed).

La Posta linkage

Location: Campo Valley, San Diego County, and El Hongo Valley, Baja California

The La Posta linkage is an ecological transition area between the coastal habitats to the west, the higher elevations of the Peninsular Range/Sierra Juárez to the north and southeast, and the Sonoran Desert to the east. This linkage forms the intersection of high elevation habitats in the Laguna Mountains with mid-elevation habitats of the upper Campo Valley and upper Sonoran mixed chaparral covering rugged canyons, inland valley grasslands, and low-to-intermediate-gradient drainages lined with live oaks and Englemann oaks. This area is rich in biodiversity, even though it does not appear to support as many endangered species as along the coast. In addition, large area dependent species like mountain lions and spotted owls occur in this area (see enclosed map). The federally endangered arroyo toad is known to occur in at least some of the streams (CBI 2003).

The long-term viability of these sensitive species and rare ecological communities depends, in part, on the maintenance of the link between the Laguna Mountains and Central Baja California. The BLM land on the border, including La Gloria and Smith canyons, are important components of that linkage and serve as dispersal areas for species moving north and south.

Park-to-Parque linkage

Location: Anza-Borrego Desert State Park, San Diego and Imperial counties, and Parque Constitución de 1857 in Baja California

The Park to Parque linkage is a continental-scale linkage along the transboundary region of the Peninsular Ranges, thus ensuring cross-border connectivity through the Eastern edge of the South Coast Ecoregion and the Sonoran Desert. Protecting this linkage ultimately will allow re-establishment of historic connectivity between endangered Peninsular bighorn sheep in the U.S. and bighorn sheep populations in the Sierra Juárez in northern Baja California and encourage binational collaboration in managing bighorn sheep populations on both sides of the border.

Efforts to maintain the link between the Jacumba and In-Ko-Pah Mountains and the Sierra Juárez involves protecting land along Interstate-8 and private lands that make up the Carrizo Gorge watershed and conserving additional lands stretching from Parque Constitución to the border.

Comments on Draft Environmental Assessment

1. Surface Waters and Waters of the U.S. for the Proposed Action Alternative fails to address how the construction of additional pedestrian fence in canyons and waters of the U.S. will deal with additional stream channel sedimentation, stream bank erosion and possible release of pollutants into stream channels.

The EA does not identify the type of fence that is being proposed at this time. Therefore, there is little information about how the proposed fence will be constructed to allow water to pass during rainfall events and especially during floods. There is insufficient information to address how DHS and CBP propose to minimize long-term erosion and stream channel sedimentation with the exception of proposing rip-rap or rock, which will be detrimental to the federally-listed arroyo toad.

2. Wildlife and Aquatic Resources for Proposed Action Alternative should read that possible short-term and long-term significant adverse impacts may occur to wildlife and aquatic species.

The impact of "filling the gaps" cannot be measured by miles of fencing alone, but rather "filling the gaps," particularly in canyons and other likely wildlife corridors, will have a true "cumulative impact" and that warrants a full Environmental Impact Study.

The additional border fencing and new roads to "fill the gaps" will further fragment habitat beyond current conditions. Loss and fragmentation of habitats is considered the single greatest threat to biodiversity at global and regional scales (Myers 1997, Noss and Csuti 1997, Brooks et al 2002). The border region is a good example of the effects of habitat fragmentation (CBI 2004). Road construction and conversion of land to urban uses have fragmented and isolated natural habitats. The remaining habitat fragments experience edge effects, altered physical conditions and fire regimes, increased invasion by exotic species, changes in vegetation, loss of top predators, and altered species population dynamics. Roads can have an even broader impact by altering hydrologic patterns, disrupting migration patterns, and causing direct mortality via road kill.

Enormous investments in habitat conservation through the Natural Community Conservation Planning/Multiple Species Conservation Program have been made to prevent further fragmentation and maintain the ecological integrity of the remaining intact areas in the borderlands. These investments in conserved lands rely upon the protection of the same habitat types in Northern Baja California, much of which is still intact but highly threatened by future infrastructure development. The

Conservancy and our partners are working under the *Las Californias Binational Conservation Initiative* to protect our investments in San Diego County by maintaining cross-border linkages and protecting lands in Mexico. By constructing a new pedestrian fence in the areas identified, some of the last remaining corridors that provide connectivity between habitats north and south will be severed.

Section 3.8.2.2 Proposed Action Alternative to wildlife and aquatic resources should read that impacts to transboundary migration patterns of animals will be significant. Conservation Biology Institute (2003) identified a list of 17 focal species used for planning linkages that are likely to be present in the project area (see attached). In addition to these species, other area dependent species that use the Laguna Mountains and lower elevations as well, such as the mountain lion and spotted owl, should be considered along with the federally endangered arroyo toad which is known to occur in some of the streams. The canyons proposed for fencing could serve as dispersal areas for these species. The proposed fence will isolate populations and reduce genetic viability of the remaining species. While many of these species were not recorded during the field visits that were conducted in October 2007 that does not mean they are not present. Negative surveys for species could have been the result of drought conditions and lack of presence at that time of the year.

An alternative to additional pedestrian fence could be to maintain or install vehicle barriers and use other virtual fence technology, such as cameras and sensors to track illegal foot traffic. This combined with additional patrols may be a less expensive alternative to installing a pedestrian fence. In addition, these areas could serve as pilot projects to evaluate operational control of the border using virtual technologies while maintaining investments in biodiversity conservation. The Conservancy would be willing to work with DHS and CBP to establish a monitoring protocol to evaluate the impacts of new pedestrian fence with a pilot project to provide open areas to maintain wildlife corridors and connectivity.

In addition, the Conservancy proposes that DHS and the San Diego Sector consider a pilot project to protect the remaining open space along the border from urban encroachment. It is our belief that preserving open space and important natural areas along the border will also benefit CBP. We understand that in urbanized areas, CBP has no other option but to construct pedestrian fences to secure the border. However, by protecting open space, CBP benefits because it is afforded more options in order to secure the border. The EA identifies Bell Valley as a property that requires a pedestrian fence. We propose to enter into a pilot project with DHS and CBP to conserve this property and prevent future urban encroachment on the border.

The EA recognizes that "Indirect adverse impacts to wildlife habitat adjacent to the project corridor could occur as illegal aliens attempt to circumvent the proposed

infrastructure.” This is a concern to The Conservancy and our partners. History has proven that as areas are secured, illegal foot traffic moves to attempt illegal entry to areas that remain open even if those areas are rugged and harder to traverse. The cumulative impacts on Peninsular bighorn sheep and their habitat from the proposed action need to be evaluated in a full Environmental Impact Study.

The Conservancy believes the current proposed fencing could have significant impacts on the Peninsular bighorn sheep. There are two main possible impacts on Bighorn Sheep from fencing elsewhere:

- More foot traffic in rugged sheep habitat by persons redirected from other areas of the border
- Increased enforcement-related vehicular access and activity in sheep habitat

Increased foot traffic: In addition to increased disturbance, we are also concerned about the use of springs by persons attempting to illegally cross the border, especially in the summer. During summer months, bighorn sheep often rely on small and scarce water sources. These same water sources may also be used by people traveling through the deserts, and use by people can (1) deplete the small amount of water at these springs, (2) keep bighorn sheep from coming to the spring (if people are frequently at the spring), and (3) contaminate the water if the spring is used for washing and personal hygiene.

Increased enforcement activity: The EA notes securing the 30-mile stretch of the border in the proposed action will act as a force multiplier and allow CBP to deploy agents to areas without pedestrian barriers. Increased Border Patrol activity in bighorn sheep habitat will have a significant negative impact on the sheep. Bighorn sheep have recently started using historical areas that have been vacant in recent years (e.g., within the island in I-8, as well as just south of I-8; Rubin, personal communication). We are optimistic that they will eventually use other areas between I-8 and the international border once again. Increased human activity in that area would reduce this possibility.

It is important to recognize and attempt to minimize and mitigate the impact of both redirected illegal crossings and enhanced border security activities on this iconic and highly sensitive species. We believe it is possible to do so without compromising the mission of the CBP.

The Conservancy recognizes the legitimate public concern about border security – especially contraband smuggling. However, the cumulative impact of the proposed action will result in significant negative impacts on wildlife and undermine the investments to date in biodiversity and habitat conservation. For this reason, The

Conservancy believes that the additional fencing should not be built as currently proposed and believes instead that there ought to be opportunities in certain high priority wildlife corridors, especially in some of the canyons, to use virtual technology, such as vehicle barriers and rapidly deployable personnel to secure the border.

The Conservancy requests that an Environmental Impact Study be conducted to consider more broadly the direct and indirect impacts that will occur from closing off the last remaining wildlife corridors in this region of the border and to consider more broadly a balance of alternatives that will maintain linkages across the border and allow for wildlife migration and dispersal to occur. It is possible to simultaneously achieve both national security and conservation goals. Doing so will require careful planning that involves consultation with wildlife agencies and experts; consideration of a full range of tools; and a thorough evaluation of impacts of various alternatives.

Thank you for your consideration of our comments and please contact us if you have any questions. We look forward to providing further comments and information as you move forward.

Sincerely yours,



KATHRYN VIATELLA
Senior Project Director

Brooks, T.M, R.A., Mittermeier, C.g. Mittermeier, G.A.B. da Fonesca, A.B. Rylands, W.R. Konstant, P.Flick, J. Pilgrim, S. Oldfield, G. Magin, and C. Hilton-Taylor. 2002. Habitat loss and extinction in the hotspots of biodiversity. *Conservation Biology* 16:909-923.

Conservation Biology Institute(CBI). 2004. Las Californias Binational Conservation Initiative: A Vision for Habitat Conservation in the Border Region of California and Baja California.

Conservation Biology Institute (CBI). 2003. La Posta linkage portfolio, San Diego County, California. Prepared for the San Diego Foundation Blasker-Rose-Miah Fund Grant #C-2002-00340. July.

Dobson, A.P., J.P. Rodriguez, W.M. Roberts and D.S. Wilcove, 1997. Geographic distribution of endangered species in the United States. *Science* 275(24):550-553.

Mittermeir, R.A., N. Myers, P.R. Gil, and C.G. Mittermier. 1999. Hotspots: Earth's biologically richest and most endangered terrestrial ecoregions. Conservation International.

Myers, N. 1997. Global biodiversity II: losses and threats. Chapter 5 in Meffe, G.K. and C.R. Carroll (eds.) Principles of conservation biology. 2nd ed. Sinauer Associatin, Inc. Sunderland, MA.

Noss, R.F. and B. Csuti. 1997. Habitat fragmentation. Chapter 9 in Meffe, G.K. and C.R. Carroll (eds.) Principles of conservation biology. 2nd ed. Sinauer Associatin, Inc. Sunderland, MA.

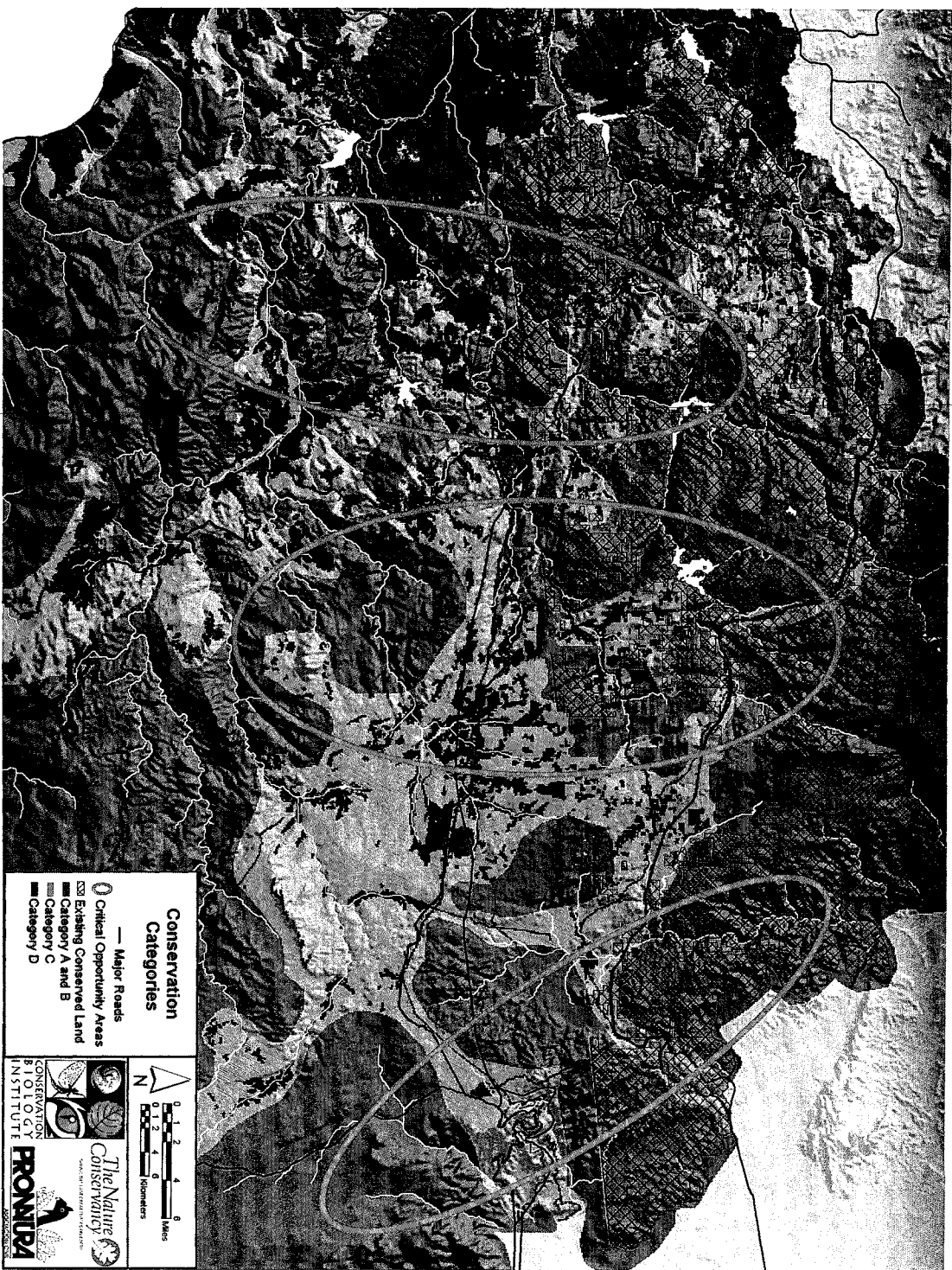


Figure 10. Critical opportunity areas along the U.S.-Mexico border.

Alpine
Palo Verde
Lake
Loveland
Reservoir

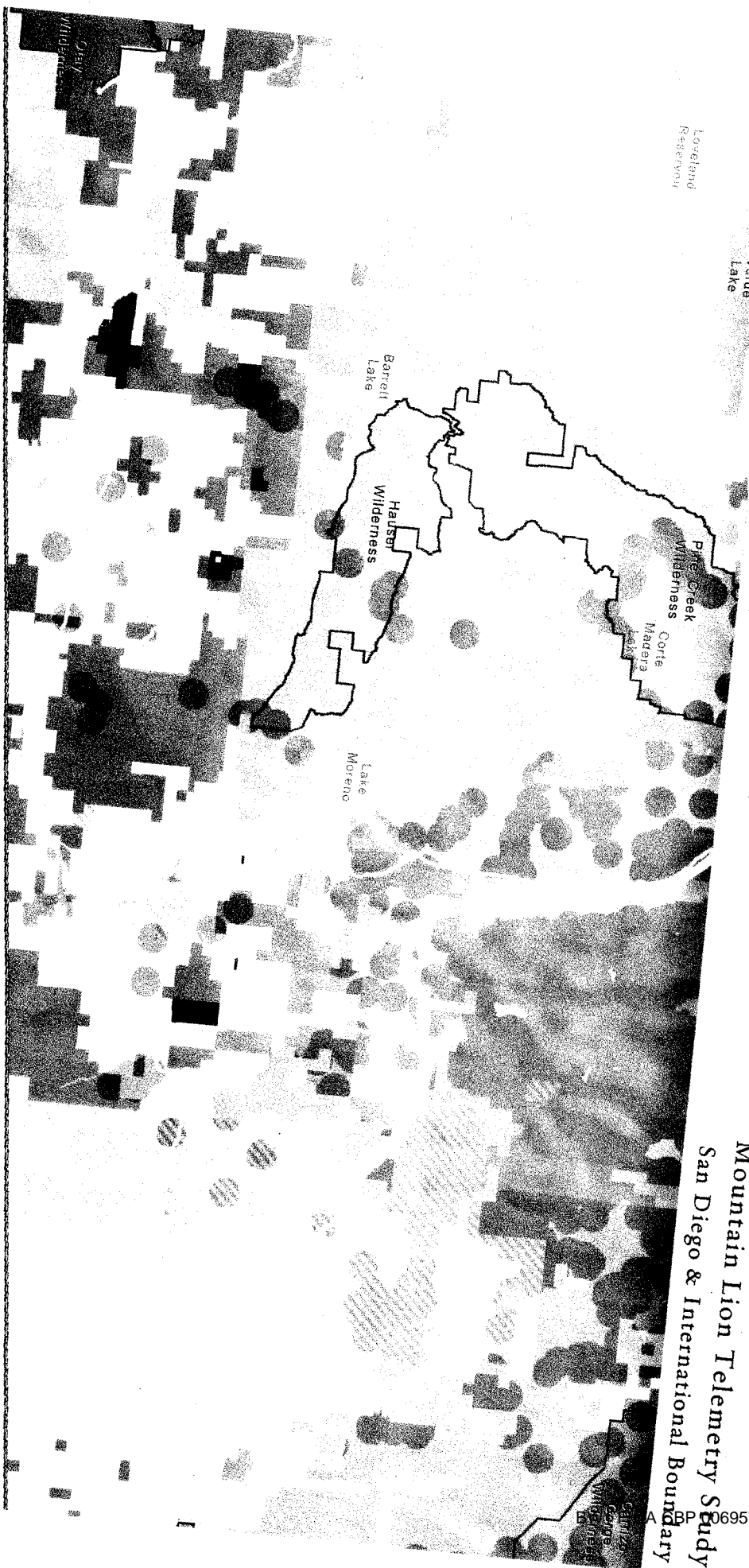
Pine Creek
Wilderness
Corte
Madera
Lake

Barrett
Lake
Hauzer
Wilderness

Lake
Moreno

Mountain Lion Telemetry Study
San Diego & International Boundary

BP 06957



MEXICO

Land Ownership by Agency

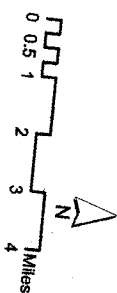
- Bureau of Land Management
- State of California
- US Forest Service
- Water District
- Department of Defense

Min Lion

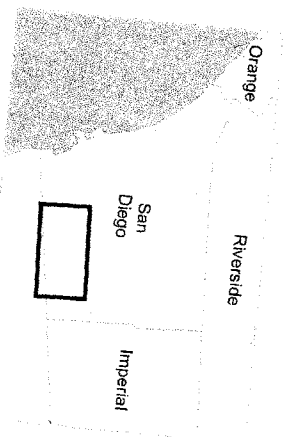
- Approximate Area Used
- Land Status
- Urban / Developed

Roads

- Highway
- Administrative Boundaries
- County



LION DATA FROM
WALTER BOYCE ET. AL.,
UC DAVIS
WILDLIFE HEALTH CENTER





Mountains and the lower elevations as well, such as the mountain lion and spotted owl. The federally endangered arroyo toad is known to occur in at least some of the streams.

Table 1. Focal species identified at the Zoo Workshop for the La Posta Linkage

Species	Habitat Preference
Velvet ant (<i>Dasymutillia</i> spp.)	Sparse upland vegetation in friable soils
Sonoran blue butterfly (<i>Philoides sonorensis</i>)	Crassulaceae species are larval hosts; chaparral in rocky canyons
Quino checkerspot butterfly (<i>Euphydryas editha quino</i>)	<i>Plantago/Castilleja</i> are larval hosts; open upland habitats with larval host plants and nectar sources for adults
Threespine stickleback (<i>Gasterosteus aculeatus</i>)	Aquatic habitats with low-gradient, cool perennial flow
Western pond turtle (<i>Clemmys marmorata</i>)	Aquatic habitats with low-gradient perennial flow
Coast horned lizard (<i>Phrynosoma coronatum</i>)	Open chamise chaparral and coastal sage scrub
Granite night lizard (<i>Xantusia henshawi</i>)	Exfoliating rock outcrops
Baja leopard lizard (<i>Gambelia copei</i>)	Open chamise chaparral
Lesser nighthawk (<i>Chordeiles acutipennis</i>)	Open, undisturbed shrublands and dry washes
Tricolored blackbird (<i>Agelaius tricolor</i>)	Large marshes for nesting and large grasslands/pastures for foraging
Golden eagle (<i>Aquila chrysaetos</i>)	Cliffs for nesting and grasslands and open chaparral for foraging
Sage sparrow (<i>Amphispiza belli</i>)	Sage scrub and young chaparral stands on gentle slopes
Mule deer (<i>Odocoileus hemionus</i>)	Hardwood-conifer, oak woodland, riparian forest, and sage scrub
Black-tailed jackrabbit (<i>Lepus californicus</i>)	Grasslands and open sage scrub
Badger (<i>Taxidea taxus</i>)	Open, level uplands
Red shank (<i>Adenostoma sparsifolia</i>)	Granitic soils in areas where summer moisture (rain, fog, soil moisture) is available
California juniper (<i>Juniperus californica</i>)	Desert-chaparral transition zone with granitic soils
Tecate cypress (<i>Cupressus forbesii</i>)	Gabbro and metavolcanic soils
White alder (<i>Alnus rhombifolia</i>)	Higher elevation streams with permanent flow
Spring beauty (<i>Linanthus bellus</i>)	Coarse sandy soils in transborder region

As requested following are the USIBWC comments for the subject EA:

General comments:

1. The draft EA indicates the proposed primary pedestrian fence will be constructed within the 60-foot wide Roosevelt Reservation along the U.S./Mexico international border. There is no mention of the IBWC monuments and how the fence will be built around them, nor the access gates for IBWC maintenance of those monuments.
2. There is no mention of changes to historic surface runoff characteristics and drainage patterns at the international borders.

Specific comments:

1. Page 1-12, Line 28: EA states "It will also ensure that design and placement of the proposed tactical infrastructure does not impact flood control process and does not violate treaty obligations between the U.S. and Mexico." Recommend the sentence be changed to read "The USIBWC will also review design and placement of the proposed tactical infrastructure. U.S. Customs and Border Protection must ensure that the design and placement of the proposed tactical infrastructure does not significantly change the historic surface runoff characteristics at the international border. The USIBWC has indicated that an increase of up to 6 inches in water surface elevations at rural areas, and 3 inches in water surface elevations at urban areas is acceptable."
2. Page 4-6, Section 4.7 "Surface Waters and Waters of the U.S.: Section does not address surface waters impacts at the international boundary.
3. Appendix D, Hydrology Report: Hydrology report focuses on groundwater impact and surface waters are not addressed. Hydrology and/or drainage report demonstrating the requirement under Comment 2 must be presented to USIBWC to allow USIBWC to adequately evaluate the impact due to the proposed work on overland drainage flows into either country.
4. The USIBWC must be ensured that the fence and any drainage structures constructed will be properly maintained such that the overland drainage flows will not be impeded.

If you have any questions, regarding these comments please contact Mr. Richard Peace at (915) 842-4158.

Ofelia Bolaños, Civil Engineer
Operations and Maintenance Division

USIBWC
4171 N. Mesa C-100
El Paso, Texas 79902-1441
Phone: 915-832-4144

To Whom it may concern,

I strongly oppose the construction of a border fence. I believe that the cost and construction will create an ecological disaster. I live on Marron Valley Rd in Dulzura, California and would be affected by trucks supplying materials during construction. I am familiar with the flow of illegal immigrants and I know the terrain and many BP agents, but a fence sounds like a viable solution to those in Washington DC, but a fence will not solve anything. The Berlin Wall that Reagan challenged Gorbachev(sic) to bring down was understood to represent oppression and isolation. These same negative symbols should not be representative of our great country. Please rise above fear and entertain other options. The Border Fence is not a good idea.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
USEPA	1	<p>Justification of FONSI – Concerned that potentially significant environmental impacts are not analyzed in the DEA and would like to see the following comments reflected in a revised EA or an EIS.</p> <p>Additionally, wants to see a firm commitment made to mitigation and ongoing maintenance and monitoring if a FONSI determination is made.</p>	<p>D. CBP feels that a FONSI determination for this project is warranted and appropriate.</p> <p>C. CBP will include mitigation and monitoring measures of natural resources in the Final EA.</p>
USEPA	2	<p>Alternatives Analysis – the DEA does not evaluate all reasonable alternatives; specifically, would like to have an additional alternative evaluated which integrates infrastructure, manpower and new technologies, as referenced in the Congressional Research Service Report, especially in environmentally sensitive areas.</p>	<p>D. This document is focused on tactical infrastructure and only tactical infrastructure satisfies the Purpose and Need. Manpower is not tactical infrastructure but is based on operational need and as such is not evaluated in this EA; however CBP recognizes that new technologies can play an important role in border enforcement strategies. Currently, these new technologies are still in the testing phase, once these technologies are viable, CBP will evaluate these technologies in additional NEPA documents as required by CEQ regulations. In addition, Section 2.5 of the Draft EA discussed several alternatives, including use of technology, that were considered but eliminated from further analyses.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
USEPA	3	<p>Soils, Hydrology, and WUS – Concerned with impacts to soils and watersheds from erosion</p> <ul style="list-style-type: none">Feels information provided was limited (CEQ regulations to not allow incorporation by reference, see note on Sierra Club v. Babbitt, 1999 and NRDC v. Duvall 1991). RECOMMENDATION – prepare a revised NEPA document with complete project descriptions, which include specific activities for each project segment, include incorporated resource information, and full impact analyses. Also include description of areas for soil storage or disposal and impacts from this activity to natural resources, ensure all significant soil earth movement is included, especially Krutzch's Hill. Would like the document to go out for public and agency review again.	<p>D.CBP believes that these court cases focus on a lack of adequate information, and do not prohibit incorporation by reference. Although, CBP did incorporate by reference, the EA included a summary statement from the referenced document. However, the Final EA has been revised to include identification of the location of the referenced documents to facilitate public review.</p> <p>D. CBP does not believe that a revised Draft EA is warranted.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
USEPA	4	<ul style="list-style-type: none">• The DEA indicates that a substantial amount of earth movement will occur, in steep slopes with highly erodible soils and feels that the impacts of this were not well analyzed. RECOMMENDATION - In areas of high grade they recommend the use of alternatives to fence and road construction as provided by the Secure Fence Act.• The DEA does not describe impacts to the watershed from expansion and operation of new drag roads. RECOMMENDATION – include impacts to washes from fence construction and identify maintenance and monitoring that will occur for these areas, include funding sources and responsible parties.	<p>D. CBP feels that a fence even in steep grades and highly erodible soils is the appropriate alternative. These issues will be addressed by appropriate design and construction methods. The roads are also needed to ensure that enforcement occurs as close to the border as possible. See also response to comment number 2.</p> <p>A. In the Final EA, drag roads will be omitted from the project description and will not be part of the Proposed Action. CBP will monitor and maintain the patrol roads and be responsible for implementing pre- and post-construction BMPs.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
USEPA	5	<p>Soils, Hydrology, and WUS – Concerned with impacts to soils and watersheds from erosion</p> <p>Feels information provided was limited (CEQ regulations to not allow incorporation by reference, see note on Sierra Club v. Babbitt, 1999 and NRDC v. Duvall 1991). RECOMMENDATION – prepare a revised NEPA document with complete project descriptions, which include specific activities for each project segment, include incorporated resource information, and full impact analyses. Also include description of areas for soil storage or disposal and impacts from this activity to natural resources, ensure all significant soil earth movement is included, especially Krutzch's Hill. Would like the document to go out for public and agency review again.</p>	<p>D. See response to comment 3.</p> <p>D. See response to comment 3.</p>
USEPA	6	<ul style="list-style-type: none">Although the DEA states that the use of standard construction measures will be employed to minimize severe erosion and sedimentation, these measures are not assured unless diligent maintenance and monitoring is required.	<p>A. See response to comment number 4.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
USEPA	7	<ul style="list-style-type: none">Impacts to WUS are only evaluated for road crossings and not for fence, feel that without identification and commitment to ongoing maintenance and monitoring there they feel that these impacts would not be less than significant. RECOMMENDATION – USACE is working on wetland delineations for some of the project areas, this information should be consulted when revising impact assessments and be included in the NEPA document.	E. Areas with impacts on WUS were covered by the Waiver issued by the Secretary of DHS, and no WUS are present in project areas included in this Final EA.
USEPA	8	<ul style="list-style-type: none">Table 2-4, p. 2-17 does not identify any adverse impacts to the watershed or surface waters. RECOMMENDATION – Modify the table to include all impacts to hydrology and watersheds.	A. Table 2-4 will be modified to include watershed impacts.
USEPA	9	Cumulative Impacts – Does not include sufficient cumulative impact assessment. Only included 1 other BLM and CBP project and did not look at other projects in the project area and did not consider past projects. Largely repeats project impacts but does not assess the ability of these resources to withstand additional stressors. RECOMMENDATION – substantial improvements to the section and the revised document be made available for public and agency review (see Guidance for Preparers of Cumulative Impacts Analysis, 2005)	A. The Final EA has been revised to expand on the cumulative impacts section.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
USEPA	10	Impacts to Biological Resources – Concerned as several federally listed species have the potential to be impacted. The DEA only provided superficial impact assessments to these resources and the cumulative impacts were not assessed at all. CBP states that there is ample opportunities for transboundary migration but does not demonstrate that this is indeed the case and does not include maps of the existing and proposed fence. RECOMMENDATION – CBP comply with all avoidance measures identified by USFWS and if conservation measures are not followed then they need to be identified so that the FONSI determination can be assessed based on CBP mitigation. Also, greater commitments to road abandonment and rehabilitation should occur. Also, urge a continuation of talks for a programmatic agreement with USFWS. CBP should ensure there are transboundary migration corridors and include maps illustrating. EPA recommends the use of wildlife friendly vehicle barriers in conjunction with virtual fencing options.	<p>D. CBP respectfully disagrees with the assertion that impacts were not fully addressed. Appendix A (detailed project maps) of the Draft EA provided aerial photography of proposed project locations; as can be easily seen in these photographs, there will still be numerous gaps along the border where no man-made barriers would exist. However, the cumulative impact section, as noted above, has been expanded. As part of these revisions, maps of where these gaps will persist have been incorporated.</p> <p>A. CBP is currently working with USFWS to complete a programmatic mitigation agreement. Further CBP will work with USFWS to include road rehabilitation into this document as necessary.</p>
USEPA	11	Table 1-2, p. 1-10 states that EPA would issue CWA NPDES permits but in actuality the State of California issues construction stormwater permits	A. The document has been revised as recommended.
USEPA	12	Page 2-4 refers to table 1-1 as a table that lists specific actions for the project, but this table lists major permits and approvals.	A. The document has been revised as recommended.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
Defenders of Wildlife (DW)	13	Because the DEA utterly fails to adequately consider the proposed project's indirect or cumulative effects, or the effects to wildlife and conservation lands, we request that DHS withdraw the DEA and instead prepare an Environmental Impact Statement ("EIS") that includes a lawful analysis of alternatives that do not simply foreordain border fencing, but instead examine all available approaches to ensuring border security in the most environmentally and economically benign way possible.	D. See response to comments 1, 3 and 10.
DW	14	The DEA's cumulative effects analysis provides only the vaguest of generalities regarding existing actions that already impact the human and natural environment within the southern San Diego County area. No attempt is made to provide detail on what these actions actually are, or the cumulative effect such activities have on specific natural resources such as imperiled plant and wildlife species.	E. See response to comment number 9.
DW	15	The border fence construction program not only has significant direct and cumulative effects, but pronounced and well-documented cumulative indirect effects on the California border region.	D. See response to comment numbers 1 and 9.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DW	16	Rather than presenting a purpose and need statement that reflects the larger goal of improving border security, and then evaluating different means to achieve that goal, DHS in this case has instead defined border wall construction itself as the goal. See DEA at ES-1 (The "purpose of the Proposed Action is to assist CBP/USBP agents and officers in gaining effective control of a section of the international border within the USBP San Diego Sector."). By so radically narrowing the scope of the project's purpose, DHS has impermissibly constricted the range of alternatives considered. See Carmel-by-the-Sea, 123 F.3d at 1155. Indeed, it would appear that DHS is meeting is already meeting is security requirements without building a wall. Border wide, the Border Patrol reported a 20% reduction in apprehensions in fiscal 2007. The greatest reductions in crossings were in areas such as Del Rio, Texas, where there was a 46% reduction in apprehensions. Del Rio has never had a border wall.	D. See response to comment number 2. CBP also respectfully disagrees that a reduction in apprehensions, albeit 46% in some areas, does not constitute effective control of the border.

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DW	17	Indeed, the DEA considers only two action alternatives, both of which are border wall proposals: the proposed action ("Alternative 2") and the "Secure Fence Act alignment" alternative ("Alternative 3"). Other methods to effectively achieve border security include: employing "virtual fence" technology-based approaches; other alternative technological solutions, such as ground-based radar that discourage illegal activities with minimal impact to sensitive wildlife populations and habitat; installation of vehicle barriers that stop vehicular traffic but permit animal passage; thorn-scrub and wetland restoration that create inhospitable conditions for undocumented migrants and drug smugglers; increases in Border Patrol agents and other enforcement personnel; and "mixed" wall alternatives that would concentrate necessary infrastructure in highly urban areas and avoid protected recreation and wildlife areas such as critical habitat, are given no consideration in the DEA. Because the purpose has been defined as requiring border wall construction, DHS has ensured that no alternative courses of action would be considered, regardless of whether such alternatives would also meet border security goals with much less significant environmental impacts.	D. See response to comment number 2.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DW	18	Despite the importance of this area to wildlife and plants such as the California gnatcatcher and Quino Checkerspot butterfly, the DEA's analysis of potential impacts to them by construction of the proposed tactical infrastructure is cursory and insufficient. The road and wall segments proposed in the DEA could very quickly doom ongoing efforts to conserve these species. Barriers of the sort and scale proposed in the DEA would likely contribute to further reducing the numbers of these species in the U.S.	D. CBP disagrees that this project is likely to contribute to the doom of the recovery efforts of these species. CBP has agreed with USFWS that the project may adversely affect the Quino and Gnatcatcher; therefore, CBP has entered into consultation with USFWS to develop mitigation measures to be implemented that would ensure a level of less than significance.
DW	19	The proposed project would fragment habitat within two of the six recovery units (Southwest and Southeast Recovery Units).	D. CBP respectfully disagrees with your assertion of fragmentation of Recovery Units as the proposed project is a linear project and parallels the border. The Recovery Units do not extend beyond the border and, as can be seen in the aerial photographs, much of area on the south side of the border where these proposed fence segments are located, have been cleared supposedly for international firebreak purposes. Further, the much of the segments where fences and other TI are proposed are also located in or adjacent to previously disturbed areas.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DW	20	The contention on page ES-4 that the proposed action and mitigation measures result in a less than significant impact on these imperiled species and their habitat is, quite simply, wrong. Construction of the proposed infrastructure will undeniably degrade and fragment more than 123 acres of habitat, including 7 miles of new road, 10 miles of primary pedestrian fence and 10 miles of road widening. Destruction or alteration of this habitat will introduce additional and possibly overwhelming pressure upon already stressed wildlife populations. A sampling of major impacts to wildlife from the construction of border walls includes, but is not limited to: increased road mortality along access and patrol roads, isolation of vegetation stands resulting in loss of habitat cover and connectivity, altered wildlife behavior and range due to high-intensity permanent lighting and construction and operational noise, and the interruption of genetic exchange necessary to sustain wildlife populations over time.	D. CBP respectfully disagrees with your assertions of significant impact on protected species. Additionally, the impacts mentioned in your comment are discussed in Section 3.8.2.2 with the exception of "permanent high-intensity lighting" as none are to be implemented per the Proposed Action. A discussion of impacts as a result of the temporary construction lights is included though. See also responses to comments 1, 9 and 10.

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DW	21	Moreover, the DEA dismisses the value of any of the habitat areas burned in recent fires as habitat not worthy of evaluation, avoidance or mitigation. For example, the DEA dismisses the value of coastal sage habitat burned in recent fires for California gnatcatcher. DEA at 3-33. However, the USFWS in its recent critical habitat rule for the California gnatcatcher, stated that "California gnatcatchers will likely recolonize these burned areas over time." 72 Federal Register 72010, 72033 (December 19, 2007). Therefore, there is no rational basis for DHS to dismiss the value of these areas out of hand. All of these areas should be surveyed, fully analyzed, and mitigated.	E. The DEA does not dismiss the areas in question solely based on the fires but rather a combination of the destroyed habitat with the presence of commercial and residential areas immediately south of the proposed project. Additionally, as stated in the Draft EA, these areas were surveyed and analyzed.

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DW	22	Further, <i>any</i> declaration of the expected impact to wildlife, especially threatened and endangered species that are intrinsically rare and often secretive, is unsupportable with available information, given that the biological surveys were not conducted during the proper season or according to accepted protocol or, even worse, were not conducted at all. Indeed, the DEA acknowledges that the survey period in October 2007 <u>"were not conducted during the proper season or in accordance with USFWS protocol."</u> DEA at 3-32 (emphasis added). In addition, the DEA acknowledges that it did not conduct any surveys on the 45 acres that are expected to be temporarily impacted due to a lack of ROEs. DEA at 3-25. The fact that DHS would be able to draw any meaningful conclusions from surveys that "were not conducted during the proper season or in accordance with USFWS protocol" or were flatly not conducted at all , clearly illuminates the predetermined conclusion of the DEA, in stark violation of NEPA, to construct border walls at any and all cost to the integrity of sensitive biological resources	<p>D. Although some sensitive species may not have been observed due to a season in which the surveys were conducted, the analysis of impacts is based on the assumption that sensitive species occupy all areas of suitable habitat. It is this conservative assumption that is also being used during the Section 7 consultation.</p> <p>The locations of the staging areas were depicted on the detailed project maps provided in Appendix A of the Draft EA. As can be seen, they are all adjacent to the project corridor and thus, the habitat within the staging area was similar to the respective segment of the project corridor. Due to the waiver of NEPA requirements for the majority of the original DEA area, the use of the staging area for this EA would result in an additional 2.1 acres of temporary impacts, and these effects are included in the overall impact analysis. Furthermore, CBP has committed to conducting additional surveys of these areas, once rights of entry are obtained and prior to construction. If any unforeseen potential impacts are identified during these surveys (i.e., new cultural resources site, different Federally listed species), measures would be implemented to avoid the resource or mitigate for the impact</p>

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DW	23	In this instance, DHS has had more than ten years of experience with the "squeezing balloon" effect of border security efforts, in which increased enforcement efforts within one area predictably lead to increased illegal immigration and subsequent increased enforcement efforts within adjoining areas. These indirect effects, which will certainly occur if the wall segments are constructed in southern San Diego County, are nonetheless not analyzed in the DEA.	D. CBP respectfully disagrees and feels that potential indirect impacts are adequately addressed in the Draft EA.
DW	24	The harmful effects of invasive, non-native species are widely recognized. It is also known that disturbance to previously intact soils promotes the colonization and spread of harmful non-native vegetation. It is especially concerning that the DEA proposes no method to control or monitor the predictable and foreseeable introduction of noxious plants following construction of the proposed walls. The DEA neither evaluated the likelihood of non-native colonization, nor proposed measures to control or mitigate for the environmental damage that such colonization and subsequent spread would produce.	D. See Sections 3.7.2.2 and 5.3 of the Draft EA.

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DW	25	<p>More specifically, an EA must analyze the <i>nature and severity</i> of the environmental impacts. DHS has not done this, but instead has listed activities that may affect or have the potential for adverse impacts, but does not analyze the type or extent of the adverse impact, for itself or for the reader. For example, the DEA does not identify the nature of the impacts to fish and wildlife or to threatened and endangered species. Without such, neither DHS nor the reader can compare alternatives. See 40 C.F.R. § 1502.16. Furthermore, without any sense of the location, type, or nature of the impacts, it cannot be possible to come to the conclusion that there are no impacts to endangered species under the No Action alternative. In the Fish and Wildlife section, on the other hand, the DEA states that there may be impacts under the No Action alternative, but does not determine the significance of the impacts. Having omitted discussion of the location, frequency, or timing of its activities, DHS is unable to even begin to quantify or predict impacts on breeding, feeding, resting, or shelter for wildlife species.</p>	<p>D. See response to comment numbers 10 and 20. Further, throughout Section 3.7.2.2 of the Draft EA it states the specific impacts and locations of these impacts to protected species that could potentially occur (i.e., loss of habitat). Aerial photographs of each project segment were provided in Appendix A.</p> <p>D. No direct impacts would occur under the No Action Alternative, since no construction activities occur. However, the Draft EA does acknowledge that indirect impacts could occur if IAs shift their operations to other areas. The magnitude and location of impact from these potential indirect impacts can not be determined as the direction, density, and volume of such occurrences is totally at the discretion of the IAs, if they attempt to illegally enter the U.S. at all.</p> <p>D. CBP respectfully disagrees, see Section 2.3, 3.1 and Appendix A (detailed project maps).</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
Kathryn Viatella The Nature Conservancy (TNC)	26	Surface Waters and Waters of the U.S. for the Proposed Action Alternative fails to address how the construction of additional pedestrian fence in canyons and waters of the U.S. will deal with additional stream channel sedimentation, stream bank erosion and possible release of pollutants into stream channels. The EA does not identify the type of fence that is being proposed at this time. Therefore, there is little information about how the proposed fence will be constructed to allow water to pass during rainfall events and especially during floods.	D. The Draft EA states that a Storm Water Pollution Prevention Plan (SWPPP) will be implemented prior to construction activities. There are no surface waters or WUS in the project area for this revised EA.
TNC	27	There is insufficient information to address how DHS and CBP propose to minimize long-term erosion and stream channel sedimentation with the exception of proposing rip-rap or rock, which will be detrimental to the federally-listed arroyo toad.	D. See response to comment number 26.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
TNC	28	Wildlife and Aquatic Resources for Proposed Action Alternative should read that possible short-term and long-term significant adverse impacts may occur to wildlife and aquatic species. The impact of "filling the gaps" cannot be measured by miles of fencing alone, but rather "filling the gaps," particularly in canyons and other likely wildlife corridors, will have a true "cumulative impact" and that warrants a full Environmental Impact Study. The additional border fencing and new roads to "fill the gaps" will further fragment habitat beyond current conditions. Loss and fragmentation of habitats is considered the single greatest threat to biodiversity at global and regional scales (Myers 1997, Noss and Csuti 1997, Brooks et al 2002). The border region is a good example of the effects of habitat fragmentation (CBI 2004). Road construction and conversion of land to urban uses have fragmented and isolated natural habitats. The remaining habitat fragments experience edge effects, altered physical conditions and fire regimes, increased invasion by exotic species, changes in vegetation, loss of top predators, and altered species population dynamics. Roads can have an even broader impact by altering hydrologic patterns, disrupting migration patterns, and causing direct mortality via road kill.	D. CBP respectfully disagrees with your assertion of significant impacts to wildlife or aquatic species. See also responses to comment numbers 9 and 10.

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TNC	29	The proposed fence will isolate populations and reduce genetic viability of the remaining species. While many of these species were not recorded during the field visits that were conducted in October 2007 that does not mean they are not present. Negative surveys for species could have been the result of drought conditions and lack of presence at that time of the year.	D. See response to comment number 9.
TNC	30	An alternative to additional pedestrian fence could be to maintain or install vehicle barriers and use other virtual fence technology, such as cameras and sensors to track illegal foot traffic. This combined with additional patrols may be a less expensive alternative to installing a pedestrian fence. In addition, these areas could serve as pilot projects to evaluate operational control of the border using virtual technologies while maintaining investments in biodiversity conservation. The Conservancy would be willing to work with DHS and CBP to establish a monitoring protocol to evaluate the impacts of new pedestrian fence with a pilot project to provide open areas to maintain wildlife corridors and connectivity.	D. See response to comment number 2.

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TNC	31	In addition, the Conservancy proposes that DHS and the San Diego Sector consider a pilot project to protect the remaining open space along the border from urban encroachment. It is our belief that preserving open space and important natural areas along the border will also benefit CBP. We understand that in urbanized areas, CBP has no other option but to construct pedestrian fences to secure the border. However, by protecting open space, CBP benefits because it is afforded more options in order to secure the border. The EA identifies Bell Valley as a property that requires a pedestrian fence. We propose to enter into a pilot project with DHS and CBP to conserve this property and prevent future urban encroachment on the border.	E. A project as proposed by TNC is beyond the scope of analysis for this EA.
TNC	32	<p>History has proven that as areas are secured, illegal foot traffic moves to attempt illegal entry to areas that remain open even if those areas are rugged and harder to traverse. The cumulative impacts on Peninsular bighorn sheep and their habitat from the proposed action need to be evaluated in a full Environmental Impact Study (EIS). The Conservancy believes the current proposed fencing could have significant impacts on the Peninsular bighorn sheep. There are two main possible impacts on Bighorn Sheep from fencing elsewhere:</p> <ul style="list-style-type: none">• More foot traffic in rugged sheep habitat by persons redirected from other areas of the border	<p>D. See response to comment numbers 1, 10, and 25.</p> <p>E. This particular comment no longer applies to this revise EA due to the reduced scope of the project.</p>

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	32, continued	<ul style="list-style-type: none">Increased enforcement-related vehicular access and activity in sheep habitat <p>Increased foot traffic: In addition to increased disturbance, we are also concerned about the use of springs by persons attempting to illegally cross the border, especially in the summer.</p> <p>Increased enforcement activity: The EA notes securing the 30-mile stretch of the border in the proposed action will act as a force multiplier and allow CBP to deploy agents to areas without pedestrian barriers. Increased Border Patrol activity in bighorn sheep habitat will have a significant negative impact on the sheep. Bighorn sheep have recently started using historical areas that have been vacant in recent years (e.g., within the island in 1-8, as well as just south of 1-8; Rubin, personal communication). We are optimistic that they will eventually use other areas between 1-8 and the international border once again. Increased human activity in that area would reduce this possibility.</p>	<p>A. Potential indirect impacts of illegal activities are out of CBP's control; however, CBP feels that any indirect impact would be mitigated by an increased availability of agents. USBP agents currently patrol and conduct apprehension activities along existing roads east of the project corridor. With an increased availability of patrol agents, the certainty of apprehension and resulting deterrence would increase; thus, indirect effects within potential Peninsular bighorn sheep habitat would be negligible. In fact, by having more presence in the areas near the border, beneficial indirect impacts are expected through a reduction of IAs within Bighorn Sheep habitat.</p>
TNC	33	Conservancy believes that the additional fencing should not be built as currently proposed and believes instead that there ought to be opportunities in certain high priority wildlife corridors, especially in some of the canyons, to use virtual technology, such as vehicle barriers and rapidly deployable personnel to secure the	D. See response to comment number 2.

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		border.	
TNC	34	The Conservancy requests that an Environmental Impact Study be conducted to consider more broadly the direct and indirect impacts that will occur from closing off the last remaining wildlife corridors in this region of the border and to consider more broadly a balance of alternatives that will maintain linkages across the border and allow for wildlife migration and dispersal to occur.	D. See response to comment numbers 1, 3, and 10.
Edmund J. Pert, California Department of Fish and Game (CDFG)	35	The Department would reiterate the requirement for a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts as identified by cooperating agencies. Due to multiple phases of the regional border infrastructure that are slated or currently under construction, a more reasonable analysis of the cumulative impacts should be provided in the final EA. The current cumulative analyses reiterates direct impacts, however the totality of similar project-related impacts (e.g., reduction of multiple wildlife corridors, alteration of reproductive or behavioral patterns to wildlife, likelihood for increased wildlife mortality) associated with the long-term project goals of the San Diego/EI Centro USBP tactical infrastructure has not been discussed. The assertion that the loss of 78 acres of local/regional common plant communities would result in an insignificant cumulative impact has not been adequately supported when compared to the overall impact acreage that would occur with similar types border	D. CBP respectfully disagrees with your assertion of lack of thorough discussion of indirect and direct impacts as a result of the proposed project. Additionally, see response to comment number 9.

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		infrastructure actions. Further discussion should be provided as to the basis for concluding that the incremental effects (as are currently being referenced) is not cumulatively considerable	
CDFG	36	Under section 3.2.2.2 Proposed Action Alternative, approximately 27 acres of privately owned land would be impacted as a result of this action. In regards to lands that have been identified to extend outside of the Memorandum of Understanding between the Department of Homeland Security and the Department of Interior, please identify all relevant mitigation measures that would apply outside the jurisdiction of the lead agency or the cooperating agencies (Sections 1502.16(h), 1 505.2 (c)).	E. Section 5.0 of the Final EA has been revised to indicate that all mitigation measures to be applied on Federal lands would be extended to privately owned lands, as appropriate.
CDFG	37	The Department's Biogeographic Data Branch in Sacramento should be contacted at (916) 322-2493 to obtain current information on any previously reported sensitive species and habitats, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. Also, any Significant Ecological Areas (SEAs) or Environmentally Sensitive Habitats (ESHs) or any areas that are considered sensitive by the local jurisdiction that are located in or adjacent to the project area should be addressed.	E. CBP has contacted the CDFG Biogeographic Data Branch but to no avail. However, in the Draft EA the California Natural Diversity Data base was used to determine locations of Federally and state protected species in juxtaposition to the project corridor (See Figures 3-2 and 3-3 of the Final EA). CBP will continue to try to obtain any possible information from the Data Branch and include in the Final EA as appropriate.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
CDFG	38	<p>The surveys performed in October 2007 will not detect species that are found during other times of the year. Surveys should be undertaken at the appropriate times of year to actually detect species and not be done opportunistically. This survey period is inappropriate to detect spring plants or plants that die to the ground during summer, and are seasonally used by animals. Along with performing the necessary survey for those areas previously identified as not being surveyed due to the lack of authorized rights-of entry, updated sensitive plant survey (including host plants associated with Quino checkerspot butterfly) should be performed in accordance with standards identified by the cooperating agencies.</p> <p>Seasonal variations in use by fauna in the project area should be addressed. Recent, focused, species-specific surveys, conducted at the appropriate time of year and time day when the sensitive species are active or otherwise identifiable should be included in the impact analysis. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.</p>	D. See response comment number 22.

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CDFG	39	Temporary impacts to 45 acres of wildlife habitat (associated with proposed staging areas) was identified as not being a significant pact, however the draft EA indicates that those areas have yet to be surveyed. A completed biological assessment is required prior to making a determination on the significance of the specific resources being impacted (including the presence/absence of threatened and endangered species).	D. See response comment number 22.
CDFG	40	Furthermore, the accompanying detailed project maps depict the placement of some staging areas within undisturbed habitat, with disturbed areas in close proximity (due to vehicle turnarounds or pullouts). The Department would reiterate that efforts should be directed at the placement of staging areas in the least environmentally intrusive area to further minimize the impact footprint.	E. The locations of staging areas were revised to incorporate disturbed areas to the maximum extent practicable during revisions to the Final EA.
CDFG	41	The proposed action should also be reanalyzed relative to the affects on the off-site habitats and associated wildlife. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor movement areas, including access to undisturbed habitat in adjacent areas are of concern to the Department, particularly within any proposed fence alignments extending across canyons.	E. Potential impacts to migratory corridors was adequately discussed in Section 3.8.2.2 of the Draft EA.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
CDFG	42	The analysis should also include a discussion of the potential for impacts resulting from increased vehicle traffic associated with patrols (frequency/duration), artificial lighting, noise, and vibration. For example, the draft EA identifies a potential indirect beneficial effect of the fence in reducing illegal traffic, whereas the proposed action could result in increased traffic in the area from local users on the U.S. border side, resulting in an attractive nuisance and contributing to additional environmental impacts.	A. See Section 3.8.2.2 of the Draft EA. D. CBP can not predict the potential amount of local user traffic, if any. However, any roads acquired as part of this project would be restricted to law enforcement and emergency personnel only.
CDFG	43	Section 3.12.2.2, Proposed Action Alternative, states that all construction and transportation activities would occur during daylight hours. Whereas section 2.3.5 Lighting, identifies work would possibly occur on a 24-hour basis. The EA should clearly define the proposed work schedule to ensure that potentially significant impacts are correctly assessed.	A. Section 3.12.2.2 has been revised to indicate that construction could occur on a 24-hour basis, as needed to satisfy schedules mandated by Congress.
CDFG	44	No reference sound levels for blasting activities have been included in the noise impact assessment section of the draft EA. Furthermore, no reference sound level for the proposed portable lights was provided. The EA identifies that it anticipates that no more than 10 lights would be operated at one time in one location to facilitate project construction. If this is correct, at a minimum the DNL dBA should be provided and discussion provided as to whether these levels constitute a significant impact to sensitive biological resources.	A. Noise levels from the potential of blasting have been included in the Final EA. A. Section 3.8.2.2 has been revised to include an assessment of noise impacts resulting from the use of up to 10 portable lights at one location.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
CDFG	45	<p>Impacts to migratory wildlife affected by this action should be fully evaluated, including proposals to remove/disturb native vegetation and other nesting habitat for native birds. All migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.3). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of birds and their active nests, including raptors and other migratory nongame birds as listed under the MBTA.</p> <p>The proposed action (including disturbances to vegetation) should take place outside of the general avian breeding season [January 15 to August 15], as defined by the Department, to avoid impacts to nesting birds (including disturbance which would cause abandonment of active nests containing eggs and/or young). To avoid any direct and indirect impacts to raptors and/or any migratory birds, grubbing and clearing of vegetation that may support active nests and construction activities adjacent to nesting habitat, should occur outside of the breeding season. If removal of habitat and/or construction activities is necessary adjacent to nesting habitat during the breeding season, the USBP shall retain an approved biologist to conduct a pre-construction survey to determine the presence or absence of non-listed nesting migratory birds on or within 100-feet d the construction area, Federally or</p>	<p>D. Impacts to migratory birds were adequately assessed in Section 3.8.2.2 and mitigation measures were discussed in Section 5.4 of the Draft EA.</p>

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	45, continued	State-listed birds (e.g., southern willow flycatcher, least Bell's vireo, coastal California gnatcatcher) on or within 300-feet of the construction area and nesting raptors within 500-feet of the construction area. The pre-construction survey must be conducted within 10 calendar days prior to the start of construction, the results of which must be submitted to the wildlife agencies for review and approval prior to initiating any construction activities. If nesting birds are detected by the approved biologist, the following buffers should be established: 1) no work within 100 feet of a non-listed nesting migratory bird nest, 2) no work within 300 feet of a listed bird nest, and 3) no working within 500 feet of a raptor nest. However, the wildlife agencies may reduce these buffer widths depending on site specific conditions (e.g. the width and type of screening vegetation between the nest and proposed activity) or the existing ambient level of activity (e.g., existing level of human activity within the buffer distance). If construction must take place within the recommended buffer widths above, the project applicant should contact the wildlife agencies to determine the appropriate buffer.	

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
CDFG	46	A biomonitor shall be present on-site during all initial grubbing and clearing of vegetation to ensure that perimeter construction fencing is being maintained and to minimize the likelihood that nests containing eggs or chicks are abandoned or fail due to construction activity. A bio-monitor shall also perform periodic inspections of the construction site during all major grading to ensure that impacts to sensitive plants and wildlife are minimized. These inspections should take place once or twice a week, as defined by the wildlife agencies, depending on the sensitivity of the resources. The bio-monitor shall send weekly monitoring reports to the Department and notify the Department immediately if clearing is done outside of the permitted project footprint.	E. Biological monitors will be used, as appropriate. Negotiations with the USFWS are on-going and one of these items being discussed is the use of such monitors.

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CDFG	47	In regards to the vegetation rehabilitation proposal, plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site relative to the components of the tactical infrastructure; (b) the plant species to be used, container sizes and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of irrigation methodology; (f) measures to control exotic vegetation onsite; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria.	A. The discussion of a restoration and revegetation plan found in Section 5.0 has been revised to incorporate, as appropriate, the suggested elements. It is beyond the scope of this EA to develop a site-specific mitigation plan. Such plans would be developed in concert with the USFWS, BLM, CDFG and other affected land and resource agencies.

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Wanda Raschkow (WRR)	48	<p>CULTURAL RESOURCES SECTION:</p> <p>As the lead for NEPA compliance of this project, the U.S. Customs and Border Protection – Border Patrol (BP) and U.S. Army Corps of Engineers (Corps) are responsible for completing Section 106 and formal consultation with SHPO and the local tribes. At this time it appears that only preliminary notice of the proposed action was given to SHPO and the tribes. The Corps must conduct government to government formal consultation with the tribes. In addition, BLM must be consulted on any determination of sites located on public lands.</p> <p>BLM must be provided the full cultural survey report for the project. This report is a critical component of the documentation BLM must review in order to authorize the project. At this time, the cultural survey report for the project has not been submitted to BLM. In addition, we require documentation of all SHPO and tribal consultation conducted by the Corp.</p>	<p>A. Since the release of the Draft EA, BLM and SHPO have received copies of the Cultural Resources Report. All correspondence with SHPO and tribes was included with the Draft EA and any additional correspondence will be included in the Final EA.</p>
WRR	49	<p>FONSI Page 1, line 43: It is unclear whether or not the staging areas have been surveyed for cultural resources.</p>	<p>E. No cultural resources surveys have been completed at the proposed staging areas.</p>

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WRR	50	FONSI P2, lines 6-7: Surface disturbance (grading or usage) of the existing roads is a direct impact of the project and as such the effects to cultural resources needs to be assessed. The argument that they are already in use and may have been maintained by other agencies does not negate the fact that they are being impacted by this undertaking.	D. The access roads to be used would not be improved and would only be brought back to pre-project condition. CBP does not feel that surveys should be conducted along these roads as they are previously disturbed and the likelihood of intact resources is highly limited.
WRR	51	FONSI P5, lines 5-8: the draft was supposed to have been revised to indicate that the prehistoric site would also be fenced and effects to it would be avoided. It appears instead that all mention of the prehistoric site has been removed from the FONSI. The BLM has not yet determined whether the site is eligible for the NRHP (due to a lack of information). Effects to the site should be avoided.	E. The USACE determined that the site was not eligible and would not be impacted, and due to the waiver, the site is no longer within the project area for this EA.
WRR	52	Page 2-6: the DEA states that the Ag Loop access roads will be extended south to the border. Map 5 does not show these extensions. In addition, there are no access roads indicated to connect to the proposed fence/road construction areas. The red polygons on Map 5 connect to roads- but according to the map key these are not access or project roads.	E. due to the waiver, the Ag Loop was addressed in an ESP, and is no longer part of the project covered by this EA.
WRR	53	Table 2-4: Were Native American concerns analyzed? The topic is not listed in the table.	D. The table is a summary table. However, as seen in Section 3.10.2.2 of the Draft EA all Federally recognized tribes affiliated with the project corridor have been consulted regarding the proposed project. To date, no concerns have been voiced by any of the tribes.

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WRR	54	Page 3-25, line 21: "vegetation surveys were not conducted in staging areas due to lack of ROEs". Were cultural resources surveys conducted in the staging areas?	A. See response to comment number 49.
WRR	55	Section 3.10: This is a very superficial treatment of the affected environment.	D. CBP respectfully disagrees. The EA contains an appropriate amount of detail for this resource. More detailed information is presented in the cultural resources survey report, which was prepared for this project and submitted to BLM and SHPO.

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WRR	56	3.10.1.1: Based on the review of literature, what are the important research questions for the area? Based upon these research questions and the historic context of the area, what types of site would have the potential to be eligible for the NRHP?	<p>Important questions to be answered by future research in the area:</p> <ul style="list-style-type: none">• What resources were exploited by past people in the area?• What function or activities were performed at sites found in the area?• Where sites integrated into a regional sphere or interaction or exploitation?• How do sites compare to other found in the area or fit into existing models of cultural behavior for the area? <p>For cultural resources to be eligible for the NRHP they must first possess integrity of location, design, setting, materials workmanship and association as defined by 36 CFR 60.4. Cultural resources must further meet at least one of 36 CFR 60.4 criteria a through d; having a) association with events that have made a significant contribution to the broad patterns of our history; or b) association with the lives of persons significant in or past; or that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or that have yielded, or may be likely to yield, information important in history or prehistory. The lack of potential for subsurface deposits and the lack of any associated artifacts make this site unlikely to yield information important in history or prehistory. These types of discussions are more appropriate for the cultural resources report, which has been prepared and submitted to BLM and SHPO.</p>

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WRR	57	Page 3-41, line 28: were the two previously recorded sites located? Are the within the APE or not?	E. The two previously located sites do not fall within the APE for this revised EA.
WRR	58	Page 3-42, line 7: Are these two <i>new</i> prehistoric sites, or are they the two that were previously recorded?	E. The two sites are new. They do not fall within the APE for this revised EA.
WRR	59	Page 3-42, lines 11-12: How was the absence of subsurface materials confirmed? Subsurface potential generally cannot be determined from surface examination only	E. See response to comment 58.
WRR	60	Page 3-42, line 13: Re/the statement that the site is "not considered eligible". The cultural resources contractor may make <i>recommendations</i> as to eligibility, but the BLM makes the determination of eligibility for resources on BLM managed lands.	E. See response to comment 58.
WRR	61	3-42, line 19: change "considered" to "recommended".	E. See response to comment 58.
WRR	62	Section 3.10.2: Use of federal terminology and regulations would be more appropriate.	E. See response to comment 58.
WRR	63	Section 3.10.2.2- Use federal terminology-change "significant cultural resources" to "historic properties".	E. See response to comment 58.
WRR	64	Page 3-43, line 21: Change "avoid adverse impacts" to "avoid effects". There should be no impact/effect to the Border Monuments if they are adequately fenced/flagged and construction is monitored.	E. The Border Monuments are not located within the APE for this EA.

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WRR	65	Page 3-43, lines 29-31: Rewrite to more accurately reflect federal terminology and process. Clarify what is meant by "Section 106 process"?	A. The document was revised to stipulate, "Section 106 consultation process."
WRR	66	Page 4-8, lines 18-21: Would be better phrased as "no effect to historic properties provided avoidance measures are implemented as described." "Historic" properties, not "historical".	E. No historic properties are present within the APE for the revised EA.
WRR	67	Pages 3-43 and 4-8: BLM has not made a determination that the project will have no effect to historic properties. This determination cannot be made until a cultural survey report has been submitted and reviewed, and the questions about the eligibility of the prehistoric milling site have been resolved.	A. See response to comment numbers 48 and 60
WRR	68	Section 4.18: This is a federal undertaking, should CEQA be referenced.	E. Yes, since CBP will need to obtain a Section 401 Water Quality Certification.
WRR	69	Section 5.6: Provide clarification of what "Section 106 will be completed" means. Address avoidance of effects to the prehistoric milling site.	E. The document was revised to stipulate that, "the Section 106 consultation process will be completed." The milling site no longer falls within the APE for the project.
Joyce Schlachter (JAS)	70	FONSI, Page 3, Line 4: Best Management Practices...add "developed in coordination or consultation with the U.S. Fish and Wildlife Service"	D. The U.S. Fish and Wildlife Service (USFWS) would not be responsible for determining Best Management Practices (BMP) regarding hazardous materials.
JAS	71	FONSI, Page 3, Line 39: Should read...reduce erosion while allowing the area to naturally <u>re</u> vegetate.	A. The document was revised as suggested.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
JAS	72	FONSI, Page 4, Line 6: same comment as comment #2...use re vegetate, instead of vegetate.	A. The document was revised as suggested.
JAS	73	FONSI, Page 5, Line 21: regarding " aggregate materials "...any gravel, cobble, or rock that is acquired from outside the project area, to be used within the project area, must also be weed and seed free . There is a major infestation of Italian thistle at this time on Otay Mountain, due to the importation of contaminated gravel by the BP for use on road surfaces.	E. Materials would be used from existing sources. USBP would implement other measures as an avenue to mitigate for invasive species.
JAS	74	SECTION 1.0 INTRODUCTION, Page 1-3, Lines 7-12: This paragraph talks about why the proposed action is needed. Considering the recent wildfires, specifically the Harris Fire which was started by an undocumented immigrant campfire, the proposed action may also help to reduce the number of wildfires in the Border Mountain area.	E. Beneficial effects of the reduction in IA traffic are discussed in several sections of the EA, but reduction of wildfires is speculative, and does not warrant individual discussion.
JAS	75	SECTION 2.3.1 ROAD IMPROVEMENTS, Page 2-3, Line 20: "Aggregate"....all aggregate must be free of weeds and seeds to prevent the infestation of non-native invasive species and weed species- as stated in comment # 4.	E. See response to comment number 73.
JAS	76	SECTION 2.3.1 ROAD IMPROVEMENTS, Page 2-4, Line 2: Please describe (where appropriate in the document) what the "soil stabilizing agent" is composed of and how it may/may not affect water quality if there is runoff, or affect wildlife if the substance is applied in a manner such that puddles or pools occur.	E. An example of the soil binding agent is found in Section 3.11.2.2 of the Draft EA. However, the Final EA has been revised to include a discussion of the potential soil binding agent in Section 3.8.2.2 and copies of Material Data Safety Sheets indicating it is an environmentally safe product.

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JAS	77	SECTION 3.4 HYDROLOGY AND GROUND WATER, Page 3-9, Line 11: "...were previously planned for and analyzed...."	A. The document was revised as suggested.
JAS	78	SECTION 3.7 VEGETATIVE HABITAT, Page 3-23, Line 1: just a note...agencies are transitioning to the use of Sawyer/Keeler-Wolf, instead of Holland, for the descriptions of plant communities in CA.	A. Thank you for your comment.
JAS	79	Page 3-34, Line 12: "...those designated by each (change to ->) BLM State Director as Sensitive ".	D. Can not find comment.
JAS	80	<p>SECTION 3.9.2.2 PROPOSED ACTION ALTERNATIVE, Page 3-38, Line 17: Were the eight specimens of Tecate Cypress determined to be mature? (i.e. are they bearing cones with seeds?) If so, has there been any discussion regarding the collection of seed from those trees that would be impacted (destroyed?).</p> <p>Line 19: Depending on the age of the Tecate Cypress, there could be a long term significant impact. The larvae of the Thorne's hairstreak butterfly depends on the "mature" cypress for its existence. The definition of "mature" is being researched, but it is thought that the larvae may be able to utilize the trees as soon as 8-10 years of age. Due to increased fire intervals, there are few remaining "mature" cypress. Have these trees been surveyed for Thorne's?</p>	E. The Tecate cypress observed near the Willows Access Road were not mature plants. The Willows area is no longer within the APE for this EA.

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JAS	81	SECTION 5.3 VEGETATION, Page 5-3, Line 16: "Native seeds or plants, (please add->) chosen in coordination with and approved by the BLM, which are compatable with...."	A. The document was revised as suggested.

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JAS	82	<p>APPENDIX E, BLM SENSITIVE SPECIES TABLE</p> <p>Below are some minor changes to plant names in the table, based on the recent 4th Edition of the <u>CHECKLIST OF THE VASCULAR PLANTS OF SAN DIEGO COUNTY</u> by Simpson and Rebman. The changes are BOLDED:</p> <p><i>Ceanothus cyaneus</i> = Lakeside-lilac</p> <p><i>Chamaesyce platysperma</i> = Flat-seeded spurge</p> <p><i>Hazardia orcuttii</i> = Orcutt's goldenbush</p> <p><i>Lupinus excubitus</i> = Mountain Springs bush lupine</p> <p><i>Bloomeria clevelandii</i> = San Diego goldenstar</p> <p><i>Cylindropuntia munzii</i> = Munz cholla</p> <p><i>Ribes canthariforme</i> = Moreno current</p> <p>The use of coast instead of California horned lizard was confirmed by Robert Fisher, USGS:</p> <p><i>Phrynosoma coronatum frontale</i> = Coast horned lizard</p>	A. The list was revised as suggested.

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JAS	83	General comment: Was translocation of cactus species, that may be impacted due to the project, discussed? Please consider this as mitigation.	E. The translocation of cactus was not considered during project development.
Janaye Byergo (JB)	84	INTRODUCTION 1.6, Page 1-13, Line 6: Should read BLM's Resource Management Plan.	A. The document was revised as suggested.
JB	85	<p>PROPOSED ACTION 2: Under the Proposed Action and Secured Fence Act Alternative, the upgrading of the existing access roads should be described in detail. Are they going to be widened? If so how much. Are culverts going to be replaced? If so how many? Are additional culverts going to be constructed?</p> <p>It is not clear in the document as to how much of the new road construction would occur within and outside of the 60' Roosevelt Corridor. This needs to be quantified.</p>	<p>Existing roads will only be improved as needed to provide utility, and will be restored to pre-project condition.</p> <p>A. The Final EA has been revised to identify roads that would be constructed outside of the Roosevelt Reservation on BLM lands.</p>

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JB	86	<p>LAND USE 3.2.2.2, Page 3-5, Line 9: It states "Privately owned land and land owned by BLM is currently open, undeveloped areas. These sites would be permanently converted to areas set aside for law enforcement purposes".</p> <p>What is meant by this statement? Does it mean the public can not have access to the area? Does the area set aside for law enforcement purposes include the entire project area or just the 60' Roosevelt Corridor?</p>	<p>E. The document was revised to read, "The land use in these areas would change from open and undeveloped to USBP infrastructure."</p> <p>E. It does not mean the public can not access these areas. The area that would be used for law enforcement purposes encompasses any areas where road or fences are planned.</p>
JB	87	<p>SURFACE WATERS 3.5.1, Page 3-12, Line 18: Figure 3-1 should be labeled 3-2.</p>	<p>D. CBP respectfully disagrees.</p>
JB	88	<p>VEGETATIVE HABITAT 3.7.1, Page 3-22, Lines 16-18: The 2007 wildfire (Harris Fire) did not affect the entire project area. The fire incorporated the western half of the project area.</p>	<p>A. The document was revised to read, ".....much of the vegetation in the areas in and surrounding the western most proposed project sites has been destroyed by these fires."</p>
JB	89	<p>AESTHETIC AND VISUAL RESOURCES 3.13.2.2 – 3.13.2.3, Page 3-54: The document needs to address the visual impacts of the proposed staging areas. These are not mentioned in this section.</p>	<p>A. The document was revised to read, "The presence of construction equipment, use of staging areas, and use of portable lighting would have a short-term, minimal impact on appearance during construction. Additionally, as a mitigation measure, all staging areas would be rehabilitated upon completion of construction activities; thus, further minimizing impacts."</p> <p>D. There is no need to discuss staging areas for the Secure Fence Alternative as all construction would be completed within the 130-foot enforcement zone.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
Wick Alexander (public)	90	To Whom it May Concern: I strongly oppose the construction of a border fence.I believe that the cost and construction will create an ecological disaster. I live on Marron Valley Rd in Dulzura, California and would be affected by trucks supplying materials during construction. I am familiar with the flow of illegal immigrants and I know the terrain and many BP agents, but a fence sounds like a viable solution to those in Washington DC,but a fence will not solve anything. The Berlin Wall that Reagan challenged Gorbechov(sic) to bring down was understood to represent oppression and isolation. These same negative symbols should not be representative of our great country. Please rise above fear and entertain other options. The Border Fence is not a good idea.	D. CBP respectfully disagrees. In addition, Marron Valley Road would not be used for construction activities under this proposed action.
Lillian Busse (San Diego Regional Water Quality Control Board)	91	Page 5, line 23/24: Impacts to waters of the U.S. and waters of the State need to be mitigated. The Regional Board usually asks for a 3:1 mitigation * 1:1 creation and 2:1 enhancement/restoration independent of the size of the impact.	E. No WUS are located within the project area for the revised EA.
San Diego Regional Water Quality Control Board	92	Page 3-12, line 8-18: The Regional Board will take jurisdiction over ephemeral streams in the project area. These ephemeral streams are waters of the State, and the applicant needs to enroll in the general WDR for isolated waters from the State Water Resources Control Board.	E. See response to comment 91.

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San Diego Regional Water Quality Control Board	93	Page 3-15, line 8-23: The impact of 0.142 acres needs to be mitigated (3:1, see comment above).	A. See response to comment 91.
San Diego Regional Water Quality Control Board	94	Page 3-17, line 6-12: This project will increase the impervious surface in the watershed by building 7 miles of roads. Please make sure that the additional stormwater does not contain pollutants that affect the beneficial uses of the streams. Post-construction BMPs might be necessary.	A. As indicated in the Draft EA, CBP intends to implement standard Best Management Practices as well as develop a Storm Water Pollution Prevention Plan and apply for all applicable permits.
Heather Wylie (HW)	95	This single and complete linear project cannot be analyzed in pieces. The cumulative environmental impacts must be analyzed as a whole. Currently the project is illegally piecemealed into several NEPA documents. In addition, cumulative effects to wildlife must be properly assessed, and mitigated.	D. CBP respectfully disagrees and does not feel that this EA is piecemealing projects. These segments are very distinct gaps where no barrier currently exists and there will continue to be gaps even after this project is completed. See also response to comment number 9 regarding expanding the cumulative impacts in the Final EA. Furthermore, this EA was tiered from the 2001 Supplemental Programmatic EIS, which identified road and fence projects as potential future actions within California.

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HW	96	Gloria, Horseshoe, Copper and Buttewig Canyons, among others, may all be within the Corps Clean Water Act (CWA) jurisdiction. However, there is no reference to this within the NEPA documents. The Corps' jurisdictional areas needed to be made clear within the NEPA document. Due to the 404 jurisdiction, the Corps has a regulatory role to play and has been included as a "cooperating agency", yet there is no 404b1 alternatives analysis within the document.	E. See response to comment 91.
HW	97	The Corps regulatory program should do everything it can to retain its autonomy and integrity in implement the Clean Water Act. USACE-regulatory should be responsible for creating their own EIS/404b1 alternatives analysis consistent with their regulations and the CWA. Regulatory should not be conscribed into a being a cooperating agency due to internal political pressures. The Corps clearly has a conflict of interest overall due to the fact that the Corps at large is managing the project for DHS.	D. CBP is the responsible party for obtaining permits; although it is true that USACE is assisting in the planning and implementation, USACE's regulatory requirements are managed in full compliance with the Federal Water Pollution Control Act. See response to comment number 91.

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HW	98	<p>In accordance with the Clean Water Act and Federal Guidelines in 40CFR230, we are providing the following comments:</p> <p>The Guidelines state dredged or fill material should not be discharged into the aquatic ecosystem, unless it can be demonstrated that there is no less environmentally damaging practicable alternative that achieves an applicant's project purpose. In addition, no discharge can be permitted if it will cause or contribute to significant degradation of the waters of the US. The applicant is proposing to fill Major Canyons which may contain special aquatic sites. Given the extent of the impacts associated with the proposed activities and the likely impacts to special aquatic sites, the applicant bears the burden of proof for clearly demonstrating that the preferred alternative is the Least Environmentally Damaging Practicable Alternative (LEDPA) that achieves the overall project purpose while not causing or contributing to significant degradation of the aquatic ecosystem.</p>	E. See response to comment 91.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
HW	99	Project Purpose and project alternatives: The first step in completing an alternatives analysis is the project purpose statement. Allowing DHS to determine whether practicable alternatives exist for this project is emphatically not an acceptable approach for conducting the alternatives analysis review under the 404(b)(1) guidelines. The Corps is responsible for controlling every aspect of the 404(b)(1) analysis. While the Corps should consider the views of DHS regarding the project's purpose and the existence (or lack of) practicable alternatives, the Corps must determine and evaluate these matters itself, with no control or direction from DHS, and without undue deference to DHS's wishes (Paragraph 7 of Plantations Landing Guidance April 21, 1989).	E. See response to comment 91.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
HW	100	<p>The Corps should consider the applicant's views and information regarding the project purpose and existence of practicable alternatives; this must be undertaken without undue deference to the applicant's wishes...the project purpose can not be so narrowly defined as to preclude the existence of practicable alternatives on the other hand, the Corps has some discretion in defining the "basic project purpose" for each Section 404 permit application in a manner which seems reasonable and equitable for that particular case....but can not give to much deference to the applicant's narrowly defined project purpose. ...the Corps determines the minimum feasibility size, circumstances, etc., which characterized a viable project. "(Hartz Mountains Development Corporation Permit Elevation Case Guidance dated August 17, 1989.)</p> <p>Furthermore the project purpose (homeland security) is not a water dependant activity. The definition of water dependent as stated in the Guidelines is limited to "activities requiring access or proximity to or sitting within a special aquatic site to fulfill the basic project purposes." There are many ways to meet the overall and basic project purpose that do not involve the discharge of fill material to special aquatic sites or to any waters of the U.S.</p>	E. See response to comment 91.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
HW	101	A reasonable range of alternatives that meet the stated project purpose while avoiding and minimizing damage to waters of the U.S. should be evaluated in the alternatives analysis. Careful consideration of non-structural alternatives to filling in waters of the US is essential in completing an alternatives analysis and is sound planning for any floodplain area. Additionally, recognizing the function and economic value to society of active floodplains, Executive Order 11988 states that agencies proposing to allow an action to be located in a floodplain will consider alternatives that avoid adverse effects of incompatible development in the floodplain.	E. See response to comment 91.

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HW	102	Clearly the level of environmental impacts to our aquatic environment and wildlife from filling in 100 to 900 foot-wide canyons is significant. Thus in these canyons, creeks, wildlife corridor areas, the alterative of having no boarder fence but instead increased man units, cameras or other technology must be seriously considered. As to date in the current NEPA document, the agency has failed to take a hard look at these non-structural alternatives. For example, in the current NEPA document DHS fails to seriously consider and analysis alternatives and instead disregards and inadequately excuses significantly high level impacts proposed to Gloria Canyon because filling it in and building a road across it would "Cut the drive time by ten minutes," We find this to simply be unacceptable and a vagrant disregard for environmental laws designed to protect our natural resources; it clearly is not the LEDPA. We recommend taking a hard look at alternatives to the proposed physical barrier (such as increase patrol units; cameras and other forms of technology) in waters of the US.	E. See response to comment 91.

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HW	103	The CWA guidelines prohibit granting of a CWA Section 404 permit if project activities will cause or contribute to the significant degradation of the Nation's waters including degradation to: 1) human health and welfare; 2) aquatic life and other wildlife; 3) aquatic ecosystem diversity, productivity, and stability; and 4) recreation, aesthetic, and economic values. This standard applies to the LEDPA, meaning that if the LEDPA caused or contributes to the significant degradation, the Corps is prohibited from granting a permit under CWA Section 404. We believe the proposed impacts to waters of the US and wildlife linkages represent a significant degradation.	E. See response to comment 91.
HW	104	The Corps regulations require all applicants (including DHS) to demonstrate that they have avoided impacts to waters of the U.S., what can't be avoided must next be minimized and thirdly what impacts are remaining after the process must be mitigated for by replacing lost functions and values provided by the aquatic resource through compensatory mitigation. This mitigation sequence does not allow applicants to skip to the third step in the process regardless of the quality of the compensatory mitigation being offered without first demonstrating avoidance and minimization (33CFR320.4(r); 1990 DA-EPA Mitigation MOA).	E. See response to comment 91.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
HW	105	The environmental impacts associated with the proposed project are not described. There is no information presented within the document to give the public the ability to assess what impacts would result from DHS' preferred project design which includes filling highly functioning Canyons and install culverts. The document also fails to identify biological impacts associate with the project; the extent of special aquatic sites and habitat types that would be impacted; Corps' CWA jurisdiction; and there is no hydrologic analysis to determine the size of the culverts. Wildlife corridors and species that are known to utilize the specific corridors proposed for impact are not identified. Instead the agency attempts to broadly identify species that can occur in all of Southern California leaving no possibility for meaningful public comment or analysis as to which species would be impacted by the project and how these impacts could possibly be mitigated for via innovative BMPs.	E. See response to comment 91.

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HW	105, continued	The biological section is inadequate. The document must properly identify, for each canyon, the species and habitat that would be impacted by the proposed project. These canyons are wildlife corridors and need to retain this function to allow the movement of wildlife. The failure of DHS and the cooperating agencies to properly identify the environmental impact is illegal; the impacts must be properly assessed by appropriate biological surveys conducted by qualified biologists, documented/disclosed and then re-circulated for public comment. In addition color photos of the sensitive areas proposed to be impacted by the project should be included within the NEPA document.	
Ofelia Bolaños, U.S. International Boundary and Water Commission (USIBWC)	106	The draft EA indicates the proposed primary pedestrian fence will be constructed within the 60-foot wide Roosevelt Reservation along the U.S./Mexico international border. There is no mention of the IBWC monuments and how the fence will be built around them, nor the access gates for IBWC maintenance of those monuments.	E. See response to comment 64.
USIBWC	107	There is no mention of changes to historic surface runoff characteristics and drainage patterns at the international borders.	D. CBP respectfully disagrees. See Section 3.3.5.2 of the Draft EA.

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USIBWC	108	Page 1-12, Line 28: EA states "It will also ensure that design and placement of the proposed tactical infrastructure does not impact flood control process and does not violate treaty obligations between the U.S. and Mexico." Recommend the sentence be changed to read "The USIBWC will also review design and placement of the proposed tactical infrastructure. U.S. Customs and Border Protection must ensure that the design and placement of the proposed tactical infrastructure does not significantly change the historic surface runoff characteristics at the international border. The USIBWC has indicated that an increase of up to 6 inches in water surface elevations at rural areas, and 3 inches in water surface elevations at urban areas is acceptable."	The Final EA has been revised accordingly.
USIBWC	109	Page 4-6, Section 4.7 "Surface Waters and Waters of the U.S.: Section does not address surface waters impacts at the international boundary.	E. See response to comment 91.
USIBWC	110	Appendix D, Hydrology Report: Hydrology report focuses on groundwater impact and surface waters are not addressed. Hydrology and/or drainage report demonstrating the requirement under Comment 2 must be presented to USIBWC to allow USIBWC to adequately evaluate the impact due to the proposed work on overland drainage flows into either country.	A. Once fence designs are complete the USIBWC would be allowed to view the designs to ensure that no significant impediments to surface water flow at the international border would occur.

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USIBWC	111	The USIBWC must be ensured that the fence and any drainage structures constructed will be properly maintained such that the overland drainage flows will not be impeded.	A. USBP will be responsible for maintaining all roads and fences as well as associated drainage structures to ensure transboundary flows are not compromised.
Gary Klockenga (San Diego Public Library)	112	The San Diego Public Library needs a copy of this EA for its collections. We already have the EIS. Please send one copy to: Science, Industry, and Govt. Publications Section San Diego Public Library 820 E Street San Diego CA 92101	A. The document was submitted as requested.
Margaret Carlson (public)	113	Dear Sirs, What an outrage! Exploiting and plundering our backcountry is a crime. Why the secrecy? Who gave you the right to steal and ruin our American lands. Shame on you and shame on the SDUT if they knew about and did nothing to investigate. Shame on the politicians who turn a blind eye to these shenanigans. This January 16th meeting was not publicized or there would have been all kinds of protesters. A full investigation should be made to see who is profiting from this "rip-off". As a taxpayer and long time resident of San Diego County I resent intrusion and confiscation of our land.	D. Thank you for your comment; however, CBP respectfully disagrees. A Notice of Availability was published on January 7, 2008 and January 13, 2008 in the San Diego Tribune.

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Patricia Port, U.S. Department of Interior, Office of the Secretary (DOI)	114	Due to incomplete project description, the EA is lacking necessary information to assess effects of the proposal on species mentioned above. The infrastructural appears to be undetermined for many segments. Since fence design is critical to determining effects on wildlife and plants, and focused surveys for the above species were either not conducted or were conducted at an inappropriate time of the year, the document's conclusions regarding environmental effects of the proposal are not substantiated.	D. The EA addresses potential impacts on a worse case scenario, regardless of fence design. The conceptual design footprint was developed by the design engineers and they believe this will be the maximum footprint needed to accomplish the proposed project. CBP respectfully disagrees with your assertion that the impacts presented as a result of the proposed project are not substantiated.
DOI	115	Without complete information on final fence design, lay-down areas, and access roads, or relevant biological information, the EA does not adequately assess adverse effects of the proposal or mitigation measures needed to reduce impacts to a level of insignificance. Furthermore, the document references avoidance measures that do not appear feasible due to timing constraints of this project.	D. See response to comment number 114. D. CBP is committed to mitigation measures described in the Draft EA and any further measures outlined through consultation with the USFWS.

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DOI	116	The EA states numerous times that environmental effects of the proposed project are below a level of significance. However, direct, indirect, and cumulative impacts to listed/sensitive species were not fully analyzed within the EA (see additional comments below) and a clear, comprehensive mitigation proposal was not provided. Without additional information and analyses the determination that project impacts are less than significant cannot be substantiated. The FWS encourages DHS to continue more comprehensive discussions with our Ecological Services and Refuges divisions to minimize and compensate for effects of the construction and operation of the proposed fence to federally-listed species	D. The Draft EA adequately addresses the potential direct and indirect impacts associated with the proposed project. Also, see response to comment numbers 9 and 115.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	117	<p>Throughout the document, the discussion and assessment of indirect impacts due to proposed construction of the fence should be expanded and clarified. Indirect impacts that should be assessed include, but may not be limited to: redirection of illegal traffic to unsecured areas of the border that may impact wildlife habitat, construction of access roads and use of staging areas that are not included in the proposed 60-foot wide right of way (ROW), and downstream effects on habitats within the Tijuana River watershed.</p> <p>Indirect impacts should be accounted for in any compensation for impacts to threatened and endangered species and mitigation for any unavoidable impacts to jurisdictional wetlands or waters of the United States.</p>	<p>D. See response to comment numbers 9, 115 and 116.</p> <p>D. Compensation for unknown impacts is impossible to accomplish. However, as mentioned previously, CBP is working with USFWS to develop proper mitigation measures regarding protected species and impacts as a result of the proposed project.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	118	(1)The project description does not provide sufficient information regarding impacts to listed species and sensitive habitats. (2) No maps or spatial representation of plant communities and listed/sensitive species distribution within and surrounding the project area were provided in the EA. Project area aerial photographs with habitat/vegetation communities clearly identified should be included to assist in the effects analysis. (3) In addition, the EA should clearly describe project related impacts (temporary and permanent) to each vegetation community and species habitat for all aspects of the project, including road widening, staging/lay down areas, new fence construction, and new road construction.	(1) A. The project description is not intended to describe impacts to protected species. (2) D. Aerial photography of the entire project corridor was included as Appendix A of the Draft EA. Further, as illustrated in Table 3-3 the various plant communities and their respective location is identified in the Draft EA. (3) D. The Draft EA states in Section 3.7.2.2, "The Proposed Action Alternative would permanently alter approximately 78 acres of vegetation." In the revised EA, road widening would impact a total of 42.2 acres, including 6.7 acres of chamise chaparral, 14.9 acres of mixed chaparral, and 7.5 acres of disturbed vegetation. The new road construction would permanently impact 0.07acre of mixed chaparral, 0.28 acre of chamise chaparral, and 10.9 acres of disturbed vegetation. In addition, staging area is expected to temporarily affect approximately 2.1 acres.
DOI	119	The EA contains an insufficient alternatives analysis. Project alternatives including options besides fencing should be analyzed. Technology may be available in lieu of or in addition to fencing that would result in reduced direct impacts to the natural resources. Such project alternatives should be clearly stated and analyzed in the EA.	D. See response to comment number 2.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	120	The EA repeatedly stated that design criteria would be used to minimize adverse impacts on threatened or endangered species and their critical habitat. Please clarify where this has or will occur. If avoidance measures cannot be included in the design criteria, mitigation measures should be included to mitigate impacts to levels that are less than significant.	D. Nowhere in the document has the design criteria been linked to no impacts regarding protected species. Regardless, see Section 3.9.2.2 of the Draft EA, which illustrates that CBP has already begun formal consultation efforts with the USFWS to mitigate for potential impacts to protected species. See also response to comment number 4.
	121	To accurately assess the impacts of the proposed project, the FWS recommends that wetland delineation for the project be verified by the U.S. Army Corps of Engineers and that natural resource agencies be provided with a mitigation plan for any unavoidable impacts to wetlands and waters of the U.S. for review and comment prior to a final decision. The mitigation plan should include a complete restoration plan for temporary impacts as well as mitigation for all permanent and indirect impacts to jurisdictional areas.	A. The USACE, Los Angeles District, as mentioned in the Draft EA is a cooperating agency and has been included on many field visits to determine jurisdiction of potential waters of the U.S. These WUS are outlined, discussed, mapped; and no wetlands are located in the project area for the revised EA.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	122	Statements used throughout the document that the fence will have beneficial effects to wetland/riparian areas, vegetation, wildlife, and federally listed species (by reducing human activity and trash) are not supported with data. To the contrary, impacts from operational vehicular activity and road maintenance would be likely to increase. We recommend that the decision documents include a thorough analysis of all direct, indirect, and cumulative impacts that is based on the best available scientific information, not unsupported assumptions.	E. CBP feels that all analyses are complete and based on best available science. Further, it has been proven repeatedly that border infrastructure does protect habitat north of the infrastructure. In fact, some protected species recovery plans call for more border infrastructure (e.g. Flat Tailed-Horned Lizard). Additionally, see the "INS, U.S. Border Patrol, U.S. Department of Interior, U.S. Forest Service, U.S. Environmental Protection Agency. 2002. Report to the House of Representatives Committee on Appropriations on Impact Caused by Undocumented Aliens Crossing Federal Lands in Southeast Arizona." for information regarding beneficial impacts to habitats north of the U.S.-Mexico border as a result of border infrastructure.
DOI	123	The EA should provide the reader with current information on the existing barrier fence segments along the International Border in San Diego County so that assessment of cumulative effects is possible, including effects to unlisted species.	A. The most current information regarding projects in the East San Diego County area were included in Section 4.0 of the Draft EA. See also response to comment number 9.
DOI	124	Clearly identify the portion of the project that is proposed to take place on BLM administered lands outside the 60' Roosevelt Corridor. Identify and quantify the impacts that would occur on these public lands.	A. See Appendix A (detailed project maps), Section 2.2, and Section 3.0 of the Draft EA. See also response to comment number 85.
DOI	125	Demonstrate that cultural and biological surveys have been completed within the project area for the following actions: Upgrade of existing access roads, construction of new roads, construction of staging areas, fence construction. Address the findings of those surveys.	A. See Sections 3.7, 3.8, 3.9, and 3.10 of the Draft EA. Throughout these sections the text states that biological surveys were completed October 2007, and November 2007 for cultural resources. There are no upgrades or improvements currently proposed for existing access roads, except as needed to maintain useability.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	126	Identify mitigation actions for cultural and biological resources.	A. See Section 5.0 of the Draft EA.
DOI	127	List Best Management Practices (BMP's) formulated for the project by the U.S. Fish and Wildlife Service for special status species.	A. See response to comment number 115.
DOI	128	In addition, BLM requires documentation which establishes the completion of Section 106 and formal tribal and SHPO consultation. The responsibility of this coordination lies with U.S. Customs and Border Protection-Border Patrol and U.S. Army Corps of Engineers as the lead agencies for the project. As part of the documentation, BLM must be provided the full cultural survey report for the project.	A. See response to comment number 48.
DOI	129	<u>2.0 Proposed Action and Alternatives, pg. 2-1:</u> "This section provides detailed information on USBP's proposal to construct, maintain, and operate TI...." While the description of the proposed action includes construction, maintenance, and operation of the fence and associated roads, the DEA does not include an analysis of potential environmental impacts associated with maintenance and operation activities.	D. Throughout the Draft EA the maintenance of the proposed roads and fence is discussed in the impact analysis section.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	130	<u>2.5 pg. 2-12:</u> While the DEA considers several alternatives in addition to the proposed action (i.e., Secure Fence Act Alignment; additional agents in lieu of tactical infrastructure (TI); vehicle barriers in lieu of fence; fence only; technology in lieu of TI), an alternative incorporating the use of a combination of methods is not discussed. For example, potential use of TI in combination with additional agents and the use of technology should be considered. Such an alternative could include construction of new fence along existing roads. In areas where the existing road is somewhat north of the international border, the use of technology or additional agents should be analyzed. The use of multiple methods of detection in combination with each other may significantly reduce the environmental impacts of the proposed action, particularly in sensitive areas that will be significantly impacted, such as La Gloria and Horseshoe canyons.	D. See response to comment number 2.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	131	<u>Staging Areas:</u> While the DEA maps depict the location of the staging areas, there is no site-specific discussion of the vegetation of each of these staging areas and subsequently no discussion of potential impacts. Also, it appears that several of these staging areas are being proposed in undisturbed habitat (e.g., staging area northwest of Cetis Hill and staging area northwest of Ag Loop). The relocation of staging areas to previously disturbed habitat would reduce impacts to sensitive species (i.e., habitat loss, fragmentation, and/or establishment of invasive species).	E. See response to comment number 22.
DOI	132	The discussion in section 5.0 Mitigation Measures of how staging areas will be rehabilitated needs clarification. It is not clear if all staging areas will be rehabilitated (e.g., in previously disturbed and undisturbed habitat). Also, section 5.0 includes only minimal discussion of how staging areas will be rehabilitated and states that rehabilitation methods would be developed in coordination with and approved by BLM.	E. The single staging area to be used for the revised project in this EA was addressed in an ESP for areas waived from NEPA compliance, but will be rehabilitated as part of the waived action.
DOI	133	Without a detailed discussion of where each staging area will be located, the species and/or potential habitat that may occur in these areas, and how each staging area will be rehabilitated, potential impacts to sensitive species resulting from the construction, use, and rehabilitation of staging areas cannot be fully analyzed.	D. See response to comment number 22.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	134	<p><u>3.7 Vegetative Habitat, pg. 3-22:</u> While the DEA discusses the presence of six potential jurisdictional ephemeral waters of the U.S. (pg. 3-15), including Campo Creek, Boundary Creek, and several small unnamed creeks, the presence of riparian habitat is not discussed in this section or in Table 3-3. Therefore, the calculations of altered vegetation are likely incomplete.</p> <p>The DEA does not include a specific discussion of the vegetative communities that would be impacted by filling LaGloria and Horseshoe canyons.</p> <p>Since coastal sage scrub and riparian habitats are considered sensitive or rare plant communities under local and State regulations, the finding that impacts to these plant communities are "not expected to be significant" is incorrect.</p>	<p>E. There are no WUS located in the project area for the Revised EA.</p> <p>E. These areas are no longer with the project area for this EA.</p> <p>D. CBP respectfully disagrees with your assertion that significant impacts would occur. The minimal impacts to coastal sage habitats are not considered serious degradation of these habitats locally or regionally.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	135	<p><u>3.8 Wildlife and Aquatic Resources, pg. 3-29:</u> Potential impacts to wildlife and aquatic resources should be discussed in terms of the life history and/or habitat requirements of the species that occur in and adjacent to the project corridor. For example, there's no discussion of the potential impacts to wildlife of erecting movement barriers between habitats on either side of the international border. Beside the direct impacts of removing habitat, these gaps/barriers could prohibit movement thereby reducing gene flow. Also, the absence of vegetation in these large gaps could result in increased predation.</p> <p>The DEA should include a detailed discussion of the potential impacts of filling La Gloria and Horseshoe canyons to wildlife and aquatic resources. Filling these canyons could have substantial impacts, including but not limited to reducing species movement between habitats on either side of the international border and reducing seasonal water flows to the Tijuana River.</p>	<p>D. See Section 3.8.2.2 of the Draft EA, and response to comment number 9.</p> <p>E. La Gloria Canyon and Horseshoe canyons are no longer with the project footprint for the revised EA.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	136	<p>Wildlife connectivity: Proposed filling of at least 2 canyons (Horseshoe and La Gloria) poses significant effects. The filling of canyons and the closing of existing gaps in the border fence would preclude general wildlife movement in one of three important dispersal zones recognized in <i>Las Californias Binational Conservation Initiative, A Vision for Habitat Conservation in the Border Region of California and Baja California</i> (2004), a report prepared by The Nature Conservancy, Conservation Biology Institute, and ProNatura, and supported by the California Biodiversity Council, a State and Federal interagency committee. The San Diego County border region is an internationally recognized biodiversity hotspot (IUCN 2000).</p> <p>The DEA should include a specific discussion of the mitigation measures that would be implemented to ensure consistency with the Migratory Bird Treaty Act.</p>	<p>D. See response to comment numbers 135.</p> <p>E. See Section 5.4 of the Draft EA.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	137	<p><u>3.9 Threatened and Endangered Species, pg. 3-32:</u> To fully analyze project impacts to protected species, the EA should include maps of each project site that depicts the plant community type within and adjacent to the project area and occurrence data and potential habitat for protected species.</p> <p>While the EA acknowledges that indirect adverse impacts to potentially suitable habitat for protected species could result from illegal immigrants shifting their activities to the end of newly constructed fence segments to avoid apprehension, it does not include a thorough analysis of additional potential impacts to protected species and their habitats in these areas.</p> <p>The EA should include a detailed discussion of the potential impacts of filling La Gloria and Horseshoe canyons to threatened and endangered species. Filling these canyons could have substantial impacts, including but not limited to reducing species movement between habitats on either side of the international border and increasing predation.</p>	<p>A. See Appendix A, Section 3.7 and 3.9, and Figures 3-3 and 3-4 of the Draft EA.</p> <p>D. The potential impacts are not known as illegal activities are at the discretion of IAs and outside of CBP's control. See also response to comment number 35.</p> <p>E. See response to comment numbers 9, 135 and 136.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	138	The EA should include a detailed discussion of the potential impacts of constructing low water crossings or similar drainage structures to riparian habitat and the protected species that may occur within these areas (e.g., least Bell's vireo, southwestern willow flycatcher, and arroyo toad). Given that the footprint of these structures is expected to extend approximately 25 to 40 feet on either side of the crossing to allow placement of rip rap (see page 2-4), the installation and use of these structures could have significant impacts to riparian habitat and associated species.	E. See response to comment 134.
DOI	139	Potential impacts to threatened and endangered species should be discussed in terms of the life history and/or habitat requirements of the species that occur in and adjacent to the project corridor. For example, there is no discussion of the potential impacts of increasing the gap between habitats on either side of the international border. Besides the direct impacts of removing habitat, these gaps could prohibit movement thereby reducing gene flow or increasing predation.	E. See response to comment numbers 9 and 138.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	140	<i>Least Bell's vireo, Southwestern willow flycatcher, and Arroyo toad:</i> While the DEA states that potential habitat for least Bell's vireo and southwestern willow flycatcher occurs adjacent to the 7 Gate/Railroad project site and that arroyo toad is known to historically and perhaps currently occur in Boundary Creek, upstream of the Willows project site, there is no detailed discussion of project impacts to these species and their habitats. Also, there is no discussion of potential habitat for any of these species along the other ephemeral waters of the U.S. (pg. 3-15), including Campo Creek and several small unnamed creeks that occur along the project corridor. Without a thorough analysis, the finding on page 3-38 that the proposed action may affect but is not likely to adversely affect the vireo or flycatcher is unsupported. Also, without a thorough discussion of arroyo toad occurrence data and habitat requirements, the finding that the project sites lack suitable habitat, and therefore would not affect this species, is unsupported.	E. There are no adverse impacts to the least Bell's vireo, flycatcher or arroyo toad, since no suitable habitat would be impacted by the revised project.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	141	<i>Coastal California gnatcatcher.</i> The EA only analyzes impacts to coastal sage scrub (CSS) habitat. While the coastal California gnatcatcher is primarily associated with CSS during the breeding season, the species also occurs in non-CSS habitat (e.g., chaparral), which it uses for foraging and dispersing. The analysis of impacts to this species should include impacts to non-CSS habitat. Also, since wildfire is a natural component of the CSS/chaparral ecosystems, impacts associated with fire are considered temporary. Therefore, the acreage of the burned areas within the project sites should be included in the estimate of gnatcatcher habitat that would be permanently impacted by the project.	D. CBP respectfully disagrees and feels that any potential impacts to the gnatcatcher have been adequately addressed. The statement regarding recent fires was made to denote the current condition, but these areas were not excluded from the suitable habitat analyses. Although no gnatcatchers were observed during the field surveys, and no gnatcatchers have been reported in the project corridor in recent years, CBP still has assumed occupancy of these habitats.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	142	<i>Quino checkerspot butterfly and critical habitat.</i> The EA acknowledges that the October 2007 biological surveys were conducted outside of the proper season to determine presence of listed species but later states that the primary host plant for Quino, <i>Plantago erecta</i> , was not observed at any of the surveyed areas. The EA should acknowledge that this host plant species is known to occur in the area but likely not found in the fall because it is an ephemeral annual plant. The EA should also discuss the other host plants known to be used by Quino and potentially present in the project corridor. Also, being a low-flying species, the DEA also should include a discussion of the potential impacts to Quino movement between habitat patches on either side of the international border associated with the construction of new fence. Effects to Quino critical habitat were not adequately analyzed in the EA. The EA should recognize that disturbed habitat may still be functionally useful to the butterfly and should be analyzed as such.	<p>A. The following was added to the Final EA, "This host plant species is known to occur in the area but likely not found during surveys because it is an annual plant. "</p> <p>D. CBP disagrees with the assertion that other host plants should be described as well. CBP has assumed occupancy of all potentially suitable habitat and acknowledged that adverse impacts would occur to the Quino checkerspot butterfly. Consequently, mitigation measures area being developed in coordination with USFWS to offset adverse impacts.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	143	<i>Otay tarplant, willowy monardella, Encinitas baccharis, and San Diego thornmint.</i> The EA acknowledges that the October 2007 biological surveys were conducted outside of the proper season to determine presence of protected species, but later states that these plant species were not observed within the surveyed areas, implying that these species do not occur in the project corridor. Without a thorough discussion of species occurrence data and habitat requirements, the finding that the project sites lack suitable habitat and therefore would not affect these listed species is unsupported.	D. Surveys completed in October likely would not have precluded observation of Otay tarplant, willowy monardella, Encinitas baccharis, or the San Diego thornmint. Species occurrence is discussed in the Draft EA, see Section 3.9.2.2. According to the California Natural Diversity Database no known locations of any Federal protected species is located within a mile of any of the project sites.
DOI	144	<i>Peninsular bighorn sheep:</i> The endangered Peninsular bighorn sheep is likely to be affected by significant indirect impacts from the funneling of illegal immigrant traffic into the Jacumba Mountains, portions of which are designated as critical habitat. Alteration of the fence design with gaps or vehicle barriers only within one mile of sheep habitat would likely reduce the significance of the impacts and provide opportunity for connectivity with bighorn sheep in Mexico.	E. See response to comment number 32.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
DOI	145	<i>Tecate cypress and Thorne's hairstreak butterfly:</i> The EA states that up to eight Tecate cypress trees would be impacted by construction but it's not clear how these individuals will be impacted (e.g., destroyed during construction, indirectly impacted due to dust, adjacent soil disturbance, etc.). There is also no discussion of how impacts to this species would be minimized or mitigated other than avoidance. Also, while the EA acknowledges that the Thorne's hairstreak butterfly uses Tecate cypress as a host plant, there is no discussion of potential occurrence of this butterfly species or its suitable habitat (in addition to Tecate cypress) on the project site.	E. No Tecate cypress is located within the revised project area for this EA.
John Kalish (BLM)	146	Clearly identify the portion of the project that is proposed to take place on BLM administered lands outside of the 60' Roosevelt corridor. Identify and quantify the impacts that would occur on these public lands.	E. Please see Appendix A (detailed project maps) as the maps depict where BLM administered lands are in conjunction with the proposed project locations. Additionally, all impacts are quantified in Section 2 and 3 of the Draft EA. See also response to comment number 35.
BLM	147	Demonstrate that cultural and biological surveys have been completed within the project area for the following actions: Upgrade of existing access roads, construction of new roads, construction of staging area, fence construction. Address the findings of those surveys.	E. See response to comment numbers 22 and 125.
BLM	148	Identify mitigation actions for cultural and biological resources.	E. See response to comment number 115.

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BLM	149	List Best Management Practices (BMP's) formulated for the project by the U.S. Fish and Wildlife Service for special status species.	The Final EA has been revised to include the BMPs developed between USFWS and CBP
Valerie Connor, SWRCB	150	<p>The California Code of Regulations (CCR), 14, Section 15063, allow the use of a NEPA document to meet the requirements for an Initial Study under CEQA."</p> <p>However, the EA does not fully describe what additional steps would be taken to comply with CEQA beyond completing this Initial Study. Conducting the NEPA process does not automatically and simultaneously satisfy the CEQA process when a California permit is required. It is our understanding that project applicants must identify a lead agency for CEQA compliance. This lead agency, which must be a California agency, is then responsible for conducting a review, which includes an opportunity for public comment. Until these steps are followed, we do not consider that the requirement for public involvement in the CEQA process discussed in Section 1.5 has been met.</p>	E. It is anticipated that the State Water Resources Control Board (SWRCB) would be the lead agency for the CEQA compliance, which is required for the issuance of 401 Water Quality Certification. CBP has included CEQA issues and discussions in this EA to satisfy the requirements under this state law. CBP has used this approach in the past to the satisfaction of the RWQCB.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
Valerie Connor, SWRCB	151	<p>2.A WATER QUALITY CERTIFICATION: As noted in Section 1.4 (Framework for Analysis) and Table 1. 1, a Clean Water Act (CWA) Section 401 State Water Quality Certification is required for the project. However, Table 1.1 requires correction since it lists the Regional Water Quality Control Board (Regional Water Board) as the permitting agency. The proposed project will occur within the boundaries of two Regional Water Boards. In cases where more than one Regional Water Board is involved, regulations require that the entity that issues the water quality certification is the State Water Resources Control Board.</p> <p>2.B We have not, to date, received an application for water quality certification (certification) for this project. The certification process routinely includes a review of the applicant's Stormwater Pollution Prevention Plan (SWPPP) and the operation and maintenance plan that details how the installed project will be maintained to prevent future discharge of pollutants from the project area. We will also review compliance with Section 404 of the CWA pertaining to wetland protection.</p> <p>2.C We strongly recommend that all the sections of road and fence be treated as a single project and be permitted as such under Sections 404 and 401 of the CWA. Thus, the sum quantity of lands and waters affected by the entire project should be considered as a whole.</p>	<p>2.A A. The text has been revised to read "State Water Resources Control Board"</p> <p>2.B. E. The 401 Water Quality Certification and SWPPP will be presented to RWQCB and other state and federal agencies once completed.</p> <p>2.C E. No WUS or wetlands are located in the revised project for this EA.</p>

PROJECT: San Diego Gap Filler

DATE: 10 July 2008

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
Valerie Connor, SWRCB	152	Section 4.0 concedes that cumulative impacts will occur if the preferred alternative is implemented, but makes no attempt at quantification of those effects. Quantification of cumulative effects is necessary for the development of appropriate mitigation measures.	A. See response to comment number 9.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
Valerie Connor, SWRCB	153	<p>Section 5.0 thus begins to address many of our concerns, but additional explanatory detail needs to be provided.</p> <p>All potential adverse effects to water quality should be identified in the CEQA documentation to a level of detail that is adequate for the development of appropriate mitigation measures.</p> <p>These potential water quality effects - whether from project construction, operation, or maintenance - should be avoided to the greatest extent feasible as a first step. When avoidance is not feasible, impacts should be minimized if possible. Otherwise, mitigation should be described such as on-site restoration or reclamation of the affected sites that includes a maintenance plan for the life of the installation. When avoidance and restoration/reclamation is not feasible and permanent effects are to occur, appropriate off-site mitigation should be considered. All of these mitigation steps should be detailed in a mitigation plan that is approved before project implementation begins. This mitigation plan should include a construction, operation, and maintenance plan that details how these mitigations will be followed during and after construction.</p>	<p>A. CBP has agreed to complete a SWPPP as well as rehabilitation plan for temporarily disturbed areas. These plans would be in place prior to construction activities begin. See also response to comment 9.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
Valerie Connor, SWRCB	154	<p>5A. The maps and figures provided in Appendix A of this document do not provide adequate detail to allow California Water Board staff to certify the proposed project. The maps provided adequate detail for assessing general location and general project activities, but additional annotation of the physical features of the landscape will be required. Development of these details can be a part of the SWPPP preparation process, but the California Water Board staff should be consulted as this process occurs.</p> <p>5.B The construction details of elements of the proposed Tactical Infrastructure (i.e., the fence itself) are not presented as final drawings but only as examples. We cannot evaluate the effects of a design until it is presented. We will be concerned with the effects on surface and sub-surface drainage that may occur with all of the presented design examples.</p> <p>5.C The pages of example drawings are not enumerated in a way that allows for easy reference. These detail drawings should be clearly enumerated, and a list of figures should be provided.</p>	<p>5A. A. Physical features and topography of the project area will be included in the SWPPP. More information will be provided to CWB staff for certification of the proposed project. The CWB will be consulted when developing the project SWPPP and the Section 401 Water Quality Certification application.</p> <p>5.B E. The final design of the project elements has not yet been finalized. However, the impacts analyzed in the Draft EA are based on worse case scenario; therefore, covering any of the designs presented in Appendix A.</p> <p>5.C E. The index map in Appendix A clearly indicates the location of each detailed map, and each map is numbered for ease of reference.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
County of San Diego (CSD)	155	The technical information to support conclusions of significance or less than significance in the EA should be provided to the public, either in the text of the EA or in appendices. It is difficult to review the EA because the information necessary for evaluating impacts has not been included.	D. CBP respectfully disagrees with your assertion of no meaningful impact analysis.
CSD	156	Technical reports for determining the significance of impacts should be included in the EA for: Aesthetics and Visual Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Hydrology (the Hydrology Report, Appendix D to the EA, currently only address groundwater wells), Noise, Socioeconomics, and Traffic.	D. CBP respectfully disagrees with your assertion and feels that all information necessary to form educated opinions are presented via the Draft EA.
CSD	157	The County would like to see the "Technology in Lieu of Tactical Infrastructure" be more fully explored in the EA as one of the alternatives for the project.	D. See response to comment number 2.
CSD	158	The EA should provide details regarding the cut and fill activities that will be required in drainages that will be crossed by the roads and the pedestrian fence so that impacts can be adequately analyzed. Details should include the dimensions for each fill (as has been included for Horseshoe Canyon and La Gloria Canyon), amount of fill to be required for each canyon, from where the proposed fill will be excavated, and how far it will need to be transported.	E. At this time the final design of the fence and roads is not known. However, CBP addressed impacts based on a worse case scenario and feels that impacts discussed are adequate. Concept designs of the cut and fill activities have been incorporated as an appendix in the Final EA, however.
CSD	159	The cuts and fills should be evaluated for their impacts to aesthetics, hydrology, surface water quality, and biological resources.	E. See response to comment numbers 156 and 158.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
CSD	160	The potential for erosion should be evaluated in the EA, and a conceptual revegetation plan designed to control erosion on steep cuts and fills resulting from construction of the project, particularly the fills in the canyons should be included as an attachment to the EA.	D. The potential for erosion was evaluated in the Draft EA. E. As mentioned in the Draft EA a SWPPP will be prepared prior to construction. The SWPPP will include additional measures other than those identified in the Draft EA for erosion and sedimentation control.
CSD	161	Section 3.8.2 Environmental Consequences identifies the Thresholds of Significance for established wildlife resources. The Thresholds of Significance include "...conflicts with the provisions of an adopted...Natural Community Conservation Plan..." (p.3-28). The County of San Diego is working with USFWS on this federally-funded Natural Community Conservation Plan for the eastern portion of the County. The area covered by this plan includes a significant portion of the land on the northern side of the Proposed Action. As noted in the EA, a range of species anticipated to be covered by the East County MSCP will be directly affected by the proposed action. The draft list of covered species is located at http://www.sdcounty.ca.gov/mscp/ec_biology.html . The EA should identify mitigation to address associated impacts to sensitive biological resources to the extent feasible.	E. The Draft EA does address associated impacts to biological resources that are within the project corridor. Since the plan has not been finalized but is rather in the planning stages CBP feels there is no need to address impacts to a plan that does not exist. Furthermore, CBP has not been invited to be signatory party to the MSCP.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
CSD	162	The primary pedestrian fence would impact species mobility and reduce habitat connectivity. It is anticipated that the Proposed Action will have significant impacts to reptiles, amphibians and a range of other species located directly to the north and south of the areas affect by the Proposed Action. The EA should identify mitigation to address associated impacts.	A. The proposed project would impact transboundary migration of larger animals at some of the specific fence locations, but not small mammals, amphibians, or reptiles. These impacts would not be considered significant as discussed in Section 3.8.2.2 of the Draft EA. See also response to comment number 9.
CSD	163	Impacts to view from SR 94 in the areas where the fence can be seen from the highway should be evaluated and appropriate mitigation should be developed.	E. To our knowledge, no proposed locations of fence can be seen from SR 94.
CSD	164	The EA should evaluate the impacts to aesthetics from the large fills in the various canyons. Mitigation for these impacts should include vegetating the huge slopes with San Diego County native plants.	E. Potential impacts to aesthetics as a result of the proposed project were evaluated in the Draft EA. The Final EA was modified to reflect that native seeds or plants from San Diego County would be used for revegetation purposes, to the extent practicable.

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
CSD	165	<p>Page 3-1. The EA states that traffic will not be impacted from construction equipment traveling to and from the various work sites; however, the EA does not provide the analysis and results to substantiate this conclusion. The EA should provide the following data regarding the construction activity from the Proposed Action Alternative:</p> <ul style="list-style-type: none">A. Hours and dates of operation for construction activityB. Construction/truck routes along or connecting to public roadsC. Types of heavy vehicles to be used for constructionD. Estimated number of heavy vehicular trips needs for construction.	<p>D. Construction traffic will be minor and temporary, and would not measurably affect current traffic patterns on the affected roads used. A detailed traffic analysis is not warranted.</p>
CSD	166	<p>The EA should identify and assess any project-related traffic that may be added to County maintained public roads (e.g. Thing Road, Humphries Road, Shockey Truck Trail, and Old Highway 80) upon completion of the Proposed Action Alternative. For example, Maps 2-5 appear to indicate that Humphries Road will be used as a project access road.</p>	<p>E. Construction traffic for the revised project would not be significantly more that current USBP TI maintenance and patrol traffic.</p>
CSD	167	<p>The EA should clearly identify locations where proposed project (construction/access/patrol) roads and/or the border fence would traverse and/or connect to County maintained public roads. For example, Figure 3-2 indicates that a project access road would connect to Thing Road, which is a County maintained public road.</p>	<p>A. See response to comment number 166.</p>

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REVIEWER	COMMENT NO.	REVIEW COMMENT	RESPONSE BY DESIGNER
CSD	168	The EA should clearly identify where proposed project roads would require a new driveway along County maintained public roads. For example, Map 19 appears to show a new project/construction road (Willow Access) that would connect from the border fence to Old Highway 80.	E. No new driveway connections are proposed as part of the revised project.
CSD	169	The EA should provide an operation assessment (e.g. sight distance) for any new driveways/access points created by the project along County maintained public roads.	E. No new driveway connections are proposed as part of the revised project.
CSD	170	The EA should note that the County will require a construction and encroachment permits for any work performed within the County's right-of-way, such as driveways or temporary road access points onto County maintained roads.	E. No new driveway connections are proposed as part of the revised project.
CSD	171	The EA should identify if the proposed project will require improvements to County maintained public roads.	E. No new driveway connections are proposed as part of the revised project.
CSD	172	The EA should specify whether all new and improved project roads will be used for government purposes only, gate for restricted access, and maintained by the Federal government.	A. See response to comment number 86

POL	petroleum, oil, and lubricants
PVB	primary vehicle barrier
RCP	reinforced concrete pipe
RMP	Resource Management Plan
ROI	region of influence
SBI	Secure Border Initiative
SCIC	South Coastal Information Center
SHPO	State Historic Preservation Office
SPCCP	Spill Prevention, Control, and Countermeasures Plan
SWPPP	Storm Water Pollution Prevention Plan
TI	Tactical Infrastructure
TMDL	Total Maximum Daily Loads
TPI	total personal income
U.S.	United States
U.S.C.	United States Code
USACE	United States Army Corps of Engineers
USBP	United States Border Patrol
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USIBWC	United States Section, International Boundary Water Commission
WPLT	Western Pluvial Lakes Tradition
WUS	Waters of the U.S.





FINAL

ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED AJO FORWARD OPERATING BASE AJO STATION AREA OF RESPONSIBILITY U.S. BORDER PATROL, TUCSON SECTOR

**Department of Homeland Security
U.S. Customs and Border Protection
U.S. Border Patrol**



SEPTEMBER 2011

EW1 FOIA CBP 007049

FINDING OF NO SIGNIFICANT IMPACT
FOR THE PROPOSED AJO FORWARD OPERATING BASE
AJO STATION AREA OF RESPONSIBILITY
U.S. BORDER PATROL, TUCSON SECTOR

Project History: The United States (U.S.) Border Patrol (USBP), Ajo Station operates a tactical camp on a 1-acre site at the intersection of Bates Well Road and the western boundary of the Organ Pipe Cactus National Monument (OPCNM) under Special Use Permit number IMR ORPI 9500 10-04. This tactical camp was previously located at Bates Well which is listed on the National Register of Historic Places. Upon the request of the National Park Service (NPS) OPCNM and the U.S. Fish and Wildlife Service (USFWS), in an effort to protect historical properties and as a conservation measure for the endangered Sonoran pronghorn (*Antilocarpa americana sonoriensis*), the tactical camp was moved from the Bates Well site to the current site. Impacts of the move and operation of the camp were analyzed in the December 2009 *Environmental Assessment for the Proposed SBInet Ajo-1 Tower Project, Ajo Station's Area of Responsibility, U.S. Border Patrol Tucson Sector*.

This Environmental Assessment (EA) tiers from the December 2009 SBInet Ajo-1 Tower Project EA and addresses the proposed expansion of the existing 1-acre tactical camp into a 3-acre Forward Operating Base (FOB) to assist CBP in their goal of establishing and maintaining effective control of the border. This EA was prepared in accordance with the National Environmental Policy Act (NEPA) and analyzes the project alternatives and potential impacts on the human and natural environment for two selected alternative sites.

Purpose and Need: The purpose of this project is to improve CBP's efficiency and safety within the USBP Tucson Sector, encompassing remote border zones in the Ajo Station Area of Responsibility (AOR). USBP Agents assigned to patrol within the area may require 2 hours or more of travel time to reach their patrol areas after mustering at the Ajo Station. USBP Agents need to be deployed closer to the international border and remote western zones of the Ajo Station to improve efficiency and effectiveness during work shifts. With the improved deterrence afforded by the SBInet technology deployed throughout the OPCNM, the far western zones of the AOR on the Cabeza Prieta National Wildlife Refuge (CPNWR) have had an increase in CBV activity. By providing a FOB with living quarters for additional Agents and refueling facilities, Agent response time to illegal cross-border activities would be greatly improved, and Agents could be more efficiently deployed to patrol the more remote sections of the Ajo Station AOR. The overall safety and efficiency of USBP Agents would be enhanced, as would the safety of employees and visitors on the OPCNM, the CPNWR, and the general public.

Proposed Action: The Proposed Action includes the expansion of the current USBP tactical camp on the OPCNM to include two additional acres, resulting in a 3-acre FOB to be run on solar or other alternative power sources with battery and diesel generator backups, including the following features: modular buildings to accommodate a maximum of 32 Agents (sleeping quarters, kitchen/dining facility, restrooms with showers, office space, muster area, communications equipment/server connectivity, fitness room, and secure storage), perimeter fencing, drinking water well system, fire suppression system, security camera, equipment and lighting for compound, bulk fuel storage, parking for up to 35 vehicles, a detention facility,

equestrian stalls and hay storage, all-terrain vehicle storage, and supply storage. Construction of the facility would take place over approximately 5 years. It will be assumed that the FOB will run on generator power exclusively for 5 years until the full build out, including solar power panels and batteries, is completed.

Conservation measures and best management practices (BMP) would also be implemented to avoid and minimize effects on U.S. Department of the Interior (DOI) trust resources.

Alternatives Considered: Four alternatives were identified and considered during the planning stages of the proposed project and all are carried forward for analysis in this EA. The four alternatives are 1) the Proposed Action (as discussed above), 2) Fossil Fuel Generator Power, 3) CPNWR Location, and 4) No Action.

Fossil Fuel Generator Alternative

The Fossil Fuel Generator Alternative includes the same features and 3-acre footprint identified for the Proposed Action; however, the site would be powered by diesel or natural gas generators with battery backup systems.

CPNWR Location Alternative

The CPNWR Location Alternative includes the same features identified for the Proposed Action; however, the site would be located within the non-wilderness corridor on the CPNWR at the intersection of Bates Well Road and the CPNWR eastern boundary.

No Action Alternative

Under the No Action Alternative, the FOB would not be expanded. The No Action Alternative serves as a baseline against which the impacts of the Proposed Action and other action alternatives are evaluated.

Affected Environment and Consequences: The Proposed Action would have a direct permanent impact on 2 acres. The FOB is located on NPS lands which are used for the protection of the Sonoran Desert Ecosystem, and recreational and educational purposes. Construction of the FOB would have direct long-term impacts on land use, wilderness, soils, wildlife, vegetation, due to loss of biological production and loss of habitat resulting from the expanded FOB. During construction, direct temporary impacts would occur on wilderness, soils, air quality, noise environment, and wildlife due to increased water and wind erosion of disturbed soil, increased traffic, increased noise emissions, and vehicle emissions. Disturbances from construction activities may affect, and likely adversely affect, the Federally endangered Sonoran pronghorn (*Antilocarpa americana sonoriensis*), and may affect, but are not likely to adversely affect the lesser long-nosed bat (*Leptonycteris curasoae yerbabuenae*). Impacts from noise and air emissions would be less in both duration and magnitude than those currently experienced from the diesel generators in continuous use at the tactical camp. Constructing the FOB would not directly impact wetlands, waters of the United States, surface waters, groundwater, floodplains, or utilities.

A total of two previously recorded archaeological sites are located near the project site. Impacts on the previously recorded archaeological sites from the Proposed Action would be avoided through a combination of project design and monitoring.

No significant adverse effects on the natural or human environment, as defined in 40 Code of Federal Regulations Section 1508.27 of the Council on Environmental Quality's Regulations for Implementing NEPA, are expected from implementation of any of the action alternatives.

Best Management Practices: BMPs that will be implemented during the expansion and operation of the FOB are described in Section 4.0 of the EA and are incorporated by reference to this Finding of No Significant Impact. Some of the more pertinent BMPs include, but are not limited to, the following:

1. Update the existing Spill Prevention, Control and Countermeasures Plan (SPCCP) to prevent and manage accidental spills that might occur during expansion of the facility. Operation of the FOB will also require an SPCCP due to the presence of hazardous materials associated with fuel storage.
2. Prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) to control stormwater erosion and sedimentation during construction.
3. Conduct bird surveys, in accordance with the Migratory Bird Treaty Act, in the event that clearing and grubbing activities occur during the normal migratory bird breeding and nesting season (February 15 through August 31).
4. CBP will minimize impacts on Sonoran pronghorn and lesser long-nosed bats and their habitats by using flagging or temporary fencing to clearly demarcate project perimeters with the land management agency. CBP will not disturb soil or vegetation outside of that perimeter.
5. CBP will minimize the number of construction vehicles traveling to and from the project site and the number of trips per day. CBP will coordinate construction vehicle activity with land managers at their discretion.
6. CBP will minimize animal collisions, particularly with Sonoran pronghorn, by not exceeding construction and maintenance speed limits of 35 miles per hour (mph) on major unpaved roads (i.e., graded with ditches on both sides) and 25 mph on all other unpaved roads. During periods of decreased visibility (e.g., night, weather, and curves), CBP and contractors will not exceed speeds of 25 mph.
7. The site boundaries of all previously recorded archaeological sites, including a 100-foot buffer, would be flagged around each of the sites to ensure that they are avoided.
8. CBP will have an archaeologist on-site during all subsurface disturbance activities. If any cultural resources are discovered during these activities, then the OPCNM archaeologist will be contacted and all work will cease until the significance of any resource has been evaluated.

Findings and Conclusions: Based upon the analyses of the EA and the environmental design and mitigation measures to be implemented, the Proposed Action would not have a significant adverse effect on the environment. Therefore, no additional environmental evaluation is warranted.

Project Proponent:

Efren V. M. Garcia

Efren V. M. Garcia
Director
Facilities Branch
Office of Border Patrol
Project Proponent

12 SEP 2011
Date

Approved:

Trent Frazier

Trent Frazier
Acting Executive Director
Facilities Management and Engineering
U.S. Customs and Border Protection

9/19/11

Date

FINAL

**ENVIRONMENTAL ASSESSMENT
FOR THE PROPOSED AJO FORWARD OPERATING BASE
AJO STATION AREA OF RESPONSIBILITY
U.S. BORDER PATROL, TUCSON SECTOR**

SEPTEMBER 2011

Lead Agency: Department of Homeland Security
U.S. Customs & Border Protection
Facilities Management and Engineering
1301 Constitution Avenue NW, Suite B-155
Washington, DC 20229

Point of Contact: Mr. Chris Colacicco
U.S. Customs & Border Protection
Facilities Management and Engineering
1301 Constitution Avenue NW, Suite B-155
Washington, DC 20229

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SECTION 1.0 BACKGROUND



1.0 BACKGROUND

1.1 INTRODUCTION

This Environmental Assessment (EA) analyzes the expansion of the existing United States (U.S.) Border Patrol (USBP) 1-acre tactical camp into a 3-acre Forward Operating Base (FOB) within the USBP Ajo Station Area of Responsibility (AOR) in southwest Arizona (Figure 1-1). The Ajo Station operates the existing tactical camp on a 1-acre site located on the Organ Pipe Cactus National Monument (OPCNM) at the intersection of Bates Well Road and the western boundary of the OPCNM under Special Use Permit number IMR ORPI 9500 10-04 (Appendix A). This tactical camp was previously located at Bates Well, a historic site listed on the National Register of Historic Places (NRHP) on the OPCNM. At the request of the National Park Service (NPS) OPCNM and the U.S. Fish and Wildlife Service (USFWS), in an effort to protect historical properties, and as a conservation measure for the endangered Sonoran pronghorn (*Antilocarpa americana sonoriensis*), the tactical camp was moved from the Bates Well site to the current site in 2010. Impacts of the move and operation of the camp were analyzed in the December 2009 *Environmental Assessment for the Proposed SBInet Ajo-1 Tower Project, Ajo Station's Area of Responsibility, U.S. Border Patrol Tucson Sector*. This EA will analyze the expansion of the tactical camp's footprint into a 3-acre FOB as well as operation of the FOB.

The USBP is a law enforcement entity of U.S. Customs and Border Protection (CBP) within the Department of Homeland Security (DHS). USBP's priority mission is to prevent the entry of terrorists and their weapons of terrorism and to enforce the laws that protect the United States homeland. This is accomplished by the detection, interdiction, and apprehension of those who attempt to illegally enter or smuggle any person or contraband across the sovereign borders of the United States. Cross-border violators (CBV) have cost United States citizens billions of dollars annually due directly to criminal activities, as well as the cost of apprehension, detention, and incarceration of criminals, and indirectly in loss of property, illegal participation in government programs, and increased insurance costs (Federation for American Immigration Reform 2000).

The project area for this EA covers Darby Wells Road from its intersection with Arizona State Route 85, southwest to Bates Well Road at its intersection with the western boundary of the OPCNM, and a 2-mile buffer around the road corridors and proposed FOB site (see Figure 3-1). In connection with earlier border infrastructure projects, much of this area and similar actions were analyzed in previous National Environmental Policy Act (NEPA) documents prepared by CBP and the legacy Immigration and Naturalization Service (INS). Accordingly, this EA tiers from a July 2001 INS and Joint Task Force-Six (JTF-6) NEPA document entitled, *Supplemental Programmatic Environmental Impact Statement, INS and JTF-6 Activities on the Southwest U.S.-Mexico Border* (INS and JTF-6 2001), the *Programmatic Environmental Assessment for the Proposed Installation and Operation of Remote Video Surveillance Systems in the Western Region of Immigration and Naturalization Service* (INS 2003), and the *Environmental Assessment for the Proposed SBInet Ajo-1 Tower Project, Ajo Station's Area of Responsibility, U.S. Border Patrol Tucson Sector* (CBP 2009). Where this EA incorporates previously documented information, the appropriate NEPA document is cited and the incorporated content

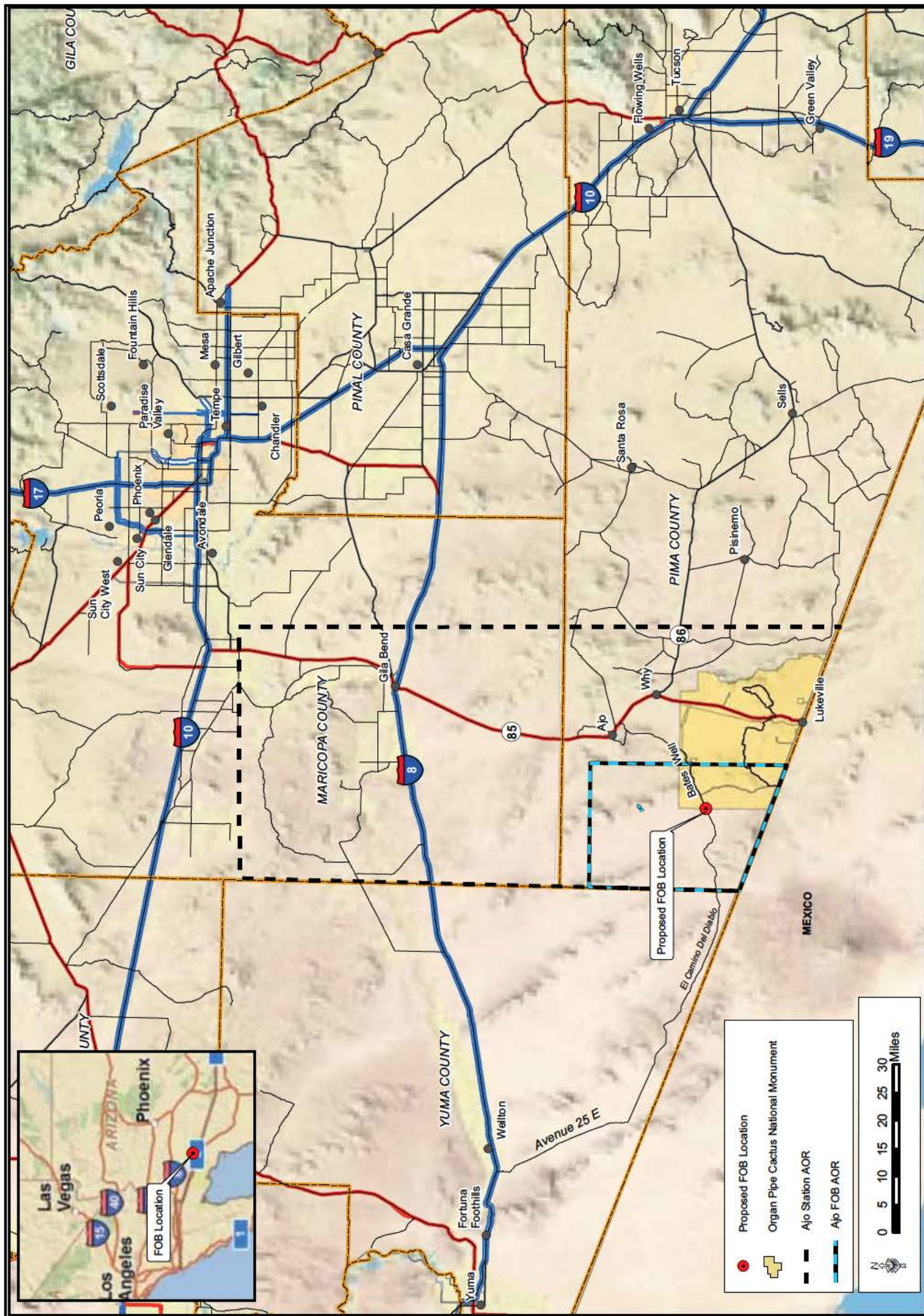


Figure 1-1: Vicinity Map

September 2011

is summarized. Where previous NEPA documents do not provide sufficient information for the analysis required in this EA, new surveys for sensitive resources and site characterization were completed and reported in this EA.

1.2 PURPOSE AND NEED

The purpose of this project is to improve CBP's efficiency and safety within the USBP Tucson Sector, encompassing remote border zones in the Ajo Station AOR. USBP Agents assigned to patrol within the area may require 2 hours or more of travel time to reach their patrol areas after mustering at the Ajo Station. USBP Agents need to be deployed closer to the international border and remote western zones of the Ajo Station to improve efficiency and effectiveness during work shifts. With the improved deterrence afforded by the *SBI_{net}* technology deployed throughout the OPCNM, the far western zones of the AOR on the Cabeza Prieta National Wildlife Refuge (CPNWR) have had an increase in CBV activity. By providing a FOB with living quarters for additional Agents and refueling facilities, Agent response time to illegal cross-border activities would be greatly enhanced, and Agents could be more efficiently deployed to patrol the more remote sections of the Ajo Station AOR. The overall safety and efficiency of USBP Agents would be enhanced, as would the safety of employees and visitors on the OPCNM, the CPNWR, and the general public.

1.3 PUBLIC INVOLVEMENT

Consultation and coordination with Federal and state agencies and other stakeholders is ongoing during the planning and preparation of this document. Included are contacts that were made during the development of the action alternatives and writing of the EA. Copies of correspondence are provided in Appendix A. Formal and informal coordination was conducted with the following agencies and entities:

- USFWS
- OPCNM
- CPNWR
- Arizona Game and Fish Department (AGFD)
- Arizona Department of Environmental Quality (ADEQ)
- U.S. International Boundary and Water Commission
- Tohono O'odham Nation
- Hopi Tribe
- Pascua Yaqui Tribe

The draft EA was made available for public review for 30 days, and a Notice of Availability (NOA) was published in the Ajo Copper News and the Arizona Daily Star on August 3, 2011. The draft EA was also available electronically at <http://ecso.swf.usace.army.mil/Pages/Publicreview.cfm>.

All correspondence sent or received during the preparation of this document is included in Appendix B. CBP provided copies of the draft EA to all coordinating state and Federal agencies and affected Native American Tribes for review and comment. Forty comment letters and

emails were received during the public comment period. All pertinent comments were included in a comment response matrix and included in Appendix B.

CBP has considered the impacts of this project and determined that a Finding of No Significant Impact (FONSI) is the appropriate determination for this project. CBP informed the public of this decision by publishing an NOA (Exhibit 1-1) in the Ajo Copper News and the Arizona Daily Star in September 2011. The final EA and signed FONSI were also available electronically at <http://ecso.swf.usace.army.mil/Pages/Publicreview.cfm>.

Exhibit 1-1.

NOTICE OF AVAILABILITY

FINAL ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED AJO FORWARD OPERATING BASE AJO STATION'S AREA OF RESPONSIBILITY U.S. BORDER PATROL, TUCSON SECTOR

The public is hereby notified of the availability of the final Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) prepared by Customs and Border Protection for the expansion of the U.S. Border Patrol Ajo Station Forward Operating Base in Pima County, Arizona. The location for the proposed action is a 3-acre site along Bates Well Road at the western boundary of Organ Pipe Cactus National Monument.

The EA was prepared pursuant to the National Environmental Policy Act (NEPA) of 1969, 42 United States Code (U.S.C.) 4321 *et seq.* The FONSI was prepared in accordance with CBP's obligations under NEPA, the Council on Environmental Quality (CEQ) implementing regulations at 40 Code of Federal Regulations (CFR) Parts 1500–1508, and DHS Management Directive 023-01 (Environmental Planning Program).

The final EA and FONSI will be available at the Pima County Public Library, Salazar-Ajo Branch, 33 Plaza, Ajo, Arizona. It is also available for download at the following URL address: <http://ecso.swf.usace.army.mil/Pages/Publicreview.cfm>.

1.4 SCOPE OF THE ANALYSIS

The scope of this EA includes the analysis of impacts on the human environment resulting from the expansion and operation of the existing Ajo tactical camp. This analysis does not include an assessment of USBP operations conducted in the field and away from the Ajo Station or the FOB. Those impacts were addressed in the December 2009 SBI^{net} Ajo-1 Tower Project EA (CBP 2009). While the establishment of this FOB would facilitate border patrol operations within the western portion of the Ajo Station AOR, those operations are not expected to change.

Current detection methodology within the Ajo Station's AOR includes traditional sign cutting which requires both patrolling and dragging of roads. To ensure timely detection and effective response, patrolling and dragging must take place on a regular basis within each shift. Remote

sensors are strategically placed to aid detection and interdiction of illegal activity. Detection methodology also relies on information provided from the recently installed *SBI*net towers.

Identification, classification, response, and resolution actions require that agents respond to evidence of illegal entry gained through the previously mentioned tools and techniques, as well as through direct observation. Agents, in most cases, follow signs as opposed to viewed subjects. They follow, flank and interdict using agents on foot, horseback, or motor vehicles. Rotary-winged aircraft are also used in support of these activities. These activities are guided by the provisions of the Cooperative National Security and Counterterrorism Efforts on Federal Lands along the United States' Borders Memorandum of Agreement between DHS, DOI, and U.S. Department of Agriculture (DHS 2006). CBP recognizes that execution of its border security mission can impact lands administered by other federal agencies, and continues to work cooperatively with other federal agencies to minimize any such impacts.

The allocation of agents within the Ajo Station AOR is dictated by the location of security threats along the border. The proposed Ajo FOB would provide greater efficiency for patrolling the western portion of the station's AOR. Currently, agents assigned to that portion of the Ajo Station AOR spend about 25 percent of their time on a daily shift commuting.

The following example illustrates how patrol activities would change within the AOR following establishment of the FOB. Currently, if the Patrol Agent in Charge determines that the threat level in the Ajo FOB AOR warrants an allocation of a hypothetical 100 agent hours per day, then 125 hours of agent time must be allocated to meet that 100 hour need with 25 percent of this time being spent on commuting. Once the Ajo FOB is operational, this 25 percent of lost time would be saved, since the agents would be pre-positioned. However, the actual amount of time spent by agents patrolling the Ajo FOB AOR and the nature and location of their duties would be unchanged.

What would change is that the number of trips taken by Agents from Ajo Station to the Ajo FOB along the Bates Well Road would be reduced during the times that the number of agents required for the border security mission in the AOR for the Ajo FOB exceeds the capacity of the current camp. CBP estimates that approximately 10,600 trips annually along the Bates Well Road would be eliminated following establishment of the FOB. Therefore, CBP has concluded that while the number of agents required to address a specified border security threat level and the number of trips on Bates Well Road would be reduced, the establishment of the FOB would result in no other change to field operations.

1.5 APPLICABLE ENVIRONMENTAL GUIDANCE, STATUTES, AND REGULATIONS

This EA was prepared in compliance with provisions of the NEPA of 1969 as amended (42 United States Code [U.S.C.] 4321 *et seq.*), Council on Environmental Quality's (CEQ) NEPA implementing regulations at 40 Code of Federal Regulations (CFR) Part 1500, and DHS *Directive 023-01*. This EA will be the vehicle for compliance with all applicable environmental statutes.

1.6 REPORT ORGANIZATION

This EA is organized into six major sections, including this introduction. Section 2.0 describes all alternatives considered for the project. Section 3.0 discusses the environmental resources potentially affected by the project and the environmental consequences for each of the viable alternatives. Section 4.0 discusses environmental design measures. Sections 5.0 and 6.0 present a list of the references cited in the document and a list of acronyms and abbreviations used in the document, respectively. Appendix A provides a copy of the OPCNM-issued Special Use Permit (IMR ORPI 9500 10-04) which allows for the operation of the existing tactical camp on the OPCNM. Correspondence generated during the preparation of this EA can be found in Appendix B. A list of Federal and state protected species for Pima County is included in Appendix C, and Appendix D provides the model calculations used to determine air quality impacts for the EA.

SECTION 2.0

PROPOSED ALTERNATIVES



2.0 PROPOSED ALTERNATIVES

Four alternatives were identified and evaluated in this EA: 1) the Proposed Action, 2) Fossil Fuel Generator, 3) CPNWR Location, and 4) No Action. The following paragraphs describe the alternative selection process and the alternatives considered.

2.1 PROPOSED ACTION

The Proposed Action would expand the existing USBP Ajo Station tactical camp on the northeast corner of the intersection of Bates Well Road and the western boundary of the OPCNM. Figure 2-1 is a conceptual layout of the proposed FOB. The existing tactical camp has a 1-acre footprint within the non-wilderness corridor which parallels Bates Well Road. The FOB would be built on a total of 3 acres within the non-wilderness corridor (Figure 2-2). Based upon potential site designs, it has been determined that a 3-acre project area is sufficient in size to accommodate FOB facilities supporting a maximum of 32 personnel. The FOB would be designed with modular buildings for more efficient construction and reduced costs. Efforts would be made when designing the FOB to meet the Leadership in Energy and Environmental Design (LEED) Silver certification by the U.S. Green Building Council. The proposed FOB would include the following components:

- Agent living quarters
- Support/maintenance building
- Detention Building
- Fuel Stations
- Dining facility
- Water well and water storage
- Generator(s)
- Vehicle parking
- Horse stalls and hay storage
- All-terrain vehicle (ATV) storage
- Secure storage
- Security lighting
- 8-foot chain-link security fencing
- Administration building

The proposed FOB construction activities are projected for the fall of 2011 through the spring of 2012. Full build-out of all proposed components, including full solar power capabilities, may be constructed in phases which could occur over up to 5 years. This EA will estimate that the solar panels would be installed by year 5. Until year 5, the FOB would rely on generators for full-time power.

A 6,400-square-foot solar array including batteries and switching/converting equipment would be installed to provide power for the FOB. The system would be backed up by a generator that would provide power to the site and would charge the battery bank, if needed. It is estimated that two 200-kilowatt generators would be needed to power the FOB. Only one generator would be in operation at any one time. The generators would be run on a weekly schedule, alternating operation and maintenance. Generators would be baffled to limit noise emissions to 35 A-weighted decibels (dBA) at 492 feet from the emission source. The solar panels would be attached to the rooftops of the FOB's modular buildings.

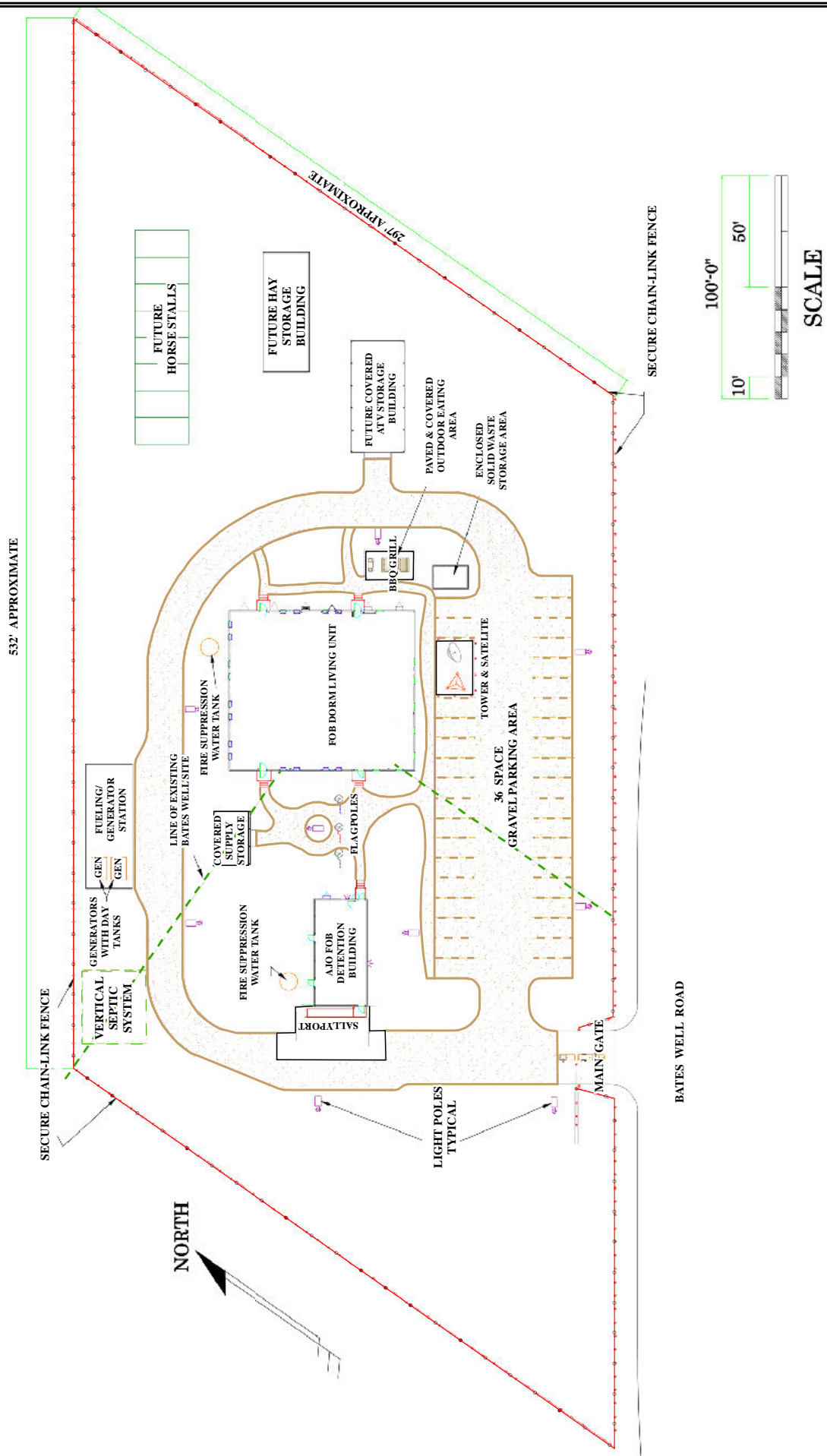


Figure 2-1: Conceptual Site Layout

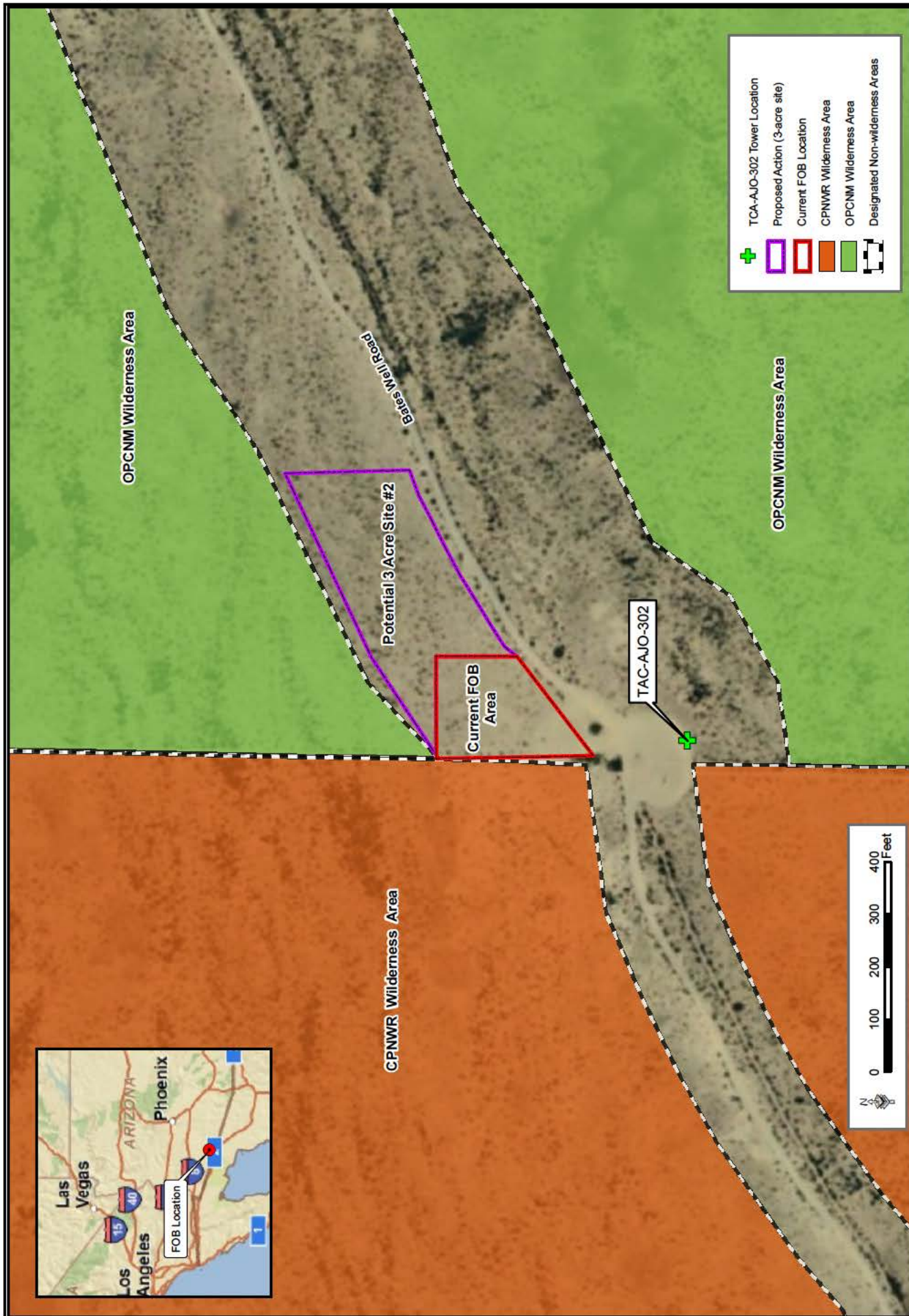


Figure 2-2: Project Location Map

A fuel facility with aboveground storage tanks (ASTs) or portable ASTs for vehicle and generator fuel would be included. Fuel requirements for vehicles and full-time generator use would be approximately 7,300 gallons per week. Both diesel and gasoline would be stored on-site. Fuel deliveries would be required once weekly via 8,600-gallon tanker truck. If a smaller tanker truck is necessary due to accessibility issues on Bates Well Road, additional trips would be necessary.

The agent living quarters and dining facility would support a maximum force of 32 Agents. CBP estimates that deployment of Agents to the FOB will be as follows: October to December, 8 to 16 agents; January to March, 16 to 24 agents; and April to September, 24 to 32 agents. The number of agents assigned to the FOB may vary based on border security requirements, but would not exceed the design capacity. Additional modular facilities would support office space, an armory, and a detention center capable of holding up to 40 detainees. All food and other supplies would be delivered weekly during shift change.

Water requirements at the FOB would be met by digging a well. If the well does not provide adequate quality or quantity of water for both potable and fire suppression requirements, water will continue to be trucked in from the Ajo Station. The estimates for potable water requirements are approximately 32 gallons per Agent per day and approximately 5 gallons per detainee. Therefore, 1,224 gallons of potable water per day would be required at the FOB.

Included in the FOB layout would be parking spaces for government-owned vehicles and specialized vehicles. Equestrian support facilities for up to eight horses at the FOB are also included in the conceptual design.

Maintenance at the FOB would include refilling fuel ASTs, delivery of food, equipment, and supplies, and if necessary, water. The number of maintenance trips and refueling trips will vary depending on the number of agents stationed at the FOB and rate of fuel usage. It is anticipated that four vehicle trips to and from the FOB per month will be required for maintenance. Tanker trucks with dual rear tires and/or rear dual axles with a gross vehicle weight of (GVW) 30,000 pounds will be used to deliver fuel. A total of approximately 48 vehicle trips per year will occur for maintenance activities.

The continued maintenance as well as potential renovations of or minor additions to the FOB would be expected. Such activities could include, but are not limited to, minor renovations and additions to buildings such as realigning interior spaces of an existing building, adding a small storage shed to an existing building. Other maintenance activities could include routine upgrade, repair, and maintenance of the FOB buildings, roofs, parking area, grounds, or other facilities which would not result in a change in its functional use (e.g., replacing door locks or windows, painting interior or exterior walls, culvert maintenance, grounds maintenance, or replacing essential components such as an air conditioning unit).

2.2 FOSSIL FUEL GENERATOR ALTERNATIVE

The Fossil Fuel Generator Alternative includes the same features and 3-acre footprint identified for the Proposed Action; however, the FOB would be powered solely by diesel generators with

battery backup systems. It is estimated that two 200-kilowatt generators would be needed to power the FOB. Generators would be baffled to limit noise emissions to 35 dBA at 492 feet from the emission source.

2.3 CPNWR LOCATION ALTERNATIVE

The CPNWR Location Alternative includes the same facility components identified for the Proposed Action; however, the FOB site would be located on the CPNWR adjacent to the north and south of El Camino del Diablo (Bates Well Road) and the CPNWR eastern boundary. The 3-acre site would be located entirely within the non-wilderness corridor which parallels El Camino del Diablo within the CPNWR (Figure 2-3). Power for the facility would be provided by solar or other alternative fuel sources with diesel generator backup.

2.4 NO ACTION ALTERNATIVE

The No Action Alternative would maintain the USBP Ajo Station tactical camp within its current 1-acre footprint, and no expansion would occur. Current equipment at the tactical camp includes three 8- by 24-foot connex boxes, a portable horse corral, three portable generators, one diesel fuel trailer, 1,000-gallon water truck, a 500-gallon water buffalo on a trailer, and one portable light generator. A 32-person, deep-discharge septic system was installed as part of the agreement with OPCNM and USFWS when the camp moved from the Bates Well site to the current location (see Appendix A).

The No Action Alternative serves as a basis of comparison to the anticipated impacts of the other action alternative, and its inclusion in this EA is required by NEPA regulations (40 CFR 1502.14(d)).

2.5 ALTERNATIVES CONSIDERED BUT ELIMINATED

2.5.1 Lukeville Location

Locating a FOB at Lukeville was proposed by the NPS and USFWS Arizona Ecological Services Office (AESO) as an alternative to this project. The level of illegal activity east of Lukeville is high; however, the distance from the USBP Ajo Station to patrol areas near Lukeville are easily accessible within 30 minutes on Arizona State Route 85. Additionally, the Lukeville FOB would not provide forward staging of Agents within the far western zones of the Ajo Station AOR. Staging Agents at a FOB in Lukeville would not meet the stated purpose and need of this project, nor would it improve the operational efficiency of the USBP Ajo Station.

2.5.2 Bates Well Road Improvements

An alternative providing for the improvement of Bates Well Road to reduce commuting time of agents was considered. In 2005, a project which proposed these improvements was in the early stages of planning, but the project was abandoned due to inadequate funding and immediate needs elsewhere. For the purposes of this document, the Bates Well Road Improvements alternative would include widening the existing driving surface of Bates Well Road to 18 feet, repairing degraded road sections, repairing incised road sections, and constructing water bars from the Bureau of Land Management (BLM)/OPCNM property boundary to the FOB. A soil

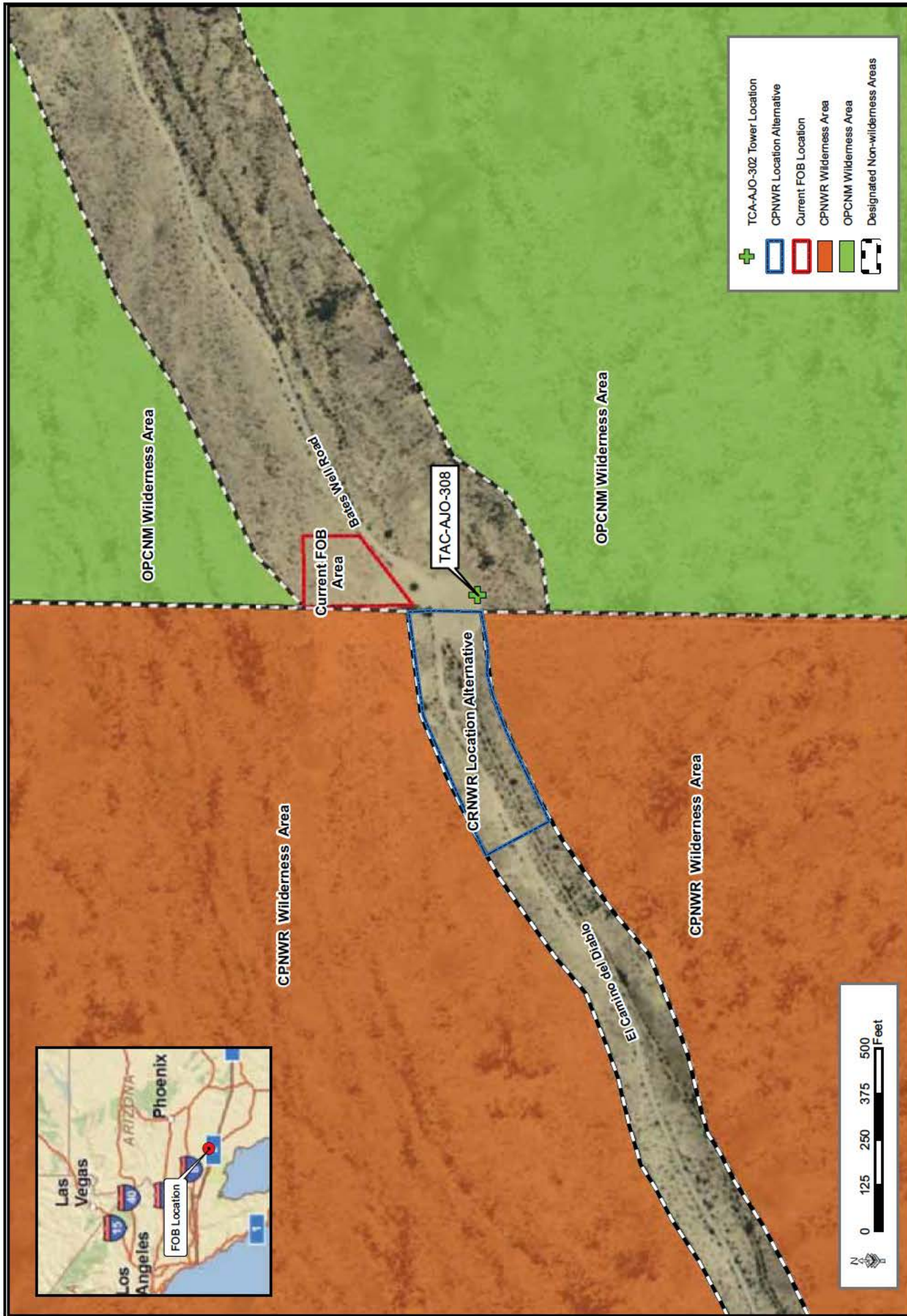


Figure 2-3: CPNWR Location Alternative Map

stabilizer would also be applied to the road surface. USBP would maintain approximately 13 miles of Darby Well Road on Bureau of Land Management lands during construction, and repair the road to pre-project conditions following construction. Darby Well Road would be used to access Bates Well Road from Ajo, Arizona.

This alternative would impact Bates Well Road which has been identified as a historic resource which may be eligible for the National Register of Historic Places. This alternative would also retain the current level of CBP use on Bates Well Road, which has been identified as a potential impact on the listed Sonoran pronghorn. While improvement of the road would reduce travel time to the remote western section of the Ajo Station AOR, it is likely that an hour of commuting time would still be required each way. Upgrading of the road would also not meet other border security requirements which would be met by construction of a FOB (i.e., detention facilities, forward positioning of equestrian facilities, and housing for up to 32 Agents). In addition, the upgrade of the road would be inconsistent with the congressional direction, because Congress has appropriated funds to CBP for the construction of two FOBs within the State of Arizona. Therefore, the alternative was not carried forward for detailed evaluation.

2.6 SUMMARY

The four alternatives selected for further analysis are the Proposed Action, the Fossil Fuel Generator Alternative, the CPNWR Location Alternative, and the No Action Alternative. An alternative matrix (Table 2-1) shows how each of these alternatives satisfies the stated purpose and need.

Table 2-1. Alternative Matrix Comparing Purpose and Need to Alternatives

Purpose and Need	Proposed Action	Fossil Fuel Generator	CPNWR Location	No Action Alternative
Expand the existing tactical camp	Yes	Yes	Yes	No
Provide a facility capable of housing up to 32 USBP Agents	Yes	Yes	Yes	No
Provide a detention facility	Yes	Yes	Yes	No
Decrease travel time from the Ajo Station to patrol areas	Yes	Yes	Yes	Partial*
Increase patrol efficiency and reduce response within the Ajo AOR	Yes	Yes	Yes	Partial*

* The No Action Alternative would partially meet the purpose and need due to the continued use of USBP Agents in the field and of the existing tactical camp

SECTION 3.0
AFFECTED ENVIRONMENT AND CONSEQUENCES

3.0 AFFECTED ENVIRONMENT AND CONSEQUENCES

3.1 IMPACT ANALYSIS

This section of the EA describes the natural and human environment that exists within the project area for this EA (as described in Section 1.1), and the potential impacts of the alternatives as outlined in Section 2.0 of this document. Only those resources with the potential to be impacted by the Proposed Action are described, per CEQ regulation (40 CFR 1501.7 [3]). Impacts can vary in magnitude from a slight to a total change in the environment. The impact analysis presented in this EA is based upon existing regulatory standards, scientific and environmental knowledge, and professional opinions.

Some topics are limited in scope due to the lack of direct impact from the proposed project on the resource, or because that particular resource is not located within the project corridor and these resources are not addressed for the following reasons.

Climate

The climate would not be impacted by the construction and operation of the Proposed Action.

Prime Farmlands

The Proposed Action would not impact any soils designated as Prime Farmlands as protected under the Farmland Protection Policy Acts of 1980 (P.L. 97-98).

Surface Waters and Waters of the U.S.

The Proposed Action would not impact any surface waters or potentially jurisdictional waters of the United States because there are no surface waters or potential waters of the United States within the area proposed for the FOB expansion.

Wild and Scenic Rivers

The Proposed Action would not impact any designated Wild and Scenic Rivers (16 U.S.C. 551, 1278[c], 1281[d]) because no rivers designated as such are located within or near the proposed FOB expansion area.

Floodplains

The Proposed Action would not impact any floodplains because there are no floodplains within the area proposed for the FOB expansion.

Utilities

The FOB would be self-supporting; therefore, its expansion would not impact the availability or supply of public utilities.

A discussion of how impacts were defined was included in the December 2009 *SBI*net Ajo-1 EA, and is incorporated herein by reference (CBP 2009). In summary, impacts can be either beneficial or adverse, and can be either directly related to the action or indirectly caused by the action. The alternatives may create temporary (lasting the duration of construction), short-term (up to 3 years), or long-term (greater than 3 years) impacts.

Impacts on each resource can vary in degree or magnitude from a slightly noticeable change to a total change in the environment. For the purpose of this analysis, the intensity of impacts will be classified as negligible, minor, moderate, or major.

The following discussions describe and, where possible, quantify the potential impacts of each alternative on the resources within or near the project area. All impacts described below are considered to be adverse unless stated otherwise.

3.2 LAND USE

3.2.1 Affected Environment

A discussion of land use was included in the December 2009 *SBI*net Ajo-1 EA, and is incorporated herein by reference (CBP 2009). Land at the site of the Proposed Action and Fossil Fuel Generator Alternative is managed by NPS and USFWS. These lands are used primarily for the protection of the Sonoran Desert Ecosystem, for recreational and educational purposes, and for the conservation of desert bighorn sheep (*Ovis canadensis nelsoni*) on the CPNWR. Approximately 95 percent of OPCNM and approximately 93 percent of CPNWR are designated wilderness. Designated wilderness areas are discussed in detail in Section 3.3.

The location of the existing tactical camp was selected by the USFWS and NPS in cooperation with CBP. OPCNM allows the operation of the existing tactical camp under Special Use Permit number IMR ORPI 9500 10-04.

Currently, land uses within the project area are directly and indirectly affected by CBV pedestrian and vehicle traffic, and consequent law enforcement activities. Natural desert areas experience damage to native vegetation and soil compaction. The effect of illegal cross-border activities within the project area has a negative impact on wilderness, wildlife, recreation, and authorized land uses. Currently, the majority of the western portion of OPCNM is closed to the visiting public for safety reasons as a result of heavy illegal cross-border traffic and activities (NPS 2009a). Litter and human waste has degraded the visual and natural resources on OPCNM and CPNWR lands. Davis (2005) reported that BLM estimated that each pedestrian CBV deposits an average of 8 pounds of trash. Trash is generally distributed along major illegal routes but is highly concentrated in passes and frequently used areas where CBVs concentrate. Deposition of trash and human waste detracts from the wilderness aspect of Organ Pipe Cactus Wilderness and Cabeza Prieta Wilderness. Additionally, unauthorized vehicle routes and unauthorized trails, and man-caused fires (CBV warming fires and signal fires) disturb or destroy native vegetation and wildlife habitat. In 2004 and 2005, OPCNM staff documented 364 miles of off-road vehicle routes and tracks created by CBVs and consequent law enforcement activity (OPCNM 2005). On CPNWR, 500 miles of unauthorized entrenched roads and 700 more miles of unauthorized trails and loosely cut roads exist (Di Silvestro 2007 and Guillot 2007). Further, illegal cross-border activities destroy fences resulting in livestock trespassing, which results in additional damage to natural resources. Any fences damaged during required USBP interdiction activities are repaired by USBP agents following completion of the interdiction action (USBP 2009).

3.2.2 Environmental Consequences

3.2.2.1 *Proposed Action*

The Proposed Action would change the primary use on 2 acres of the 330,689-acre OPCNM from lands managed primarily for conservation purposes to lands developed with CBP facilities. The lands which would be developed are located along a public road, immediately adjacent to the existing Ajo Station tactical camp and across the public road from the 120-foot-tall SBI*net* tower (Photograph 3-1). The Proposed Action would have long-term, minor adverse impacts on land use in the project area.



Photograph 3-1. Overview of existing tactical camp with SBI*net* tower in background, facing south.

3.2.2.2 *Fossil Fuel Generator Alternative*

The Fossil Fuel Generator Alternative would have the same 2-acre direct impact on land use as the Proposed Action.

3.2.2.3 *CPNWR Location Alternative*

If the FOB expanded westward rather than eastward as under the Proposed Action, the land use impacts would shift from OPCNM lands to CPNWR lands. Therefore, 3 acres of the 860,810-acre CPNWR, which are managed primarily for conservation purposes, would change to developed lands with CBP facilities. The lands which would be developed are also located along a public road, immediately adjacent to the existing Ajo Station tactical camp and northwest of the 120-foot-tall SBI*net* tower. The expansion of the FOB would result in a long-term, minor adverse impact on land use in the project area.

3.2.2.4 *No Action Alternative*

Under the No Action Alternative, the tactical camp would not be expanded. No changes in land use would occur. The tactical camp encompasses approximately 1 acre of the OPCNM. More Agents would be required to patrol remote zones west of Bates Well Camp to account for the necessary drive time to their patrol post.

3.3 WILDERNESS

3.3.1 *Affected Environment*

The Wilderness Act of 1964 (Public Law [P.L.] 88-577 [Wilderness Act]) allowed for the establishment of a National Wilderness Preservation System and allows for the establishment of wilderness on Federally owned lands as designated by Congress. Areas designated as wilderness are to be administered in such a manner as to leave the lands undisturbed for future use and enjoyment by the public as wilderness and to provide protection of these areas for the preservation of their wilderness character. As defined by the Wilderness Act, wilderness should provide for the opportunities to experience solitude, unconfined recreation, and naturalness. To maintain the wilderness characteristics of designated wilderness areas, certain activities are prohibited, including commercial enterprise and permanent roads, and, except as necessary to meet minimum requirements for the administration of the area for the purpose of the Wilderness

Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation (16 U.S.C. 1131-1136).

Components of wilderness character include the presence of native wildlife at naturally occurring population levels; lack of human structures, roads, motor vehicles or mechanized equipment; lack of crowding or large groups; few or no human "improvements" for visitor conveniences; and little or no sign of biophysical damage caused by visitor use, such as trampled or denuded ground. Some intangible components of wilderness character include outstanding opportunities for reflection, freedom, risk, adventure, discovery, and mystery; places where self-reliance and safety are a personal responsibility; untrammeled, wild, and self-willed land not for sale; opportunities to experience our humanity as connected to the larger community of life; places that forever provide solitude and respite from modern civilization, its technologies, conventions, and conveniences. The area where the Ajo Station FOB is proposed for construction under both the Proposed Action and the CPNWR Location Alternative would not meet many of these wilderness character components (e.g., lack of human structures, roads, motor vehicles, little or no sign of biophysical damage caused by visitor use, untrammeled, respite from technologies). The areas, as previously described are adjacent to a public road and existing developments, impacted by CBV activity and where visitor access is at least partially restricted due to safety concerns.

There are designated wilderness areas on both the OPCNM and the CPNWR. Organ Pipe Cactus Wilderness was created within OPCNM by the National Parks and Recreation Act of 1978 (P.L. 95-625). It encompasses 95 percent (312,660 acres of designated wilderness and 1,240 acres of potential wilderness) of the OPCNM and was created to celebrate the life and landscape of the Sonoran Desert (NPS 1997). Cabeza Prieta Wilderness was created within CPNWR by the 1990 Arizona Wilderness Act (P.L. 101-628). It encompasses 93 percent (803,418 acres) of CPNWR and was created to preserve the Sonoran Desert Ecosystem. Within the Arizona Wilderness Act, Congress included the following provision:

“(g) Law Enforcement Border Activities. - Nothing in this title, including the designation as wilderness of lands within the Cabeza Prieta National Wildlife Refuge, shall be construed as—(1) precluding or otherwise affecting continued border operations by the Immigration and Naturalization Service, the Drug Enforcement Administration, or the United States Customs Service within such refuge, in accordance with any applicable interagency agreements in effect on the date of enactment of this Act;”

The existing tactical camp is located within a non-wilderness corridor which parallels the entire route of the Bates Well Road/El Camino del Diablo through the OPCNM and CPNWR. On the topic of development within non-wilderness areas directly adjacent to designated wilderness areas, Section 2(d) of the 1990 Arizona Wilderness Act includes the following provision:

No Buffer Zones - The Congress does not intend for the designation of wilderness areas in the State of Arizona pursuant to this title to lead to the creation of protective perimeters or buffer zones around any such wilderness area. The fact that non-

wilderness activities or uses can be seen and heard from areas within a wilderness area shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area.

Backcountry overnight use within OPCNM has been precluded for the last several years by the NPS due to visitor safety concerns. It is unknown when these current restrictions will be lifted. Therefore, there is currently no overnight wilderness use within OPCNM. NPS and USFWS estimate that visitor road use of the Bates Well Road is approximately 4,000 vehicles annually. Use by persons seeking a wilderness recreation experience in the project vicinity is not currently known, but not expected to be very high.

3.3.2 Environmental Consequences

3.3.2.1 Proposed Action

The expanded FOB would not be located on any lands which have been designated as wilderness by Congress. However, the facilities would be audible and visible from wilderness lands adjacent to the FOB.

The FOB is an unnatural element in an area visited for its untrammelled, natural, undeveloped setting with an outstanding opportunity for solitude. In the *SBI*net Ajo-1 Project EA, a viewshed analysis was conducted for the nearby tower site, TCA-AJO-302. Depending on the location and elevation of the viewer, the tower would be visible from the eastern portion of CPNWR (CBP 2009). It is possible that the current tactical camp and planned FOB would also be visible from locations within the designated wilderness areas. The Proposed Action would have a long-term, minor impact on the Cabeza Prieta Wilderness Area and the Organ Pipe Wilderness Area. Beyond a relatively short distance or without an overlook providing an observation point, there would be no impact on the region's wilderness characteristics. Congress has determined that sights and sounds from adjacent non-wilderness areas are not a sufficient reason to preclude wilderness designation. A number of wilderness areas have been designated adjacent to major cities. For example, the entire city of Tucson is visible from many locations within the Rincon Mountain Wilderness Unit of Saguaro National Monument. The proposed facility would be visible, but taken in the context of previously developed lands in the project vicinity; the increased visibility of these additional facilities would have a negligible additional impact on the wilderness experience, as most visitors would be driving the road which is adjacent to the existing tactical camp/proposed expanded FOB and *SBI*net tower facilities (see Photograph 3-1) to access the wilderness experience. The proposed FOB site does not meet many of the wilderness character components (i.e., untrammelled, natural, undeveloped, provides outstanding opportunities for solitude).

Under the Proposed Action alternative, there would be temporary impacts due to construction activities which are expected to last several months. Construction equipment could produce noise emissions up to 81 dBA during the FOB expansion. The Federal Highway Administration has established a construction noise abatement criterion of 57 dBA for lands where serenity and quiet are of extraordinary significance (23 CFR 722, Table 1). A total of 39 acres of designated wilderness would be temporarily impacted by noise levels above 57 dBA during the expansion of the FOB. Noise emissions during construction activities would have a temporary, moderate

impact on the quality of designated wilderness. A detailed noise analysis is provided in Section 3.11.

The long-term noise footprint from backup generators and air conditioners would be smaller than the current noise footprint of the No Action alternative. The proposed FOB would run off of solar power with a diesel generator as a backup power source. The development of solar power would reduce the duration of generator noise emissions to only 2 to 4 hours per month. Noise emissions from the operation of the FOB would be localized and would have a long-term, minor impact on designated wilderness. Impacts from noise emissions would be less in both duration and magnitude than those currently experienced from the diesel generators in continuous use at the tactical camp site.

Given the relatively small area impacted by construction and operational noise, juxtaposition of the FOB adjacent to a public road in the vicinity of other developments and low wilderness visitor use levels in the project area, the proposed action is anticipated to have long-term, minor impacts on wilderness values.

3.3.2.2 Fossil Fuel Generator Alternative

The Fossil Fuel Generator Alternative would have the same visual impacts on wilderness as discussed for the solar-powered FOB in the Proposed Action; however, long-term impacts on noise levels would be greater. The proposed FOB would be powered by a 200-kilowatt diesel-fueled generator, running continuously. Although OPCNM has reported that ambient noise on OPCNM is 20 dBA, CBP, OPCNM, and USFWS have agreed that a noise emission at or below 35 dBA should be the goal for long-term noise levels (Sturm 2009). Therefore, wilderness qualities (e.g., serenity) would be degraded within this noise contour, which encompasses approximately 17 acres of the 1,116,078 acres of designated wilderness within CPNWR and OPCNM. Noise emissions from the operation of generators at the FOB would be localized and would have a long-term, moderate impact on designated wilderness.

3.3.2.3 CPNWR Location Alternative

The FOB expansion on CPNWR lands would be run on solar or other alternative fuel power with diesel generator backups. Impacts on the designated wilderness areas from noise and visual impediments would be the same as those described for the Proposed Action. However, Congress specifically authorized CBP operational activities when establishing the CPNWR wilderness area (P.L. 101-628).

3.3.2.4 No Action Alternative

Under the No Action Alternative, there would be long-term, moderate impacts on wilderness from noise emissions from the continuous use of the generator at the existing tactical camp. The generator is unbaflled and impacts approximately 64 acres of designated wilderness.

3.4 GEOLOGY AND SOILS

3.4.1 Affected Environment

Geology

As discussed in the SBI*net* Ajo-1 Tower Project EA, the project area is part of the Basin and Range Physiographic Province as delineated by the U.S. Geological Survey (USGS and

California Geologic Survey 2000). The geology discussion is incorporated herein by reference (CBP 2009).

Soils

The mapped soil type at the proposed FOB expansion sites is the Growler-Antho complex (NPS 2005). The soil complex is a gravelly loam, with moderate permeability, and a slight to moderate erosion hazard. The erosion hazards are based on undisturbed soils. To prevent soil loss, best management practices (BMP) would be implemented, as described in the Stormwater Pollution Prevention Plan (SWPPP), during construction activities to avoid significant soil loss.

3.4.2 Environmental Consequences

3.4.2.1 Proposed Action

Geology

The Proposed Action primarily involves disturbances to topsoil layers. During construction activities, any holes or excavations for either perimeter fence posts or foundations for modular buildings would impact an area no larger than approximately 50 square feet and would not significantly alter the geologic features or processes in the project area.

Soils

Expansion of the FOB would have a direct permanent impact on 2 acres of Growler-Antho complex soils. The disturbance of 2 acres of soils would be minor when examined on a regional scale. The Growler-Antho complex covers approximately 16,243 acres on the OPCNM. Much of the expansion site for the FOB has been previously disturbed. Limited erosion would be expected during and immediately following construction activities. A SWPPP, including BMPs, would be prepared prior to construction. Additionally, CBP will obtain materials, such as gravel or topsoil, that are clean and acceptable to the land management agency from existing developed or previously used sources, not from undisturbed areas adjacent to the project area.

3.4.2.2 Fossil Fuel Generator Alternative

The Fossil Fuel Generator Alternative would have the same impacts on geology and soils as discussed for the solar-powered FOB in the Proposed Action.

3.4.2.3 CPNWR Location Alternative

The FOB expansion on CPNWR lands would cause the same impacts on geology and soils as discussed for the Proposed Action.

3.4.2.4 No Action Alternative

Under the No Action Alternative, there would be no expansion of the FOB. Therefore, there would be no additional impacts on the soils or geologic resources of the area. The current tactical camp disturbed 1 acre of the Growler-Antho complex soils.

3.5 HYDROLOGY AND GROUNDWATER

3.5.1 Affected Environment

The FOB expansion site is located in the Arizona Department of Water Resources (ADWR) Western Mexican groundwater basin. The Western Mexican Basin lies along the international

boundary with Mexico and occupies approximately 610 square miles on the U.S. side of the border. The basin is characterized by desert valleys and low-level mountain ranges. The average annual rainfall ranges from 4 inches per year in the western portion of the basin to 14 inches per year in the far eastern portion of the basin. Vegetation types include Lower Colorado River Valley and Arizona Uplands Sonoran Desertscrub (Brown 1991).

On the U.S. side of the Western Mexican Basin, the land use is almost exclusively Federal lands with no irrigated croplands. NPS monitoring data shows a decline in groundwater levels that has been attributed to water pumping from the aquifer, and drought (OPCNM 2011). On the Mexico side of the border, the basin (called the Sonoyta Valley aquifer) area is 5,000 square miles. Land use on the Mexican side of the basin is primarily agriculture. Agricultural irrigation draws a significant portion of its water needs from the Sonoyta Valley aquifer. Overall, the balance of water stored in the Western Mexican Basin experiences an annual deficit, and the amount of groundwater stored in the basin is steadily declining (ADWR 2008).

3.5.2 Environmental Consequences

3.5.2.1 *Proposed Action*

Currently, all water at the existing tactical camp is brought to the site and stored in tanks for use. Under the Proposed Action, a water well would be established on-site to meet the demands of the FOB. Daily water usage would be up to approximately 1,024 gallons per day, assuming that 32 Agents would use 32 gallons of water each per day (Adkins 2011). The detention facility has a capacity of up to 40 people. By design, detainees would be at the site for a limited time, so it can be assumed that their water consumption would be minimal (e.g., 5 gallons of water each per day or up to 200 gallons per day total). Sanitary waste from toilets, showers, and sinks will continue to be collected and disposed of through an existing deep-discharge septic system with a leach field located on-site. If water needs at the FOB exceed what the water well can produce, or if the well water can be used for sanitary purposes only, potable water would be trucked into the FOB. Minor impacts on groundwater quality and availability would occur. The water well would be certified as potable, and CBP will comply with all applicable ADEQ regulations on drinking water.

The location of the well proposed to support the FOB would be within the 3-acre site. There is no evidence that groundwater in this location is hydrologically connected to the source of water for Quitobaquito Spring which provides habitat for the Quitobaquito pupfish (Carruth 1996).

Water required during construction would be brought to the site from an outside source. Additionally, a SWPPP would be prepared prior to construction and would contain drainage controls to prevent soil erosion. The planned FOB expansion would have a minor impact on hydrology and groundwater. Efforts to minimize the impact of the Proposed Action on all water resources are listed below.

- Standard construction procedures will be implemented to minimize the potential for erosion and sedimentation during construction. All work shall cease during heavy rains and would not resume until conditions are suitable for the movement of equipment and material. All fuels, waste oils, and solvents will be collected and stored in tanks or drums within secondary containment areas consisting of an impervious floor and bermed

sidewalls capable of holding the volume of the largest container stored therein. The refueling of machinery will be completed following accepted guidelines, and all vehicles will have drip pans during storage to contain minor spills and drips. No refueling or storage will take place within 100 feet of drainages.

- A Construction Stormwater General Permit will be obtained prior to construction, and this would require approval of a site-specific SWPPP and Notice of Intent. A site-specific SPCCP will also be in place prior to the start of construction. Other environmental design measures will be implemented, such as silt fencing, aggregate materials, and wetting compounds to decrease erosion and sedimentation.
- CBP will avoid impacts on groundwater by obtaining treated water from outside the immediate area for construction use. CBP storage tanks containing untreated water will be of a size that, if a rainfall event were to occur, the tank (assuming open) will not be overtopped and cause a release of water into the adjacent drainages. Water storage on the project area will be in on-ground containers located on upland areas, not in washes.

3.5.2.2 Fossil Fuel Generator Alternative

The Fossil Fuel Generator Alternative would have the same impacts on groundwater and hydrology as discussed for the solar-powered FOB in the Proposed Action.

3.5.2.3 CPNWR Location Alternative

The FOB expansion on CPNWR lands would cause the same impacts on hydrology and groundwater as discussed for the Proposed Action.

3.5.2.4 No Action Alternative

The No Action Alternative would not impact hydrology and groundwater, as the FOB would not be expanded. All water used at the existing tactical camp is brought to the site, stored in tanks for use, and treated in the on-site septic system. Indirect impacts from illegal activity would continue.

3.6 VEGETATIVE HABITAT

3.6.1 Affected Environment

Biological surveys of proposed FOB expansion areas on the OPCNM and CPNWR were conducted in March 2011. The survey area included a 300-foot buffer zone around both the existing tactical camp and the potential FOB expansion site. An additional area (approximately 3 acres) was surveyed on CPNWR as an alternative. The vegetative habitat observed within both surveyed areas is considered Sonoran Desertscrub Lower Colorado River Subdivision as described by Brown (1994). A discussion of this vegetative habitat type is incorporated herein by reference from the December 2009 SBI^{net} Ajo-1 EA (CBP 2009). Dominant vegetation observed within the survey area includes creosote bush (*Larrea tridentata*) and triangle-leaf bursage (*Ambrosia deltoidea*). Other perennial vegetation noted includes: white bursage (*Ambrosia dumosa*), velvet mesquite (*Prosopis velutina*), wolfberry (*Lycium* sp.), barrel cactus (*Ferocactus emoryi*), night-blooming cereus (*Peniocereus greggii*), and big galleta (*Pleuraphis rigidus*). The area was extremely dry at the time of the survey and no living annual vegetation was observed. However, dried remnants of several annual species were noted: fiddleneck

(*Amsinkia intermedia*), wooly plantain (*Plantago insularis*), spiny herb (*Chorizanthe rigida*), peppergrass (*Lepidium lasiocarpum*), a mustard (*Brassica* sp.), and bladderpod (*Lesquerella gordonii*). Dried infructescences of Ajo lily (*Hesperocallis undulatus*) were also noted.

3.6.2 Environmental Consequences

3.6.2.1 Proposed Action

The Proposed Action would result in the permanent loss of approximately 2 acres of Sonoran Desertscrub vegetation community. The Sonoran Desertscrub vegetation community is extremely common, and vast areas of similar vegetation are protected by their inclusion on lands managed by CPNWR, Barry M. Goldwater Bombing Range, Buenos Aires National Wildlife Refuge, OPCNM, and the Tohono O'odham Nation.

The direct permanent degradation and removal of 2 acres of vegetation would have a long-term, negligible adverse impact on the overall Sonoran Desertscrub vegetation communities within OPCNM. Efforts to minimize the direct loss of vegetation communities are listed below.

- CBP will minimize habitat disturbance by restricting vegetation removal to the smallest possible project footprint. CBP will limit the removal of cacti and brush to the smallest amount needed to meet the objectives of the project.
- CBP will use natural materials free of non-native plant seeds and other plant parts to limit potential for infestation for on-site erosion control in uninfected native habitats. Natural materials will be certified weed and weed-seed free. CBP will identify fill material brought in from outside the project area by its source location and will use sources that are clean and weed-free. Outside fill material must be approved by the land management agency prior to use.
- CBP will document any establishment of non-native plants and will implement appropriate control measures.

3.6.2.2 Fossil Fuel Generator Alternative

The Fossil Fuel Generator Alternative would have the same impacts on vegetation communities as discussed for the solar-powered FOB in the Proposed Action.

3.6.2.3 CPNWR Location Alternative

The FOB expansion on CPNWR lands would cause the equivalent impacts on 3 acres of vegetation communities as discussed for the Proposed Action.

3.6.2.4 No Action Alternative

No direct impacts would occur, as the FOB would not be expanded. The existing tactical camp has impacted 1 acre of highly disturbed Sonoran Desertscrub.

3.7 WILDLIFE AND AQUATIC RESOURCES

3.7.1 Affected Environment

A description of Sonoran Desert wildlife typical for the project area was discussed in detail in the December 2009 SBI^{net} Ajo-1 EA. That discussion is incorporated herein by reference (CBP 2009).

Biological surveys of proposed FOB expansion areas on the OPCNM and CPNWR were conducted in March 2011. Animals observed during the March 2011 survey effort include: jumping spider (*Phidippus* sp.), western whiptail (*Aspidoscelis tigris*), side-blotched lizard (*Uta stansburiana*), Eurasian collared dove (*Streptopelia decaocto*), common raven (*Corvus corax*), sage thrasher (*Oreoscoptes montanus*), phainopepla (*Phainopepla nitens*), loggerhead shrike (*Lanius ludovicianus*), and coyote (*Canis latrans*).

3.7.2 Environmental Consequences

3.7.2.1 Proposed Action

The permanent loss of up to 2 acres of Sonoran Desert vegetation communities would have a minimal impact on wildlife. Soil disturbance and operation of heavy equipment could result in the direct loss of localized individuals such as lizards, snakes, and ground-dwelling mammal species. However, most wildlife would avoid any direct harm by escaping to surrounding habitat. The direct degradation and loss of habitat could also impact burrows and nests, as well as cover, forage, and other important wildlife resources. The loss of these resources would result in the displacement of individuals which would then be forced to compete with other wildlife for the remaining resources. Although this resulting competition for resources could result in a reduction of total population size, this reduction would be extremely minimal in relation to total population size and would not result in long-term impacts on the sustainability of any wildlife species. The Proposed Action would have a short-term, minor adverse impact on wildlife resources.

Increased vehicular traffic along Bates Well Road during construction of the proposed FOB could also cause minor impacts on wildlife; however, since construction traffic represents a small fraction of the total road use, any such impacts would be negligible.

The long-term noise emissions associated with operation of the solar-powered FOB (i.e., generators and air conditioners) would be sporadic, only occurring when this equipment is operating. It is anticipated that wildlife would become accustomed to these intermittent and minimal increases in noise, and that subsequent avoidance of the FOB and any adjacent habitats would be minor. Noise emissions expected from the solar- or alternative-fueled FOB would be considerably less invasive than the current unbaffled generators at the tactical camp. Conservation measures listed below would reduce disturbance and loss of wildlife habitats.

- The Migratory Bird Treaty Act (16 U.S.C. 703-712, [1918, as amended 1936, 1960, 1968, 1969, 1974, 1978, 1986 and 1989]) requires that Federal agencies coordinate with the USFWS if a construction activity would result in the take of a migratory bird. If construction or clearing activities are scheduled during nesting seasons (March 15 through August 31), surveys will be performed to identify active nests.
- To prevent entrapment of wildlife species during construction, CBP will cover all excavated, steep-walled holes or trenches more than 2 feet deep at the end of each working day with plywood or provide these holes with escape ramps of earthen fill or wooden planks. Biological monitors will thoroughly inspect all holes and trenches for trapped animals, and if animals are present, no construction can resume until the animals are out of the pit or trench.

- Biological monitors will check under construction equipment for wildlife species (e.g., desert tortoise) prior to moving equipment that has sat idle for more than 1 hour.

3.7.2.2 Fossil Fuel Generator Alternative

The Fossil Fuel Generator Alternative would have the same impacts on wildlife as discussed for the solar-powered FOB in the Proposed Action during construction; however, impacts on wildlife from increased noise levels would be greater. Long-term noise emissions from the FOB generators would be attenuated to 35 dBA beyond 492 feet of the FOB. Noise emissions from the continuous operation of the generators at the FOB would be localized and would have long-term, minor impacts on wildlife.

3.7.2.3 CPNWR Location Alternative

The FOB expansion on CPNWR lands would be run on solar or other alternative fuel power with diesel generator backups. Impacts on wildlife from noise would be the same as those described for the Proposed Action.

3.7.2.4 No Action Alternative

Under the No Action Alternative, there would be long-term, minor impacts on wildlife from noise emissions from the continuous use of the generator at the existing tactical camp. The generator is unbaffled and impacts approximately 64 acres.

3.8 PROTECTED SPECIES AND CRITICAL HABITATS

3.8.1 Affected Environment

A description of the Endangered Species Act (ESA) and how it protects Sonoran Desert species in the project area was included in detail in the December 2009 SBInet Ajo-1 EA. That discussion is incorporated herein by reference (CBP 2009). Biological surveys of the project area were conducted in March 2011. All Federal, NPS, and state-protected species potentially occurring in the project area were included in the surveys. The surveys were conducted to determine presence or absence, and no specific protocols were used.

3.8.2 Federal

USFWS lists 14 species as endangered, two as threatened, and three as candidate species within Pima County (Table 3-1; Appendix C). Not all of these species occur within the vicinity of the FOB. Two endangered species have the potential to occur within or near the project area, the lesser long-nosed bat (*Leptonycteris curasoae yerbabuenae*) and Sonoran pronghorn. An ecological description of the lesser long-nosed bat and Sonoran pronghorn was included in detail in the December 2009 SBInet Ajo-1 EA, and that discussion is incorporated herein by reference (CBP 2009). No critical habitat has been designated for either of these species.

The ESA consultation regulations (50 CFR 402) require that agencies undertake an analysis of impacts arising from interrelated and interdependent actions associated with the Proposed Action. The regulations define interrelated actions as actions which are part of a larger action and depend on the larger action for their justification, and interdependent actions are defined as those actions which have no independent utility apart from the action under consideration. The USFWS ESA Consultation Handbook (USFWS 1998) suggests application of the “but for” test

Table 3-1. Federally Listed and Proposed Species Potentially Occurring Within Pima County, Arizona

Common/Scientific Name	Federal/State Status	Habitat	Potential to Occur within or near the Project Area
Yellow-billed cuckoo (<i>Coccyzus americanus</i>)	Candidate	Large blocks of riparian woods.	No – No suitable habitat
Masked bobwhite (<i>Colinus virginianus ridgewayi</i>)	Endangered	Desert grasslands with diversity of dense native grasses, forbs, and brush.	No – Presently only known to occur on Buenos Aires NWR
Southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	Endangered	Cottonwood/willow and tamarisk vegetation communities along river and streams.	No – No suitable habitat
California brown pelican (<i>Pelecanus occidentalis californicus</i>)	Endangered	Coastal lands and islands, also found around lakes and rivers inland.	No – No suitable habitat
Mexican spotted owl (<i>Strix occidentalis lucida</i>)	Threatened	Nests in canyons and dense forests with multi-layered foliage structure.	No – No suitable habitat
Sonoran pronghorn (<i>Antilocapra americana sonoriensis</i>)	Endangered	Broad intermountain alluvial valleys with creosote-bursage and palo verde-mixed cacti associations. Current distribution known to occur on the CPNWR.	Yes - Species present on CPNWR and western OPCNM
Ocelot (<i>Leopardus pardalis</i>)	Endangered	Dense, thorny chaparral communities and cedar breaks.	No – No suitable habitat
Lesser long-nosed bat (<i>Leptonycteris curasoae yerbabuenae</i>)	Endangered	Desertscrub habitat with agave and columnar cacti present as food plants.	Yes – Potential foraging habitat present within project area
Jaguar (<i>Panthera onca</i>)	Endangered	Found in Sonoran desertscrub up through subalpine conifer forest.	No – Extirpated from the area
Sonoyta mud turtle (<i>Kinosternon sonoriense longifemorale</i>)	Candidate	Occurs in pond and streams; however, it is restricted to Quitobaquito Springs and nearby stream habitat.	No – Known to occur at Quitobaquito Springs, but outside of project corridor
Chiricahua leopard frog (<i>Rana chiricahuensis</i>)	Threatened	Streams, rivers, ponds, backwaters, and stock tanks that are mostly free from exotic species at elevations ranging from 1,200 to 4,000 feet.	No – No suitable habitat
Desert pupfish (<i>Cyprinodon macularius</i>)	Endangered	Shallow springs, small streams, and marshes. Tolerant of saline and warm water.	No – Known to occur at Quitobaquito Springs, but outside of project corridor
Gila chub (<i>Gila intermedia</i>)	Proposed Endangered	Pools, springs, cienegas, and streams within the Gila River system.	No – Known populations occur within the Gila River drainage
Gila topminnow (<i>Poeciliopsis occidentalis occidentalis</i>)	Endangered	Small streams, springs, and cienegas within the Gila River system.	No – Known populations occur within the Gila River drainage
Kearney blue star (<i>Amsonia kearneyana</i>)	Endangered	West-facing drainages in the Baboquivari mountains.	No – Project area is west of Baboquivari Mountains

Table 3-1, continued

Common/Scientific Name	Federal/State Status	Habitat	Potential to Occur within or near the Project Area
Pima pineapple cactus (<i>Coryphantha scheeri</i> var. <i>robustispina</i>)	Endangered	Ridges in semi-desert grassland and alluvial fans in Sonoran desertscrub with elevation ranges from approximately 2,300 to 5,000 feet.	No – Known populations occur in east Pima County at high elevations
Nichol Turk's head cactus (<i>Echinocactus horizonthalonius</i> var. <i>nicholii</i>)	Endangered	Unshaded microsites in Sonoran desertscrub on dissected limestone mountains.	No – Known populations occur in east Pima and south Pinal counties
Huachuca water umbel (<i>Liaepsis schaffneriana</i> var. <i>recurva</i>)	Endangered	Cienegas, perennial low gradient streams, wetlands.	No – Known populations found in San Pedro and Santa Cruz River Basins
Acuña cactus (<i>Echinomastus erectocentrus</i> var. <i>acunensis</i>)	Candidate	Acuña cacti are found on granite substrates on rounded small hills at elevations ranging from 1,300-2,000 feet.	No– Known populations are located on OPCNM approximately 8 miles north of the U.S.-Mexico border; however, no individual of this species was observed during the biological field surveys

Source: USFWS 2011b

to determine whether there are interrelated or interdependent actions which require analysis. Since CBP would continue to deploy resources to achieve its border security mission within the Ajo Station AOR regardless of the establishment of the Ajo FOB, there are no interrelated or interdependent activities to be analyzed for ESA compliance.

3.8.2.1 Sonoran Pronghorn

The United States range of the Sonoran pronghorn encompasses approximately 1.6 million acres (USFWS 1998) though only portions of this range provide optimal habitat for the species and optimal habitat varies seasonally and is highly dependent on localized rainfall patterns. The current population of Sonoran pronghorn within the United States range is 170 animals, of which 70 are currently confined to holding pens on CPNWR (USFWS 2011a). Thus, 100 non-captive animals are currently distributed across 1.6 million acres. The species range is confined to lands administered by the following four Federal agencies: NPS (OPCNM), USFWS (CPNWR), BLM and Department of Defense (Barry M. Goldwater Range). Telemetry data and visual records from USFWS, AGFD, and OPCNM have shown that areas associated with the Valley of the Ajo, Growler Valley, and San Cristobal Wash, among others, are or were commonly occupied by Sonoran pronghorn. Based on telemetry data and previous biological surveys, Sonoran pronghorn could occur in the vicinity of the proposed action.

Since 1994, AGFD has been collecting location data and seasonal movement pattern information from weekly aerial surveys of radio-collared pronghorn. AGFD has also collected daily location information from other radio-collared pronghorn. The location data from radio-collared pronghorn has been recently supplemented by monitoring data collected in the project vicinity during days of construction activities by CBP from February 1, 2010 until March 12, 2011. This data was collected pursuant to a Biological Opinion issued for the *SBI*net tower project on OPCNM and adjacent lands (USFWS 2009), and resulted in collection of location data for both radio-collared and non-collared pronghorn. This Biological Opinion required CBP to position an environmental monitor in a skybox located approximately 1 mile east of the proposed FOB during construction of *SBI*net tower TCA-AJO-302 and during relocation of the Bates Well Camp to its current location. Observational data was collected during a total of 120 days (Gulf South Research Corporation [GSRC] 2011 and HDR 2011). The protocol for these observations was as follows:

Before any construction work commenced each day, the monitor conducted hilltop surveys (visual and telemetry, if appropriate) for Sonoran pronghorn at sunrise in close coordination with land managers. If Sonoran pronghorn were detected within 2 miles of the proposed daily project activities, no project work commenced until the Sonoran pronghorn moved, of their own volition, to a distance greater than 2 miles from the activities. During 120 days of observations at this site, a total of 7 individuals or groups of pronghorn were observed, with only a single male being recorded within two miles of the construction activities. Work was suspended until this individual moved more than three miles from the project area. Since no construction activities occurred at any time pronghorn were within less than two miles of the construction area, CBP has determined that these construction activities resulted in no adverse impact on pronghorn.

The USFWS has concluded that pronghorn are particularly susceptible to stress caused by disturbance during the fawning season due to increased energetic demands during this period

(USFWS 2009). As a result, both the NPS on OPCNM and the USFWS on CPNWR have instituted visitor travel restrictions from March 15 to July 15 across the species' range. A review of the weekly AGFD data documents that no radio-collared pronghorn have been recorded within two miles of the FOB expansion site during the last five fawning seasons (Figure 3-1). A review of the data collected from pronghorn on a daily basis documents that a single female pronghorn used habitat in the vicinity of the proposed FOB in 2009-2010.

The rare occurrence of Sonoran pronghorn in the project area was anticipated by CBP, since the present location of the relocated Bates Well Camp was recommended to CBP by the Department of the Interior to offset the impacts of the proposed *SBI*net tower construction project on Sonoran pronghorn (USFWS 2009).

Dominant vegetation observed within the proposed footprint of the FOB includes creosote bush (*Larrea tridentata*) and triangle bur ragweed (*Ambrosia deltoidea*); and other perennial vegetation observed includes burrobush (*Ambrosia dumosa*), velvet mesquite (*Prosopis velutina*), wolfberry (*Lycium* sp.), Emory's barrel cactus (*Ferocactus emoryi*), night-blooming cereus (*Peniocereus greggii*), and big galleta (*Pleuraphis rigida*). A review of pronghorn diet as reported in the scientific literature (USFWS 1998) supports a conclusion that many of the perennial species identified as important in the pronghorn diet are not found on this site. However, due to the March survey date of the site, the composition of annual species cannot be fully assessed and it is possible that the proposed 2-acre site could provide seasonal forage for Sonoran pronghorn.

3.8.2.1 Lesser Long-nosed Bat

Lesser long-nosed bats are seasonally present in the vicinity of the project area from April to September when preferred species of blooming agave and cacti provide forage for these nectar-feeding bats. During the daylight hours, bats concentrate in roosts from which they emerge at dusk on foraging bouts up to 35 miles from the roost. Three roosts have been identified on NPS- and USFWS-administered lands. The proposed FOB expansion site is 8.3 miles from the nearest of these roosts and is within the foraging range from this roost site.

In March 2011, CBP conducted a site inventory of the proposed FOB expansion site. This survey confirmed that there are no plants which provide food for this species within the proposed disturbance footprint (under any alternative). A single saguaro cactus (*Carnegiea gigantea*) was located approximately 875 yards from the proposed FOB expansion site.

3.8.3 State

AGFD Natural Heritage Program maintains lists of wildlife of special concern (WSC) in Arizona. This list includes fauna whose occurrence in Arizona is or may be in jeopardy, or with known or perceived threats or population declines (AGFD 2010). These species are not necessarily the same as those protected under the ESA. A list of these species is presented in Appendix C. No Arizona WSC or NPS sensitive species were observed within the project area during the March 2011 biological survey.

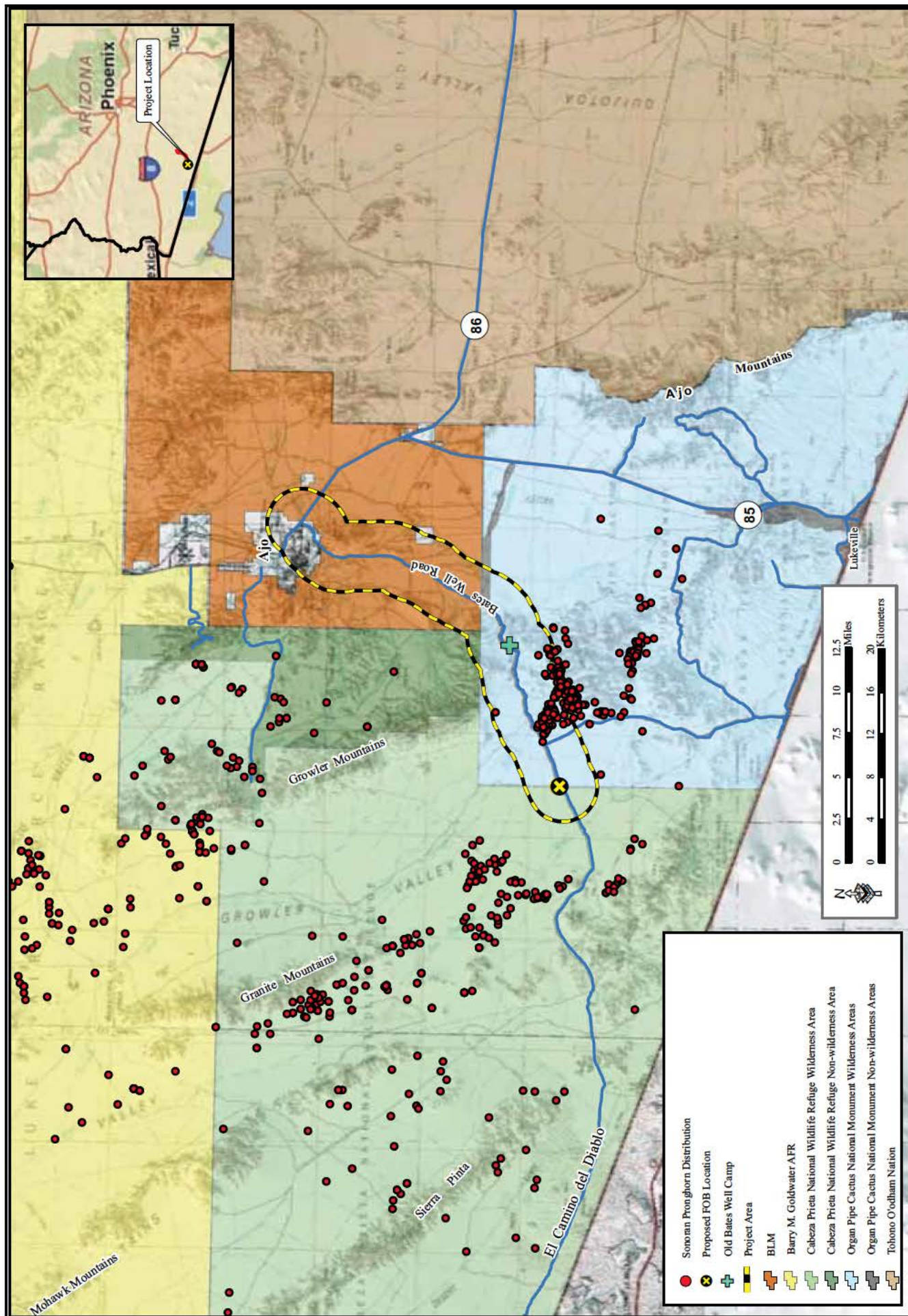


Figure 3-1: Sonoran Pronghorn Fawning Season (2006 - 2011)

The Arizona Department of Agriculture (ADA) maintains a list of protected plant species within Arizona. The 1999 Arizona Native Plant Law defined five categories of protection within the state: 1) Highly Safeguarded, no collection allowed; 2) Salvage Restricted, collection only with permit; 3) Export Restricted, transport out of state prohibited; 4) Salvage Assessed, permit required to remove live trees; and 5) Harvest Restricted, permit required to remove plant byproducts (ADA 2007). A list of native plants protected by the ADA is included in Appendix C.

Eleven individuals of two state-protected, Salvage Restricted cacti species (eight Emory's barrel-cactus [*Ferrocactus emoryi*] and three night-blooming cereus [*Peniocereus greggii* var. *transmontanus*]) were observed within the survey area during the March 2011 biological survey. One Emory's barrel cactus is within the 2-acre FOB expansion site on the OPCNM. Within the proposed footprint for the CPNWR Alternative, there are two night-blooming cereus and one Emory's barrel cactus. These plants can be salvaged before construction begins to avoid impacts.

3.8.4 Environmental Consequences

3.8.4.1 Proposed Action

The potential environmental consequences from the proposed expansion of the Ajo FOB on listed species could result from two sources. These sources are temporary construction impacts and long-term operational impacts, extending the duration of Ajo FOB operations. All impacts arising during construction and operation of the FOB would be direct impacts, there are no indirect impacts anticipated from the Proposed Action.

Based on known occurrences, existing preferred habitat, potential home range, and foraging habitats overlapping with the FOB expansion footprint, the Sonoran pronghorn and lesser long-nosed bat would potentially occur within the vicinity of the project. Therefore, these two species could be impacted by the Proposed Action.

FOB Construction-related Impacts

The sources of temporary construction impacts includes transient vehicular access to the proposed site along the existing Bates Well Road, construction activities on the 2-acre area which would be developed as the Ajo FOB, and attendant noise. Direct impacts from these activities could result from collisions with vehicles either traveling the Bates Well Road or within the construction footprint, loss of habitat, or disturbance due to noise.

Vehicles using the Bates Well Road include NPS, USFWS, and BLM administrative use, CBP patrol and administrative use in support of facilities, and visitors to OPCNM and CPNWR. The total number of annual vehicle trips on the Bates Well Road can only be estimated. The USFWS reports issuing approximately 4,000 vehicle permits for access to the refuge annually. The USFWS recently opened public roads on the CPNWR to ATVs and street legal motorcycles, which is expected to increase public vehicle use of this road (USFWS 2011c). CBP estimates that 14,000 trips are currently made on the Bates Well Road annually to provide patrol in the western portion of the Ajo Station AOR. The total number of trips necessary by construction vehicles is estimated to be several hundred during the FOB expansion and therefore would constitute a minor increase in current road use levels.

In the only study designed to specifically examine human impacts on behavior of an unconfined population of Sonoran pronghorn, Krausman et al. (2004) recorded 44,375 observations of pronghorn behavior on Barry M. Goldwater Range and Buenos Aires National Wildlife Refuge. Of these observations, 2,121 were related to human ground-based stimuli (vehicles and foot traffic). Based on his observations, Krausman et al. concluded that pronghorn habituated to both ground-based and aerial military activity exhibited a flight response to these human activities approximately 5 percent of the time and that impacts of these activities were not biologically significant. In addition, USFWS (2009) has reported that there is no record of a Sonoran pronghorn in Arizona being struck and killed by a motor vehicle.

Additional potential direct impacts along the Bates Well Road and the FOB expansion site arise from construction traffic noise. As previously discussed, construction traffic represents a small fraction of actual Bates Well Road use; therefore, the noise caused by the addition of this construction traffic would not significantly increase the range at which Bates Well Road traffic noise is audible by pronghorn.

It is also possible that pronghorn may be exposed to noise arising from construction activities at the FOB site. Construction noise at the FOB site is anticipated to be audible at a level of 57 dBA or higher over an estimated 39 acres. This noise disturbance footprint represents a small fraction of the 1.6 million-acre pronghorn range.

Krausman et al. (2004) sampled ambient sound levels on portions of the BMGR routinely used by pronghorn for 242 days between the fall of 1998 and the summer of 1999. Krausman's research team recorded average 24-hour sound levels during training periods of 65.2 dBA and peak levels as high as 122 dBA. When combined with their observations of behavior during overflight events, Krausman et al. concluded that pronghorn habituated to military activities, including noise. This is similar to other researchers who concluded that Sonoran pronghorn either habituate to noise or that noise impacts are minor (Workman et al. 1992, Weisenberger et al. 1996, DeVos 1989, and Dames and Moore 1995).

Vegetation surveys of the proposed FOB site determined that preferred perennial forage used by Sonoran pronghorn is not found on-site, though due to the time of year the site was surveyed, the presence of annual forage species could not be determined. The quality of the forage is consistent with limited use of the area around the project site by pronghorn as found in AGFD telemetry data. In fact, data provided by AGFD reflects that there has been no recorded use of the habitat within 2 miles of the proposed FOB during fawning season by radio-collared animals over the last 4 years (see Figure 3-1). Observations by CBP environmental monitors confirm the infrequent use of this area by both collared and non-collared pronghorn.

Most research on the physiological impacts of noise or other potential human stressors on wild populations has been conducted on avian species. These studies suggest that the response of wild populations to human activity is variable. For example, Hayden et al. (2009) determined that military training at Fort Hood did not elicit a chronic stress response as indexed by corticosterone levels, and Tempel and Guitierrez (2003) found that exposure to chainsaw noise resulted in no increase in fecal corticosterone for California spotted owls, while Wasser et al.

(1997) found that fecal corticosterone did increase in California spotted owls based on proximity to logging roads.

Several studies of physiological impacts of human stressors on large mammals have focused primarily on human transportation-related stressors. For example, Weisenberger et al. (1996) conducted studies of the impacts of simulated overflights on the heart rates of penned desert bighorn sheep and mule deer. He reported that while heart rates and activity patterns were altered by simulated overflights, heart rates returned to normal within 1 to 3 minutes and activity patterns returned to normal within about 4 minutes. Based on the results from this study, the authors concluded that aircraft noise events were of such short duration and recovery was so rapid that it was unlikely that low flying aircraft would result in adverse impacts on the species.

Using immunoassays of fecal glucocorticoid levels in wolves and elk from 3 national parks where the animals were exposed to snowmobile traffic, Creel et al. (2002) determined that glucocorticoid levels were higher in animals exposed to snowmobile traffic. However, the authors concluded that the animals were able to compensate for any physiological impacts of snowmobile traffic and exhibited normal patterns of survival and recruitment. Using similar fecal glucocorticoid analysis techniques, Munshi-South et al. (2008) found that the elephants in National parks exhibited significantly higher levels of glucocorticoid metabolite levels than elephant populations outside of parks which were subject to oil development and commercial logging.

It is likely that stress in wild populations is influenced by a variety of natural factors in addition to human causes. No studies of physiological stress in Sonoran pronghorn populations have been undertaken, and there is no evidence that these animals suffer from any chronic stress condition due to either human or natural environmental conditions. Although antelope will not be exposed to any new human stressors as a result of this project, the existing literature cannot be used as a basis to conclude that the physiological impacts of construction activities are insignificant.

Based on the infrequent use of lands in the vicinity of the project area by pronghorn, the limited increase in Bates Well Road traffic arising from construction vehicle use, past research on the effects of ground-based vehicles on pronghorn, and the fact that a Sonoran pronghorn has never been struck and killed within Arizona, CBP concludes that impacts from construction vehicles along the Bates Well Road and proposed FOB are extremely unlikely to occur. Based on the infrequent use of lands in the vicinity of the project area, the quality of forage in the project area and the size of the project area in relation to the 1.6 million-acre range of the pronghorn, CBP concludes that impacts resulting from habitat loss are not significant. Noise resulting from this project will not raise ambient sound levels across a significant portion of the species range (e.g. 39 acres in the vicinity of the FOB will experience sound levels exceeding 57 dBA) and will not exceed ambient sound levels currently experienced by pronghorn in other portions of their range. However, due to the varying nature of impacts of human activity on wild populations and the lack of species-specific physiological data for pronghorn, CBP has determined that FOB construction activities may affect and are likely to adversely affect Sonoran pronghorn.

FOB Operational-related impacts

Potential impacts on pronghorn arising from operational activities at the FOB include: noise impacts, impacts from water and diesel fuel deliveries, and expansion of the area of artificial lighting. Table 3-2 compares the potential stressors on Sonoran pronghorn from operational activities at the current tactical camp (No Action Alternative) and as expected under the Proposed Action.

Table 3-2. Comparison of FOB Operational Impacts on Sonoran Pronghorn under the Proposed Action versus the No Action Alternative

Potential Stressors	Proposed Action Alternative	No Action Alternative
Generator noise	Generators would run continuously (24 hours per day, 7 days per week) for up to 5 years, until the construction of the FOB is complete. The solar- powered FOB would have a generator for emergency backup, which would run 2 to 4 hours per month for maintenance	Continuous generator operations (24 hours per day, 7 days per week) for power supply
Fuel delivery trips	1 trip per week (if a 8,600-gallon tanker truck is used).	1 trip per week
Water delivery trips	None upon development of a successful well	1 trip per week
Night lighting	3 acres of artificial lighting in non-Wilderness	1 acre of artificial lighting in non-wilderness

In 2011, the USFWS completed an analysis of whether another nearby FOB had resulted in any impacts on Sonoran pronghorn movement patterns. Camp Grip, which is located approximately 10 miles west of the proposed FOB site was established in 2005. USFWS analyzed available AGFD Sonoran pronghorn location data from radio-collared animals and results of this analysis were inconclusive as to whether Camp Grip had any impact on Sonoran pronghorn movement. These inconclusive results were in part due to the many complex factors involving Sonoran pronghorn movement, including artificial feeding and watering of the animals across the species' range (Cindi Holt, personnel communication).

When CBP planned for solar panels to be considered as a potential power source for the FOB, CBP weighed construction and operational costs versus improved soundscape. In the *SBI_{net}* Ajo-1 BO, a noise threshold of 35 dBA at 492 feet (150 meters) from the towers was established (USFWS 2009). The BO indicates that below this level, noise would have no impact on Sonoran pronghorn. However, Krausman et al. (2004) found that pronghorn inhabit areas with much higher ambient sound levels.

In the short term, the proposed action will substantially reduce sound levels from the current situation where a single, unbaffled generator provides power, as the proposed action will meet the sound thresholds as established in the 2009 BO for Ajo 1. In the long term, installation of solar power will result in further reductions to ambient sound level impacts from the FOB to a duration of several hours a month when generators are exercised.

The water and fuel delivery traffic on Bates Well Road will be reduced by half upon implementation of the proposed action since development of a water well will eliminate the need

for hauling water to the site. In addition, while establishment of the Ajo FOB is not anticipated to change activity patterns of agents within the AOR, it is anticipated to substantially reduce the number of commuting trips between the Ajo Station and the FOB. CBP estimates approximately 10,600 trips will be eliminated annually. USFWS has previously expressed concern about human activity along this road corridor which provides access to the Valley of the Ajo (USFWS 2009).

The area which will be impacted by night lighting will increase under the Proposed Action from one to three acres. However, appropriate measures will be undertaken to ensure lighting is directed within the FOB perimeter. In addition, this lighting is not significant when considered across the 1.6 million-acre range of the pronghorn.

Based on a reduction in ambient noise levels from installation of baffled generators and solar power, a reduction in CBP traffic along Bates Well Road and the limited expansion of night lighting across the range of the pronghorn, CBP has determined that the operational impacts of the Ajo FOB on Sonoran pronghorn are either extremely unlikely to occur or insignificant.

Lesser Long-nosed Bat

Construction of the Ajo FOB will occur from fall 2011 through spring of 2012 when bats are not found in Arizona. In addition, based on site surveys, CBP has determined that the project will result in no loss of bat foraging habitat. As a result, there will be no direct or indirect effect on lesser long-nosed bats arising from construction of the FOB. Direct and indirect impacts on lesser long-nosed bats may occur during operation and maintenance of the Ajo FOB.

Operational impacts on bats are limited to expanding the footprint of the lighted area at the FOB for security purposes from 1 to 3 acres and operational noise. The additional two acres of lighting is surrounded by more than 1.1 million acres of designated wilderness within CPNWR and OPCNM, which is unlit. In addition, security lighting at the FOB will be limited to the greatest extent practicable by minimizing the number of lights used and selectively placing and pointing lights down toward the ground, with shields on lights to prevent light from going up into the sky or out laterally beyond the FOB site footprint. AGFD recently completed a study of lesser long-nosed bat movement patterns in relation to artificial light in Tucson and Marana, Arizona (AGFD 2009). This study found that while the bats preferred lower light levels for transit corridors, they frequently used areas with substantially higher levels of artificial light than would be generated under the Proposed Action.

USFWS has previously determined that noise from the relocated Bates Well Camp would have no impact on the nearest lesser long-nosed bat roost site (USFWS 2009). Under the Proposed Action, the overall operation of diesel generators to support FOB operations would be reduced compared to the current tactical camp's continuous generator operation through installation of baffled generators and eventually solar power. Based on this analysis, the Proposed Action would reduce operational noise and reduce potential current impacts on lesser long-nosed bats.

Based on this analysis, CBP has determined that operational impacts of the Proposed Action would result in discountable or reduced direct impacts on the lesser long-nosed bat.

Measures to Minimize and Avoid Impacts on Listed Species

1. CBP will minimize impacts on Sonoran pronghorn and lesser long-nosed bats and their habitats by using flagging or temporary fencing to clearly demarcate project construction area perimeters. CBP will not disturb soil or vegetation outside of 2-acre expansion site perimeter.
2. CBP will minimize the number of construction and maintenance vehicles traveling to and from the project site and the number of trips per day. Special emphasis will be placed on this approach during the pronghorn fawning season.
3. CBP will minimize potential animal collisions, particularly with Sonoran pronghorn, by not exceeding construction and maintenance speed limits of 25 mph on all unpaved roads.
4. CBP will establish communication channels which will enable the biological monitor the capability to delay or stop work if a Sonoran pronghorn is observed within 1 mile of the FOB construction site.
5. CBP will minimize the duration of construction noise exposure for projects in Sonoran pronghorn habitat.
6. During the construction phase, temporary noise impacts are possible. All applicable Occupational Safety and Health Administration regulations and requirements will be followed. Construction equipment will possess properly working mufflers and will be kept properly tuned to reduce backfires. Implementation of these measures will reduce the potential temporary noise impacts to an insignificant level in and around the construction site.
7. CBP will significantly minimize noise levels for the FOB facility's operations within Sonoran pronghorn and lesser long-nosed bat habitat by using either baffle boxes (a sound-resistant box that is placed over or around a generator, air-conditioning unit, or any other sound-producing equipment) or other noise-abatement methods for all generators, air-conditioning units, or any other sound producing equipment. Specifically, CBP will limit noise emissions so as not to exceed 35 dBA (measured ambient noise) at 492 feet distance from the noise source. CBP will use an acoustical professional to ensure that building and/or sound barrier design details are sufficient to achieve the aforementioned criteria. CBP will provide acoustic findings to USFWS and NPS.
8. CBP will avoid nighttime lighting impacts by conducting construction and maintenance activities during daylight hours only. If night lighting is unavoidable: 1) minimize the number of lights used, 2) place lights on poles pointed down toward the ground, with shields on lights to prevent light from going up into the sky or out laterally into landscape, and 3) selectively place lights so they are directed away from all native vegetative communities.
9. CBP will minimize security and other operations-related lighting impacts at FOB to the greatest extent practicable by minimizing the number of lights used and selectively placing and pointing lights down toward the ground, with shields on lights to prevent light from going up into the sky, or out laterally beyond the FOB footprint.
10. CBP will provide for an on-site biological monitor to be present during work activities for all construction activities. At a time interval (i.e., daily, weekly) determined by the land management agency, the monitor will check in and out of the land management unit (with the land manager or his/her representative). The biological monitor will have the following duties: ensure and document that agreed upon measures to minimize and avoid impacts on listed species and BMPs are properly implemented, send a weekly summary

report via electronic mail to the DOI land managers and USFWS AESO following CBP review, and notify the construction manager (who has the authority to temporarily suspend activities) when construction activities are not in compliance with all agreed upon BMPs.

11. The on-site biological monitor shall be a qualified Sonoran pronghorn monitor as defined by USFWS and NPS. The monitor shall report all detections of Sonoran pronghorn via electronic mail to USFWS AESO and the OPCNM within 48 hours of any detection. The electronic mail will include the following details: a) if known, the coordinates and a description of the locations where the pronghorn was detected, b) the date and time of the detection, c) the method used to make the detection, and d) as available, other pertinent details, such as the behavior of the Sonoran pronghorn (i.e. whether it was standing, foraging or running). The monitor shall also coordinate with CBP personnel monitoring tower number 302 to determine whether antelope have been observed in the vicinity of the FOB and with AGFD and DOI land managers regarding any observations of antelope within the project vicinity.
12. All vehicular traffic associated with construction and maintenance will use designated/authorized roads to access the sites, avoiding off-road vehicle activity outside of the project footprint.
13. All construction or maintenance personnel will report detections of Sonoran pronghorn to the biological monitor.
14. CBP will develop and implement a training program focusing on Trust Resources for contractors/construction personnel. Training will be provided to all personnel associated with the project before project construction begins and before any new personnel begin work on the project. Information presented in the training program will include occurrence of sensitive species in the project area, their general ecology, and sensitivity to human activities; legal protection afforded the species and the penalties for violation of state or Federal laws; implementation of included conservation actions/BMPs; and reporting requirements. Also included in this training program will be color photos of the listed species and maps of federally listed species' habitats.
15. Vehicle operators will be trained to recognize pronghorn. If pronghorn are sighted within one mile of the project site or the Bates Well access road to the site by the biological monitor or vehicle operators, the vehicle involved would initially stop to allow pronghorn to move away and to reduce disturbance to the extent possible. Once the pronghorn has moved away from line of sight or greater than 1 mile from the vehicle or project site, vehicles would proceed at 15 mph for the first mile and then resume normal speed (25 mph).
16. Fill material (gravel and topsoil) brought in from outside the project area will be identified by its source location. Sources will be used that are clean and weed-free.
17. Certified weed/seed free natural materials (e.g., straw) will be used for on-site erosion control to avoid the spread of non-native plants.
18. Removal of invasive plants that appear on the site will be done in ways that eliminate the entire plant and remove all plant parts to a disposal area. Herbicides not toxic to listed species that may be in the area can be used for non-native vegetation control. Application of herbicides will follow Federal guidelines and be in accordance with label directions. An NPS Pesticide Use Permit would be received prior to herbicide application on NPS lands.

19. CBP will include a configuration to support fire management operations in the design of facilities that require land clearing.
20. CBP will undertake all reasonable efforts to complete construction of the FOB before the beginning of pronghorn fawning season on March 15. If the construction is not complete, CBP agrees there will be no earth moving or heavy construction equipment used after March 15.
21. CBP will avoid effects on bats in bat roosts by not implementing construction-related activities within 4 miles of the roost between May 1 and September 30.
22. NPS and USFWS will be notified two weeks before any project construction activities begin and within one week after project construction activities are completed.
23. CBP will provide a report to USFWS AESO and DOI land management agencies within 90 days of project construction completion which includes a complete description of the action (construction component) implemented (including photographs; total acres impacted; total acres of Sonoran pronghorn habitat impacted; total number of lesser long-nosed bat food plants impacted; length of time to complete the project; all environmental design [i.e., BMPs] and conservation measures implemented, including all Sonoran pronghorn daily and other biological monitoring reports, etc.). As implementation of some measures will continue after project construction is completed, the report will also identify environmental design and conservation measures still under implementation or proposed for implementation and a time frame for completing the measures.
24. Standard construction procedures will be implemented to minimize the potential for erosion and sedimentation during construction. All work shall cease during heavy rains and would not resume until conditions are suitable for the movement of equipment and material.
25. A Construction Stormwater General Permit will be obtained prior to construction, and this would require approval of a site-specific SWPPP and Notice of Intent. A site-specific SPCCP will also be in place prior to the start of construction. Other environmental design measures will be implemented, such as silt fencing, aggregate materials, and wetting compounds to decrease erosion and sedimentation.
26. CBP will not, for any length of time, permit any pets inside the project area or adjacent native habitats. This BMP does not pertain to law enforcement animals.
27. CBP will minimize site disturbance and avoid attracting predators by promptly removing waste materials, wrappers, and debris from the site. Any waste that must remain more than 12 hours will be properly stored until disposal.
28. All BMPs to be implemented by the project contractor will be included in the contract.
29. The FOB will be removed within 12 months of cessation of use if CBP determines it is no longer needed, and site will be restored to natural habitat conditions.
30. The spread of non-native plants will be reduced by providing weed-free feed to horses that are corralled at the FOB.
31. Animal waste will be removed from the corral and deposited at an appropriate waste facility to avoid water contamination.
32. Any collisions with Sonoran pronghorn will be reported to USFWS AESO and OPCNM via telephone and electronic mail as soon as practicable, but no later than 12 hours after the collision. Information to be relayed will include: a) location of the collision, b) date and time of the collision, c) type of vehicle, and d) a description of the collision to include the outcome and a photograph of the Sonoran pronghorn (if available).

Conservation Measures

1. If there is surplus water from the well, CBP will permit NPS and USFWS to use surplus water to replenish Sonoran pronghorn waters.
2. CBP will explore opportunities to assign agents to the FOB on a longer term basis and provide USBP agents with more extensive environmental training.
3. CBP will assign a supervisor for the FOB who will have oversight of FOB operations, One of the duties of this individual will be working with the NOS and USFWS to ensure impacts of ISBP operations on OPCNM and CPNWR are minimized.
4. Provide environmental education for agents via kiosk/information display at Ajo FOB and Ajo Station.

3.8.4.2 Fossil Fuel Generator Alternative

The Fossil Fuel Generator Alternative would have the same impacts on protected species as discussed for the solar-powered FOB in the Proposed Action during construction; however, any impacts on Sonoran pronghorn and lesser long-nosed bats from noise would be greater in duration. The proposed FOB would be powered by two 200-kilowatt diesel-fueled generators, running continuously. Long-term noise emissions from the FOB generator would be attenuated to 35 dBA within 492 feet of the FOB. Noise emissions from the operation of the generators at the FOB would be localized and would have long-term, minor impacts on Sonoran pronghorn and lesser long-nosed bats.

3.8.4.3 CPNWR Location Alternative

The FOB expansion on CPNWR lands would be run on solar or other alternative fuel power with diesel generator backups. Impacts on the Sonoran pronghorn and lesser long-nosed bat from noise and visual impediments would be the same as those described for the Proposed Action.

3.8.4.4 No Action Alternative

Under the No Action Alternative, there would be no additional impacts on threatened or endangered species or their habitats, as no construction activities would occur. Impacts from the establishment of the tactical camp at the current site were identified and assessed in the Biological Opinion prepared for the SBInet Ajo 1 Project (USFWS 2009).

3.9 CULTURAL, HISTORICAL, AND ARCHAEOLOGICAL RESOURCES

3.9.1 Affected Environment

The process of identifying and evaluating potential impacts on cultural resources was described in detail in several documents. Those discussions are incorporated herein by reference (CBP 2007 and INS and JTF-6 2001). Briefly, the National Historic Preservation Act (NHPA) of 1966 established the Advisory Council on Historic Preservation (ACHP) to advocate full consideration of historic values in Federal decision making and ensure consistency in national policies. Additionally, the NHPA also established the SHPO to administer national historic preservation programs on a state level and Tribal Historic Preservation Officers on tribal lands, where appropriate. The NHPA also established the NRHP, which is the Nation's official list of cultural resources worthy of preservation and protection. The historic preservation review process mandated by Section 106 of the NHPA is outlined in the ACHP regulations, "Protection of

Historic Properties” (36 CFR Part 800), which were revised and became effective on January 11, 2001.

The cultural chronology of the Western Papaguería is usually discussed in periods: Preceramic Period, which is divided into two temporal phases, Paleo-Indian (circa 10,000 B.C. to 7,500 B.C.) and Archaic (circa 7,500 B.C. to A.D. 200); Ceramic Period, which is generally divided into Patayan (A.D. 700 to 1500), Hohokam (A.D. 200 to 1500), and Trincheras (A.D. 700 to 1900); Early Historic Period (A.D. 1540 to 1848); Late Historic Period (A.D. 1848 to 1945); and World War II and Cold War Period (A.D. 1945 to 1989). The main time periods are typically subdivided into smaller temporal phases, based on particular characteristics of the artifact assemblages. For example, the prehistoric periods and corresponding phases are defined by particular diagnostic artifacts such as projectile points and certain types of pottery. Occasionally the phases or periods can be defined by distinctive site locations. Phases of the Historic period are often distinguished by ethnohistoric accounts and other written records, though specific artifacts are also temporally or culturally diagnostic. The western Papaguería region is bounded by the Colorado River to the west, the Gila River to the north, and the Rio Sonoita, Sonora, Mexico and the Gulf of California to the south (Ahlstrom 2000). The eastern Papaguería and the Tohono O’odham Nation bound the region to the east.

3.9.1.1 Previous Archaeological Investigations

The archaeological site records on the Arizona State Museum’s (ASM) AZSITE Cultural Resource Inventory were examined prior to the initiation of the field survey of the proposed FOB expansion site. In addition, both maps and patent records from the General Land Office were examined in order to identify potential historic resources located within the vicinity of the FOB site. Six archaeological surveys, which identified seven archaeological sites, were previously conducted within 1 mile of the FOB site. These surveys were conducted in support of construction, utility installation, road maintenance and improvements, park improvements, research, and other initiatives. Seven previously recorded sites are located within the 1-mile search radius around the proposed FOB site. Six of these sites were recorded by Rankin from 1989 to 1991. All six sites consist of possible roasting features, each containing from one to four concentrations of fire-cracked rock (Rankin 1995). The cultural and temporal affiliation of these sites is unknown due to a lack of artifacts. Only one site contained an artifact, AZ Y:16:34(ASM), a basalt metate fragment. The historic Bates Well Road and was recorded by Northland Research, Inc. (Hopkins 2006). Two of these seven sites (AZ Y:16:32[ASM] and Bates Well Road) are located within the current survey area.

3.9.1.2 Current Investigations

Archaeological surveys were conducted at the FOB expansion site in March 2011. Approximately 24 acres were surveyed as part of this effort. Two previously recorded sites were relocated during the current investigation (Table 3-3) and 14 isolated occurrences (IO) were discovered (Hart 2011). The following section describes the cultural resources recorded within the project area.

Table 3-3. Archaeological Sites within 1 mile of the Proposed FOB Expansion Area

Site No.	Site Type	Age	Eligibility Recommendation
AZ Y:16:32(ASM)	Thermal features	Indeterminate	Eligible
	Bates Well Road	Historic	Undetermined

AZ Y:16:32(ASM) consists of three clusters of fire-cracked rock and one recent charcoal pile. The site is on the south side of Bates Well Road just east of the CPNWR/OPCNM boundary on the OPCNM side. The site was originally documented by A. Rankin in 1990 for the NPS (Rankin 1995). The site contains three thermal features and one recent charcoal-filled fire ring. Thermal Feature 1 consists of 150 to 200 cobbles of partially buried fire-cracked rock. Thermal Feature 2 is a small cluster of about 25 pieces of fire-cracked rock and may represent a clean-out event. Thermal Feature 3 consists of about 100 pieces of partially buried fire-cracked rock. No artifacts were observed on the ground surface, and cultural/temporal affiliation remains unknown.

Rankin (1995) and Gibson (2010) recommended the site as eligible for listing on the National Register of Historic Places (NRHP) under Criterion D. Both archaeologists state that these features appear to predate a nearby modern fire ring and have the potential to contain datable radiocarbon deposits.

The historic Bates Well Road was originally documented in 2006 by Northland Research (Hopkins 2006). The east end begins at the OPCNM/BLM boundary in Section 20 of Township 14 South, Range 6 West. Its western terminus was previously documented as ending at the OPCNM/CPNWR boundary. During the current investigation, the west end of the road was extended about 1,500 feet to include the surveyed road corridor.

The NRHP-listed site of Bates Well (AZ Z:13:39[ASM]) is located along Bates Well Road. The site was an important water source for the nearby Growler Camp and Growler Copper Mine (AZ Z:13:48[ASM]), and was also a crucial crossroads for north-south travel between Ajo and Sonoita, Mexico, as well as east-west travel between Tucson and Yuma. The road also provides access to the NRHP-listed site/district of El Camino del Diablo (SN C:1:15[ASM]). Although Bates Well Road is not within the recorded district boundaries of El Camino, portions of the road, particularly its west end, may actually be segments of El Camino del Diablo.

Northland Research originally recommended the road's eligibility to be undetermined (Hopkins 2006; Carpenter and Hopkins 2009). The viewshed integrity from the road is intact with little modern disturbance, and thus contributes to the overall integrity of the travel corridor. Given the road's association with two NRHP-listed sites, Bates Well Road may be a significant historic property. Archival research is needed to fully assess the historical significance of this road and determine if it should be included within El Camino del Diablo historic district, or if its research potential should be considered exhausted following thorough archival research.

During the field survey, 14 IOs of cultural materials were discovered. The IOs consist of cans, scattered fire-cracked rocks, ground stone, and a trail segment. Many of the cans are scattered

near Bates Well Road and are likely associated with it. One trail segment was documented on desert pavement just outside the survey corridor. No artifacts were noted along the trail, but it appears to lead towards AZ Y:16:32(ASM). One notable IO is a wooden sign that serves as a memorial to a man named Patrick Reidelbach who died on November 13, 1992. It is unclear who Reidelbach was. He is not listed as one of the CBP Agents who were killed in the line of duty. Items recorded as IOs do not meet the ASM definition of an archaeological site, and none are considered eligible for inclusion on the NRHP (Hart 2011).

3.9.2 Environmental Consequences

3.9.2.1 *Proposed Action*

Impacts on the two previously recorded archaeological sites (AZ Y:16:32[ASM] and Bates Well Road) from the planned FOB expansion would be avoided through project design. No additional archaeological work is recommended for these sites. BMPs to be employed to avoid impacts on these cultural resources are listed below.

- The site boundaries of all previously recorded sites, along with a 100-foot buffer, would be flagged around each of the sites to ensure that they are avoided.
- An archaeologist will be on-site during any subsurface disturbing activities.
- Should any archaeological artifacts be found during construction, the OPCNM archaeologist will be notified immediately. All work will cease until an evaluation of the discovery is made by the OPCNM archaeologist to determine appropriate actions to prevent the loss of significant cultural or scientific values.

3.9.2.2 *Fossil Fuel Generator Alternative*

The Fossil Fuel Generator Alternative would have the same impacts on cultural resources as discussed for the solar- or other alternative fuel-powered FOB in the Proposed Action.

3.9.2.3 *CPNWR Location Alternative*

The FOB expansion on CPNWR lands would cause the same impacts on cultural resources as discussed for the Proposed Action.

3.9.2.4 *No Action Alternative*

The No Action Alternative would have no impact, either beneficial or adverse, on cultural resources because the existing Ajo Station FOB would not be expanded.

3.10 AIR QUALITY

3.10.1 Affected Environment

The EPA established National Ambient Air Quality Standards (NAAQS) for specific pollutants determined to be of concern with respect to the health and welfare of the general public. Ambient air quality standards are classified as either "primary" or "secondary." The major pollutants of concern, or criteria pollutants, are carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), ozone, particulate matter less than 10 microns (PM-10), particulate matter less than 2.5 microns (PM-2.5), and lead. NAAQS represent the maximum levels of background pollution that are considered safe, within an adequate margin of safety, to protect the public health and welfare.

Areas that do not meet these NAAQS standards are called non-attainment areas; areas that meet both primary and secondary standards are known as attainment areas. The Federal Conformity Final Rule (40 CFR Parts 51 and 93) specifies criteria or requirements for conformity determinations for Federal projects. The Federal Conformity Rule was first promulgated in 1993 by the EPA, following the passage of Amendments to the Clean Air Act in 1990. The rule mandates that a conformity analysis must be performed when a Federal action generates air pollutants in a region that has been designated a non-attainment or maintenance area for one or more NAAQS.

A conformity analysis is the process used to determine whether a Federal action meets the requirements of the General Conformity Rule. It requires the responsible Federal agency to evaluate the nature of a Proposed Action and associated air pollutant emissions, and calculate emissions as a result of the Proposed Action. If the emissions exceed established limits, known as *de minimis* thresholds, the proponent is required to implement appropriate mitigation measures.

EPA considers Pima County as a moderate non-attainment area for PM-10 (EPA 2010b). The *de minimis* threshold for moderate non-attainment for PM-10 is 100 tons per year (40 CFR 51.853).

3.10.1.1 Greenhouse Gases and Climate Change

Global climate change refers to a change in the average weather on the earth. Greenhouse gases (GHG) are gases that trap heat in the atmosphere. They include water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), fluorinated gases including chlorofluorocarbons (CFC) and hydrochlorofluorocarbons (HFC), and halons, as well as ground-level ozone (California Energy Commission 2007).

The major GHG-producing sectors in society include transportation, utilities (e.g., coal and gas power plants), industry/manufacturing, agriculture, and residential. End-use sector sources of GHG emissions include transportation (40.7 percent), electricity generation (22.2 percent), industry (20.5 percent), agriculture and forestry (8.3 percent), and other (8.3 percent) (California Energy Commission 2007). The main sources of increased concentrations of GHG due to human activity include the combustion of fossil fuels and deforestation (CO₂), livestock and rice farming, land use and wetland depletions, landfill emissions (CH₄), refrigeration system and fire suppression system use and manufacturing (CFC), and agricultural activities, including the use of fertilizers (California Energy Commission 2007).

Final Mandatory GHG Inventory Rule

In response to the Consolidation Appropriations Act (House Resolution [H.R.] 2764; P.L. 110–161), EPA has issued the Final Mandatory Reporting of Greenhouse Gases Rule. The rule requires large sources that emit 25,000 metric tons (27,557 U.S. tons) or more per year of GHG to report GHG emissions in the U.S., collect accurate and timely emissions data to inform future policy decisions, and submit annual GHG reports to the EPA. The final rule was signed by the Administrator on September 22, 2009, published on October 30, 2009, and made effective December 29, 2009.

GHG Threshold of Significance

The CEQ provided draft guidelines for performing meaningful GHG decision-making analysis. The CEQ GHG guidance is currently undergoing public comment at this time; however, the draft guidance states that if the action would be reasonably anticipated to cause direct emissions of 25,000 metric tons (27,557 U.S. tons) or more of CO₂ GHG emissions on an annual basis, agencies should consider this an indicator that a quantitative and qualitative assessment may be meaningful to decision makers and the public. For long-term actions that have annual direct emissions of less than 25,000 metric tons (27,557 U.S. tons) of CO₂, CEQ encourages Federal agencies to consider whether the action's long-term emissions should receive similar analysis. CEQ does not propose this as an indicator of a threshold of significant impacts, but rather as an indicator of a minimum level of GHG emissions that may warrant some description in the appropriate NEPA analysis for agency actions involving direct emissions of GHGs (CEQ 2010).

The GHGs covered by Executive Order (EO) 13514 are CO₂, CH₄, N₂O, HFC, perfluorocarbons, and sulfur hexafluoride. These GHGs have varying heat-trapping abilities and atmospheric lifetimes. CO₂ equivalency (CO₂e) is a measuring methodology used to compare the heat-trapping impact from various greenhouse gases relative to CO₂. Some gases have a greater global warming potential than others. Nitrous oxides (NO_x), for instance, have a global warming potential that is 310 times greater than an equivalent amount of CO₂, and CH₄ is 21 times greater than an equivalent amount of CO₂.

3.10.2 Environmental Consequences

3.10.2.1 Proposed Action

Temporary and minor increases in air pollution would occur from the use of construction equipment (combustible emissions) and the disturbance of soils (fugitive dust) during construction of the FOB. The following paragraphs describe the air calculation methodologies utilized to estimate air emissions produced by the construction of the FOB expansion. Fugitive dust emissions were calculated using the emission factor of 0.19 ton per acre per month (Midwest Research Institute 1996), which is a more current standard than the 1985 PM-10 emission factor of 1.2 tons per acre-month presented in AP-42 Section 13 Miscellaneous Sources 13.2.3.3 (EPA 2001).

EPA's NONROAD Model (EPA 2005) was used, as recommended by EPA's *Procedures Document for National Emission Inventory, Criteria Air Pollutants, 1985-1999* (EPA 2001), to calculate emissions from construction equipment. Combustible emission calculations were made for standard construction equipment, such as front-end loaders, backhoes, cranes, and cement trucks. Assumptions were made regarding the total number of days each piece of equipment would be used, and the number of hours per day each type of equipment would be used.

Construction workers would temporarily increase the combustible emissions in the airshed during their commute to and from the project area. Emissions from delivery trucks would also contribute to the overall air emission budget. Emissions from delivery trucks and construction workers traveling to the job site were calculated using the EPA MOBILE6.2 Model (EPA 2005a, 2005b and 2005c).

The total air quality emissions were calculated for the construction activities to compare to the General Conformity Rule. Summaries of the total emissions for the Preferred Alternative are presented in Table 3-4. Details of the analyses are presented in Appendix D.

Table 3-4. Total Air Emissions (tons/year) from the Proposed Action Construction versus the *de minimis* Threshold Levels

Pollutant	Total (tons/year)	<i>de minimis</i> Thresholds (tons/year) ¹
CO	24.92	100
Volatile Organic Compounds (VOC)	4.87	100
Nitrous Oxides (NOx)	39.21	100
PM-10	4.93	100
PM-2.5	3.31	100
SO ₂	4.91	100
CO ₂ and CO ₂ equivalents	16,158	27,557

Source: 40 CFR 51.853 and Gulf South Research Corporation (GSRC) model projections.

⁽¹⁾ Note that Pima County is in non-attainment for PM-10 (USEPA 2010b).

Several sources of air pollutants would contribute to the overall air impacts of the construction project. The air results in Table 3-4 included emissions from the following sources.

- Combustible engines of construction equipment
- Construction workers' commute to and from work
- Supply trucks delivering materials to construction site
- Fugitive dust from job-site ground disturbances

Operational Air Emissions

Operational air emissions refer to air emissions that may occur after the FOB has been installed, such as maintenance of two backup diesel generators operating 2 to 4 hours per month per year (worst case scenario). The air emissions from diesel generators and bimonthly maintenance are presented in Appendix D and are summarized in Table 3-5.

Table 3-5. Total Air Emissions (tons/year) from Diesel Generators vs. *de minimis* Levels for the Proposed Action

Pollutant	Total (tons/year)	<i>de minimis</i> Thresholds (tons/year) ¹
CO	0.11	100
Volatile Organic Compounds (VOC)	0.04	100
Nitrous Oxides (NOx)	0.18	100
PM-10	0.02	100
PM-2.5	0.02	100
SO ₂	0.02	100
CO ₂ and CO ₂ equivalents	74.86	27,557

Source: 40 CFR 51.853 and Gulf South Research Corporation (GSRC) model projections (Appendix D).

⁽¹⁾ Note that Pima County is in non-attainment for PM-10 (EPA 2010b).

As can be seen from the table above, the proposed construction and operational activities do not exceed Federal *de minimis* thresholds and, thus, would not require a Conformity Determination. As there are no violations of air quality standards and no conflicts with the state implementation plans, the impacts on air quality from the implementation of the Proposed Action would be less than significant. BMPs to be incorporated to ensure that fugitive dust and other air quality constituent emission levels do not rise above the minimum threshold as required per 40 CFR 51.853(b)(1) are listed below.

- Dust suppression methods, such as road watering to minimize airborne particulate matter created during construction activities will be utilized. Standard construction BMPs such as routine watering of the construction site, as well as access roads to the site, will be used to control fugitive dust and thereby assist in limiting potential PM-10 excursions during the construction phase of the proposed project.
- All construction equipment and vehicles will be required to be maintained in good operating condition to minimize exhaust emissions.

3.10.2.2 Fossil Fuel Generator Alternative

Air quality impacts associated with construction activities would be similar to those described in the Proposed Action; however, the ongoing emissions would be greater due to the elimination of solar power and the use of diesel generators as the primary source of power at the FOB.

Operational air emissions associated with this alternative include operation of two diesel generators operating 24 hours per day and 365 days per year. The air emissions from diesel generators are presented in Appendix D and are summarized in Table 3-6.

Table 3-6. Total Air Emissions (tons/year) from Diesel Generators vs. *de minimis* Levels for the Fossil Fuel Generator Alternative

Pollutant	Total (tons/year)	<i>de minimis</i> Thresholds (tons/year) ¹
CO	20.76	100
Volatile Organic Compounds (VOC)	6.68	100
Nitrous Oxides (NOx)	32.97	100
PM-10	4.03	100
PM-2.5	3.92	100
SO ₂	4.47	100
CO ₂ and CO ₂ equivalents	13,662	27,557

Source: 40 CFR 51.853 and Gulf South Research Corporation (GSRC) model projections (Appendix D).

⁽¹⁾ Note that Pima County is in non-attainment for PM-10 (EPA 2010b).

As can be seen from the table above, the air emissions associated with the Fossil Fuel Generator Alternative's construction and operational activities do not exceed Federal *de minimis* thresholds and, thus, would not require a Conformity Determination. As there are no violations of air quality standards and no conflicts with the state implementation plans, the impacts on air quality from the implementation of the Fossil Fuel Generator Alternative would be less than significant. During construction, proper and routine maintenance (i.e., appropriate oil change schedules, lubrication levels, and fuel for efficient performance) of all vehicles and other construction equipment would be implemented to ensure that emissions are within the design standards of all

construction equipment. Dust suppression methods should be implemented to minimize fugitive dust. In particular, water would be applied to the construction area to minimize the emissions of fugitive dust.

3.10.2.3 CPNWR Location Alternative

The FOB expansion on CPNWR lands would have the same impacts on air quality as discussed for the Proposed Action.

3.10.2.4 No Action Alternative

The No Action Alternative would not result in any additional direct impacts on air quality because there would be no construction activities. Air quality and air emissions for operation of the existing tactical camp were discussed in the *SBI^{net}* Ajo-1 Project EA (CBP 2009). Air emissions from the continuous use of one generator would be approximately half of the expected emissions presented in Table 3-6 for the Fossil Fuel Generator Alternative.

3.11 NOISE

Noise is often described as unwanted sound. Sound is usually represented on a logarithmic scale with a unit called the decibel (dB). Sound on the dB scale is referred to as sound level. The dBA scale takes sound pressure into account and emphasizes the frequencies, and is a measure of noise at a given, maximum level or constant state level. The threshold of perception of the human ear is approximately 3 dBA, which is considered barely perceptible, and a 5 dBA change is considered to be clearly noticeable. A 10 dBA increase in the measured sound level is typically perceived as being twice as loud as the original sound level.

3.11.1 Affected Environment

The FOB is located in a rural area which includes designated wilderness areas. OPCNM and CPNWR lands are undeveloped lands used primarily for the protection of the Sonoran Desert Ecosystem, recreational, and educational purposes. Anthropogenic noises can degrade the natural soundscape and adversely impact humans and wildlife. Natural soundscapes are composed completely of natural sounds without the presence of human-made sounds. The project area is located on lands where noise would potentially adversely impact natural soundscapes.

Wilderness Areas

Two important noise emission thresholds are considered in this noise analysis of designated wilderness. First, noise emission criteria for construction activities have been published by the Federal Highway Administration, which has established a construction noise abatement criterion of 57 dBA for lands, such as national parks, in which serenity and quiet are of extraordinary significance (23 CFR 722, Table 1). The 57 dBA threshold is used to assess the impacts from temporary noise emissions associated with constructing the proposed FOB expansion.

Secondly, CBP is committed to minimizing long-term noise impacts on the natural environment. The natural ambient background noise levels on OPCNM were measured, and averaged 20 dBA over a 20-day period (NPS 2009b). CBP used the 35 dBA threshold to measure impacts from

long-term operational noise emissions from long-term point sources of noise, such as power generators.

3.11.2 Environmental Consequences

3.11.2.1 Proposed Action

The following analysis segregates noise emissions into two categories: temporary noise emissions, which include emissions from construction equipment used to construct the proposed FOB expansion, and long-term noise emissions, which refer to ongoing noise emissions that would occur after the FOB expansion has been completed and is operational. The noise analysis modeled noise contours for a variety of sources and summarized the area of impact in acres for temporary and long-term noise emissions.

Temporary FOB Construction Noise

It was assumed that expansion of the FOB would require the use of general construction equipment, which produces noise emissions up to 81 dBA (crane), to install building modules. Assuming the worst case scenario of 81 dBA from general construction equipment, the noise model predicts that noise emissions would be attenuated to levels equal to or below 57 dBA at 738 feet from the noise source (23 CFR 722, Table 1). The 57 dBA construction noise contour would encompass 39 acres located near or within designated wilderness areas. Wilderness areas would be directly exposed to temporary noise emissions in excess of 57 dBA during construction. Noise emissions would have a temporary, minor adverse impact on the soundscape.

Long-term Noise Emission from FOB

Long-term noise emissions refer to noise emissions that would occur during and after the FOB has been expanded. Initially, two diesel generators would serve as the electrical power supply at the FOB; however, only one would be operating while the other is idle. By the 5th year of construction, CBP would install solar panels and storage batteries to supply electrical power needs at the FOB. The diesel generator would be expected to operate 24 hours a day and 7 days per week. Noise emissions from the diesel generator (225 Kilowatt) would be mitigated by a building an enclosure that would reduce the noise emissions.

The enclosure would be designed to reduce noise levels equal to or below 35 dBA at 492 feet from the noise source. Within a radius of 492 feet from the enclosed generator set, approximately 17 acres of land adjacent to FOB would be exposed to noise emissions greater than 35 dBA for 24 hours a day. Noise emissions associated with FOB operations would have a short-term (5-years), minor adverse impact on the soundscape. Potential impacts would be localized to the 17 acres adjacent to the FOB site. Noise emissions from the operation of a diesel generator would have a short-term, minor adverse impact on the soundscape. However, the eventual use of solar energy as the primary power source for the FOB would substantially reduce the duration of noise emissions compared to the No Action alternative to only a few hours per week.

The following BMPs would be implemented to minimize the impact of noise emissions from the Proposed Action.

- During the construction phase, temporary noise impacts are anticipated. All applicable Occupational Safety and Health Administration regulations and requirements will be followed. On-site activities would be restricted to daylight hours to the greatest extent practicable, although nighttime construction could occur if the construction schedule requires it. Construction equipment will possess properly working mufflers and would be kept properly tuned to reduce backfires. Implementation of these measures will reduce the expected temporary noise impacts to an insignificant level in and around the construction site.
- Noise mitigation enclosure for diesel generators.

3.11.2.2 Alternative 2 Fossil Fuel Generator Alternatives

It is assumed that the two generators would be located next to each other and essentially be one noise source when operating. Similar baffle boxes or other noise control techniques would be employed to limit noise emissions to meet the impact threshold of less than 35 dBA. It is estimated that noise emissions from the generators would travel 492 feet before they attenuated to 35 dBA. Within a radius of 492 feet from the enclosed generator set, approximately 17 acres of land at FOB would be exposed to noise emissions greater than 35 dBA, continuously. Noise impacts associated with this alternative would have a minor impact on the natural environment.

3.11.2.3 Alternative 3 CPNWR Location

Noise associated with construction would be similar to that described in the Proposed Action; however, noise emissions would be located on CPNWR lands. Noise emissions would have temporary and long-term, minor impacts on the soundscape.

3.11.2.4 No Action Alternative

Under the No Action Alternative, the soundscape near the existing tactical camp would continue to experience the existing tactical camp operational noise. The generator is unbaffled and impacts approximately 63.86 acres (Magnum 2010). The No Action Alternative would have long-term minor adverse impacts on the soundscape.

3.12 ROADWAYS AND TRAFFIC

3.12.1 Affected Environment

The proposed FOB expansion sites are located on OPCNM and CPNWR lands in western Pima County along Bates Well Road (El Camino del Diablo in CPNWR). The project area is extremely remote, and the only highway within the project area is State Route 85, which extends from Interstate 10 near Buckeye south to the Port of Entry at Lukeville. The average annual daily traffic count for State Route 85 from Puerto Blanco Road to the Lukeville Port of Entry is 1,400 vehicles (Arizona Department of Transportation 2009).

3.12.2 Environmental Consequences

3.12.2.1 *Proposed Action*

With the implementation of the Proposed Action, construction activities at the FOB would create a temporary, negligible impact on roadways and traffic within the project region. An increase of vehicular traffic would occur to supply materials and work crews to the FOB site for the limited construction period.

Only existing roads which are authorized for public use would be utilized to access the FOB. These roads include State Route 85, Darby Wells Road, and Bates Well Road.

Once construction work is completed, maintenance visits to the FOB would be required up to twice a month depending on the availability of well water and generator usage. Maintenance visits would have a long-term, negligible impact on traffic.

Operation of the FOB is anticipated to decrease vehicular traffic along Bates Well Road and the 59.4 Road which is a cut-through road, used by USBP Agents by approximately 10,600 trips per year.

3.12.2.2 *Fossil Fuel Generator Alternative*

The Fossil Fuel Generator Alternative would have impacts on roadways and traffic similar to those discussed for the solar-powered FOB in the Proposed Action during construction; however, maintenance trips would have a greater impact on roadways and traffic. The proposed FOB would be powered by two 200-kilowatt diesel-fueled generators, running continuously. Maintenance trips and delivery of fuel to the FOB would have a negligible impact on current use levels of roadways along the access route.

3.12.2.3 *CPNWR Location Alternative*

The FOB expansion on CPNWR lands would be run on solar or other alternative fuel power with diesel generator backups. Impacts on roadways and traffic would be the same as those described for the Proposed Action.

3.12.2.4 *No Action Alternative*

Under the No Action Alternative, no additional direct impacts on roadways and traffic would occur. USBP Agents, park visitors, OPCNM or CPNWR employees would continue to travel the roadways at current levels.

3.13 HAZARDOUS MATERIALS

3.13.1 Affected Environment

Solid and hazardous wastes are regulated in Arizona by a combination of laws promulgated by the Federal, state, and regional Councils of Government. The proposed FOB expansion site was searched on EPA's Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS). CERCLIS contains information on hazardous waste sites, potential hazardous waste sites, and remedial activities, including sites that are on the National Priorities List (NPL) or being considered for the NPL. The search found no active NPL sites within a 1-mile radius of the proposed FOB expansion site. Additionally, during the March 2011

biological survey, no evidence of hazardous waste or materials (e.g., drums, soil staining) was observed at the FOB expansion site.

3.13.2 Environmental Consequences

3.13.2.1 Proposed Action

Construction Activities

The Proposed Action would have temporary, minor impacts on the environment as a result of hazardous materials. During construction, a potential exists for petroleum, oil and lubricant (POL) contamination at the construction site due to storage of POL material for maintenance and refueling vehicles and fuel storage tanks. Cleanup materials (e.g., oil mops) would be maintained at the site for appropriate spill response and cleanup in case an accidental spill occurs. Drip pans would be provided for the generators and other stationary equipment to collect any POL that is accidentally spilled during maintenance activities or leaks from equipment. To ensure oil pollution prevention, a Spill Prevention Control and Countermeasures Plan (SPCCP) would be in place prior to the start of construction activities.

Portable sanitary facilities would be provided during construction activities, and waste products would be collected and disposed of by licensed contractors. Disposal contractors would only use established roads to transport equipment and supplies, and all waste would be disposed of in compliance with Federal, state, and local regulations, and in accordance with contractors' permits.

Maintenance and Operations Activities

All solid and hazardous wastes and materials, including universal waste (such as batteries, motor oil, fluorescent light bulbs, etc.), would be handled in accordance with applicable Federal and state laws and guidelines governing these items.

The following BMPs will be implemented as standard operating procedures during all construction activities, and will include proper handling, storage, and disposal of hazardous and regulated materials.

- To avoid potential impacts from hazardous and regulated materials, all fuels, waste oils and solvents will be collected and stored in tanks or drums within a secondary containment system that consists of an impervious floor and bermed sidewalls capable of containing the volume of the largest container stored therein.
- The refueling of machinery will be completed in accordance with accepted industry and regulatory guidelines, and all vehicles will have drip pans during storage to contain minor spills and drips.
- Although it is unlikely that a major spill would occur, any spill of reportable quantities will be contained immediately within an earthen dike, and the application of an absorbent (e.g., granular, pillow, sock) will be used to absorb and contain the spill.
- All spills will be reported to the designated CBP point of contact for the project. Furthermore, a spill of any petroleum liquids (e.g., fuel) or material listed in 40 CFR 302 Table 302.4 of a reportable quantity must be cleaned up and reported to the appropriate Federal and state agencies.

- CBP will contain non-hazardous waste materials and other discarded materials, such as construction waste, until they can be removed from the construction and maintenance sites. This will assist in keeping the project area and surroundings free of litter and reduce the amount of disturbed area needed for waste storage. CBP will minimize site disturbance and avoid attracting wildlife by promptly removing waste materials, wrappers, and debris from the site. Any waste that must remain more than 12 hours should be properly stored until disposal. Solid waste receptacles will be maintained at construction staging areas. Non-hazardous solid waste (trash and waste construction materials) will be collected and deposited in on-site receptacles. Solid waste will be collected and disposed of by a local waste disposal contractor
- All waste oil and solvents will be recycled. All non-recyclable hazardous and regulated wastes will be collected, characterized, labeled, stored, transported, and disposed of in accordance with all applicable Federal, state, and local regulations, including proper waste-manifesting procedures.
- CBP will avoid contamination of ground and surface waters by storing concrete wash water, and any water that has been contaminated with construction materials, oils, equipment residue, etc., in closed containers on-site until removed for disposal. This wash water is toxic to wildlife. Storage tanks must have proper air space (to avoid rainfall-induced overtopping), be on-ground containers, and be located in upland areas instead of washes.
- Disposal of used batteries or other small quantities of hazardous waste will be handled, managed, maintained, stored, and disposed of in accordance with applicable Federal and state rules and regulations for the management, storage, and disposal of hazardous materials, hazardous waste and universal waste. Additionally, to the extent practicable, all batteries will be recycled locally. CBP will avoid soil contamination by using drip pans underneath equipment and containment zones when refueling vehicles or equipment.

3.13.2.2 Fossil Fuel Generator Alternative

The Fossil Fuel Generator Alternative would have impacts on the environment as a result of hazardous materials similar to those discussed for the solar-powered FOB in the Proposed Action during construction.

3.13.2.3 CPNWR Location Alternative

The FOB expansion on CPNWR lands would have impacts on the environment as a result of hazardous materials similar to those discussed for the Proposed Action.

3.13.2.4 No Action Alternative

The No Action Alternative would not contribute any hazardous waste or materials to the project area, as no construction would take place.

3.14 SOCIOECONOMICS

3.14.1 Population and Demographics

The Region of Influence (ROI) for the proposed project consists of Pima County, Arizona. This discussion supplements and updates the socioeconomic analysis conducted for the December 2009 SBI^{net} Ajo-1 EA (CBP 2009).

The population and racial mixes of the ROI and Arizona are presented in Table 3-7 (U.S. Census Bureau 2008a). The Pima County population was 994,244 in the 3-year census ending in 2008 (U.S. Census Bureau 2008b). Approximately 33 percent of Pima County and 30 percent of the State of Arizona reported having populations of (or populations with) Hispanic origin in the 3-year census ending in 2008, while 3.3 percent of Pima County and 3.5 percent of Arizona reported being African American.

Table 3-7. Population and Race Estimates within the Region of Influence for the 3-Year Census Ending in 2008

	Arizona	Pima County
White	4,928,196 (77.7%)	728,159 (73.2%)
African American	223,500 (3.5%)	32,440 (3.3%)
Native American	285,183 (4.5%)	32,688 (3.3%)
Asian	149,960 (2.4%)	24,029 (2.4%)
Native Hawaiian	10,172 (0.2%)	1,408 (0.1%)
Some Other Race	588,440 (9.3%)	143,489 (14.4%)
Two or More Races	158,501 (2.5%)	31,851 (3.2%)
Hispanic Origin	1,877,267 (29.6%)	325,139 (32.7%)
Total Population	6,343,952	994,244

Sources: U.S. Census Bureau 2008a and 2008b.

3.14.1.1 Employment and Income

Table 3-8 summarizes the total number of jobs in the ROI and Arizona. The number of jobs in Pima County increased 25.4 percent between 1998 and 2008 (a gain of 105,326 jobs). However, in an 18-month period (from 2008 to April 2009), the number of jobs in Pima County decreased 6.5 percent, which is less than the percentage of jobs lost in the state during the same time period (8.6 percent). The decrease in jobs in the last year, from April 2009 until April 2010, was 0.02 percent in Pima County, and was less than the 0.78 percent decrease in the state. The government sector provided the most jobs in Pima County in April 2010 (79,900 jobs), followed by educational and health services and trade, transportation and utilities sectors (Arizona Department of Commerce Research Administration 2010a and b).

Table 3-8. Total Number of Jobs within the Region of Influence

Location	1998	2008	April 2009	April 2010	Percent Change from April 2009 to April 2010
Arizona	2,610,870	3,437,191	2,909,000*	2,886,200*	-0.78%
Pima County	415,118	520,444	454,400*	454,300*	-0.02%

Sources: U.S. Bureau of Economic Analysis 1998a, 1998b, 2008a and 2008b, Arizona Department of Commerce Research Administration 2010a and 2010b.

*Data were rounded to the nearest 100.

The unemployment rate doubled in Arizona between 1999 and 2009 (Table 3-9), but has remained the same since 2009. In Pima County, between 1999 and 2009, the unemployment rate more than doubled. Since 2009, the unemployment rate in Pima County has decreased slightly (by 0.1 percent), while the unemployment rate for the state has remained the same (9.1 percent).

Table 3-9. Unemployment Rate within the ROI

Location	1999 (percent)	2009 (percent)	April 2010 (percent)
Arizona	4.5	9.1	9.1
Pima County	3.2	8.3	8.2

Sources: Real Estate Center 2010a and 2010b.

The 2008 per capita personal income (PCPI) for Pima County was \$34,058 and ranked 4th in the state (Table 3-10; U.S. Bureau of Economic Analysis 2008c). This PCPI was 99 percent of the state average (\$34,339) and 85 percent of the National average (\$40,166). The 1998 to 2008 average annual growth rate in the ROI was 4.2, greater than both the average annual growth rate for the state (3.8 percent) and the Nation (4.0 percent) (U.S. Bureau of Economic Analysis 2008c).

Table 3-10. Median Household Income for the U.S., Arizona, and Pima County

Location	2008 Per Capita Personal Income (PCPI)	PCPI 1998-2008 Average Annual Growth Rate (percent)	2008 Median Household Income
U.S.	\$40,166	4.0	\$52,029
Arizona	\$34,339	3.8	\$51,009
Pima County	\$34,058	4.2	\$46,653

Source: U.S. Bureau of Economic Analysis 2008c and U.S. Census Bureau 2008c.

In 1998, the median household income in Pima County was \$34,049, with 15.9 percent of the population living below poverty (U.S. Census Bureau 2008c); the percentage of persons living in poverty decreased slightly to 15.4 percent in 2008, and the median household income increased nearly 37 percent to \$46,653 (U.S. Census Bureau 2008c). In 1998, the State of Arizona

experienced a median household income of \$37,281, with 14.9 percent of the population living below poverty (U.S. Census Bureau 2008c). The percentage of persons living below poverty in 2008 remained about the same at 14.7 percent, and the median household income increased by 37 percent to \$51,009 in 2008 (U.S. Census Bureau 2008c).

3.14.1.2 Housing

The total number of housing units in the ROI during the 3-year census ending in 2008 was 421,325, with an 11.8 percent vacancy rate, which is about 4 percent less than that of the State of Arizona (Table 3-11). There is a higher percentage of owner-occupied houses in the state than in the ROI.

Table 3-11. Housing Units by Location (3-year Census Ending 2008)

Location	Vacant Housing Units	Occupied Housing Units		Total Housing Units
		Owner	Renter	
Arizona	417,579 (15.7%)	1,537,334 (68.3 %)	712,907 (31.7%)	2,667,820
Pima County	49,526 (11.8%)	244,519 (65.8%)	127,280(34.2%)	421,325

Sources: U.S. Census Bureau 2008a and 2008b.

3.14.2 Environmental Consequences

3.14.2.1 Proposed Action

The labor for the Proposed Action would be provided by private contractors, resulting in only temporary increases in the population of the ROI. When possible, materials and other project expenditures would be obtained through merchants in the local community resulting in temporary, minor economic benefits. All construction activities, regardless of the area, would be limited to daylight hours only, to the maximum extent practicable. Safety buffer zones would be designated around all construction sites to ensure public health and safety. No displacement of residential or commercial properties would result from this action.

Adequate housing and contracting resources are available in the ROI for private contractor involvement in expanding the FOB. Only minor direct impacts on housing or employment in the ROI would result from temporary increases in the contracted workforce. No changes to local employment rates, poverty levels, or local incomes would occur as a result of this project. Long-term, but minor, beneficial socioeconomic impacts would be realized from the purchasing of fuel for the backup generator and future maintenance of the FOB.

3.14.2.2 Fossil Fuel Generator Alternative

The Fossil Fuel Generator Alternative would have impacts on socioeconomics similar to those discussed for the solar-powered FOB in the Proposed Action during construction. The impacts expected from fuel purchase and maintenance would be significantly higher due to the higher amount of fuel necessary to run the diesel generators 24 hours per day and 365 days per year.

3.14.2.3 CPNWR Location Alternative

The FOB expansion on CPNWR lands would have impacts on socioeconomics similar to those discussed for the Proposed Action.

3.14.2.4 No Action Alternative

Under the No Action Alternative, the FOB would not be constructed. As a result, no additional direct impacts would be anticipated.

3.15 ENVIRONMENTAL JUSTICE AND PROTECTION OF CHILDREN

3.15.1 Affected Environment

3.15.1.1 Executive Order 12898, Environmental Justice

The fair treatment of all races has been assuming an increasingly prominent role in environmental legislation and implementation of environmental statutes. In February 1994, President Clinton signed EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*. This action requires all Federal agencies to identify and address disproportionately high and adverse impacts of its programs, policies, and activities on minority and low-income populations. Pima County has approximately 32 percent of their population claiming Hispanic or Latino origin (see Table 3-7). Furthermore, Pima County has a greater percentage of its population in poverty relative to both Arizona and the Nation (Table 3-12).

Table 3-12. 2007 Poverty Data for the Nation, Arizona, and the ROI

Location	All Ages in Poverty, Percentage
United States	13.0
Arizona	14.1
Pima County	14.9

Source: U.S. Census Bureau 2008c.

3.15.1.2 Executive Order 13045, Protection of Children

EO 13045 requires each Federal agency “to identify and assess environmental health risks and safety risks that may disproportionately affect children”; and “ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks.” This EO was prompted by the recognition that children, still undergoing physiological growth and development, are more sensitive to adverse environmental health and safety risks than adults. In Pima County, 226,705 individuals, or 23.9 percent of the population, are children under the age of 18 (U.S. Census Bureau 2007c). The potential for impacts on the health and safety of children would be greater where projects are located near residential areas.

3.15.2 Environmental Consequences

3.15.2.1 Proposed Action

The Proposed Action would not result in disproportionately high or adverse environmental health or safety impacts on minority or low-income populations or children. This conclusion is based on the fact that the FOB site is located on remote Federal lands, and there would be no displacement of persons (minority, low-income, children, or otherwise) as a result of implementing the Proposed Action.

3.15.2.2 Fossil Fuel Generator Alternative

The Fossil Fuel Generator Alternative would not result in disproportionately high or adverse environmental health or safety impacts on minority or low-income populations or children. This conclusion is based on the fact that the FOB site is located on remote Federal lands, and there would be no displacement of persons (minority, low-income, children, or otherwise) as a result of implementing this alternative.

3.15.2.3 CPNWR Location Alternative

The FOB expansion on CPNWR lands would not result in disproportionately high or adverse environmental health or safety impacts on minority or low-income populations or children. This conclusion is based on the fact that the FOB site is located on remote Federal lands, and there would be no displacement of persons (minority, low-income, children, or otherwise) as a result of implementing this alternative.

3.15.2.4 No Action Alternative

Impacts associated with the implementation of the No Action Alternative would not result in disproportionately high or adverse environmental health or safety impacts on minority or low-income populations or children. This conclusion is based on the fact that the FOB site is located on remote Federal lands, and there would be no displacement of persons (minority, low-income, children, or otherwise) as a result of implementing this alternative.

3.16 SUSTAINABILITY AND GREENING

3.16.1 Affected Environment

In accordance with EO 13423 – *Strengthening Federal Environmental, Energy, and Transportation Management* (72 FR 3919), CBP would incorporate practices in an environmentally, economically, and fiscally sound, integrated, continuously improving, efficient and sustainable manner in support of their mission. CBP implements practices throughout the agency to: 1) improve energy efficiency and reduce greenhouse emissions, 2) implement renewable energy projects, 3) reduce water consumption, 4) incorporate sustainable environmental practices such as recycling and the purchase of recycled-content products, and 5) reduce the quantity of toxic and hazardous materials used and disposed of by the agency. Additionally, new facility construction would comply with the *Guiding Principles for Federal Leadership in High Performance and Sustainable Buildings* set forth in the *Federal Leadership in High Performance and Sustainable Memorandum of Understanding*. DHS will also reduce total consumption of petroleum products as set forth in the EO and use environmentally sound practices with respect to the purchase and disposition of electronic equipment.

3.16.2 Environmental Consequences

3.16.2.1 Proposed Action

Under the Proposed Action, the Federal sustainability and greening practices would be implemented, to the extent practicable. CBP intends to reduce petroleum-based product use with a Fleet Management Plan facilitated through CBP's Asset Management Division and to use environmentally sound practices with respect to the purchase and disposition of electronic equipment. This project would adhere to this management plan. Efforts would be made to design the new FOB to meet the LEED silver award standards.

3.16.2.2 Fossil Fuel Generator Alternative

The Fossil Fuel Generator Alternative would use more petroleum-based products than the Proposed Action alternative due to the necessity of running the diesel generators continuously. All applicable sustainability and greening practices would be implemented, to the extent practicable.

3.16.2.3 CPNWR Location Alternative

The FOB expansion on CPNWR lands would have impacts similar to those discussed for the Proposed Action.

3.16.2.4 No Action Alternative

The No Action Alternative would not result in any direct or indirect impacts, as no construction activities would take place.

3.17 SUMMARY OF IMPACTS

Table 3-13 presents a summary matrix outlining the impacts from the four alternatives analyzed and how they affect the environment and environmental resources in the proposed FOB expansion areas.

Table 3-13. Summary Matrix

Affected Environment	Proposed Action	Fossil Fuel Generator	CPNWR Location	No Action Alternative
Land Use (Section 3.2)	The Proposed Action would change the primary use on 2 acres of the 330,689-acre OPCNM from lands managed primarily for conservation purposes to lands developed with CBP facilities. The lands which would be developed are located along a public road, immediately adjacent to the existing Ajo Station tactical camp and across the public road from the 120-foot-tall SBInet tower. The Proposed Action would have direct long-term, minor adverse impacts on land use in the project area.	Impacts would be the same as those discussed for the Proposed Action.	Impacts would be the same as those discussed for the Proposed Action, except that the impacts would occur on 3 acres of the approximately 860,000-acre CPNWR.	No direct impacts are expected. The existing tactical camp would continue to exist on the 1-acre site on the OPCNM.
Wilderness (Section 3.3)	The facilities would not be located on any lands which have been designated as wilderness by Congress. However, the facilities would be audible and visible from wilderness lands adjacent to the FOB. Under the Proposed Action alternative, there would be temporary impacts due to construction activities which are expected to last several months; however, the long-term noise footprint would be less than the No Action alternative due to development of solar power. The facilities would be visible, but taken in the context of previously developed lands in the project vicinity, the low wilderness public use levels, the increased visibility of these additional facilities is anticipated to have a minor additional impact on the wilderness experience.	The Fossil Fuel Generator Alternative would have the same visual impacts on wilderness as discussed for the solar-powered FOB in the Proposed Action; however, impacts on noise levels would be greater. The proposed FOB would be powered by two diesel-fueled generators, running continuously. Noise emissions from the operation of generators at the FOB would be localized and would have a long-term, moderate impact on designated wilderness.	The FOB expansion on CPNWR lands would be run on solar or other alternative fuel power with diesel generator back-ups. Impacts on the designated wilderness areas from noise and visual impediments would be the same as those described for the Proposed Action. However, Congress specifically authorized CBP operational activities when establishing the CPNWR wilderness area (P.L. 101-628).	Under the No Action Alternative, there would be long-term, moderate impacts on wilderness from noise emissions from the continuous use of the generator at the existing tactical camp. The generator is unbaffled and impacts approximately 64 acres of designated wilderness.
Geology and Soils (Section 3.4)	There would be no impacts on geologic resources of the area. A total of 2 acres of soils would be permanently impacted due to the expansion of the FOB. No soils classified as prime farmlands occur in the project area. The Proposed Action would have a long-term, negligible adverse impact on soils.	Impacts would be the same as those discussed for the Proposed Action.	Impacts would be the same as those discussed for the Proposed Action.	No direct impacts are expected. The existing tactical camp impacted approximately 1 acre of the Growler-Antho complex.
Hydrology and Groundwater (Section 3.5)	Water required during construction would be brought to the site from an outside source. Additionally, a SWPPP would be prepared prior to construction and would contain drainage controls to prevent soil erosion. The planned FOB expansion would have a minor impact on hydrology and groundwater. A total of 1,224 gallons of water per day would be required by the Agents and detainees at the FOB during operation. If the on-site water well does not provide potable water, these water needs would be met with water brought in from off-site. The proposed project would have a minor impact on groundwater and hydrology.	Impacts would be the same as those discussed for the Proposed Action.	Impacts would be the same as those discussed for the Proposed Action.	No additional direct impacts are expected. All water used at the existing tactical camp is brought to the site, stored in tanks for use, and treated in the on-site septic system.
Vegetation (Section 3.6)	The Proposed Action would result in the permanent loss of 2 acres of Sonoran desertscrub vegetation community. The proposed project would have long-term, negligible adverse impacts on the approximately 3.5 million acres of similar Sonoran Desert vegetation communities on CPNWR, Barry M. Goldwater Range, and OPCNM.	Impacts would be the same as those discussed for the Proposed Action.	Impacts would be the same as those discussed for the Proposed Action.	No additional direct impacts are expected. The existing tactical camp impacted approximately 1 acre of highly degraded Sonoran Desertscrub.
Wildlife and Aquatic Resources (Section 3.7)	Approximately 2 acres of previously disturbed wildlife habitat would be impacted. The habitat type is extremely abundant in the region with approximately 3.5 million acres of similar wildlife habitat on CPNWR, Barry M. Goldwater Range, and OPCNM. The Proposed Action would have a long-term, negligible adverse impact on widely available wildlife habitat and on local wildlife due to construction and operational noise.	The Fossil Fuel Generator Alternative would have the same habitat loss impacts on wildlife as discussed for the Proposed Action; however, impacts on wildlife from noise levels would be greater. The proposed FOB would be powered by two diesel-fueled generators, running continuously. Noise emissions from the operation of generators at the FOB would be localized and would have a long-term, moderate impact on wildlife.	Impacts would be the same as those discussed for the Proposed Action.	No additional direct impacts are expected. The existing tactical camp impacted 1 acre of highly disturbed wildlife habitat when it was established.

Table 3-13, continued

Affected Environment	Proposed Action	Fossil Fuel Generator	CPNWR Location	No Action Alternative
Protected Species (Section 3.8)	There is only limited foraging habitat for Sonoran pronghorn within the proposed FOB expansion site. In addition, CBP would use minimization and avoidance measures to address potential impacts to species. For example, by completing construction during the winter when bats have migrated to Mexico, impacts to listed bats would be avoided. Based on these methods, CBP has determined the Proposed Action would not have a significant impact on lesser long nosed bats or Sonoran pronghorn.	The Fossil Fuel Generator Alternative would have the same habitat loss impacts on Sonoran Pronghorn and lesser long-nosed bats as discussed for the Proposed Action; however, impacts from noise levels would be greater. The proposed FOB would be powered by two diesel-fueled generators, running continuously. Noise emissions from the operation of generators at the FOB would be localized and would have a long-term, minor impact on Sonoran Pronghorn.	Impacts would be the same as those discussed for the Proposed Action.	No additional direct impacts are expected. Impacts from the establishment of the tactical camp at the current site were identified and assessed in the Biological Opinion prepared for the SBInet Ajo 1 Project (USFWS 2009).
Cultural Resources (Section 3.9)	There are two previously recorded archaeological sites in the project vicinity. All impacts to these sites would be avoided through project design. As a result CBP has determined no historic resources would be impacted.	Impacts would be the same as those discussed for the Proposed Action.	Impacts would be the same as those discussed for the Proposed Action.	No direct impacts are expected.
Air Quality (Section 3.10)	Temporary and minor increases in air pollution would occur from the use of construction equipment and the disturbance of soils during construction of the expanded FOB. There would be no violations of air quality standards and no conflicts with the state implementation plans; therefore, impacts on air quality from the implementation of the Proposed Action would be minor.	The Fossil Fuel Generator Alternative would have the same impacts on air quality as discussed for the Proposed Action during the construction phase; however, impacts during operation would be much greater. The proposed FOB would be powered by two diesel-fueled generators, running continuously. There would be no violations of air quality standards and no conflicts with the state implementation plans; therefore, no significant impacts on air quality would occur. Air emissions from the operation of generators at the FOB would be localized and would have a long-term, minor impact on air quality.	Impacts would be the same as those discussed for the Proposed Action.	Air emissions would be approximately half of what is expected for the Fossil Fuel Generator Alternative during operations. The existing tactical camp uses one generator, running continuously.
Noise (Section 3.11)	Noise generated by construction equipment would be intermittent and last a maximum of several months, after which noise levels would return to ambient levels. The noise impacts from construction activities would be temporary and negligible to minor. Noise generated by generators and air-conditioning units associated with the FOB would have a minor, long-term impact on the noise environment. Impacts from noise emissions would be less in both duration and magnitude than those currently experienced from the diesel generators in continuous use at the tactical camp site.	The Fossil Fuel Generator Alternative would have greater impacts on noise levels than the Proposed Action. The proposed FOB would be powered by two diesel-fueled generators, running continuously. Noise emissions from the operation of generators at the FOB would be localized and would have a long-term, minor impact on the noise levels within the designated wilderness areas. Noise levels from the generators would be attenuated to 35 dBA at 492 feet. Approximately 17 acres of land would be contained within the 35 dBA contour.	Impacts would be the same as those discussed for the Proposed Action.	The tactical camp would continue to impact approximately 63.86 acres with an increased soundscape. The impact would be long-term and minor.
Roadways and Traffic (Section 3.12)	The increase of vehicular traffic would occur to supply materials and work crews for a short period of time. Once construction work is completed, maintenance visits to the FOB would be required up to twice a month. Maintenance visits would have a long-term, negligible impact on traffic. There would be an estimated reduction of 10,600 trips annually along the Bates Well Road.	The Fossil Fuel Generator Alternative would have greater impacts on roadways and traffic during operation. Diesel fuel would be delivered to the site, adding to the traffic along Darby Wells Road and Bates Well Road. Additional traffic from maintenance and fuel deliveries would have a long-term, minor impact on roadways and traffic along the access route.	Impacts would be the same as those discussed for the Proposed Action.	No additional direct impacts are expected.
Hazardous Materials (Section 3.13)	The Proposed Action would not result in the exposure of the environment or public to any hazardous materials. The potential exists for minor releases of POLs during construction, operational or maintenance activities. BMPs would be put in place to avoid any potential contamination at the proposed sites during construction activities and operation.	Impacts would be the same as those discussed for the Proposed Action.	Impacts would be the same as those discussed for the Proposed Action.	No additional direct impacts are expected.
Socioeconomics (Section 3.14)	The Proposed Action would not cause any changes to local employment rates, poverty levels, or local incomes. Long-term beneficial, socioeconomic impacts could be realized from the purchasing of fuel for generators.	Impacts would be the same as those discussed for the Proposed Action. However, long-term impacts associated with fuel purchases would be greater due to the increased fuel necessary for full-time diesel generators.	Impacts would be the same as those discussed for the Proposed Action.	No direct impacts are expected.
Environmental Justice (Section 3.15)	Implementation of the Proposed Action would cause no direct impacts on minority and low-income populations.	Impacts would be the same as those discussed for the Proposed Action.	Impacts would be the same as those discussed for the Proposed Action.	Impacts would be the same as those discussed for the Proposed Action.
Sustainability and Greening (Section 3.16)	Under the Proposed Action, applicable Federal sustainability and greening practices would be implemented to the greatest extent practicable.	Impacts would be the same as those discussed for the Proposed Action.	Impacts would be the same as those discussed for the Proposed Action.	No direct impacts are expected.

SECTION 4.0
BEST MANAGEMENT PRACTICES

4.0 BEST MANAGEMENT PRACTICES

This chapter describes those measures that would be implemented to reduce or eliminate potential adverse impacts on the human and natural environment. Many of these measures have been incorporated as standard operating procedures by CBP on past projects. These are general measures; development of specific environmental design or conservation measures would be required for certain activities implemented under the Proposed Action. The specific measures would be coordinated through appropriate agencies and land managers or administrators, as required. Environmental design measures vary by project and are typically coordinated with the USFWS and other appropriate Federal and state resource agencies.

4.1 PROJECT PLANNING/DESIGN

CBP will use disturbed areas or areas that will be used later in the construction period for staging, parking, and equipment storage.

CBP will ensure that all construction will follow *DHS Directive 025-01* for waste for Sustainable Practices for Environmental, Energy, and Transportation Management. A CBP-approved spill protection plan (or SPCCP) will be developed and implemented at construction and maintenance sites to ensure that any toxic substances are properly handled and that escape into the environment is prevented. Drip pans underneath equipment, containment zones used when refueling vehicles or equipment, and other measures are to be included. CBP will incorporate BMPs relating to project area delineation, water sources, waste management, and site restoration into project planning and implementation for construction and maintenance.

All BMPs to be implemented by the project contractor will be included in the contract.

4.2 GENERAL CONSTRUCTION ACTIVITIES

CBP will clearly demarcate the project construction area perimeter, including access roads, with flagging or fencing in accordance with the land management agency. No disturbance outside that perimeter will be authorized.

CBP will minimize the number of construction and maintenance vehicles traveling to and from the project site, as well as the number of trips per day, to reduce the likelihood of disturbing animals in the area, or injuring animals on the road, or disturbing their habitat.

Within the designated disturbance area, CBP will minimize the area to be disturbed by limiting deliveries of materials and equipment to only those needed for effective project implementation.

CBP will avoid contamination of ground and surface waters by storing concrete wash water and any water that has been contaminated with construction materials, oils, equipment residue, etc., in closed containers on-site until removed for disposal. This wash water is toxic to wildlife. Storage tanks must have proper air space (to avoid rainfall-induced overtopping), be on-ground containers, and be located in upland areas instead of washes.

CBP will avoid lighting impacts during the night by conducting construction and maintenance activities during daylight hours only. If night lighting is unavoidable, CBP will: 1) use special bulbs designed to ensure no increase in ambient light conditions, 2) minimize the number of lights used, 3) place lights on poles pointed down toward the ground, with shields on lights to prevent light from going up into sky or out laterally into landscape, and 4) selectively place lights so they are directed away from all native vegetative communities.

CBP will avoid transmitting disease vectors, introducing invasive non-native species, and depleting natural aquatic systems by using wells, irrigation water sources, or treated municipal sources for construction or irrigation purposes instead of natural sources.

CBP will include a configuration to support fire management operations in the design of facilities that require land clearing. CBP will minimize fences and other infrastructure that may be damaged due to periodic wildfire.

SECTION 5.0

REFERENCES



5.0 REFERENCES

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SECTION 6.0

ACRONYMS AND ABBREVIATIONS

6.0 ACRONYMS AND ABBREVIATIONS

1°	Primary
2°	Secondary
AC	Advisory Circulars
ACHP	Advisory Council on Historic Preservation
ADA	Arizona Department of Agriculture
ADEQ	Arizona Department of Environmental Quality
ADOT	Arizona Department of Transportation
ADWR	Arizona Department of Water Resources
AESO	Arizona Ecological Services Office
AGFD	Arizona Game and Fish Department
AOR	area of responsibility
ASM	Arizona State Museum
bgs	below ground surface
BLM	Bureau of Land Management
BMP	best management practices
CBP	U.S. Customs and Border Protection
CBV	cross-border violator
CEQ	Council on Environmental Quality
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CFC	chlorofluorocarbons
CFR	Code of Federal Regulations
CH ₄	methane
CO	carbon monoxide
CO ₂	carbon dioxide
CPNWR	Cabeza Prieta National Wildlife Refuge
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DHS	Department of Homeland Security
DOI	Department of Interior
EA	Environmental Assessment
EIS	Environmental Impact Statement
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FOB	Forward Operating Base
FONSI	Finding of No Significant Impact
FR	Federal Register
GHG	greenhouse gases
GSRC	Gulf South Research Corporation
HFC	hydrochlorofluorocarbons
H.R.	House Resolution

HUD	U.S. Department of Housing and Urban Development
INS	Immigration and Naturalization Service
IO	isolated occurrence
JTF-6	Joint Task Force-Six
kW	Kilowatt
mph	miles per hour
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
N ₂ O	nitrous oxide
NO ₂	nitrogen dioxide
NOA	Notice of Availability
NPL	National Priorities List
NPS	National Park Service
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O ₃	ozone
OPCNM	Organ Pipe Cactus National Monument
P	primary
PCPI	per capita personal income
PM-10	particulate matter measuring less than 10 microns
P.L.	Public Law
POL	petroleum, oil, and lubricants
ppm	parts per million
ROI	region of influence
S	sensitive
SBI	Secure Border Initiative
SC	species of concern
SHPO	State Historic Preservation Officer
SO ₂	sulfur dioxide
SPCCP	Spill Prevention Control and Countermeasures Plan
SR	salvage restricted
SWPPP	Stormwater Pollution Prevention Plan
U.S.	United States
U.S.C.	U.S. Code
USACE	U.S. Army Corps of Engineers
USBP	U.S. Border Patrol
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Service
WSC	wildlife of special concern

APPENDIX A
OPCNM SPECIAL USE PERMIT

CONDITIONS OF THIS PERMIT
Permit # IMR-ORPI-9500 10-04 Initial
Permittee: Customs & Border Protection

1. The permittee shall exercise this privilege subject to the supervision of the Superintendent, and shall comply with all applicable laws and regulations of the area.
2. The permittee shall pay the National Park Service for any damages resulting from this use that would not reasonably be inherent in the use for which the permittee is authorized as described in this permit when consistent with applicable law, regulations, and rulings, and to the extent appropriated funds are made available for such purpose.
3. Assignment - this permit may not be transferred or assigned without the consent of the Superintendent in writing.
4. Nothing in this permit may be construed to obligate the agencies of the United States to any current or future expenditure of funds in advance, or in excess, of the availability of appropriations.
5. **Revocation – This permit may be terminated upon breach of any of the conditions herein or at the discretion of the Superintendent if he deems it necessary to do so in order to protect public health or safety or park resources. The Superintendent will consult with the permittee before any discretionary termination.**
6. The permittee will comply with all applicable public health and sanitation standards and codes.
7. The permittee will require all contractor employees and assigned project personnel to display visible company logos on vehicles and employees are required to carry ID Badges identifying them as employees of the contractor or assigned project personnel
8. The permittee will immediately inform the National Park Service of any accidents, criminal incidents, or emergency medical issues within the monument. **The following numbers may be utilized to report such incidents: (623) 580-5515 or 911**
9. The permittee will have adequate fire extinguishers with each vehicle.
10. **The permittee will adhere to a 25 mph or less speed limit at all times.**
11. **Driving or parking vehicles off of delineated roads or the pre-established "footprint" of the worksite is prohibited.**
12. The permittee will minimize the number of vehicles utilized for the project so that normal traffic flows may be maintained by other vehicles using the area.
13. Workers wishing to carry a firearm in their vehicle while in the monument may do so, but the use of a firearm is **PROHIBITED**, per 36 CFR 2.4.
14. During the project if **inadvertent discoveries** of cultural resources are made, they should be reported to the ORPI Archeologist at (520) 387-6849 ext. 7120. Inadvertent discoveries, particularly if there are human remains or funerary objects present, should be left in situ, treated with respect, and not disturbed.
15. In the unlikely event that **human remains** are discovered during project work, work should be halted immediately within a 100 ft. radius and the ORPI Superintendent and Staff Archeologist should be contacted without delay at (520) 387-6849 ext. 7500, radio call number 500 (Superintendent Lee Baiza) or (520) 387-6849 ext. 7120, radio call number 120 (Archeologist Connie Gibson), to begin NAGPRA protection and notification procedures.
16. The permittee will maintain all access and administrative roads during construction to meet park requirements, and will stay within the existing road footprint. The permittee will repair roads in cooperation with NPS.

17. All best management practices, avoidance and mitigation measures identified in the Ajo1 SBInet Biological Opinion, Environmental Assessment and National Historic Preservation Act compliance documents must be adhered to.

SITE SPECIFIC STIPULATIONS

Bates Well FOB Location:

18. The existing Bates Well FOB and all associated infrastructure will be dismantled and removed in to the satisfaction of the Superintendent.

West Boundary FOB Location:

19. The new FOB location, shown in the attached map, measures one acre and is located within Organ Pipe Cactus National Monument, outside of wilderness, north of El Camino Del Diablo and adjacent to the park's western boundary.
20. The entirety of the West Boundary FOB will be located inside the area described above.
21. Vehicular access to and from the West Boundary FOB site is granted only via the southwest corner of the site, in that area that has already been previously disturbed.
22. CBP must obtain prior written approval from the Superintendent regarding the removal and deposition of any of materials coming from the site.
23. Foreign fill materials will be permitted to be brought and utilized on the site only upon receipt of written permission from the Superintendent.
24. The design of any proposed perimeter fence around the West Boundary FOB must meet with approval in writing by the Superintendent prior to construction.
25. All West Boundary FOB construction must comply with Arizona Department of Environmental Quality (ADEQ) requirements and regulations.
26. A Stormwater Pollution Prevention Plan (SWPPP) must be prepared prior to the West Boundary FOB construction.
27. An erosion and sediment control plan, which stipulates measures to minimize erosion and sedimentation during and after construction, must be developed and approved by the park Superintendent and later implemented during the West Boundary FOB construction and subsequent use.



United States Department of the Interior

NATIONAL PARK SERVICE ORGAN PIPE CACTUS NATIONAL MONUMENT

10 Organ Pipe Drive
Ajo, Arizona 85321



A3815

July 7, 2010

Mr. Paul Kuhn
Acting Chief Patrol Officer in Charge
US Border Patrol - Ajo Station
State Route 85
Why, AZ 85321

Dear Mr. Kuhn:

I am writing to express my conditional support for construction of a septic system at the Forward Operating Base (FOB) that is proposed along the western boundary of Organ Pipe Cactus National Monument adjacent to the Camino Del Diablo, and the park's western boundary with Cabeza Prieta National Wildlife Refuge. The area is approximately 1 acre in size and has been agreed upon as the preferred site for establishing the FOB.

A meeting with representatives of the US Border Patrol (USBP), the National Park Service (NPS), and the US Fish and Wildlife Service (FWS) was held at the USBP Ajo Station headquarters. Among the issues discussed at this meeting was the size of the septic system at the FOB. The Biological Opinion on SBInet Ajo 1 Tower System states: "The septic system will be of sufficient design and capacity for up to ten people." (FWS December 7, 2009). Based on my understanding that FWS Ecological Services has granted permission for construction of a larger septic system, I will issue a special use permit (SUP) for the system, provided the following conditions and requirements are met:

- Provide NPS with copies of all required and approved ADEQ permits prior to construction.
- Provide NPS a copy of the final design drawings of the septic system
- Provide NPS written documentation from FWS Ecological Services (ES) Office and Cabeza Prieta NWR stating that they have no objection to the proposed action.

Allowing construction of the expanded capacity septic system is conditional and will be revoked if the above requirements are not met. Permitting construction of the septic system should in no way be interpreted as permission to increase the number of agents operating out of the FOB. Additional FWS consultation and an assessment of the environmental effects of additional agents would need to be conducted prior to any changes in numbers.

Please feel free to contact Mark Sturm, Chief of Resource Management, at (520) 387-6849 x 17110 should you have questions or concerns regarding this matter. Thank you.

Sincerely,

Lee Baiza
Superintendent
cc: Wayne Lackner, USBP
Sherry Barrett, USFWS

APPENDIX B
CORRESPONDENCE





**U.S. Customs and
Border Protection**

MAR 31 2011

Mr. Steve Spangle, Field Supervisor
U.S. Fish and Wildlife Service
Arizona Ecological Services Field Office
2321 West Royal Palm Road, Suite 103
Phoenix, AZ 85021-4915

Dear Mr. Spangle:

U.S. Customs and Border Protection (CBP) and the Department of Homeland Security (DHS) intends to supplement the *Environmental Assessment (EA) for the Proposed Secure Border Initiative (SBI)net Ajo-1 Tower Project, Ajo Station's Area of Responsibility, U.S. Border Patrol (USBP), Tucson Sector* for the Proposed Ajo Forward Operating Base (FOB). This supplemental EA (SEA) will address the construction, operation, and maintenance of a FOB at the site of the current USBP camp located north of El Camino del Diablo at the Organ Pipe Cactus National Monument (OPCNM)/Cabeza Prieta National Wildlife Refuge property boundary (Figure 1). The USBP camp was relocated from Bates Well to its current location in 2011 as part of the Ajo-1 Tower Project.

The SEA will analyze the potential for significant adverse or beneficial impacts of the proposed actions. At the present time, the preferred alternative includes the expansion of the current one-acre footprint of the USBP camp to up to a 3-acre site within the non-wilderness corridor, entirely within the OPCNM. The proposed FOB would be referred to as the Ajo FOB and include: an Administrative/lodging modular building to accommodate up to 32 agents, perimeter fencing, electric generators, drinking water well, septic system, fire suppression system, security equipment and cameras, fuel storage, parking for 35 vehicles, a Detention and Processing modular building to accommodate 40 individuals, an equestrian facility with 8 stalls and hay storage, an ATV storage area, and an supply storage area.

CBP is currently in the process of gathering the most current information available regarding Federal and state listed species potentially occurring within this area. CBP respectfully requests that your agency provide input regarding protected species, designated critical habitat, descriptions of sensitive resources (e.g., rare or unique plant communities, threatened, endangered, and candidate species), and unique or environmentally sensitive areas that you believe may be affected by the proposed USBP activities.

We intend to provide your agency with a copy of the Draft SEA to solicit formal comments once the document is completed.

Mr. Steve Spangle
Page 2

Your prompt attention to this request would be greatly appreciated. If you have any questions, please call Mr. Steve Hodapp at (202) 325-4459.

Sincerely,

A handwritten signature in black ink, appearing to read 'Loren Flossman', with a long horizontal flourish extending to the right.

Loren Flossman
Director
Border Patrol Facilities and Tactical Infrastructure
Program Management Office

cc: Ms. Erin Fernandez
Mr. Scott Richardson

Identical copies of the coordination letter from CBP (dated March 31, 2011) were sent to the following Federal and state agencies and Native American tribal representatives.

Mr. Lee Biaza, Superintendent
Organ Pipe Cactus National Monument
10 Organ Pipe Drive
Ajo, AZ 85321

Mr. Sid Slone, Manager
Cabeza Prieta National Wildlife Refuge
1611 North Second Avenue
Ajo, AZ 85321

Arizona Game and Fish Department
WMHB - Project Evaluation Program
ATTN: Project Evaluation Program Supervisor
5000 W. Carefree Highway
Phoenix, AZ 85086-5000

Mr. Steve Owens, Director
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, AZ 85007

Ms. Joan Card, Director
Arizona Department of Environmental Quality
Water Quality Division
1110 West Washington Street
Phoenix, AZ 85007

Mr. Bill Ruth, Commissioner
U.S. International Boundary and Water Commission
4171 North Mesa Street
Suite CIOO
El Paso, TX 79902

The Honorable Ned Norris, Chairman
Tohono O'odham Nation
P.O. Box 837
Sells, AZ 85634

The Honorable Leroy Shingoitewa
Hopi Tribe
P.O. Box 123
Kykotsmovi, AZ 86039



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Henry R. Darwin
Director

April 20, 2011

David Guzewich
U.S. Customs and Border Protection
1300 Pennsylvania Avenue NW
Washington, DC 20229

SENT VIA E-MAIL: david.guzewich@dhs.gov

Re: Supplement to Environmental Assessment for SBInet Ajo-1 Tower Project, Ajo Station

Dear Mr. Guzewich:

We received the March 31, 2011 letter requesting comments on the supplement to the Environmental Assessment for the Proposed Secure Border Initiative Ajo-1 Tower Project, Ajo Station's Area of Responsibility, U.S. Border Patrol, Tucson Sector. The Arizona Department of Environmental Quality, Water Quality Division (ADEQ) is responsible for ensuring the delivery of safe drinking water to customers of regulated public water systems under the Safe Drinking Water Act, permits for proposed discharges to surface waters of the United States under the federal Clean Water Act (CWA), permits under the State aquifer protection program, and water quality certifications of certain federal licenses and permits. With the information provided, ADEQ would like to make you aware of some water quality issues that may need to be addressed.

1. Clean Water Act

As of December 5, 2002, Arizona has authorization from the U.S. Environmental Protection Agency (EPA) to operate the National Pollutant Discharge Elimination System (NPDES) Permit Program (Section 402 of the CWA) on the state level. The NPDES program, and the surface water permits issued, are referred to as the Arizona Pollutant Discharge Elimination System (AZPDES) Permit Program. Stormwater discharges associated with construction activities, such as clearing, grading, or excavating, that disturb one acre or more must obtain permit coverage under the AZPDES Construction General Permit. Permit coverage is also required if the project is part of a larger common plan of development and the entire project will ultimately disturb one or more acres. As part of permit coverage, a Stormwater Pollution Prevention Plan (SWPPP) must be prepared and implemented before ground disturbance begins. The SWPPP must comply with ADEQ's Construction General Permit's SWPPP requirements, and must identify such elements as the project scope, anticipated acreage of land disturbance, and the best management practices that would be implemented to reduce soil erosion, and contain or minimize the pollutants that might be released to waters of the U.S. In addition to preparing the SWPPP, the project proponent must file for permit coverage. If one or more acres of land disturbance will occur, then the project will require coverage under the Construction General Permit. The Construction General Permit, SWPPP checklist, and associated forms are available on ADEQ's website at: <http://www.azdeq.gov/environ/water/permits/stormwater.html#const>. For questions, please contact

Northern Regional Office
1801 W. Route 66 • Suite 117 • Flagstaff, AZ 86001
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733 BW1 FOIA CBP 007146

Chris Henninger in our Stormwater and General Permits Unit at (602) 771-4508 or by e-mail at cph@azdeq.gov.

If project activities will occur inside the Ordinary High Water Mark of any water of the U.S., then a CWA section 404 permit (a.k.a. dredge and fill) from the U.S. Army Corps of Engineers may be required. If a 404 permit (or any other federal permit) is required for the project, a state-issued CWA section 401 certification of the permit may be required to ensure that the permitted activities will not result in a violation of Arizona's surface water quality standards. For questions, please contact Bob Scalamera at (602) 771-4502 or by e-mail at rs3@azdeq.gov. The CWA 401 application form can be downloaded from ADEQ's website at: <http://www.azdeq.gov/function/forms/appswater.html#dredge>.

2. Drinking Water

The letter mentions the use of a drinking water well. A water system that has at least fifteen service connections or regularly serves an average of at least twenty-five individuals daily at least 60 days out of the year must comply with state drinking water regulations. As part of the regulatory requirements, an applicant for a new drinking water system, or modifying an existing system, must submit plans for review and approval before construction begins. Future drinking water systems may require that ADEQ approve the source water as a drinking water source. Also, ADEQ may need to evaluate and approve an Elementary Business Plan to ensure that the water system has and can maintain adequate technical, managerial, and financial capabilities to consistently provide safe drinking water. While ADEQ has delegated permitting and enforcement responsibilities of state rules for drinking water systems to some counties, ADEQ is responsible for all reviews and approvals for a federal entity. For questions, please contact Donna Calderon in the Drinking Water Unit at (602) 771-4641 or via e-mail at dml@azdeq.gov.

3. Aquifer Protection Program

The letter mentions the use of a septic system. Wastewater treatment facilities, including on-site treatment facilities, require an Aquifer Protection Permit (APP). A general permit is available for most sewage collection systems and on-site systems (septic) that have a design flow less than 24,000 gallons per day. While ADEQ has delegated permitting and enforcement responsibilities of state rules for wastewater systems to some counties, ADEQ is responsible for all reviews and approvals for a federal entity. Any on-site system that cannot qualify for a general permit will require an individual APP, which can be issued only by ADEQ. For questions, please contact David Burchard in the Wastewater and Subdivision Review Unit at (602) 771-4298 or via e-mail at db2@azdeq.gov.

We appreciate the opportunity to review and provide comments. If you need further information, please contact Wendy LeStarge of my staff at (602) 771-4836 or via e-mail at wll@azdeq.gov, or myself at (602) 771-4416 or via e-mail at lc1@azdeq.gov.

Sincerely,



Linda Taunt, Deputy Director
Water Quality Division



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Henry R. Darwin
Director

April 28, 2011

Ms. Loren Flossman
Director, Border Patrol Facilities and Tactical Infrastructure
Program Management Office
U.S. Customs and Border Protection
1300 Pennsylvania Avenue NW
Washington, DC 20229

RE: Santa Cruz County: Scoping Letter for the Proposed Ajo Forward Operating Base

Dear Ms. Loren Flossman:

The ADEQ Air Quality Division has reviewed your letter, dated March 31, 2011, concerning the Scoping Letter for the Proposed Ajo Forward Operating Base Project. Your project is located in a nonattainment area regulated for 10-micron particulate matter (PM₁₀). As described, it may have a de minimis impact on air quality. Disturbance of particulate matter, however, is anticipated during the construction phase and during operation of ATVs. Please include details about numbers of ATVs and estimated PM₁₀ emissions in your supplement. Considering prevailing winds, to comply with other applicable air pollution control requirements and minimize adverse impacts on public health and welfare, the following information is provided for consideration:

REDUCE DISTURBANCE of PARTICULATE MATTER during CONSTRUCTION

This action, plan or activity may temporarily increase ambient particulate matter (dust) levels. Particulate matter 10 microns in size and smaller can penetrate the lungs of human beings and animals and is subject to a National Ambient Air Quality Standard (NAAQS) to protect public health and welfare. Particulate matter 2.5 microns in size and smaller is difficult for lungs to expel and has been linked to increases in death rates; heart attacks by disturbing heart rhythms and increasing plaque and clotting; respiratory infections; asthma attacks and cardiopulmonary obstructive disease (COPD) aggravation. It is also subject to a NAAQS.

Northern Regional Office
1801 W. Route 66 • Suite 117 • Flagstaff, AZ 86001
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

BW1 FOIA CBP 007148

The following measures are recommended to reduce disturbance of particulate matter, including emissions caused by strong winds as well as machinery and trucks tracking soil off the construction site:

- I. Site Preparation and Construction
 - A. Minimize land disturbance;
 - B. Suppress dust on traveled paths which are not paved through wetting, use of watering trucks, chemical dust suppressants, or other reasonable precautions to prevent dust entering ambient air;
 - C. Cover trucks when hauling soil;
 - D. Minimize soil track-out by washing or cleaning truck wheels before leaving construction site;
 - E. Stabilize the surface of soil piles; and
 - F. Create windbreaks.
- II. Site Restoration
 - A. Revegetate any disturbed land not used;
 - B. Remove unused material; and
 - C. Remove soil piles via covered trucks.

The following rules applicable to reducing dust during construction, demolition and earth moving activities are enclosed:

- ☐ Arizona Administrative Code R18-2-604 through -607
- ☐ Arizona Administrative Code R18-2-804

Should you have further questions, please do not hesitate to call me at (602) 771-2375, or Lhamo at (602) 771-2373.

Very truly yours,



Diane L. Arnst, Manager
Air Quality Planning Section

Enclosures (2)

cc: Bret Parke, EV Administrative Counsel
Lhamo LeMoine, Administrative Secretary
File No. 257647

- c. If the burning would occur at a solid waste facility in violation of 40 CFR 258.24 and the Director has not issued a variance under A.R.S. § 49-763.01.
- E. Open outdoor fires of dangerous material. A fire set for the disposal of a dangerous material is allowed by the provisions of this Section, when the material is too dangerous to store and transport, and the Director has issued a permit for the fire. A permit issued under this subsection shall contain all provisions in subsection (D)(3) except for subsections (D)(3)(e) and (D)(3)(f). The Director shall permit fires for the disposal of dangerous materials only when no safe alternative method of disposal exists, and burning the materials does not result in the emission of hazardous or toxic substances either directly or as a product of combustion in amounts that will endanger health or safety.
- F. Open outdoor fires of household waste. An open outdoor fire for the disposal of household waste is allowed by provisions of this Section when permitted in writing by the Director or a delegated authority. A permit issued under this subsection shall contain all provisions in subsection (D)(3) except for subsections (D)(3)(e) and (D)(3)(f). The permittee shall conduct open outdoor fires of household waste in an approved waste burner and shall either:
1. Burn household waste generated on-site on farms or ranches of 40 acres or more where no household waste collection or disposal service is available; or
 2. Burn household waste generated on-site where no household waste collection and disposal service is available and where the nearest other dwelling unit is at least 500 feet away.
- G. Permits issued by a delegated authority. The Director may delegate authority for the issuance of open burning permits to a county, city, town, air pollution control district, or fire district. A delegated authority may not issue a permit for its own open burning activity. The Director shall not delegate authority to issue permits to burn dangerous material under subsection (E). A county, city, town, air pollution control district, or fire district with delegated authority from the Director may assign that authority to one or more private fire protection service providers that perform fire protection services within the county, city, town, air pollution control district, or fire district. A private fire protection provider shall not directly or indirectly condition the issuance of open burning permits on the applicant being a customer. Permits issued under this subsection shall comply with the requirements in subsection (D)(3) and be in a format prescribed by the Director. Each delegated authority shall:
1. Maintain a copy of each permit issued for the previous five years available for inspection by the Director;
 2. For each permit currently issued, have a means of contacting the person authorized by the permit to set an open fire if an order to extinguish open burning is issued; and
 3. Annually submit to the Director by May 15 a record of daily burn activity, excluding household waste burn permits, on a form provided by the Director for the previous calendar year containing the information required in subsections (D)(3)(e) and (D)(3)(f).
- H. The Director shall hold an annual public meeting for interested parties to review operations of the open outdoor fire program and discuss emission reduction techniques.
- I. Nothing in this Section is intended to permit any practice that is a violation of any statute, ordinance, rule, or regulation.

Historical Note

Adopted effective May 14, 1979 (Supp. 79-1). Amended effective October 2, 1979 (Supp. 79-5). Correction, subsection (C) repealed effective October 2, 1979, not shown (Supp. 80-1). Former Section R9-3-602 renumbered without change as Section R18-2-602 (Supp. 87-3). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-602 renumbered to R18-2-802, new Section R18-2-602 renumbered from R18-2-401 effective November 15, 1993 (Supp. 93-4). Amended by final rulemaking at 10 A.A.R. 388, effective March 16, 2004 (Supp. 04-1).

R18-2-603. Repealed

Historical Note

Adopted effective May 14, 1979 (Supp. 79-1). Former Section R9-3-603 renumbered without change as Section R18-2-603 (Supp. 87-3). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-603 renumbered to R18-2-803, new Section R18-2-603 renumbered from R18-2-403 effective November 15, 1993 (Supp. 93-4). Repealed effective October 8, 1996 (Supp. 96-4).

R18-2-604. Open Areas, Dry Washes, or Riverbeds

- A. No person shall cause, suffer, allow, or permit a building or its appurtenances, or a building or subdivision site, or a driveway, or a parking area, or a vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, without taking reasonable precautions to limit excessive amounts of particulate matter from becoming airborne. Dust and other types of air contaminants shall be kept to a minimum by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means.
- B. No person shall cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, trucks, cars, cycles, bikes, or buggies, or by animals such as horses, without taking reasonable precautions to limit excessive amounts of particulates from becoming airborne. Dust shall be kept to a minimum by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means.
- C. No person shall operate a motor vehicle for recreational purposes in a dry wash, riverbed or open area in such a way as to cause or contribute to visible dust emissions which then cross property lines into a residential, recreational, institutional, educational, retail sales, hotel or business premises. For purposes of this subsection "motor vehicles" shall include, but not be limited to trucks, cars, cycles, bikes, buggies and 3-wheelers. Any person who violates the provisions of this subsection shall be subject to prosecution under A.R.S. § 49-463.

Historical Note

Adopted effective May 14, 1979 (Supp. 79-1). Former Section R9-3-604 renumbered without change as Section R18-2-604 (Supp. 87-3). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-604 renumbered to R18-2-804, new Section R18-2-604 renumbered from R18-2-404 and amended effective November 15, 1993 (Supp. 93-4).

R18-2-605. Roadways and Streets

- A. No person shall cause, suffer, allow or permit the use, repair, construction or reconstruction of a roadway or alley without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. Dust and other particulates shall be kept to a minimum by employing temporary paving, dust suppressants, wetting down, detouring or by other reasonable means.
- B. No person shall cause, suffer, allow or permit transportation of materials likely to give rise to airborne dust without taking reasonable precautions, such as wetting, applying dust suppressants, or covering the load, to prevent particulate matter from becoming airborne. Earth or other material that is deposited by trucking or earth moving equipment shall be removed from paved streets by the person responsible for such deposits.

Historical Note

Adopted effective May 14, 1979 (Supp. 79-1). Former Section R9-3-605 renumbered without change as Section R18-2-605 (Supp. 87-3). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-605 renumbered to R18-2-805, new Section R18-2-605 renumbered from R18-2-405 effective November 15, 1993 (Supp. 93-4).

R18-2-606. Material Handling

No person shall cause, suffer, allow or permit crushing, screening, handling, transporting or conveying of materials or other operations likely to result in significant amounts of airborne dust without taking reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods to prevent excessive amounts of particulate matter from becoming airborne.

Historical Note

Section R18-2-606 renumbered from R18-2-406 effective November 15, 1993 (Supp. 93-4).

R18-2-607. Storage Piles

- A. No person shall cause, suffer, allow, or permit organic or inorganic dust producing material to be stacked, piled, or otherwise stored without taking reasonable precautions such as chemical stabilization, wetting, or covering to prevent excessive amounts of particulate matter from becoming airborne.
- B. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne.

Historical Note

Section R18-2-607 renumbered from R18-2-407 effective November 15, 1993 (Supp. 93-4).

R18-2-608. Mineral Tailings

No person shall cause, suffer, allow, or permit construction of mineral tailing piles without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. Reasonable precautions shall mean wetting, chemical stabilization, revegetation or such other measures as are approved by the Director.

Historical Note

Section R18-2-608 renumbered from R18-2-408, new Section R18-2-408 adopted effective November 15, 1993 (Supp. 93-4).

R18-2-609. Agricultural Practices

A person shall not cause, suffer, allow, or permit the performance of agricultural practices outside the Phoenix and Yuma planning areas, as defined in 40 CFR 81.303, which is incorporated by reference in R18-2-210, including tilling of land and application of fertilizers without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne.

Historical Note

Section R18-2-609 renumbered from R18-2-409 effective November 15, 1993 (Supp. 93-4). Amended by final rulemaking at 6 A.A.R. 2009; effective May 12, 2000 (Supp. 00-2). Amended by final rulemaking at 11 A.A.R. 2210, effective July 18, 2005 (Supp. 05-2).

R18-2-610. Definitions for R18-2-611

The definitions in Article 1 of this Chapter and the following definitions apply to R18-2-611:

1. "Access restriction" means restricting or eliminating public access to noncropland with signs or physical obstruction.
2. "Aggregate cover" means gravel, concrete, recycled road base, caliche, or other similar material applied to noncropland.
3. "Artificial wind barrier" means a physical barrier to the wind.
4. "Best management practice" means a technique verified by scientific research, that on a case-by-case basis is practical, economically feasible, and effective in reducing PM₁₀ emissions from a regulated agricultural activity.
5. "Chemical irrigation" means applying a fertilizer, pesticide, or other agricultural chemical to cropland through an irrigation system.
6. "Combining tractor operations" means performing two or more tillage, cultivation, planting, or harvesting operations with a single tractor or harvester pass.
7. "Commercial farm" means 10 or more contiguous acres of land used for agricultural purposes within the boundary of the Maricopa PM₁₀ nonattainment area.
8. "Commercial farmer" means an individual, entity, or joint operation in general control of a commercial farm.
9. "Committee" means the Governor's Agricultural Best Management Practices Committee.
10. "Cover crop" means plants or a green manure crop grown for seasonal soil protection or soil improvement.
11. "Critical area planting" means using trees, shrubs, vines, grasses, or other vegetative cover on noncropland.
12. "Cropland" means land on a commercial farm that:
 - a. Is within the time-frame of final harvest to plant emergence;
 - b. Has been tilled in a prior year and is suitable for crop production, but is currently fallow; or
 - c. Is a turn-row.

ARTICLE 8. EMISSIONS FROM MOBILE SOURCES (NEW AND EXISTING)

R18-2-801. Classification of Mobile Sources

- A. This Article is applicable to mobile sources which either move while emitting air contaminants or are frequently moved during the course of their utilization but are not classified as motor vehicles, agricultural vehicles, or agricultural equipment used in normal farm operations.
- B. Unless otherwise specified, no mobile source shall emit smoke or dust the opacity of which exceeds 40%.

Historical Note

Adopted effective February 26, 1988 (Supp. 88-1). Amended effective September 26, 1990 (Supp. 90-3). Amended effective February 3, 1993 (Supp. 93-1). Former Section R18-2-801 renumbered to Section R18-2-901, new Section R18-2-801 renumbered from R18-2-601 effective November 15, 1993 (Supp. 93-4).

R18-2-802. Off-road Machinery

- A. No person shall cause, allow or permit to be emitted into the atmosphere from any off-road machinery, smoke for any period greater than 10 consecutive seconds, the opacity of which exceeds 40%. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.
- B. Off-road machinery shall include trucks, graders, scrapers, rollers, locomotives and other construction and mining machinery not normally driven on a completed public roadway.

Historical Note

Adopted effective February 26, 1988 (Supp. 88-1). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-802 renumbered to Section R18-2-902, new Section R18-2-802 renumbered from R18-2-602 effective November 15, 1993 (Supp. 93-4).

R18-2-803. Heater-planer Units

No person shall cause, allow or permit to be emitted into the atmosphere from any heater-planer operated for the purpose of reconstructing asphalt pavements smoke the opacity of which exceeds 20%. However three minutes' upset time in any one hour shall not constitute a violation of this Section.

Historical Note

Adopted effective February 26, 1988 (Supp. 88-1). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-803 renumbered to Section R18-2-903, new Section R18-2-803 renumbered from R18-2-603 effective November 15, 1993 (Supp. 93-4).

R18-2-804. Roadway and Site Cleaning Machinery

- A. No person shall cause, allow or permit to be emitted into the atmosphere from any roadway and site cleaning machinery smoke or dust for any period greater than 10 consecutive seconds, the opacity of which exceeds 40%. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.
- B. In addition to complying with subsection (A), no person shall cause, allow or permit the cleaning of any site, roadway, or alley without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions may include applying dust suppressants. Earth or other material shall be removed from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water or by other means.

Historical Note

Adopted effective February 26, 1988 (Supp. 88-1). Amended effective September 26, 1990 (Supp. 90-3). Amended effective February 3, 1993 (Supp. 93-1). Former Section R18-2-804 renumbered to Section R18-2-904, new Section R18-2-804 renumbered from R18-2-604 effective November 15, 1993 (Supp. 93-4).

R18-2-805. Asphalt or Tar Kettles

- A. No person shall cause, allow or permit to be emitted into the atmosphere from any asphalt or tar kettle smoke for any period greater than 10 consecutive seconds, the opacity of which exceeds 40%.
- B. In addition to complying with subsection (A), no person shall cause, allow or permit the operation of an asphalt or tar kettle without minimizing air contaminant emissions by utilizing all of the following control measures:
 1. The control of temperature recommended by the asphalt or tar manufacturer;
 2. The operation of the kettle with lid closed except when charging;
 3. The pumping of asphalt from the kettle or the drawing of asphalt through cocks with no dipping;
 4. The dipping of tar in an approved manner;
 5. The maintaining of the kettle in clean, properly adjusted, and good operating condition;
 6. The firing of the kettle with liquid petroleum gas or other fuels acceptable to the Director.

Historical Note

Adopted effective February 26, 1988 (Supp. 88-1). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-805 renumbered to Section R18-2-905, new Section R18-2-805 renumbered from R18-2-605 effective November 15, 1993 (Supp. 93-4).



United States Department of the Interior

U.S. Fish and Wildlife Service
Arizona Ecological Services Office
2321 West Royal Palm Road, Suite 103
Phoenix, Arizona 85021-4951
Telephone: (602) 242-0210 Fax: (602) 242-2513



In reply refer to:

AESO/SE
22410-2009-SL-0089-R002

May 9, 2011

MAY 31 2011

Mr. Loren Flossman, Director
U.S. Customs and Border Protection
Border Patrol Facilities and Tactical
Infrastructure Program Management Office
1300 Pennsylvania Avenue NW
Washington, DC 20229

RE: Proposed Construction, Operation, and Maintenance of the Forward Operating Base (FOB) Located North of El Camino Del Diablo at the Organ Pipe Cactus National Monument, Pima County, Arizona

Dear Mr. Flossman:

Thank you for your recent request for information on threatened or endangered species, or those that are proposed to be listed as such under the Endangered Species Act of 1973, as amended (Act), which may occur in your project area. The Arizona Ecological Service Field Office has posted lists of the endangered, threatened, proposed, and candidate species occurring in each of Arizona's 15 counties on the Internet. Please refer to the following web page for species information in the county where your project occurs:

<http://www.fws.gov/southwest/es/arizona>

If you do not have access to the Internet or have difficulty obtaining a list, please contact our office and we will mail or fax you a list as soon as possible.

After opening the web page, find Arizona County/Species List on the main page. Then click on the county of interest. The arrows on the left will guide you through information on species that are listed, proposed, candidates, or have conservation agreements. Here you will find information on the species' status, a physical description, all counties where the species occurs, habitat, elevation, and some general comments. Additional information can be obtained by going back to the main page. On the left side of the screen, click on Document Library, then click on Documents by Species, then click on the name of the species of interest to obtain General Species Information, or other documents that may be available. Click on the "Cactus" icon to view the desired document.

Register (FR) are included for each listed and proposed species. The FR is available at most Federal depository libraries. This information should assist you in determining which species may or may not occur within your project area. Site-specific surveys could also be helpful and may be needed to verify the presence or absence of a species or its habitat as required for the evaluation of proposed project-related impacts.

Endangered and threatened species are protected by Federal law and must be considered prior to project development. If the action agency determines that listed species or critical habitat may be adversely affected by a federally funded, permitted, or authorized activity, the action agency will need to request formal consultation with us. If the action agency determines that the planned action may jeopardize a proposed species or destroy or adversely modify proposed critical habitat, the action agency will need to enter into a section 7 conference. The county list may also contain candidate or conservation agreement species. Candidate species are those for which there is sufficient information to support a proposal for listing; conservation agreement species are those for which we have entered into an agreement to protect the species and its habitat. Although candidate and conservation agreement species have no legal protection under the Act, we recommend that they be considered in the planning process in the event that they become listed or proposed for listing prior to project completion.

If any proposed action occurs in or near areas with trees and shrubs growing along watercourses, known as riparian habitat, we recommend the protection of these areas. Riparian areas are critical to biological community diversity and provide linear corridors important to migratory species. In addition, if the project will result in the deposition of dredged or fill materials into waterways, we recommend you contact the Army Corps of Engineers which regulates these activities under Section 404 of the Clean Water Act.

The State of Arizona and some of the Native American Tribes protect some plant and animal species not protected by Federal law. We recommend you contact the Arizona Game and Fish Department and the Arizona Department of Agriculture for State-listed or sensitive species, or contact the appropriate Native American Tribe to determine if sensitive species are protected by Tribal governments in your project area. We further recommend that you invite the Arizona Game and Fish Department and any Native American Tribes in or near your project area to participate in your informal or formal Section 7 Consultation process.

For additional communications regarding this project, please refer to consultation number 22410-2009-SL-0089-R002. We appreciate your efforts to identify and avoid impacts to listed and sensitive species in your project area.

Please note this letter does not authorize avian mortality for species that are protected under the Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. sec. 703-712) nor does this letter authorize the destruction of occupied nests of migratory birds. If you believe migratory birds will be affected by this activity, we recommend you contact our Migratory Bird Permit Office, P.O. Box 709, Albuquerque, NM 87103, (505) 248-7882, or FW2_birdpermits@fws.gov. For more information regarding the MBTA, please visit the following web site:

<http://www.fws.gov/migratorybirds/>.

Mr. Loren Flossman, Director

3

birds will be affected by this activity, we recommend you contact our Migratory Bird Permit Office, P.O. Box 709, Albuquerque, NM 87103, (505) 248-7882, or FW2_birdpermits@fws.gov. For more information regarding the MBTA, please visit the following web site: <http://www.fws.gov/migratorybirds/>.

If we may be of further assistance, please feel free to contact Brenda Smith (928) 226-0614 (x101) for projects in Northern Arizona, Debra Bills (602) 242-0210 (x239) for projects in central Arizona and along the Lower Colorado River, and Scott Richardson (520) 670-6150 (x242) for projects in southern Arizona.

Sincerely,



Steven L. Spangle
Field Supervisor

cc: Regional Supervisor, Arizona Game and Fish Department, Tucson, AZ
Assistant Field Supervisor, Fish and Wildlife Service, Tucson, AZ
(Attn: E. Fernandez and S. Sferra)
Organ Pipe Cactus National Monument, Ajo, AZ

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Comment Response Matrix Preliminary Draft Supplemental Environmental Assessment for the SBI-net Ajo-1 Project – AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station					
#	Location		Comment	Reviewer	GSRC Response
	Page	Line Section			
1.			<p>Please include details about numbers of ATVs and estimated PM10 emissions in your supplement</p>	ADEQ Air	<p>Border Patrol operations, including ATV patrols will not be discussed or analyzed in this document. The estimated PM10 emissions are included in Section 3.10.</p>
2.			<p>The following measures are recommended to reduce disturbance of particulate matter, including emissions caused by strong winds as well as machinery and trucking soil off the construction site:</p> <p>I. Site Preparation and Construction</p> <ul style="list-style-type: none"> A. Minimize land disturbance; B. Suppress dust on traveled paths which are not paved through wetting, use of watering trucks, chemical dust suppressants, or other reasonable precautions to prevent dust entering ambient air; C. Cover trucks when hauling soil; D. Minimize soil track-out by washing or cleaning truck wheels before leaving construction site; E. Stabilize the surface of soil piles; and F. Create windbreaks. <p>II. Site Restoration</p> <ul style="list-style-type: none"> A. Revegetate any disturbed land not used; B. Remove unused material; and C. Remove soil piles via covered trucks. 	ADEQ Air	<p>These BMPs have been included.</p>
3.			<p>The following rules applicable to reducing dust during construction, demolition, and earth moving activities are enclosed:</p> <ul style="list-style-type: none"> o Arizona Administrative Code R18-2-604 through -607 o Arizona Administrative Code R18-2-804 	ADEQ Air	<p>The project will comply with all applicable Arizona Air Quality codes.</p>

Comment Response Matrix Preliminary Draft Supplemental Environmental Assessment for the SBI-net Ajo-1 Project – AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station					
#	Location		Comment	Reviewer	GSRC Response
	Page	Line	Section		
4.				ADEQ Water	The project will comply with all applicable parts of the Clean Water Act, and prior to construction, a Construction General Permit will be obtained from ADEQ.
			<p>The Clean Water Act: Stormwater discharges associated with construction activities such as clearing, grading, or excavating, that disturb one acre or more must obtain permit coverage under the Arizona Pollutant Discharge Elimination System (AZPDES) Construction General Permit. Permit coverage is also required if the project is part of a larger common plan of development and the entire project will ultimately disturb one or more acres. As part of permit coverage, a Stormwater Pollution Prevention Plan (SWPPP) must be prepared and implemented before ground disturbance begins. The SWPPP must comply with ADEQ's scope, anticipated acreage of land disturbance, and the best management practices that would be implemented to reduce soil erosion, and contain or minimize the pollutants that might be released to waters of the U.S. In addition to preparing the SWPPP, the project proponent must file for permit coverage. If one or more acres of land disturbance will occur, then the project will require coverage under the Construction General Permit. The Construction General Permit, SWPPP checklist, and associated forms are available on ADEQ's website at: www.azdeq.gov/enviro/water/permits/stormwater.html#const.</p>		
5.				ADEQ Water	The project will comply with all applicable ADEQ regulations on drinking water.
			<p>Drinking Water: A water system that has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days out of the year must comply with state drinking water regulations. As part of the regulatory requirements, an applicant for a new drinking water system, or modifying an existing system, must submit plans for review and approval before construction begins. Future drinking water systems may require that ADEQ approve the source water as a drinking water source. While ADEQ has delegated permitting and enforcement responsibilities of state rules for drinking water systems to some counties, ADEQ is responsible for all reviews and approvals for a federal entity.</p>		
6.				ADEQ Water	The project will comply with all applicable ADEQ regulations on wastewater treatment facilities. If any changes are made to the existing system, ADEQ will be consulted.
			<p>Aquifer protection Program: Wastewater treatment facilities, including on-site treatment facilities, require an Aquifer protection Permit (APP). A general permit is available for most sewage collection systems and on-site systems (septic) that have a design flow less than 24,000 gallons per day. While ADEQ has delegated permitting and enforcement responsibilities of state rules for wastewater systems to some counties, ADEQ is responsible for all review and approvals for a federal entity. Any on-site system that cannot quality for a general permit will require an individual APP, which can be issued only by ADEQ.</p>		

ARIZONA DAILY STAR

Tucson, Arizona

STATE OF ARIZONA)
COUNTY OF PIMA)

Debbie Capanear, being first duly sworn deposes and says: that she is the Legal Advertising Representative of **TNI PARTNERS**, a General Partnership organized and existing under the laws of the State of Arizona, and that it prints and publishes the Arizona Daily Star, a daily newspaper printed and published in the City of Tucson, Pima County, State of Arizona, and having a general circulation in said City, County, State and elsewhere, and that the attached and was printed and

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AUGUST 3, 2011

Debbie Capanear

Subscribed and sworn to before me this 9 day of
September, 2011

Silvia H Valdez
Notary Public



SILVIA H VALDEZ
Notary Public—Arizona
Pima County
Expires 12/15/2013

My commission expires _____

AD NO. 7558071

NOTICE OF AVAILABILITY

DRAFT ENVIRONMENTAL
ASSESSMENT FOR THE PROPOSED
AJO FORWARD OPERATING BASE
AJO STATION'S AREA OF
RESPONSIBILITY U.S. BORDER
PATROL, TUCSON SECTOR

The public is hereby notified of the availability of the draft Environmental Assessment (EA) and draft Finding of No Significant Impact (FONSI) prepared by Customs and Border Protection for the expansion of the U.S. Border Patrol Ajo Station Forward Operating Base in Pima County, Arizona. The location for the proposed action is a 3-acre site along Bates Well Road at the western boundary of Organ Pipe Cactus National Monument. The draft EA and FONSI will be available at the Pima County Public Library, Salazar-Ajo Branch, 33 Plaza, Ajo, Arizona. It is also available for download at the following URL address: <http://ecso.syl.usace.army.mil/Pages/Publicreview.cfm>.

All comments must be received by September 2 and should be sent to Mr. David C. Guzewich, Environmental Planning, Border Patrol Facilities and Tactical Infrastructure, Program Management Office, Via mail: 1301 Constitution Avenue NW, Suite B-155, Washington DC 20229.

Via fax: (202) 344-1250
Via email:
David.Guzewich@dhs.gov

Publish August 3, 2011
Arizona Daily Star

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>					
#	Location	Comment	Reviewer	CBP Response	
1.		The Department prefers the Proposed Action	Arizona Game and Fish Department (AGFD)	CBP concurs.	
2.		With the successful implementation of proposed best management practices, the Department does not anticipate any significant adverse impacts to wildlife species resulting from the approval of this proposed project.	AGFD	CBP appreciates your comments.	
3.		On behalf of Linda Taunt, Deputy Division Director, Water Quality Division of the Arizona Department of Environmental Quality, thank you for the opportunity to review and comment on the Draft Environmental Assessment for the Proposed Ajo Forward Operation Base. The Draft Environmental Assessment addresses our comments that were submitted April 20, 2011. We have no additional comments.	Arizona Department of Environmental Quality (ADEQ) Water Quality Division	CBP appreciates your comments.	
4.		The USBWC has reviewed the above referenced project and determined that the project should not have any impacts on USBWC property or interests. Construction should maintain best management practices to prevent runoff or degradation of air quality during construction to avoid impacts to watershed interests in Mexico.	U.S. International Boundary and Water Commission (USIBWC)	CBP concurs. The best management practices identified for each environmental resource will be implemented to prevent, avoid, or minimize impacts on resources.	
5.		Additionally, the EA states that biological impacts to birds during bird breeding season will be avoided. This should be expanded to note that breeding season for the endangered Sonoran Pronghorn occurs in September and October. Measures similar to those taken during the Ajo-I Tower project to avoid construction impacts to the Sonoran Pronghorn should also be planned and initiated for this project.	USIBWC	CBP concurs. CBP is currently in consultation with the U.S. Fish and Wildlife Service (USFWS) to determine conservation measures to avoid and/or minimize impacts on Sonoran pronghorn.	
6.		The following measures are recommended to reduce disturbance of particulate matter, including emissions caused by strong winds as well as machinery and trucks tracking soil off of the construction site: *** list provided in letter***	ADEQ Air Quality	CBP has included these measures to reduce disturbance of particulate matter into the EA.	

Comment Response Matrix
Revised Preliminary Draft Environmental Assessment for the
Ajo Station FOB, U.S. Border Patrol Tucson Sector, Ajo Station

#	Location		Comment	Reviewer	CBP Response	
	Page	Line				
7.		General	<p>Thank you for the opportunity to submit comments. The NPS is supportive of USBP's mission "to prevent the entry of terrorists and their weapons of terrorism and to enforce the laws that protect the United States homeland." The NPS further understands that the purpose of the proposed action is to improve "efficiency and safety within the USBP Tucson Sector, encompassing remote border zones in the Ajo Station AOR." The NPS also understands that an operational enforcement footprint is absolutely necessary in the region given the existing high levels of illegal border activities. Identifying where to locate limited border enforcement infrastructure is key to achieving USBP's stated objective of reducing depth of intrusion to areas as close to the border as possible. Doing so will contribute greatly to the Nation's security as well as to the successful conservation of the invaluable natural and cultural resources that are found in proximity to the border. Regarding the conservation of these resources, both USBP and NPS have acknowledged the need to work together to reduce border related impacts wherever and whenever possible. Indeed USBP and NPS are already collaborating to restore some impacted areas. There are certainly numerous additional opportunities for improvement and the challenge before us is to determine how to limit the continuation of impacts while also contemplating a significant expansion of operational support infrastructure.</p>	Organ Pipe Cactus National Monument (OPCNM)	CBP appreciates your cooperation and your comments.	
8.		General	<p>The <i>Final Environmental Assessment for the Proposed SBInet Ajo-1 Tower Project, Ajo Station's Area of Responsibility, U.S. Border Patrol Tucson Sector, December 2009</i>, is hereafter referred to as CBP 2009.</p>	OPCNM		

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
9.	General	<p>We request that the alternative of locating the FOB in Lukeville, AZ be given equal consideration as an alternative carried forward for analysis in the EA.. CBP incursion data from January 2010 to June 2011 reveal that 526% more incursions occurred in a 100 square mile area around Lukeville, AZ as compared to the same sized area in proximity of the proposed action. Additionally, throughout the region, for years there has existed a vehicle barrier along the international border with Mexico that has been very successful at preventing vehicular incursions originating from Mexico. Consequently, today the vast majority of illegal border activities, particularly those in remote wilderness areas, occur on foot. NPS monitoring results reveal a reduction in the number of foot trails in proximity of the proposed action area (Figure 1), nearing zero per kilometer. By comparison, monitoring in the southeastern region of the park, near Lukeville, detected an estimated 10 and 7 foot trails per kilometer in 2009 and 2011 respectively. Additionally, in response to the comparatively high levels of illegal cross border activities that are sustained near Lukeville, CBP is proposing additional border security infrastructure there. Therefore, the NPS submits that Lukeville should be considered as an alternate location for the proposed forward operating base (FOB).</p> <p>CBP states that its objective is to constrict the depth of intrusion as close to the international border as possible (CBP 2009). OPCNM believes that a FOB near Lukeville would accomplish this by allowing agents to deploy laterally, east and west along the border in order to deter and interdict illegal cross border activity. The benefits of considering Lukeville an alternate site are many and extend far beyond the logistical advantages of being nearer the border in an area where data indicate most illegal activities originate. In addition Lukeville has paved access, grid power, available water, fiber optic, communication infrastructure, lies outside of wilderness at the extreme easterly limits of the Sonoran pronghorn's US range.</p>	OPCNM	<p>OPCNM has participated in discussion with CBP dating to 2009 regarding the need to establish a FOB in the western portion of the Ajo Station AOR. In July 2010, the Superintendent of OPCNM approved installation of a septic system with a 32-person capacity at the proposed FOB site. In January 2011, the OPCNM Superintendent concurred in a meeting with CBP that the proposed location in the EA was the preferred FOB site. CBP agrees that locating the FOB at Lukeville would result in reduced environmental impacts form physical FOB construction compared to the preferred location in the EA; however, since Lukeville is a 30 minute drive on a paved road from the existing Ajo Station, CBP is able to adequately respond to border security issues in the Lukeville area without a new FOB. Further, construction of a FOB at Lukeville would actually position agents further from the areas currently needing increased border security compared to the existing conditions where agents must drive form the Ajo Station to the western portion of the Ajo AOR. As stated in the EA, location of the FOB at the proposed site would result in a substantial savings to the government through reduced commuting time. As the Lukeville site does not meet the basic agency need, it has been included in Section 2.5 of the EA as an alternative considered but eliminated.</p>

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
10.		<p>The NPS acknowledges that many of the direct impacts of the proposed action have been disclosed, however, we believe that many of the indirect impacts of the proposed action have not been fully analyzed and disclosed in the document. Similarly, the NPS believes that the cumulative impacts to many resource topics should be analyzed in greater detail so that the full breadth of impacts are disclosed, and mitigating measures could be put in place to more effectively deal with adverse impacts to important resources. As always, the NPS would welcome the opportunity to work with CBP towards identifying resource impacts of concern and developing mitigation measures help offset adverse effects to resources.</p>	OPCNM	<p>The EA addresses all impacts of construction and operation of the FOB facility. It is unclear precisely what NPS means by "indirect impacts" however, if NPS intends this to include operational activities of agents within the FOB AOR, then CBP points out that those impacts on the environment were analyzed in the 2009 Ajo 1 EA to which this EA is tiered. For further information on this question see Section 1.1 and 1.4 of the EA.</p>
11.		<p>The NPS believes that the types of CPB interdiction activities should be quantified. The referenced CBP 2009 describes the types of CBP interdiction activities that occur in the project area. It goes on to predict that "...when the proposed towers become functional as a result of the enhanced detection capabilities, ... interdiction efforts would be more focused and off-road interdiction activities would not be expected to increase overall and would decrease over time." Since 2002 the NPS has monitored foot and vehicle trail impacts associated with border related activities. Figure 1 reveals the results of this effort from the Growler Valley, the area where the proposed action would be implemented. Figure 1 reveals that contrary to what was anticipated in CBP 2009, and referenced in the current document, vehicle impacts have actually increased substantially in the region. Accordingly, this agency submits that the effects of these significantly higher than predicted impacts should be disclosed and mitigated in the current document. Specifically this agency is concerned about the effects of such sustained high levels of impacts on: land use, wilderness, Sonoran pronghorn and its habitat; soils and geology; and hydrologic processes.</p>	OPCNM	<p>Based on experience in other border locations where similar sensor tower technology has been deployed, CBP anticipates that off-road interdiction will decrease in the area covered by Ajo 1 towers. There has been an increase in interdiction efforts in the first year after the towers became operational. This increase in activity is similar to what happened after this technology was deployed in Altar Valley and Yuma Sector. The initial increase in activity was predicted in the Ajo 1 EA (Section 2.3.6). CBP expects a decrease in off road traffic over the next several years.</p>

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
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12.		<p>There is currently a one acre Border Patrol camp on the premises where the proposed action would occur. Existing infrastructure at the site of the proposed action is already considerable. This agency requests working with CBP to identify a location/expansion effort that serves both the CBP and NPS missions without compromising respective agency objectives.</p> <p>The document describes construction of the proposed action, and some long term effects of an expanded forward operating base on the three acre site that will be directly impacted, however the environmental and ecological consequences of the proposed action with regard to the long term effects it would have in supporting expanded Border Patrol operations is not included in the document. The conclusion that the expanded FOB would constitute a net decrease in the number of agent hours operating in the region by eliminating the need to commute daily from the Ajo station. The referenced, CBP 2009 predicted a similar outcome of no increase and an eventual decrease in vehicular traffic levels however NPS soundscape data collected in 2009 and again in 2011 reveal traffic level estimates of 37 and 72 vehicles per day respectively. We have already discussed some of the documented increases in the levels of off-road impacts that occurred during this same time. The NPS is concerned because contrary to what was anticipated in CBP 2009, monitoring results reveal an increase in vehicle related impacts (Figure 1). The Growler Valley is the region that would be most affected by the proposed action. Every two years transects are monitored for signs of vehicle and foot traffic associated with border impacts. Figure 1 reveals that impacts from off-road vehicle use have increased in the Growler Valley over the past two years, despite low foot traffic levels and the presence of the Ajo1 SBIInet towers. The conclusion that traffic levels will decrease as a result of the proposed action should be revisited in light of the fact that similar expectations regarding decreases in traffic, stated in the reference CBP 2009, have not come to fruition. NPS data show that traffic has actually increased.</p>	OPCNM	<p>As discussed in response number 9 above, CBP has been working with NPS on placement of the FOB at the proposed location over the last two years. As explained in Section 1.4 of the EA, the proposed action will result in no change in the number of agents working in the Ajo AOR, but will result in reduced agent commuter traffic on Bates Well Road. With regard to the issue of increased operations since the installation of SBIInet towers, see the response number 11 above. CBP has not been provided copies of any technical reports prepared by NPS regarding soundscape or Growler Valley transect monitoring. Therefore, CBP cannot comment on this data at this time.</p>

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
13.	General – Sonoran Pronghorn	<p>Since March 2011 the existing Border Patrol camp has been capable of supporting field operations for approximately 10 agents. The camp exists deep within the range of Sonoran pronghorn, a species that is listed as endangered under the Endangered Species Act. Sonoran pronghorn are adapted to survive in the extreme environments of the Sonoran Desert. In the US, Sonoran pronghorn currently occupy DOI and DOD lands representing about 8% of its former range. Sonoran pronghorn are reclusive, secretive animals that are known to be impacted by different types of anthropogenic disturbances. Managers have accordingly taken measures to limit Sonoran pronghorn exposure to such activities by limiting access, particularly during the fawning season which typically extends from March 15 through July 15.</p> <p>The referenced CBP 2009 states “although the proposed project would contribute to the adverse cumulative effects which threaten Sonoran pronghorn, it would not contribute to curtailment of their range” and goes on the state that “the proposed project . . . would substantially reduce the cumulative adverse effects associated with human presence”. Figure 3-1 in the draft environmental assessment (pg. 3-17) reveals that for the first time all 2011 radio-collared Sonoran pronghorn detections in the area shown occur twenty or more miles north of the international border.</p> <p>The NPS believes that the proposed action would increase the possibility of Sonoran pronghorn encounters by increasing more than three-fold the number of agents supporting the FOB and operating in the Sonoran pronghorn’s range. Efforts to minimize or mitigate detrimental effects to Sonoran pronghorn, such as Sonoran pronghorn monitoring, avoidance and mitigation have been successfully developed and implemented for years by the US Department of Defense, which also conducts diverse operations throughout the species’ range.</p> <p>The NPS offers to work with CBP to develop similar procedures in support of DHS operations. The potential for negative interactions with Sonoran pronghorn by CBP operations could be minimized by routinely determining pronghorn locations, particularly during key periods, and establishing clear procedures for conducting operations in proximity to areas where pronghorn are known to be present.</p>	OPCNM	<p>As stated in the EA, the FOB would not change the number of agents operating within the Ajo FOB AOR or within Sonoran Pronghorn habitat. As is the case with Department of Defense military operations on Barry M Goldwater Range, the USFWS has determined there is no record of CBP operations resulting in take of Sonoran pronghorn. CBP is aware of no studies which document adverse impacts of CBP operations on Sonoran pronghorn. Krausman et al. (2004) conducted research on the impacts of ground based vehicle and foot traffic and fixed and rotary winged aircraft overflights on Sonoran pronghorn. Karusman concluded that pronghorn habituated to both ground-based and overflight activities, exhibited a flight response to these human activities approximately 5 percent of the time and that impacts of these activities were not biologically significant. Unlike military training, CBP cannot schedule its interdiction activities which are directed in response to border incursions. CBP will complete Section 7 consultation with USFWS on this project and is committed to taking all necessary steps to minimize and avoid impacts of this project on all Federally listed species.</p>

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
14.	General – Soils and Hydrology	<p>Figure 2 shows the summary results of soil strength measurements that were collected in Organ Pipe Cactus National Monument during January of 2011. It reveals that depth of penetration using a fixed applied force in soils is reduced by exposure to off road vehicle use. This empirically demonstrates that soils become compacted under exposure to such off road vehicle use.</p> <p>Compaction reduces soil air pockets. Such pockets facilitate water retention as well as soil to plant nutrient transfer, both vital ecosystem functions in the Sonoran desert's extreme environment. Soils are unable to quickly recover their porous properties once compacted. Such processes take millennia. Surface hydrology also plays an important ecosystem sustaining function throughout the Sonoran desert. Water and nutrients are frequently dispersed over vast areas via sheet flow. Sheet flow is often interrupted when elevated or incised linear features, such as those created by prolonged exposure to off road vehicle use, interrupt the process. The consequences of soil compaction can be frequently observed throughout the project area. Restoration of impacted areas and reduction of off road vehicle impacts both act to minimize the effects of off road vehicle use on soils and hydrological processes. The NPS requests CBP's continued collaboration in working to restore and reduce off road impacts wherever opportunities exist.</p> <p>The region's administrative roads were not designed or constructed to sustain the levels of traffic that they currently experience. The proposed action will facilitate earlier and prolonged operations in remote areas since agents will commence operations each day from the FOB. These activities will occur on administrative roads. An engineering roads study was conducted on Organ Pipe Cactus National Monument as part of the Ajo1 SBInet project, however the resulting recommendations have yet to be implemented as called for in the project's compliance. Administrative road improvements and maintenance are an essential component of the proposed action that should be adequately addressed.</p>	OPCNM	<p>CBP agrees that vehicular traffic on soils within OPCNM can result in compaction. However, under the proposed action, all traffic will be confined to the existing Bates Well Road and the 2-acre FOB construction site. Therefore, the proposed action will result in no soil compaction impacts. In March 2010, CBP executed an agreement which provided \$1,750,000 to the NPS to address impacts of CBP travel on land administered by the NPS and USFWS. To date, none of these funds have been expended. CBP is working closely with NPS to develop a maintenance program for NPS roads used by CBP for border security purposes.</p>

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
15.	General - Wilderness	<p>Impacts to wilderness extend beyond the physical construction and existence of the FOB to also include the indirect effects of activities supported by the FOB. The NPS appreciates the CBP's acknowledgement that there is a need to reduce impacts to wilderness, and other DOI resources. In fact, CBP is currently engaged with DOI agencies in the project area, and working with them to identify restoration opportunities. A major component of such efforts is education about sensitive resource issues. In support of this educational need, the NPS has committed to providing an employee position that will be dedicated to developing and implementing a program to inform individuals operating throughout the project area about such issues. This agency requests that CBP field agents be certified (through such a program) that they are aware of sensitive resource issues and associated mitigation measures and BMPs within the project area, prior to deployment. This agency further requests that CBP appoint a representative at the station level who can work locally with the NPS to develop and periodically update the content of such a program.</p> <p>The existing camp, established under the Ajo1 SBInet project, often supports detailers who are temporarily deployed to the area. Correspondingly, opportunities for land managers to convey conservation information to individuals working in the field are currently limited. If deployment of permanent staff is not possible, then establishing FOB site supervisors out of CBP's Ajo station, who in turn would have an understanding and supervisory responsibility of ensuring that conservation measures are enforced may be an alternative worthy of consideration. The NPS submits this possibility for consideration.</p>	OPCNM	<p>To address information and education of USBP agents operating within the FOB AOR, CBP will implement the following provisions:</p> <ol style="list-style-type: none"> 1. Assign a supervisor for the FOB who will have oversight of FOB operations. One of the duties of this individual will be working with the NPS and USFWS to ensure impacts of USBP operations on lands administered by these agencies are minimized, 2. Provide enhanced environmental training for persons assigned to the FOB via internet training, and 3. Provide environmental education for agents via kiosk/information display at Ajo FOB and Ajo Station. 4. Continue to provide opportunities for NPS personnel to conduct training sessions for CBP agents regarding sensitive resources

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
16.	General – Cumulative Affects	<p>This agency is concerned about the cumulative effects of the past, ongoing, and proposed projects their effects on OPCNM.</p> <p>The cumulative impact of the proposed action, in conjunction with other existing and proposed landscape scale projects include: The Cabeza Prieta NWR and Organ Pipe Cactus NM vehicle barriers; the Lukeville pedestrian fence; the Ajo-1 SBInet tower project; the Ajo station expansion; Ajo station staffing expansions; the RVSS tower projects proposed within the Tohono O'odham Nation, Cabeza Prieta NWR and Organ Pipe Cactus NM; Table top telephone fiber optic project along SR 85; Sonoran pronghorn recovery team actions; environmental restoration actions associated with the Ajo-1 SBInet project and the Lukeville pedestrian fence project; CBP TACCOM infrastructure project; CBP's tactical infrastructure maintenance and repair program, and, in the foreseeable future, the Tactical Infrastructure Maintenance and Repair (TIMR) effort.</p> <p>The NPS fully understands that an operational enforcement footprint is necessary in the region given the existing high levels of illegal border activities. Identifying where to locate limited border enforcement infrastructure is key to achieving the Department of Homeland Security's stated objective of reducing depth of intrusion to areas as close to the border as possible. Doing so will contribute greatly to the Nation's security as well as to the successful conservation of the invaluable natural and cultural resources that are found in proximity to the border. Ultimately, there needs to be a renewed commitment to reducing border related impacts. There are certainly numerous opportunities for improvement and the challenge before us is how to do so in an effective manner while also contemplating a significant expansion of operational support infrastructure.</p>	OPCNM	<p>The footprint of each of the CBP projects identified is relatively small (less than 20 acres) and are scattered over more than 3 million acres. In addition, the environmental impacts of each of the funded projects undertaken by CBP have been addressed in accord with the NEPA and other applicable environmental laws. Even projects completed under CBP authority which permits waiver of certain environmental laws have been analyzed and fully disclosed to the public. Since each of the projects has a unique project footprint, the impacts of one project are not additive to other projects. However, the cumulative effects of USBP operations within the Ajo Station AOR were addressed in the SBInet Ajo-1 EA to which this document is tiered.</p>
17.	1-5 23	Please include an analysis of the effects of additional agents operating out of the FOB.	OPCNM	As stated in the EA, the number of agents working in the FOB AOR will not change once the FOB is in operation from the current situation (see Section 1.4 of the EA).
18.	2-1 20-21	The Proposed Action no longer includes a helipad however the size of the proposed FOB remains the same as when a helipad was included. Should the proposed FOB be reduced in size in proportion to the deleted helipad?	OPCNM	The proposed action is for a 3-acre FOB which is the size required to accommodate the proposed facilities.
19.	2-1 28	The proposed action would use solar power and this distinguishes it from the Fossil Fuels alternative. The EA claims a number of beneficial impacts due to solar power. However, p.3-21 states "installation of solar power (which) is anticipated within 5 years." Please evaluate the impacts of using fossil fuels for a period of time prior to conversion to solar power.	OPCNM	The noise impacts of diesel generator operations which would provide power until solar power is installed are fully described in Section 3.11 of the EA.

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
20.	3-5 14 3.3 Wilderness	<p>Under the proposed action, the indirect effects of an expanded FOB adjacent to wilderness boundaries extend to its support of up to 32 agents conducting operations have not been analyzed. The referenced CBP 2009 states (page 89)“ interdiction efforts would be more focused and off-road interdiction activities would not be expected to increase overall and would decrease over time... resulting in a reduced enforcement footprint within Organ Pipe Cactus Wilderness...the enforcement footprint of USBP would generally move closer to the border and impacts to designated wilderness would be reduced...Beneficial effects would include reduced vehicle traffic within designated wilderness, reduced degradation of the landscape...”</p> <p>NPS monitoring data reveal that off road vehicle trails have actually increased markedly since the Ajo-1 SBInet project’s implementation. The NPS requests that the indirect and cumulative effects to wilderness, which include loss of opportunities to experience solitude in areas that are untrammelled, natural and undeveloped, be analyzed.</p>	OPCNM	See responses numbered 10, 11 and 12.
21.	3-6 13 16	NPS believes the impacts of the FOB could be greater than minor due to the FOB’s close proximity to Wilderness.	OPCNM	CBP has characterized the impacts of FOB establishment on wilderness in Section 3.3 of the EA.
22.	3-6 3.4. 2 Soils	<p>Please consider analyzing the indirect effects on soils of an expanded FOB supporting up to 32 agents conducting operations Contrary to the anticipated outcome from Ajo-1 SBInet implementation, current NPS monitoring data reveal that off road vehicle trails have increased markedly since the Ajo-1 SBInet project’s implementation (Figure 1). Consequently, the predicted benefits to soils have not been achieved. Instead, abundant adverse impacts to soils are occurring that need to be disclosed and analyzed as part of the indirect and cumulative effects analysis.</p> <p>Provided there is adequate capacity, water from the proposed well could be used for other purposes or locations, such as in support of Camp Grip or to replenish existing Sonoran pronghorn waters. Please assess all potential uses of well water including support of road and Sonoran pronghorn support infrastructure throughout the region.</p>	OPCNM	See responses numbered 11 and 14.
23.	3-7 3.5.2 Hydrology and Ground water		OPCNM	CBP will revise the EA to include the use of any excess water from the Ajo well to support Camp Grip and Sonoran pronghorn waters as a general conservation measure listed in Section 4.3.

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>					
#	Location		Comment	Reviewer	CBP Response
24.	3-8	7-9	NPS monitoring data shows a decline in ground water levels that has been attributed to water pumping from the aquifer, and drought (ORPI Vital Signs Report, 2011). The EA's statement that recharge exceeds withdrawal is unsubstantiated. The NPS requests that rates of ground water use and ground water levels be monitored continuously and adjusted if needed.	OPCNM	The EA will be corrected in accord with NPS data. CBP will monitor the rate of ground water use and the ground water level within the well.
25.	3-15	3-8 Protected Species	The document states: "No critical habitat has been designated for either of these species." This should in no way imply that the project's affected area does not contain habitats that are of crucial importance to protected species. Designation of critical habitat is often not done due to budgetary constraints, concerns for habitat security, lack of specific information on habitat requirements, and other factors. The Growler Valley and adjacent areas are in fact critically important to Sonoran Pronghorn. For the lesser long-nosed bat, superior foraging habitat is found east of the project area, and in areas indirectly affected by the proposed action. Roost sites are known within 10 miles of the proposed FOB. Formal designation of "critical habitat" by the USFWS for listed species is actually more the exception than the rule.	OPCNM	CBP will complete Section 7 consultation on this project and take all necessary steps to minimize and avoid any impacts to Federally listed species.
26.	3-16	12-14	The EA suggests the proposed FOB expansion will have no effects on Sonoran pronghorn during the fawning season, because no radio-collared Sonoran pronghorn have been detected within 2 miles of the site during the past 4 fawning seasons. However, the effects of the FOB will extend far beyond a 2-mile radius, as agents' range throughout the southern Growler Valley and nearby portions of the Bates, Cipriano, Growler, Agua Dulce, and Granite mountains. NPS and USFWS data document that vehicle activity off-road is widespread throughout this area. Sonoran pronghorn are found in these areas annually during fawning season. Sonoran pronghorn fawns have been observed approximately 5 miles east of the FOB annually since 2004, when hilltop visual surveys began in that area (NPS data). Since SBInet tower #302 became active and the existing camp was relocated adjacent to it, off-road vehicle activity has increased in the area where pronghorn and fawns have been observed (Figure 1). Concurrently, pronghorn presence in that area appears to have diminished (NPS data).	OPCNM	CBP has previously consulted with USFWS on the impacts of its operations on Sonoran pronghorn across the species range (22410-F-2009-0089, dated December 9, 2009). All measures designed to minimize or avoid impacts and all terms and conditions as developed under that consultation will remain unchanged with the adoption of the proposed action under this EA.

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#	Location	Comment	Reviewer	CBP Response	
27.	3-16 18-21	3.8 Protected Species	OPCNM	See response number 11.	
28.	3-16 23-2	3.8 Protected Species	OPCNM	CBP is aware of no evidence that that CBP operations have influenced Sonoran pronghorn movement patterns across the species range. See also response number 13.	

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29.	3-17	<p>The EA states that Figure 3-1 shows no radio-collared pronghorn have been detected within 2 miles of the FOB site since 2008. Figure 3-1 also illustrates that only 5 radio-collared pronghorn have been detected within 2 miles of the Bates Well Road and Camino del Diablo <i>anywhere</i> since 2008, as that route transects about 75 miles of Sonoran pronghorn range. NPS data show radio-telemetry locations from 1994-2001, when Sonoran pronghorn were routinely located within 2 miles of those roads (Figure 4, below). During 1994-2001, there were no FOBs along the Bates Well Rd/Camino del Diablo, and border-related traffic (including interdiction) was a small fraction of what it has been since about 2003. This comparison provides compelling evidence that current traffic levels on this road alignment, is repelling Sonoran pronghorn up to 2 miles or farther from the road. Furthermore, the Figure 3-1 shows only 20 pronghorn locations south of the Bates Well Rd/Camino del Diablo, and very few more, anywhere within 20 miles of the international border. Figure 4 shows heavy use of OPCNM and CPNWR in these areas, from 1994 to 2001. Some factors have certainly resulted in the radio-collared sample being biased towards pronghorn lingering near the semi-captive breeding site where they were born, raised, and released. However, it seems significant that even those radio-collared pronghorn that have ranged south of the Bates Well Rd/Camino del Diablo have not lingered long, before retreating northward. Similarly, the biennial aerial surveys have not detected many pronghorn near, or south of, the Bates Well Rd/Camino del Diablo. Border-related impacts, including vehicular traffic on and off legally established roads, have been much heavier in the area in question in recent years, than from 1994-2001.</p>	OPCNM	<p>The factors which influence movement of a species across its range can be numerous, complex and inter related. CBP is aware of no studies which identify the reasons for changes in Sonoran pronghorn movement patterns. In March 2010, CBP provided \$20,000 to NPS to relocate pronghorn to more suitable habitat within OPCNM and \$470,000 for relocation of pronghorn to a second, potentially more suitable range site. None of those funds have been expended to date.</p>
30.	1-4 44-45	<p>Air operations in support of CBP ground based operations frequently involve low level flight by rotary winged aircraft often operating for prolonged periods and slow speeds over expansive areas. NPS personnel have, on numerous occasions, observed rotor winged aircraft conducting such operations throughout the Growler Valley. The likelihood that such operations would increase under the proposed action is high given the increased number of field agents who in turn will require increased rotary winged aviation support. The effects of such rotary winged aircraft operations, particularly on Sonoran pronghorn, are of concern and should be assessed and disclosed.</p>	OPCNM	<p>The proposed action is not anticipated to result in any changes of USBP operations, including overflight activities.</p>

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31.	3-21	13-14	<p>The conclusion that the Proposed Action would yield beneficial or discountable effects for Sonoran pronghorn is not well-supported. While the traffic on the Bates Well Road between the FOB and SR 85 may be reduced, Figure 1 tells us that the proposed action will result in further impacts to DOI trust resources in the area of the FOB. The NPS would like to work with CBP towards a quantifiable commitment to mitigate existing levels of impacts. Benefits to Sonoran pronghorn can only truly be achieved by reducing the operational footprint their range. The NPS requests that a discussion of how and when this will occur to substantiate a conclusion of beneficial effects, or discount adverse effects.</p>	OPCNM	<p>CBP has determined the proposed action may affect, and is likely to adversely affect the Sonoran pronghorn. CBP will work with USFWS and NPS to ensure the impacts of the proposed action on listed species are minimized.</p>
32.	3-21	<div>Env Co nse que nce s</div> <div>1 3 - 1 4</div>	<p>The conclusion that the Proposed Action would yield beneficial or discountable effects for Sonoran pronghorn is not well-supported. While the traffic on the Bates Well Road between the FOB and SR 85 may be reduced, Figure 1 tells us that the proposed action will result in further impacts to DOI trust resources in the area of the FOB. The NPS would like to work with CBP towards a quantifiable commitment to mitigate existing levels of impacts. Benefits to Sonoran pronghorn can only truly be achieved by reducing the operational footprint their range. The NPS requests that a discussion of how and when this will occur to substantiate a conclusion of beneficial effects, or discount adverse effects.</p>	OPCNM	<p>See response number 31.</p>

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33.	3-21	<p>The 2011 wild US population of Sonoran pronghorn is just barely approaching the 2000 level of 99 individuals, a level that was then considered near jeopardy. In the intervening years, Sonoran pronghorn habitat, including that within a 20-mile radius of the proposed FOB, has experienced continually increasing levels of border-related activity, i.e. human traffic by foot, ATV, trucks, SUV's, and low-level aircraft. The current levels of human activity and operation of vehicles off-road is substantially greater than the levels that existed in 2001, when it was recognized the species existed near the "jeopardy" level. Since this time the number of CBP agents working in the project area has increased significantly. CBP interdiction activities routinely involve operating motor vehicles off of established legal roadways. In the Growler Valley and adjacent areas, OPCNM and CPNWR have sustained thousands of miles of unauthorized vehicle routes. In 1999-2001, the judge managing the litigation against the US, along with the subject agencies, acknowledged at that time, that existing levels of vehicle travel, on existing roads, and existing levels of human activity in the backcountry, constituted adverse impacts on Sonoran pronghorn. Today, unprecedented levels of vehicular travel is occurring on legal roads and off-road throughout the Sonoran pronghorn's US range. These levels are far in excess of anything that was imagined 10 years ago. According to these findings, the NPS believes that the proposed FOB expansion would result in an increase of such impacts, on both legal roads and in off-road areas, and consequently reduce related adverse impacts on Sonoran pronghorn. Restoration of impacted areas and reduction of off road vehicle impacts both act to minimize the effects of off road vehicle use on Sonoran pronghorn. The NPS requests CBP's continued collaboration in working to restore and reduce off-road vehicle impacts wherever opportunities exist.</p>	OPCNM	<p>According to the USFWS, prior to the increase of USBP operations in the Sonoran pronghorn range, the population ranged from 60 (in 1941) to 184 animals (in 1994). Only in one year was the population estimated to be above 200. USFWS reported a general downward trend for the population from 1992 to 2000. The carrying capacity of the current range is unknown, but according to the USFWS it is unlikely the current range is adequate to support 300 animals. The current population is within the range of normal variability in the 45 years since the species was listed as a Federally endangered species and CBP is aware of no data or studies which indicate that CBP activities have any influence on the pronghorn's population levels or fitness. See also response number 13. As previously stated, CBP provided \$1.75 million to NPS for the purpose of restoring areas impacted by off road traffic in March 2010.</p>

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34.	3-21 Env Co nse que nce s	<p>In 2002, the US Sonoran pronghorn population crashed to about 21-25 animals. Since then major conservation and recovery efforts have included: the establishment of a semi-captive breeding program; provision of supplemental food, water and forage enhancements; area closures; etc. From 2002 to 2004, the US wild population more than doubled, from 21 to about 58 (Figure 3). Yet most recovery efforts were not effect until after 2004. Since 2004, the US population has increased by only small annual increments, despite considerable conservation and recovery efforts.</p> <p>A likely answer is that much of the remaining US Sonoran pronghorn range has experienced increasing levels of vehicle activity off-road, and other human disturbance. Inventory and monitoring results show that vehicle activity off-road throughout the Sonoran pronghorn's US range has increased greatly since 2004 (Figure 1), coinciding with the weak recovery of the species. This has occurred despite augmentation of the wild population with pronghorn from the semi-captive breeding program, which began in 2006 (Figure 3) and other recovery actions. Data also show that the wild US Sonoran pronghorn population has shifted its occupancy pattern within its current range, abandoning or greatly reducing use of vast areas of suitable, high quality habitat, e.g. the Ajo Valley and more recently the Growler Valley. Such areas are heavily impacted by vehicle activity off-road. The consequence is a continued range reduction the species can ill afford. Given what is known about Sonoran pronghorn response to approach by humans and vehicles on the ground, and habitat impacts by vehicles operating off-road, it is likely the vehicle activity off-road and inhibited pronghorn population recovery are related. Restoration of impacted areas and reduction of off road vehicle impacts both act to minimize the effects of off road vehicle use on Sonoran pronghorn. The NPS requests CBP's continued collaboration in working to restore and reduce off-road vehicle impacts wherever opportunities exist.</p>	OPCNM	<p>CBP is strongly committed to Sonoran pronghorn conservation. In the last 3 years, CBP has provided approximately \$6 million to NPS and USFWS to support Sonoran pronghorn conservation and habitat restoration. These funds have been provided for establishment of pronghorn waters, aerial survey, establishment of a second pronghorn population, establishment of forage enhancement plots, and a study of human impacts on pronghorn. In addition CBP has spent substantial funds to ensure its actions have not adversely impacted the species. For example, CBP spent more than \$550,000 on environmental monitors to ensure that construction of SBInet towers has no impact on Sonoran pronghorn. CBP will take any appropriate measures to ensure the any impacts of this project on listed species are minimized. CBP continues to take all necessary steps to ensure any impacts of its operations on the species are minimized. By comparison, in 2007 through 2009, NPS reported to USFWS total expenditures on pronghorn conservation ranging from \$35,000 to \$72,000 per year.</p>
35.	3-25	<p>Given the proximity of prehistoric sites to the proposed FOB expansion area, it is likely they will be adversely affected by future off-road vehicle activity emanating from the FOB. In a similar situation, prehistoric sites adjacent to the road from the international boundary to SBInet tower 310 have been adversely affected by off-road driving. Reducing the levels of off road driving would have a net benefit to the impacts to cultural resources.</p>	OPCNM	<p>CBP is not aware of any impacts of USBP operations on prehistoric sites and requests that NPS furnish this information to CBP so these impacts can be addressed.</p>

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36.	General	A description of the various entities that will use the FOB is needed. Borstar, Ajo Station, Yuma. How will the FOB support the various CBP entities operating in the region?	OPCNM	In addition to Ajo personnel, the FOB may be utilized by Welton agents and various entities within CBP such as Search and Rescue (BORSTAR), Tactical (BORTAC), Mobile Response Team (MRT) and intelligence units. The FOB may also be utilized by DOI law enforcement during special operations	
37.	3-23 17 2 4 3 9 -4 1	<p>Please consider these editorial comments: The brief cultural history outlined in lines 17-24 is not accurate for this location. The periods of Pioneer, Colonial, Sedentary, and Classic refers specifically only to the Hohokam and not to the other traditions present in the western Papageria—the Patayan and Trincheras cultures. Lines 39-41: Historic Bates Well Road was never recorded as site AZ Z:13:134(ASM) by Northland during previous cultural resource surveys—the number was not used at ASM and therefore all discussion using that site number should be removed from the cultural report and the EA, both in Section 3.9 and elsewhere in the EA. According to Johanna Huitra at Northland, the site number will be turned back over to ASM and re-assigned to another site. The report cited as ‘Hopkins 2006’ was apparently a draft survey report that was never finalized and that needs to be made clear in the 2011 cultural survey report by Tina Hart for this project. Lines 45-46: Therefore, all mention of site number AZ Z:13:134(ASM) should be edited out of both the survey report and the EA for this project. Bates Well Road is considered a historic road alignment. It provided access to El Camino del Diablo from the northeast, but to date, the historic alignment of Bates Well Road remains unrecorded and unevaluated for eligibility to the National Register of Historic Places. Since ORPI considers Bates Well Road to be eligible without it being officially recorded at ASM; and also nearby site AZ Y:16:32(ASM) to be eligible; and we agree that the 14 isolates are not eligible, we concur with a finding of ‘No Adverse Effect’ for this project.</p>	OPCNM	Revised as requested.	
38.	3-24 2 1 -2 6	Site number AZ Z:13:134(ASM) should be removed from Table 3-3; however, the ‘historic alignment of Bates Well Road’ should remain in the table, as the road is considered a historic resource and the assessment of effect on that alignment should be included in the archeological report and the EA. We concur with a finding of ‘No Adverse Effect’ to the historic alignment, but the potential for future adverse effects to the viewshed and the historic character of this road does exist.	OPCNM	Revised as requested.	

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39.		<p>Thirteen emails were received from a Sierra Club email address (information@sierraclub.org). Many of the emails commented on fencing, operations, and other issues which are beyond the scope of this project. The substantive comments from these emails are listed below.</p> <p>1) I ask that you please halt plans to expand the patrol base located in Organ Pipe Cactus National Monument. Tripling the size of the temporary base would have significant adverse effects on the surrounding wilderness, not to mention the adverse effects due to significantly higher patrolling in the area. Besides, because far fewer migrants have crossed in the Organ Pipe area in recent years, such a base expansion is unnecessary.</p> <p>2) We are pleased that the illegals are not using the area of Organ Pipe National Monument as frequently as in the past. The traffic is down dramatically! Yeah! Therefore, expansion of the base is not needed!! Any expansion would probably just lead to the smugglers making more wildlife trails and roads through the Monument. Let's show concern for the environment!</p> <p>3) I am concerned that this case here is an example of the M.O.A. not being followed, and the land managers and the land are being negatively impacted.</p> <p>4) Common sense must be used in all our strategies! Please consider the topography, wildlife, flood zones, needs of citizens, etc. when implementing border security!</p> <p>5) The base should not be expanded from its current temporary one-acre footprint to a permanent three-acre footprint because it would significantly degrade the wilderness character of surrounding areas. The base should not be expanded because increased patrols in that area would lead to an increase in wildlife roads and off-road vehicular impacts to wilderness. Because cross-border traffic has dropped dramatically in the area of Organ Pipe in recent years, a base expansion there is not needed.</p> <p>6) This base, from which 24-hour patrols across these public lands will be operated, will be located well north of the actual border and will affect many sensitive areas, including the national monument, national wildlife refuge, and designated wilderness areas.</p>	<p>Sierra Club</p> <p>Jonathan Amgott (1)</p> <p>Barbara Cain (2)</p> <p>Merlin Dilley (3)</p> <p>Thomas Nieland (4)</p> <p>Michael @ Kathleen Shores (5)</p> <p>Amy Catalino (6)</p>
			<p>1) CBP appreciates this comment; however, the FOB will allow for fewer impacts on the OPCNM and wilderness areas, as described in Sections 1.4 and 3.3 of the EA. The necessity of the expansion is discussed in Section 1.2</p> <p>2) Please see response above for comment from Mr. Amgott (1).</p> <p>3) The land managers at OPCNM and CPNWR were intimately involved with the planning of this project. The location of the alternatives were selected by the land managers at the OPCNM and CPNWR.</p> <p>4) Please refer to the EA for analyses of these resources in sections 3.4 (Geology and Soils), 3.7 (Wildlife and Aquatic Resources), 3.14 (Socioeconomics) and 3.15 (Environmental Justice and Protection of Children). Impacts on floodplains were not discussed, because the proposed location is not within a mapped floodzone.</p> <p>5) Please see response above for comment from Mr. Amgott (1).</p>

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39.		<p>6) (continued) The base should not be expanded from its current temporary one-acre footprint to a permanent three-acre footprint because it would significantly degrade the wilderness character of surrounding areas.</p> <p>7) Expansion of the base from 1 to 3 acres would cause deterioration of the wilderness character of the area. Expansion of the base would result in more roads and off road vehicular traffic. Cross border traffic of undocumented migrants has decreased significantly in recent years in this area making a larger base unnecessary. I spent over a week in southern.</p> <p>8) I do not support the idea of a 3 acre patrol base in Organ Pipe Cactus National Monument. This is unnecessary and will have a very bad impact on the wilderness of that area. There has also been an extreme decrease of migration through those regions which makes it even more clear that this is unnecessary.</p> <p>9) Please do not further damage the wilderness va by increasing the size of the temporary base.</p> <p>10) Please, protect the wildlife refuge and the wilderness lands within it.</p> <p>11) This action is not really needed. The impact to the landscape would be severe. The patrols should be concentrated along the border itself. The degradation of the area by this action would leave a permanent impact.</p> <p>12) The base should not be expanded from the current temporary one-acre footprint. An increase would significantly degrade the wilderness character of the area and lead to an increase in wildcat roads and off-road vehicular impact on the wilderness.</p> <p>13) The area is too far north of the border line to be effective and too close to the sensitive wildlife habitat found in the national monument, wildlife refuge and wilderness areas. My friends and I frequently travel to southern Arizona to view wildlife, especially birds. The amazing variety of wildlife in the area is worth the long trip from California, and it certainly deserves to be protected rather than overlaid with roads and OHV damage. Given the recent decrease in cross-border traffic, a base expansion there cannot be justified.</p>	<p>Naomi Cohen (7)</p> <p>Cicily Cooper (8)</p> <p>Roy Emrick (9)</p> <p>Tom Finholt (10)</p> <p>Robert Kee (11)</p> <p>Kenneth Kennon (12)</p> <p>Vicki Lee (13)</p>	<p>6) Impacts on the National Monument, National wildlife refuge and designated wilderness areas were discussed in detail in Sections 3.2 and 3.3 of the EA. The construction of the FOB will occur completely within non-wilderness corridors.</p> <p>7) Please see response above for comment from Mr. Amgott (1).</p> <p>8) Please see response above for comment from Mr. Amgott (1).</p> <p>9) Please see response above for comment from Mr. Amgott (1).</p> <p>10) CBP agrees with your comment and works daily with the CPNWR and OPCNM to improve stewardship.</p> <p>11) Please see response above for comment from Mr. Amgott (1).</p> <p>12) Please see response above for comment from Mr. Amgott (1).</p> <p>13) Please see response above for comment from Mr. Amgott (1). CBP is currently in consultation with the USFWS to determine conservation measures to avoid and/or minimize impacts on sensitive wildlife species.</p>

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39	co nt	<p>14) The base should not be expanded from its current temporary one-acre footprint to a permanent three-acre footprint because it would significantly degrade the wilderness character of surrounding areas. The base should not be expanded because increased patrols in that area would lead to an increase in wildcat roads and off-road vehicular impacts to wilderness.</p> <p>15) The wilderness character of Cabeza Prieta and backcountry ORPI must be preserved,</p> <p>16) Having a larger presence and bigger footprint would only hurt the natural environment more. Fewer illegals are entering the area so there is no need to expand the border patrol base that is already present.</p> <p>17) The BP base should not be expanded from its current temporary one-acre footprint to a permanent three-acre footprint because it would significantly degrade the wilderness character of surrounding areas. Because cross-border traffic has dropped dramatically in the area of Organ Pipe in recent years, a base expansion there is not needed. Please do not contribute to the degradation of this fragile ecosystem!</p> <p>18) Expanding the current base would not make a significant contribution to border security, but would result in unacceptable harm to the surrounding wilderness. The decline of cross-border traffic in the Organ Pipe area in recent years makes expansion of this base unnecessary. The enjoyment of being in nature is seriously compromised by highly visible border security infrastructure and patrol activity in birding areas. I am also aware of the damage being done to unique ecosystems all along the border in the name of security, such as the damage done by off-road vehicles in sensitive areas.</p>	<p>Sarah Loftus (14)</p> <p>Alex and Carole Mintzer (15)</p> <p>Carolyn Morley (16)</p> <p>Brit Rosso (17)</p> <p>Suzanne Williams (18)</p>	<p>14) Please see response above for comment from Mr. Amgott (1)</p> <p>15) CBP agrees with your comment. Please see response above for comment from Ms. Catalino (6).</p> <p>16) Please see response above for comment from Mr. Amgott (1).</p> <p>17) Please see response above for comment from Mr. Amgott (1).</p> <p>18) Please see response above for comment from Mr. Amgott (1). Impacts to visual resources were also analyzed in the EA in Section 3.3. Large portions of the CPNWR and OPCNM are closed to visitor use due to border security issues. It is possible that with improved CBP security, the closed area may once again open to visitors.</p>
40.		<p>“USBP agents need to be deployed CLOSER TO THE INTERNATIONAL BORDER and remote western zones of the Ajo station to improve efficiency and effectiveness during work shifts.”</p> <p>1. Your proposed location is too far north. It should be on the international boundary directly south of the proposed location. The best alternative to that plan would be to build the facility at Lukeville</p>	Fred Goodsell	CBP considered a FOB in Lukeville at the request of the NPS and USFWS; however, this alternative was eliminated and discussed in Section 2.5 of the EA.
41.		2. I consider the alternatives offered totally insufficient.	Fred Goodsell	CBP appreciates your comment; however, the alternative locations were discussed and identified as a collaborative effort with CBP, OPCNM, and CPNWR. The alternatives are adequate for NEPA analyses.

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42.		3. I first drove the entire Camino del Diablo in 1970. I have been driving it multiple times per year since 2001. Your FONSI, to be polite, is inappropriate. What "human environment?" There was no "Human environment" out there until this mess. As to the natural environment just how do you think you can introduce 16 - 32 people into the area and have them do their jobs without tremendous impact to the natural environment. The area shown on the map as the area to be covered by this station is all Wilderness. Your agents won't be walking quietly across the desert.	Fred Goodsell	CBP appreciates your comment; however, the human environment collectively incorporates aesthetics, wilderness characters, land use, socioeconomic, and cultural resources. The FOB will allow for fewer impacts on the OPCNM, CPNWR, and wilderness areas, as described in Sections 1.4 and 3.3 of the EA.
43.		The entire EA is a farce and anyone reading it knows it is. It shows that you can not be trusted with your plans so you lose the trust of the general public. While out there doing construction and use you will be in violation of multiple federal laws. I can't list them all but they include the Wilderness Act, Endangered Species Act, Historical and Cultural preservation acts, clean air acts and clean water acts.	Fred Goodsell	CBP appreciates your comment; however, this EA identifies how CBP is currently and will continue to comply with the Wilderness Act (Section 3.3), the Endangered Species Act (Section 3.8) including ongoing Formal Section 7 consultation with USFWS, National Historic Preservation Act (Section 3.9), Clean Air Act (Section 3.10), and Clean Water Act (sections 3.4, 3.5, and 3.13).
44.		ps. The local BP administration and officers do not want or need this facility. Please drop it.	Fred Goodsell	CBP appreciates your comment; however, the local USBP Ajo Station has had been intimately involved in the planning of this facility.
45.		Despite having commented on several previous Environmental Assessments in this sector, my organization – nor any other conservation group, public interest group, or private citizen to my knowledge – was involved in scoping this decision and Environmental Assessment.	National Parks Conservation Association (NPCA)	"Scoping" as defined by the Council on Environmental Quality regulations is only required in the preparation of an environmental impact statement. Nonetheless, CBP did publish notice of its intent to prepare this environmental assessment in the Arizona Daily Star and the Ajo Copper News. Several comments were received by CBP in response to this solicitation. In addition, letters soliciting input were sent to several key state and federal agencies.

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46.		For instance, if the reason for the Forward Operating Base (FOB) is because it takes a certain amount of time for staff to reach this region when deployed from Ajo, then one obvious alternative that should have been identified during scoping is simply improving the road. That's not to say that we necessarily endorse this alternative, but it should certainly be looked at, and might prove to be cheaper and have less impact on the environment.	NPCA	Improvement of the access road to the proposed FOB site is included in section 2.5 of the final EA as an alternative considered but eliminated because it does not meet CBP needs.
47.		Likewise, considering this facility's need in the larger context of your strategy and operations is lacking, and would have been mentioned in the scoping process. Is this the place you should be placing your resources? Would it be more effective to spend the money and personnel time closer to the actual border to prevent border crossings or intercept border crossers closer to where they enter our country? There has been some concern that backcountry interception has been emphasized over the vast amount of illegal traffic that occurs at ports of entry, such as Lukeville. Which makes us wonder why you are not planning a FOB at Lukeville, which seems both needed and useful, while proposing this isolated facility rather far from the border?	NPCA	The purpose and need for the FOB in the proposed location is provided in Section 1.2 of the EA. The Lukeville FOB alternative was considered, but eliminated when the location was determined to provide little tactical advantage. See the discussion of the Lukeville FOB in Section 2.5.
48.		The current FOB at Bates Well uses one acre, and yet this Environmental Assessment asks for three acres, stating that the footprint will be two acres. Why the 150% increase? Why the false assumption that having permission to use three acres will only result in a two-acre footprint? This is a cherish national monument, upon which development should only be done after careful, careful consideration. The need for the size of this facility has not been established in this document.	NPCA	The current tactical camp impacts 1 acre. The impacts on this 1 acre were assessed in the SBInet Ajo-1 EA. This one acre will continue to be impacted. The new facility will impact a total of 3 acres (1 acre, currently home to the tactical camp, and 2 additional acres adjacent). The one acre that the tactical camp currently occupies will be reused.
49.		In fact, it seems obvious that a proposal for a three-acre, staffed law enforcement facility inside a national monument would require the careful consideration that only comes with the full NEPA process. We ask that you continue your deliberations by preparing a draft environmental impact statement, one that 1) better involves the interested public, 2) looks seriously at the full range of alternatives including a smaller facility, road improvement instead of a forward operating base in this vicinity, other locations for the base, and/or re-allocating these resources to interdictions more closely along the border or at ports of entry, and 3) includes in more detail and substance the impacts that your proposed facility would have on the natural and cultural resources of Organ Pipe Cactus National Monument as well as on wildlife and wildlife habitat as a component of your total strategy and operations in the area.	NPCA	CBP has followed appropriate NEPA guidance for preparation of this environmental document, including an appropriate level of public involvement. A full range of reasonable alternatives has been analyzed in this EA. The best long term solution for protection of natural and cultural resources in OPCNM is to ensure border security. Placement of the FOB in the proposed location is a key element of achieving the required border security which will again enable OPCNM to reduce restrictions which have been in place on visitor use for the last several years.

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
50.		The construction of an advance law enforcement base in a remote section of the monument deserves the scrutiny and consideration that only comes when NEPA, ESA, and other environmental and cultural protection laws are followed. I urge that this occur before plans to construct the base are finalized. The draft EA is insufficient, as expressed by NPCA comments and the comments of other organizations, and certainly doesn't warrant a finding of FONSI. Please continue with the process and do a full environmental impact statement.	Kevin Dahl (NPCA)	Impacts as described in the EA are sufficient under the guidance of NEPA. CBP is currently in formal Endangered Species Act, Section 7 consultation with USFWS regarding impacts on Sonoran pronghorn from this project. The Section 7 process will be completed prior to the FONSI being finalized and signed. CBP will also complete compliance with the National Historic Preservation Act and any other applicable law prior to initiation of construction.
51.		It is inappropriate to tier the analysis for the Forward Operating Base (FOB) expansion project to the 2009 analysis because the 2009 SBInet Finding of No Significant Impact (FONSI) and Environmental Assessment (EA) did not adequately analyze the impacts of off-road vehicle use and travel by U.S. Border Patrol agents and the expected benefits of the 2009 FONSI and EA for the SBInet project have not occurred.	Center for Biological Diversity (CBD)	See responses numbered 11 and 26.
52.		This is a critical point given that the current project seeks to triple the footprint of the FOB, yet there is no analysis of the impacts of a three-fold increase in the number of U.S. Border Patrol agents who could all potentially engage in off-road travel for interdiction or other purposes.	CBD	As stated in the EA (Section 1.4), the FOB would not change the number of agents operating within the Ajo Station or within area of responsibility of the FOB.
53.		The EA for the FOB expansion project erroneously states that the 2009 SBInet Ajo-1 Tower Project EA addresses the impacts of U.S. Border Patrol activities away from the Ajo Station and the FOB. This is not correct. Therefore, the current EA must address the impacts of U.S. Border Patrol activities, especially off-road motorized travel during interdiction activities.	CBD	CBP appreciates your comment; however, Section 2.3.6 of the 2009 SBInet Ajo-1 EA contains a 10-page discussion of Border Patrol operations within the Ajo Station AOR.
54.		This project will increase the number of U.S. Border Patrol agents on the ground on both the Cabeza Prieta National Wildlife Refuge (CPNWR) and the Organ Pipe Cactus National Monument (OPCNM).	CBD	CBP appreciates your comment; however, as stated in the EA (Section 1.4), the FOB would not change the number of agents operating within the Ajo Station or within area of responsibility of the FOB.

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
55.		<p>Unfortunately, "CBV foot traffic and off-road vehicle activity and required Federal law enforcement response have been and continue to be significant threats to the pronghorn and its habitat[.]"³ FWS has not analyzed the impacts from U.S. Border Patrol agents located at the FOB nor the amount of off-road vehicle activity associated with the number of agents on the ground. For this project expansion, the FWS and U.S. Department of Homeland Security must analyze the existing impacts of current off-road vehicle traffic by U.S. Border Patrol agents as well as the anticipated increase in those impacts by an expansion of this FOB.</p>	CBD	<p>When CBP completed the Ajo 1 EA, the agency consulted with FWS on CBP operations across the range of the Sonoran pronghorn (see FWS BO number SE 22410-F-2009-0089, dated December 12, 2009).</p>
56.		<p>Unfortunately, the highest level of personnel stationed at the expanded FOB will take place from April through September (24-32 personnel),⁷ which corresponds to the pronghorn fawning period, a time during which impacts from motorized and other uses should be minimized.</p> <p>It appears as though the impacts from the FOB expansion on Sonoran pronghorn have not been adequately analyzed, rendering this draft FONSI and EA inadequate.</p> <p>Formal consultation under Section 7 of the Endangered Species Act is warranted for this EA, especially in light of the inconsistent statements of fact regarding the intensity of enforcement in the 2009 EA and the current EA, which render previous FWS opinions unreliable.</p>	CBD	<p>As stated in the EA, the FOB would not change the number of agents currently operating within the Ajo Station or within Sonoran Pronghorn habitat. CBP is currently in formal Section 7 consultation with USFWS regarding impacts of this project on Sonoran Pronghorn. Section 7 consultation will be completed before the FONSI is signed.</p>

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
57.		<p>Unfortunately, it appears as if U.S. Border Patrol off-road vehicle traffic associated with interdiction activities has not decreased on the CPNWR and reporting is spotty at best. We ask the U.S. Customs and Border Patrol and Department of Homeland Security to review the U.S. Department of Interior, July 2011 report entitled Vehicle Trails Associated with Illegal Border Patrol Activities on Cabeza National Wildlife Refuge.</p> <p>Therefore, a significant assumption upon which the original 2009 <i>SBI_{net}</i> analysis was premised has proven invalid, but this is not addressed in the current analysis for the expansion of the FOB.</p> <p>The 2009 <i>SBI_{net}</i> FONSI and EA describe U.S. Border Patrol agent responses using vehicles as taking place only "when necessary" (at page 57) and only in compliance with the 2006 Memorandum of Understanding (MOU) between the Department of Homeland Security, U.S. Forest Service, U.S. FWS, and Department of Interior. However, the actual practice appears to be, in most cases, with the use of a motorized, wheeled vehicle and the MOU is not being complied with.</p> <p>Tiering the FONSI and EA for the current project to expand the FOB to the 2009 FONSI and EA requires the agency to rely upon information that is known to be incorrect and/or invalid. Tiering to the 2009 <i>SBI_{net}</i> Ajo-1 Tower Project analysis and failing to include any reference to continued, significant impacts from cross-country travel by U.S. Border Patrol agents renders this current analysis completely inadequate and invalid.</p>	CBD	See responses number 11 and 26.
58.		<p>Documentation of Damage The lack of a decrease in off-road vehicle traffic is despite the statement in the 2009 FONSI and EA that "vehicle seizures decreased from 456 in (FY2004) to 248 (FY2008) [because of the vehicle barrier at the border] and the construction of the <i>SBI_{net}</i> Ajo-1 Tower Project "would enhance USBP agents' enforcement efficiency, and thus compress[] the primary enforcement footprint closer to the U.S./Mexico border.24</p>	CBD	CBP agrees that the vehicle barrier along CPNWR and OPCNM have been successful in reducing vehicle incursions into those areas. Unfortunately, the number of apprehensions have increased substantially in both areas in the year since the <i>SBI_{net}</i> towers became operational. This initial increase in apprehensions is similar to what CBP experienced in other locations were similar technology was deployed and was predicted for these areas in the 2009 EA.

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
59.		The EA suggests that there will be no change in enforcement activity as a result of the FOB expansion, yet with a reduction in vehicle trips between the Ajo Station and the FOB juxtaposed with 15,000 patrol trips in the AOR it seems clear that there will be an increase in the intensity of patrols in the western portion of the AOR. The EA for the FOB expansion project does not analyze the impacts of this increase, which are likely to be significant, especially for the endangered Sonoran pronghorn. Formal consultation with FWS under Section 7 of the Endangered Species Act is warranted for this project.	CBD	As stated in the EA, the FOB would not change the number of agents currently operating within the Ajo Station or within Sonoran Pronghorn habitat. CBP is currently in formal Section 7 consultation with USFWS regarding impacts of this project on Sonoran Pronghorn. Section 7 consultation will be completed before the FONSI is signed.
60.		In the 2009 FONSI and EA for the SBI _{net} Ajo-1 Tower Project, the intent of the "tolerance to the depth of intrusion" was to be "as close to the international border as practical" (at page 52). However, during the Center's tour of the CPNWR, we found far more off-road vehicle tracks, presumably from U.S. Border Patrol interdiction efforts, on the north side of El Camino del Diablo than on the south side of the road. A walking tour of the south side of El Camino del Diablo did not reveal the extent of damage from off-road vehicle use that was found on the north side. This would appear to be in conflict with the "tolerance to depth of intrusion" information that was made available in the 2009 FONSI and EA, and to which this EA is tiered.	CBD	CBP continues to focus its interdiction as close to the border as practicable. Due to terrain, personal availability, and actionable intelligence, the distance from the border at which the most effective interdiction can be executed is variable.
61.		In the 2009 FONSI and EA for the SBI _{net} Ajo-1 Tower Project, the septic system is described with a capacity for "up to 10 people" (at page 51). Yet in the current DEA for the Ajo FOB expansion project, the septic system is described (at page 2-6) as a "32-person, deep-discharge septic system [] installed as part of the agreement with OPCNM and USFWS when the camp moved from the Bates Well site to the current location." It is not clear how the septic system described in the 2009 FONSI and EA will accommodate a three-fold increase in use. It is not clear when the septic system was expanded to a 32-person deep discharge unit. It is also not clear where the NEPA documentation for the three-fold increase in septic system capacity is, or when the NEPA process for said increase occurred. This information must be made publicly available immediately.	CBD	A letter dated July 7, 2010, was received by CBP from OPCNM (signed by Lee Baiza, Superintendent) approving the installation of a 32-person capacity deep-discharge septic system at the tactical camp. This letter will be included in the final EA as part of Appendix A.

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
62.		Unfortunately, the Draft EA does not sufficiently provide appropriate analysis of major affected elements, including air, water, wildlife, and wilderness resources. A Finding of No Significant Impact (FONSI) is unwarranted and inappropriate.	Arizona Wilderness Coalition, Defenders of Wildlife, Sierra Club, and Sky Island Alliance (Joint comments)	CBP respectfully disagrees with your opinion. This EA identifies how CBP is currently and will continue to comply with the Clean Air Act (Section 3.10), Clean Water Act (sections 3.4, 3.5, and 3.13), the Endangered Species Act (Section 3.8) including ongoing Formal Section 7 consultation with USFWS, and the Wilderness Act (Section 3.3). CBP has determined that a FONSI is the appropriate decision document for this project.
63.		The SBInet Ajo-1 Tower Project EA of 2009 promised to "reduce the enforcement footprint" in the region that includes OPCNM and CPNWR, and to move "USBP traffic closer to the border." Since then, USBP vehicle traffic and associated impacts emanating from the FOB location remain intense. Increasing the capacity and footprint of the FOB would only exacerbate these impacts, and would act in contradiction to the intent of the SBInet Ajo-1 Tower Project.	Joint comments	See response number 11.
64.		After the construction of the SBInet infrastructure, it was our assumption and was clearly stated by Border Patrol that enforcement efforts would be "moving USBP traffic closer to the border." We request clarification on how the Ajo FOB reconciles with facts and projections provided by the SBInet Ajo-1 Final EA in this regard.	Joint comments	See response number 60.
65.		With a reduction in vehicle trips between the FOB and the Ajo Station, but retention of 15,000 patrol trips within the AOR, it is clear that intensities of patrol will increase in the western portion of AOR. No analysis of this shift in patrol intensities and time is reflected in the draft EA though there are large consequences to such shifts. The area west of the FOB includes important habitat for species such as the endangered Sonoran pronghorn, though the draft EA does not disclose or analyze the potential for additional time, miles, and trips that would emanate from the FOB westward.	Joint comments	As stated in the EA, the FOB would not change the number of agents currently operating within the Ajo Station or within Sonoran Pronghorn habitat. CBP is currently in formal Section 7 consultation with USFWS regarding impacts of this project on Sonoran Pronghorn. Section 7 consultation will be completed before the FONSI is signed.
66.		As such, formal consultation under Section 7 of the Endangered Species Act is warranted for this draft EA. Given the inconsistency of statements facts regarding enforcement intensity shifts between the 2009 EA and this draft EA, which increases patrol intensity within occupied pronghorn habitat, Border Patrol cannot rely on previous opinions provided by USFWS.	Joint comments	CBP is currently in formal Section 7 consultation with USFWS regarding impacts of this project on Sonoran Pronghorn. Section 7 consultation will be completed before the FONSI is signed.

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>					
#	Location	Comment	Reviewer	CBP Response	
67.		The EA for FOB expansion makes no mention of facilities and capabilities directed at use of horse patrols within designated wilderness and sensitive habitat areas. Any apparatus aimed at patrolling these areas should focus primarily on horse patrols for maximum protection of wilderness resources. Horse patrol units within the Border Patrol have a long history of success and provided agents with unique capabilities for patrol and interdiction. Does the expanded FOB include infrastructure for the eminence of stock during appropriate times of year?	Joint comments	The FOB will include horse stabling facilities and CBP will continue to use horse patrol throughout the AOR of the proposed FOB.	
68.		The draft EA also contradicts previous plans by the Border Patrol to focus enforcement efforts at the border in this exceptionally fragile region rather than a primary strategy of interdiction efforts north of Bates Well and the Camino del Diablo Roads. To expand the FOB while unauthorized crossing numbers are exceptionally low would unnecessarily endanger the fragile and precious resources of the OPCNM and CPNWR.	Joint comments	CBP Ajo Station, OPCNM and CPNWR have agreed that the preferred location provides the most tactical advantage. See also response number 11.	
69.		I have personally witnessed destruction to cryptogamic soils by off road vehicle use. At a quick glance the soil may not be noticed but when one looks closely, it is every where. These soils take decades to form and are imperative to desert life as they provide a healthy environment.	Laura Chamberlin	As stated in Section 1.4, the proposed action will result in no change to border patrol operations, therefore, no changes to cryptogamic soils form the proposed action are anticipated.	
70.		The endangered Sonoran Pronghorn and The Lesser Long-Nosed bats are just a few of the animals that need our attention. If the off road presence continues with no regard to their lively hood than it pains me to think of their future.	Laura Chamberlin	CBP is currently in formal Endangered Species Act, Section 7 consultation with USFWS regarding impacts on Sonoran pronghorn from this project. This consultation will be completed prior to construction initiation.	
71.		My experience at Cabeza Prieta leads me to believe that Border Patrol agents need to be educated on the impacts they are having to Refuge resources and visitors to the Refuge.	Laura Chamberlin	CBP, OPCNM and CPNWR are working together to create an educational liaison to be responsible for environmental, wildlife and botanical education for agents working with the Refuge and Monument or stationed at the FOB.	
72.		I ask that the Department of Homeland Security take another look at the need for this project and develop alternatives that address the need to secure the border while at the same time the need to protect America's natural treasures.	Laura Chamberlin	CBP has determined that a full range of alternatives have been analyzed and the proposed action offers the best tactical advantage for USBP.	

<p style="text-align: center;">Comment Response Matrix Draft Environmental Assessment for the AJO FOB, U.S. Border Patrol Tucson Sector, Ajo Station</p>				
#	Location	Comment	Reviewer	CBP Response
73.		I adopt and incorporate by reference the comments submitted by the Center for Biological Diversity.	Keri Dixon	Thank you for your comment. Please see above in this matrix for the CBD comments and responses.
74.		My first hand experiences on the Refuge in the area of the Forward Operating Base leads me to believe that Border Patrol agents need to be educated on the impacts they are having to Refuge resources and visitors to the Refuge. I have many friends who used to visit the refuge regularly but who no longer visit at all because of the excessive number of Border Patrol agents driving around 24 hours a day. Not one of the people I know has ever had a negative experience with "cross border violators" and it seems as if "CBV" numbers are significantly down for this area.	Keri Dixon	CBP, OPCNM and CPNWR are working together to create an educational liaison to be responsible for environmental, wildlife and botanical education for agents working with the Refuge and Monument or stationed at the FOB.
75.		I personally visited the refuge and monument less often in the past few years because of the excessive noise, dust and degraded landscapes. However, I miss the picturesque views and wildlife experiences I used to have when there was less border patrol presence.	Keri Dixon	CBP plans to document and mitigate for these impacts as part of the re-initiation of consultation with USFWS on the Ajo-1 Biological Opinion.
76.		I sincerely ask that the Department of Homeland Security take another look at the need for this project. I urge you to develop alternatives that address the need to secure the border while at the same time the need to protect America's natural treasures.	Keri Dixon	CBP has determined that a full range of alternatives have been analyzed and the proposed action offers the best tactical advantage for USBP.
77.		I adopt and incorporate by reference the comments submitted by the Center for Biological Diversity.	Cyndi Tuell	Thank you for your comment. Please see above in this matrix for the CBD comments and responses.
78.		My first hand experiences on the Refuge in the area of the Forward Operating Base leads me to believe that Border Patrol agents need to be educated on the impacts they are having to Refuge resources and visitors to the Refuge. I have many friends who used to visit the refuge regularly but who no longer visit at all because of the excessive number of Border Patrol agents driving around 24 hours a day. Not one of the people I know has ever had a negative experience with "cross border violators" and it seems as if "CBV" numbers are significantly down for this area.	Cyndi Tuell	CBP, OPCNM and CPNWR are working together to create an educational liaison to be responsible for environmental, wildlife and botanical education for agents working with the Refuge and Monument or stationed at the FOB.
79.		I ask that the Department of Homeland Security take another look at the need for this project and develop alternatives that address the need to secure the border while at the same time the need to protect America's natural treasures.	Cyndi Tuell	CBP has determined that a full range of alternatives have been analyzed and the proposed action offers the best tactical advantage for USBP.



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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

REGION IV, 9140 E. 28TH ST., YUMA, AZ 85365

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August 29, 2011

Mr. David Guzewich
U.S. Customs and Border Protection
Facilities Management and Engineering
1301 Constitution Ave. NW, Suite B-155
Washington, D.C. 20229

Re: Draft Environmental Assessment for a Proposed Ajo Forward Operating Base, Ajo Border Patrol Station Area of Responsibility, U.S. Border Patrol, Tucson Sector

Dear Mr. Guzewich:

The Arizona Game and Fish Department (Department) has reviewed the above-referenced Draft Environmental Assessment (DEA) for the proposed Ajo forward operating base. The following comments are provided for your consideration.

The Department is an active participant on the Sonoran Pronghorn Recovery Team and in the recovery efforts for this endangered subspecies. The Department's comments and input on this project for the pronghorn will be through the Recovery Team and U.S. Fish and Wildlife Service. This comment letter is limited to impacts to wildlife excluding the Sonoran pronghorn.

The Proposed Action is to expand the existing 1 acre tactical base located on Bates Well Road at the western boundary of Organ Pipe Cactus National Monument (OPCNM) to a 3 acre forward operating base (FOB). The second alternative is to create a new FOB along Bates Well Road at the eastern boundary of Cabeza Prieta National Wildlife Refuge (CPNWR). These two alternatives will use solar panels to generate electricity. The third alternative is to use fossil fuel generators instead of solar arrays to produce electricity. Because the Proposed Action will have a smaller footprint of new disturbance than the CPNWR alternative and the solar panels will reduce noise levels, reduce the chance of a hazardous materials incident and reduce traffic on Bates Well Road, the Department prefers the Proposed Action.

Solar panels will have fewer impacts to wildlife than will fossil fuel generators. For this reason the Department recommends converting to solar power as soon as possible.

With the successful implementation of proposed best management practices, the Department does not anticipate any significant adverse impacts to wildlife species resulting from the approval of this proposed project.

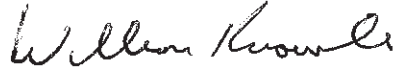
David Guzewich

August 29, 2011

2

Thank you for the opportunity to provide comments on this DEA. If you have any questions, please contact me at 928-341-4047.

Sincerely,



William Knowles

Habitat Specialist, Region IV

cc: Josh Avey, Chief, Habitat Branch
Laura Canaca, PEP Supervisor, Habitat Branch
Leonard Ordway, Assistant Director, Field Operations Division
Troy Smith, Habitat Program Manager, Region IV

AGFD #M11-08084901

From: Wendy S. LeStarge <LeStarge.Wendy@azdeq.gov>
To: GUZEWICH, DAVID C
Cc: Linda C. Taunt <Taunt.Linda@azdeq.gov>
Sent: Thu Aug 11 16:20:05 2011
Subject: Draft Environmental Assessment for Proposed Ajo Forward Operation Base

On behalf of Linda Taunt, Deputy Division Director, Water Quality Division of the Arizona Department of Environmental Quality, thank you for the opportunity to review and comment on the Draft Environmental Assessment for the Proposed Ajo Forward Operation Base. The Draft Environmental Assessment addresses our comments that were submitted April 20, 2011. We have no additional comments.

*Wendy LeStarge
Environmental Rules Specialist
Arizona Department of Environmental Quality
Water Quality Division
(602) 771-4836*



INTERNATIONAL BOUNDARY AND WATER COMMISSION
UNITED STATES AND MEXICO

OFFICE OF THE COMMISSIONER
UNITED STATES SECTION

August 12, 2011

Mr. David Guzewich
U.S. Customs & Border Protection
Facilities Management and Engineering
1301 Constitution Avenue NW, Suite B-155
Washington, DC 20229

Dear Mr. Guzewich:

The International Boundary and Water Commission, United State Section (USIBWC) has received your draft Environmental Assessment and Proposed FONSI entitled "Environmental Assessment for the Proposed Ajo Forward Operating Base, Ajo Border Patrol Station Area of Responsibility, U.S. Border Patrol, Tucson Sector."

The USIBWC has reviewed the above referenced project and determined that the project should not have any impacts on USIBWC property or interests. Construction should maintain best management practices to prevent runoff or degradation of air quality during construction to avoid impacts to watershed interests in Mexico.

Additionally, the EA states that biological impacts to birds during bird breeding season will be avoided. This should be expanded to note that breeding season for the endangered Sonoran Pronghorn occurs in September and October. Measures similar to those taken during the Ajo-1 Tower project to avoid construction impacts to the Sonoran Pronghorn should also be planned and initiated for this project.

If you have any questions, please feel free to call me at (915) 832-4702 or Mr. Wayne Belzer at (915) 832-4703.

Sincerely,

Gilbert Anaya
Division Chief
Environmental Management Division



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Henry R. Darwin
Director

August 23, 2011

Mr. David Guzewich
U.S. Customs and Border Protection
Facilities Management and Engineering
1301 Constitution Avenue NW, Suite B-155
Washington, DC 20229

RE: Draft Environmental Assessment for the Proposed Ajo Forward Operating Base

Dear Mr. David Guzewich:

The ADEQ Air Quality Division has reviewed your letter, received August 4, 2011, concerning the Draft Environmental Assessment for the Proposed Ajo Forward Operating Base Project. While the project is not located in a nonattainment area regulated for 10-micron particulate matter (PM₁₀), the area is, however, near the Ajo PM₁₀ Nonattainment area. Please note: in our review of the proposed project, it has come to our attention that, in a letter dated April 28, 2011, ADEQ previously misidentified the proposed project as within the nonattainment area.

As described, the project is anticipated to have a de minimis impact on air quality. Considering prevailing winds and to minimize adverse impacts on public health and welfare, the following information is provided for consideration:

REDUCE DISTURBANCE of PARTICULATE MATTER during CONSTRUCTION

This action, plan or activity may temporarily increase ambient particulate matter (dust) levels. Particulate matter 10 microns in size and smaller can penetrate the lungs of human beings and animals and is subject to a National Ambient Air Quality Standard (NAAQS) to protect public health and welfare. Particulate matter 2.5 microns in size and smaller, also subject to a NAAQS, is difficult for lungs to expel and has been linked to increases in death rates; heart attacks by disturbing heart rhythms and increasing plaque and clotting; respiratory infections; asthma attacks and cardiopulmonary obstructive disease (COPD) aggravation.

The following measures are recommended to reduce disturbance of particulate matter, including emissions caused by strong winds as well as machinery and trucks tracking soil off the construction site:

Northern Regional Office
1801 W. Route 66 • Suite 117 • Flagstaff, AZ 86001
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

BW1 FOIA CBP 007192

- I. Site Preparation and Construction
 - A. Minimize land disturbance;
 - B. Suppress dust on traveled paths which are not paved through wetting, use of watering trucks, chemical dust suppressants, or other reasonable precautions to prevent dust entering ambient air;
 - C. Cover trucks when hauling soil;
 - D. Minimize soil track-out by washing or cleaning truck wheels before leaving construction site;
 - E. Stabilize the surface of soil piles; and
 - F. Create windbreaks.
- II. Site Restoration
 - A. Revegetate any disturbed land not used;
 - B. Remove unused material; and
 - C. Remove soil piles via covered trucks.

The following rules applicable to reducing dust during construction, demolition and earth moving activities are enclosed:

- ☐ Arizona Administrative Code R18-2-604 through -607
- ☐ Arizona Administrative Code R18-2-804

Should you have further questions, please do not hesitate to call me at (602) 771-2375, or Lhamo LeMoine at (602) 771-2373.

Very truly yours,



Diane L. Arnst, Manager
Air Quality Planning Section

Enclosures (2)

cc: Bret Parke, EV Administrative Counsel
Lhamo LeMoine, Administrative Secretary
File No. 257647

R18-2-605. Roadways and Streets

- A. No person shall cause, suffer, allow or permit the use, repair, construction or reconstruction of a roadway or alley without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. Dust and other particulates shall be kept to a minimum by employing temporary paving, dust suppressants, wetting down, detouring or by other reasonable means.
- B. No person shall cause, suffer, allow or permit transportation of materials likely to give rise to airborne dust without taking reasonable precautions, such as wetting, applying dust suppressants, or covering the load, to prevent particulate matter from becoming airborne. Earth or other material that is deposited by trucking or earth moving equipment shall be removed from paved streets by the person responsible for such deposits.

Historical Note

Adopted effective May 14, 1979 (Supp. 79-1). Former Section R9-3-605 renumbered without change as Section R18-2-605 (Supp. 87-3). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-605 renumbered to R18-2-805, new Section R18-2-605 renumbered from R18-2-405 effective November 15, 1993 (Supp. 93-4).

R18-2-606. Material Handling

No person shall cause, suffer, allow or permit crushing, screening, handling, transporting or conveying of materials or other operations likely to result in significant amounts of airborne dust without taking reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods to prevent excessive amounts of particulate matter from becoming airborne.

Historical Note

Section R18-2-606 renumbered from R18-2-406 effective November 15, 1993 (Supp. 93-4).

R18-2-607. Storage Piles

- A. No person shall cause, suffer, allow, or permit organic or inorganic dust producing material to be stacked, piled, or otherwise stored without taking reasonable precautions such as chemical stabilization, wetting, or covering to prevent excessive amounts of particulate matter from becoming airborne.
- B. Stacking and reclaiming machinery utilized at storage piles shall be operated at all times with a minimum fall of material and in such manner, or with the use of spray bars and wetting agents, as to prevent excessive amounts of particulate matter from becoming airborne.

Historical Note

Section R18-2-607 renumbered from R18-2-407 effective November 15, 1993 (Supp. 93-4).

R18-2-608. Mineral Tailings

No person shall cause, suffer, allow, or permit construction of mineral tailing piles without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. Reasonable precautions shall mean wetting, chemical stabilization, revegetation or such other measures as are approved by the Director.

Historical Note

Section R18-2-608 renumbered from R18-2-408, new Section R18-2-408 adopted effective November 15, 1993 (Supp. 93-4).

R18-2-609. Agricultural Practices

A person shall not cause, suffer, allow, or permit the performance of agricultural practices outside the Phoenix and Yuma planning areas, as defined in 40 CFR 81.303, which is incorporated by reference in R18-2-210, including tilling of land and application of fertilizers without taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne.

Historical Note

Section R18-2-609 renumbered from R18-2-409 effective November 15, 1993 (Supp. 93-4). Amended by final rulemaking at 6 A.A.R. 2009; effective May 12, 2000 (Supp. 00-2). Amended by final rulemaking at 11 A.A.R. 2210, effective July 18, 2005 (Supp. 05-2).

R18-2-610. Definitions for R18-2-611

The definitions in Article 1 of this Chapter and the following definitions apply to R18-2-611:

1. "Access restriction" means restricting or eliminating public access to noncropland with signs or physical obstruction.
2. "Aggregate cover" means gravel, concrete, recycled road base, caliche, or other similar material applied to noncropland.
3. "Artificial wind barrier" means a physical barrier to the wind.
4. "Best management practice" means a technique verified by scientific research, that on a case-by-case basis is practical, economically feasible, and effective in reducing PM₁₀ emissions from a regulated agricultural activity.
5. "Chemical irrigation" means applying a fertilizer, pesticide, or other agricultural chemical to cropland through an irrigation system.
6. "Combining tractor operations" means performing two or more tillage, cultivation, planting, or harvesting operations with a single tractor or harvester pass.
7. "Commercial farm" means 10 or more contiguous acres of land used for agricultural purposes within the boundary of the Maricopa PM₁₀ nonattainment area.
8. "Commercial farmer" means an individual, entity, or joint operation in general control of a commercial farm.
9. "Committee" means the Governor's Agricultural Best Management Practices Committee.
10. "Cover crop" means plants or a green manure crop grown for seasonal soil protection or soil improvement.
11. "Critical area planting" means using trees, shrubs, vines, grasses, or other vegetative cover on noncropland.
12. "Cropland" means land on a commercial farm that:
 - a. Is within the time-frame of final harvest to plant emergence;
 - b. Has been tilled in a prior year and is suitable for crop production, but is currently fallow; or
 - c. Is a turn-row.

- c. If the burning would occur at a solid waste facility in violation of 40 CFR 258.24 and the Director has not issued a variance under A.R.S. § 49-763.01.
- E. Open outdoor fires of dangerous material. A fire set for the disposal of a dangerous material is allowed by the provisions of this Section, when the material is too dangerous to store and transport, and the Director has issued a permit for the fire. A permit issued under this subsection shall contain all provisions in subsection (D)(3) except for subsections (D)(3)(e) and (D)(3)(f). The Director shall permit fires for the disposal of dangerous materials only when no safe alternative method of disposal exists, and burning the materials does not result in the emission of hazardous or toxic substances either directly or as a product of combustion in amounts that will endanger health or safety.
- F. Open outdoor fires of household waste. An open outdoor fire for the disposal of household waste is allowed by provisions of this Section when permitted in writing by the Director or a delegated authority. A permit issued under this subsection shall contain all provisions in subsection (D)(3) except for subsections (D)(3)(e) and (D)(3)(f). The permittee shall conduct open outdoor fires of household waste in an approved waste burner and shall either:
1. Burn household waste generated on-site on farms or ranches of 40 acres or more where no household waste collection or disposal service is available; or
 2. Burn household waste generated on-site where no household waste collection and disposal service is available and where the nearest other dwelling unit is at least 500 feet away.
- G. Permits issued by a delegated authority. The Director may delegate authority for the issuance of open burning permits to a county, city, town, air pollution control district, or fire district. A delegated authority may not issue a permit for its own open burning activity. The Director shall not delegate authority to issue permits to burn dangerous material under subsection (E). A county, city, town, air pollution control district, or fire district with delegated authority from the Director may assign that authority to one or more private fire protection service providers that perform fire protection services within the county, city, town, air pollution control district, or fire district. A private fire protection provider shall not directly or indirectly condition the issuance of open burning permits on the applicant being a customer. Permits issued under this subsection shall comply with the requirements in subsection (D)(3) and be in a format prescribed by the Director. Each delegated authority shall:
1. Maintain a copy of each permit issued for the previous five years available for inspection by the Director;
 2. For each permit currently issued, have a means of contacting the person authorized by the permit to set an open fire if an order to extinguish open burning is issued; and
 3. Annually submit to the Director by May 15 a record of daily burn activity, excluding household waste burn permits, on a form provided by the Director for the previous calendar year containing the information required in subsections (D)(3)(e) and (D)(3)(f).
- H. The Director shall hold an annual public meeting for interested parties to review operations of the open outdoor fire program and discuss emission reduction techniques.
- I. Nothing in this Section is intended to permit any practice that is a violation of any statute, ordinance, rule, or regulation.

Historical Note

Adopted effective May 14, 1979 (Supp. 79-1). Amended effective October 2, 1979 (Supp. 79-5). Correction, subsection (C) repealed effective October 2, 1979, not shown (Supp. 80-1). Former Section R9-3-602 renumbered without change as Section R18-2-602 (Supp. 87-3). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-602 renumbered to R18-2-802, new Section R18-2-602 renumbered from R18-2-401 effective November 15, 1993 (Supp. 93-4). Amended by final rulemaking at 10 A.A.R. 388, effective March 16, 2004 (Supp. 04-1).

R18-2-603. Repealed

Historical Note

Adopted effective May 14, 1979 (Supp. 79-1). Former Section R9-3-603 renumbered without change as Section R18-2-603 (Supp. 87-3). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-603 renumbered to R18-2-803, new Section R18-2-603 renumbered from R18-2-403 effective November 15, 1993 (Supp. 93-4). Repealed effective October 8, 1996 (Supp. 96-4).

R18-2-604. Open Areas, Dry Washes, or Riverbeds

- A. No person shall cause, suffer, allow, or permit a building or its appurtenances, or a building or subdivision site, or a driveway, or a parking area, or a vacant lot or sales lot, or an urban or suburban open area to be constructed, used, altered, repaired, demolished, cleared, or leveled, or the earth to be moved or excavated, without taking reasonable precautions to limit excessive amounts of particulate matter from becoming airborne. Dust and other types of air contaminants shall be kept to a minimum by good modern practices such as using an approved dust suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means.
- B. No person shall cause, suffer, allow, or permit a vacant lot, or an urban or suburban open area, to be driven over or used by motor vehicles, trucks, cars, cycles, bikes, or buggies, or by animals such as horses, without taking reasonable precautions to limit excessive amounts of particulates from becoming airborne. Dust shall be kept to a minimum by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means.
- C. No person shall operate a motor vehicle for recreational purposes in a dry wash, riverbed or open area in such a way as to cause or contribute to visible dust emissions which then cross property lines into a residential, recreational, institutional, educational, retail sales, hotel or business premises. For purposes of this subsection "motor vehicles" shall include, but not be limited to trucks, cars, cycles, bikes, buggies and 3-wheelers. Any person who violates the provisions of this subsection shall be subject to prosecution under A.R.S. § 49-463.

Historical Note

Adopted effective May 14, 1979 (Supp. 79-1). Former Section R9-3-604 renumbered without change as Section R18-2-604 (Supp. 87-3). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-604 renumbered to R18-2-804, new Section R18-2-604 renumbered from R18-2-404 and amended effective November 15, 1993 (Supp. 93-4).

ARTICLE 8. EMISSIONS FROM MOBILE SOURCES (NEW AND EXISTING)

R18-2-801. Classification of Mobile Sources

- A. This Article is applicable to mobile sources which either move while emitting air contaminants or are frequently moved during the course of their utilization but are not classified as motor vehicles, agricultural vehicles, or agricultural equipment used in normal farm operations.
- B. Unless otherwise specified, no mobile source shall emit smoke or dust the opacity of which exceeds 40%.

Historical Note

Adopted effective February 26, 1988 (Supp. 88-1). Amended effective September 26, 1990 (Supp. 90-3). Amended effective February 3, 1993 (Supp. 93-1). Former Section R18-2-801 renumbered to Section R18-2-901, new Section R18-2-801 renumbered from R18-2-601 effective November 15, 1993 (Supp. 93-4).

R18-2-802. Off-road Machinery

- A. No person shall cause, allow or permit to be emitted into the atmosphere from any off-road machinery, smoke for any period greater than 10 consecutive seconds, the opacity of which exceeds 40%. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.
- B. Off-road machinery shall include trucks, graders, scrapers, rollers, locomotives and other construction and mining machinery not normally driven on a completed public roadway.

Historical Note

Adopted effective February 26, 1988 (Supp. 88-1). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-802 renumbered to Section R18-2-902, new Section R18-2-802 renumbered from R18-2-602 effective November 15, 1993 (Supp. 93-4).

R18-2-803. Heater-planer Units

No person shall cause, allow or permit to be emitted into the atmosphere from any heater-planer operated for the purpose of reconstructing asphalt pavements smoke the opacity of which exceeds 20%. However three minutes' upset time in any one hour shall not constitute a violation of this Section.

Historical Note

Adopted effective February 26, 1988 (Supp. 88-1). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-803 renumbered to Section R18-2-903, new Section R18-2-803 renumbered from R18-2-603 effective November 15, 1993 (Supp. 93-4).

R18-2-804. Roadway and Site Cleaning Machinery

- A. No person shall cause, allow or permit to be emitted into the atmosphere from any roadway and site cleaning machinery smoke or dust for any period greater than 10 consecutive seconds, the opacity of which exceeds 40%. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.
- B. In addition to complying with subsection (A), no person shall cause, allow or permit the cleaning of any site, roadway, or alley without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions may include applying dust suppressants. Earth or other material shall be removed from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water or by other means.

Historical Note

Adopted effective February 26, 1988 (Supp. 88-1). Amended effective September 26, 1990 (Supp. 90-3). Amended effective February 3, 1993 (Supp. 93-1). Former Section R18-2-804 renumbered to Section R18-2-904, new Section R18-2-804 renumbered from R18-2-604 effective November 15, 1993 (Supp. 93-4).

R18-2-805. Asphalt or Tar Kettles

- A. No person shall cause, allow or permit to be emitted into the atmosphere from any asphalt or tar kettle smoke for any period greater than 10 consecutive seconds, the opacity of which exceeds 40%.
- B. In addition to complying with subsection (A), no person shall cause, allow or permit the operation of an asphalt or tar kettle without minimizing air contaminant emissions by utilizing all of the following control measures:
 1. The control of temperature recommended by the asphalt or tar manufacturer;
 2. The operation of the kettle with lid closed except when charging;
 3. The pumping of asphalt from the kettle or the drawing of asphalt through cocks with no dipping;
 4. The dipping of tar in an approved manner;
 5. The maintaining of the kettle in clean, properly adjusted, and good operating condition;
 6. The firing of the kettle with liquid petroleum gas or other fuels acceptable to the Director.

Historical Note

Adopted effective February 26, 1988 (Supp. 88-1). Amended effective September 26, 1990 (Supp. 90-3). Former Section R18-2-805 renumbered to Section R18-2-905, new Section R18-2-805 renumbered from R18-2-605 effective November 15, 1993 (Supp. 93-4).



United States Department of the Interior

NATIONAL PARK SERVICE
INTERMOUNTAIN REGION
12795 West Alameda Parkway
P.O. Box 25287
Denver, Colorado 80225-0287



IN REPLY REFER TO:
L7617 (IMR-D)

SEP 02 2011

Christopher J. Colacicco
Program Manager,
Real Estate and Environmental Services Division,
Border Patrol Facilities and Tactical Infrastructure
Program Management Office
1301 Constitution Ave. NW, Suite B-155
Washington, DC 20229

Dear Mr. Colacicco,

Thank you for the opportunity to review the Environmental Assessment (EA) for the Proposed Ajo Forward Operating Base, Ajo Station Area of Responsibility U.S. Border Patrol, Tucson Sector. Department of Homeland Security, US Customs and Border Protection, US Border Patrol. (August 2011). Organ Pipe Cactus National Monument (OPCNM) has worked on our review of the EA and the attached matrix contains our National Park Service (NPS) comments.

We would like to meet with you and your staff at your earliest convenience to discuss what we believe are some key points that could be addressed to ensure continued success in each of our respective missions. We will be in contact with you shortly to arrange such a meeting.

Please feel free to contact Colin Campbell, Deputy Director, Intermountain Region Office, (303) 969-2800, or Lee Baiza, Superintendent, OPCNM, (520) 387-6849 x 7500, to further discuss our comments.

Sincerely,

John Wessels
Regional Director

cc: Lee Baiza, Organ Pipe Cactus National Monument

----- Original Message -----

From: Sierra Club <information@sierraclub.org>

To: GUZEWICH, DAVID C

Sent: Fri Aug 19 11:12:32 2011

Subject: Please protect Organ Pipe Cactus National Monument!

Aug 19, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

I ask that you please halt plans to expand the patrol base located in Organ Pipe Cactus National Monument. Tripling the size of the temporary base would have significant adverse effects on the surrounding wilderness, not to mention the adverse effects due to significantly higher patrolling in the area. Besides, because far fewer migrants have crossed in the Organ Pipe area in recent years, such a base expansion is unnecessary.

Thank you in advance for your attentiveness to citizen input.

Sincerely,

Mr. Jonathan Amgott
3630 Mallie Ct
Melbourne, FL 32934-8358

----- Original Message -----

From: Sierra Club <information@sierraclub.org>

To: GUZEWICH, DAVID C

Sent: Tue Aug 23 17:00:43 2011

Subject: Save Organ Pipe National Monument's Environment!

Aug 23, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

We are pleased that the illegals are not using the area of Organ Pipe National Monument as frequently as in the past. The traffic is down dramatically! Yeah! Therefore, expansion of the base is not needed!!

Any expansion would probably just lead to the smugglers making more wildcat trails and roads through the Monument. Let's show concern for the environment!

Sincerely,

Miss Barbara Cain
3489 N Camino La Jicarrilla
Tucson, AZ 85712-6042
(520) 881-5689

-----Original Message-----

From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Merlin Dilley
Sent: Saturday, August 20, 2011 6:04 PM
To: GUZEWICH, DAVID C
Subject: Please respect the M.O.A.

Aug 20, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

As a citizen of a border state, border issues concern me greatly, even though I am so far from the Southern border. I understand that border issues are of huge importance, but I believe that the Memorandum of Understanding is the most effective way to deal with border issues. I am concerned that this case here is an example of the M.O.A. not being followed, and the land managers and the land are being negatively impacted.

Sincerely,

Mr. Merlin Dilley
101 High St Apt 1
Farmington, ME 04938-1806

----- Original Message -----

From: Sierra Club <information@sierraclub.org>

To: GUZEWICH, DAVID C

Sent: Fri Aug 19 15:31:47 2011

Subject: Please protect our sensitive borderlands! We must do better!

Aug 19, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

Common sense must be used in all our strategies! Please consider the topography, wildlife, flood zones , needs of citizens, etc. when implementing border security!

Sincerely,

Mr. Thomas Nieland
415 Oakwood Dr
Alamo, TX 78516-9300
(210) 399-8338

----- Original Message -----

From: Sierra Club <information@sierraclub.org>

To: GUZEWICH, DAVID C

Sent: Fri Sep 02 04:52:16 2011

Subject: Protect our border wilderness

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

Patrols should be concentrated along the border itself near Organ Pipe and Cabeza Prieta to avoid the severe operational impacts wrought by the current strategy, which focuses on the Devil's Highway area well north of the border.

The base should not be expanded from its current temporary one-acre footprint to a permanent three-acre footprint because it would significantly degrade the wilderness character of surrounding areas.

The base should not be expanded because increased patrols in that area would lead to an increase in wildcat roads and off-road vehicular impacts to wilderness.

Because cross-border traffic has dropped dramatically in the area of Organ Pipe in recent years, a base expansion there is not needed.

Sincerely,

Mr. Michael @ Kathleen Shores

1021 S Ash Ave

Tempe, AZ 85281-8728

(480) 967-7771

----- Original Message -----

From: Sierra Club <information@sierraclub.org>

To: GUZEWICH, DAVID C

Sent: Fri Sep 02 15:42:47 2011

Subject: Please protect our borderlands against unnecessary construction

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

I am writing to ask you to consider the importance of the environment, wilderness and wildlife. I am against the proposed Border Patrol station to be built in the Organ Pipe Cactus National Monument, adjacent to Cabeza Prieta National Wildlife Refuge. This base, from which 24-hour patrols across these public lands will be operated, will be located well north of the actual border and will affect many sensitive areas, including the national monument, national wildlife refuge, and designated wilderness areas.

Patrols should be concentrated along the border itself near Organ Pipe and Cabeza Prieta to avoid the severe operational impacts wrought by the current strategy, which focuses on the Devil's Highway area well north of the border.

The base should not be expanded from its current temporary one-acre footprint to a permanent three-acre footprint because it would significantly degrade the wilderness character of surrounding areas.

The base should not be expanded because increased patrols in that area would lead to an increase in wildcat roads and off-road vehicular impacts to wilderness.

Because cross-border traffic has dropped dramatically in the area of Organ Pipe in recent years, a base expansion there is not needed.

I believe in protecting our U.S. border, however I would like the effort to do so to NOT sacrifice the precious treasures of wilderness and wildlife in our country that add to the richness that makes our country so great.

Thank you for your time and consideration.

Sincerely,

Ms. Amy Catalino
2109 Manchester St
Rosamond, CA 93560-7686

-----Original Message-----

From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Naomi Cohen

Sent: Friday, September 02, 2011 3:12 PM

To: GUZEWICH, DAVID C

Subject: Do not expand the Border Patrol base in Southwestern Arizona

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

I am writing to oppose the proposed operating base in Organ Pipe Cactus National Monument for the following reasons:

Patrols should be concentrated along the border to minimize operational impacts and to intercept undocumented migrants before they are subject to the harsh conditions in this area.

Expansion of the base from 1 to

3 acres would cause deterioration of the wilderness character of the area. Expansion of the base would result in more roads and off road vehicular traffic. Cross border traffic of undocumented migrants has decreased significantly in recent years in this area making a larger base unnecessary.

I spent over a week in southern Arizona in April 2011 learning about undocumented migrants and the threats to fragile lands like Cabeza Prieta, Organ Pipe and Saguaro National Monument. What I learned during that time convinced me that there are better solutions to protect our borders and our wildlands than increased roads, bases and border patrols.

Sincerely,

Ms. Naomi Cohen

PO Box 39

Gap Mills, WV 24941-0039

----- Original Message -----

From: Sierra Club <information@sierraclub.org>

To: GUZEWICH, DAVID C

Sent: Fri Sep 02 19:43:25 2011

Subject: NO expansion of patrol base!

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

I do not support the idea of a 3 acre patrol base in Organ Pipe Cactus National Monument. This is unnecessary and will have a very bad impact on the wilderness of that area. There has also been an extreme decrease of migration through those regions which makes it even more clear that this is unnecessary. As a taxpaying citizen I DO NOT support the idea of increasing border militarization at the expense of beautiful border lands or really at any expense at all!

Thank you for your time and consideration and I hope that you will re-think this plan!

Sincerely,

Dr. Cicily Cooper
4145 Montgomery St
Oakland, CA 94611-5119
(917) 514-3042

-----Original Message-----

From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Roy Emrick
Sent: Friday, September 02, 2011 2:43 PM
To: GUZEWICH, DAVID C
Subject: Comment on Cabeza DEIS

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

Twenty and thirty years ago I used to love crossing the Cabeza when it was almost pristine, though military maneuvers were degrading it even then.

There are already myriads of wildcat roads because of increased patrols by ORV's.

Please do not further damage the wilderness va by increasing the size of the temporary base.

Dealing with the causes of the problem, not destroying the environment to make it look like something is being done, is not the answer

Sincerely,

Dr. Roy Emrick
2220 N Norton Ave
Tucson, AZ 85719-3831

-----Original Message-----

From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Tom Finholt
Sent: Friday, September 02, 2011 7:56 PM
To: GUZEWICH, DAVID C
Subject: Protecting Wilderness Lands

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

This is Tom Finholt.

Please, protect the wildlife refuge and the wilderness lands within it.

Thanks,

Tom Finholt

Sincerely,

Mr. Tom Finholt
212 Timber Wind Dr
Wildwood, MO 63011-1961
(636) 458-3521

----- Original Message -----

From: Sierra Club <information@sierraclub.org>

To: GUZEWICH, DAVID C

Sent: Sat Sep 03 00:56:10 2011

Subject: sensitive borderlands!

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

This action is not really needed. The impact to the landscape would be severe. The patrols should be concentrated along the border itself. The degradation of the area by this action would leave a permanent impact. Please reconsider.

Sincerely,

Mr. Robert Kee
6726 E Calle Dened
Tucson, AZ 85710-5618

----- Original Message -----

From: Sierra Club <information@sierraclub.org>

To: GUZEWICH, DAVID C

Sent: Fri Sep 02 16:12:55 2011

Subject: Our sensitive borderlands need your protection!

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

It is my strong opinion that the Border Patrol should concentrate its work along the border itself near Organ Pipe and Cabeza Prieta to avoid severe operational impact that results from the present strategy which focuses on the area well north of the border.

The base should not be expanded from the current temporary one-acre footprint. An increase would significantly degrade the wilderness character of the area and lead to an increase in wildcat roads and off-road vehicular impact on the wilderness.

And, finally, because the border crossing traffic has dramatically dropped in the Organ Pipe area in recent years, a base expansion there is not needed.

Sincerely,

Mr. Kenneth Kennon
5125 E Burns Pl
Tucson, AZ 85711-3122

-----Original Message-----

From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Vicki Lee
Sent: Friday, September 02, 2011 2:12 PM
To: GUZEWICH, DAVID C
Subject: Pls don't expanded border patrol base near Cabeza Prieta

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

Mr. Guzewich,

I am writing in opposition to the proposal to install a permanent 3-acre Border Patrol base near Cabeza Prieta National Wildlife Refuge.

The area is too far north of the border line to be effective and too close to the sensitive wildlife habitat found in the national monument, wildlife refuge and wilderness areas.

My friends and I frequently travel to southern Arizona to view wildlife, especially birds. The amazing variety of wildlife in the area is worth the long trip from California, and it certainly deserves to be protected rather than overlaid with roads and OHV damage.

Given the recent decrease in cross-border traffic, a base expansion there cannot be justified.

Thanks for listening.

Sincerely,

Ms. Vicki Lee
16401 San Pablo Ave Spc 206
San Pablo, CA 94806-1318
(510) 741-1201

-----Original Message-----

From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of sarah loftus
Sent: Friday, September 02, 2011 2:42 PM
To: GUZEWICH, DAVID C
Subject: Please protect the Arizona wilderness and out important borderland resources

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

I am writing to voice my opposition and concern regarding the proposed construction of a forward operating base on the Arizona border and the potential vehicular impacts development of the base will have on the Cabeza Prieta National Wildlife Refuge. Please consider the following:

1. Patrols should be concentrated along the border itself near Organ Pipe and Cabeza Prieta to avoid the severe operational impacts wrought by the current strategy, which focuses on the Devil's Highway area well north of the border.
2. The base should not be expanded from its current temporary one-acre footprint to a permanent three-acre footprint because it would significantly degrade the wilderness character of surrounding areas.
3. The base should not be expanded because increased patrols in that area would lead to an increase in wildcat roads and off-road vehicular impacts to wilderness.
4. Because cross-border traffic has dropped dramatically in the area of Organ Pipe in recent years, a base expansion there is not needed.

Thank you,

Sarah Loftus
2501 Wickersham #423
Austin, Texas
78741

Sincerely,

Ms. sarah loftus
2501 Wickersham Ln Apt 423
Austin, TX 78741-4668

-----Original Message-----

From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Alex and Carole Mintzer
Sent: Friday, September 02, 2011 2:43 PM
To: GUZEWICH, DAVID C
Subject: Reduce CBP quad bike ATV interdiction in wilderness!

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

I oppose conversion of ORPI wilderness land to a 3-acre CBP forward base for quad bike ATV operations.

I have visited Organ Pipe Cactus National Monument and adjacent Sonoita, Mexico, dozens of times over the past 4 decades. I have seen the tremendous increase in UDA footprint traffic at ORPI during the 1990s and early part of last decade, but it has now decreased greatly again as opportunities provided by the US economy has tanked. On my last visit in January, I saw lots of quad bike ATV tracks across the open desert and through the washes of ORPI. This is CBP agent activity, as smugglers/UDAs generally don't use such range-limited, high visibility, low cargo capacity vehicles. Although the tracks thru arroyo channels are "re-groomed" and removed by water flow during each monsoon season, open desert vehicle tracks may remain as land scars for many decades. CBP should return to aerial surveillance used heavily in past years, and reduce its reliance on quad bike ATVs. The wilderness character of Cabeza Prieta and backcountry ORPI must be preserved, no matter the paranoid sentiments of poorly informed "Tea Party" Arizona residents.

Sincerely,

Dr. Alex and Carole Mintzer
465 N Christine St
Orange, CA 92869-5711
(714) 288-2829

-----Original Message-----

From: Sierra Club [mailto:information@sierraclub.org] On Behalf Of Carolyn Morley
Sent: Wednesday, August 24, 2011 11:34 AM
To: GUZEWICH, DAVID C
Subject: The impact on our border

Aug 24, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

I live in Arizona and camped in the last few years at Organ Pipe Cactus Pipe Monument. The natural beauty of the area is already affected by the human activity. The road is dangerous with the chases the border patrol uses to track down illegals. Having a larger presence and bigger footprint would only hurt the natural environment more. Fencing the border is devastating to the land and animals. Fewer illegals are entering the area so there is no need to expand the border patrol base that is already present.

Sincerely,

Mrs. Carolyn Morley
745 W Paseo Del Canto
Green Valley, AZ 85622-3421

----- Original Message -----

From: Sierra Club <information@sierraclub.org>

To: GUZEWICH, DAVID C

Sent: Fri Sep 02 17:12:52 2011

Subject: Please protect our sensitive desert ecosystem along the AZ border!

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

Border patrols should be concentrated along the border itself near Organ Pipe and Cabeza Prieta to avoid the severe operational impacts wrought by the current strategy, which focuses on the Devil's Highway area well north of the border.

The BP base should not be expanded from its current temporary one-acre footprint to a permanent three-acre footprint because it would significantly degrade the wilderness character of surrounding areas.

The base should not be expanded because increased patrols in that area would lead to an increase in wildcat roads and off-road vehicular impacts to wilderness.

Because cross-border traffic has dropped dramatically in the area of Organ Pipe in recent years, a base expansion there is not needed.

Please do not contribute to the degradation of this fragile ecosystem!

thank you in advance for doing the right thing

Sincerely,

Mr. Brit Rosso
8629 S Triangle K Ranch Pl
Vail, AZ 85641-8932

----- Original Message -----

From: Sierra Club <information@sierraclub.org>

To: GUZEWICH, DAVID C

Sent: Fri Sep 02 15:42:36 2011

Subject: No to the expansion of patrol base in Organ Pipe

Sep 2, 2011

Mr. David Guzewich

Dear Mr. Guzewich,

I am writing to voice my opposition to the proposed installation of a permanent Border Patrol base in Organ Pipe Cactus National Monument.

Expanding the current base would not make a significant contribution to border security, but would result in unacceptable harm to the surrounding wilderness. The decline of cross-border traffic in the Organ Pipe area in recent years makes expansion of this base unnecessary, and border security funds could be better spent by concentrating patrols along the border itself.

Although I live in Oregon, southeast Arizona is one of my favorite destinations for bird watching. The enjoyment of being in nature is seriously compromised by highly visible border security infrastructure and patrol activity in birding areas. I am also aware of the damage being done to unique ecosystems all along the border in the name of security, such as the damage done by off-road vehicles in sensitive areas.

I believe security objectives can be met without diminishing the beauty of our National Monuments, Wildlife Refuges and other natural treasures.

Thank you for taking time to consider my concerns.

Dr. Suzanne Williams

Sincerely,

Dr. Suzanne Williams
1980 Cleveland St
Eugene, OR 97405-1533
(541) 465-9075

----- Original Message -----

From: fred goodsell <fgoodsell@yahoo.com>

To: GUZEWICH, DAVID C

Sent: Wed Aug 31 14:26:11 2011

Subject: EA for FOB, Ajo, AZ.

1530 N. Rosedale Ave

Ajo, AZ 85321

August 31, 2011

Mr. David C. Guzewich

Environmental Planning, Border Patrol and Tactical Infrastructure Program.

Please consider the following comments on your plans for a new Forward Operating Facility to replace your Bates Well facility on Organ Pipe Cactus N.M. near Ajo, AZ.

Purpose and need

“USBP agents need to be deployed CLOSER TO THE INTERNATIONAL BORDER and remote western zones of the Ajo station to improve efficiency and effectiveness during work shifts.”

1. Your proposed location is too far north. It should be on the international boundary directly south of the proposed location. The best alternative to that plan would be to build the facility at Lukeville.

No one said your job would be easy so please do the job well and effectively in the proper location.

2. I consider the alternatives offered totally insufficient.

A. Your preferred alternative. See comments below.

B. Alternative two - Generator. This is not an alternative, merely a change in about 1 % of the facility.

C. Alternative Three - CPNWR location. This changes nothing in the effects on the “human and natural environment”. Simply moves the facility a few feet west.

D. Alternative four - no action. This means a continuation of the present situation which is unacceptable.

FONSI 3

“No significant impacts on the natural or human environment are expected from implementation of any of the action alternatives.”

3. I first drove the entire Camino del Diablo in 1970. I have been driving it multiple times per year since 2001. Your FONSI, to be polite, is inappropriate.

What “human environment?” There was no “Human environment” out there until this mess.

As to the natural environment just how do you think you can introduce 16 - 32 people into the area and have them do their jobs without tremendous impact to the natural environment. The area shown on the map as the area to be covered by this station is all Wilderness. Your agents won’t be walking quietly across the desert.

4. The entire EA is a farce and anyone reading it knows it is. It shows that you can not be trusted with your plans so you lose the trust of the general public. While out there doing construction and use you will be in violation of multiple federal laws. I can’t list them all but they include the Wilderness Act, Endangered Species Act, Historical and Cultural preservation acts, clean air acts and clean water acts.

Try telling the truth rather than printing a fabrication like the EA.

Please move south and obey Federal laws. We need border protection but not the way it is being done or proposed.

Sincerely,

Fred Goodsell

ps. The local BP administration and officers do not want or need this facility. Please drop it.

.

Mr. David C. Guzewich
Environmental Planning
Border Patrol Facilities and Tactical Infrastructure
Program Management Office
1301 Constitution Avenue NW, Suite B-155
Washington, DC 20229
David.Guzewich@dhs.gov

RE: Draft Environmental Assessment for the Proposed Ajo Forward Operating Base,
Ajo Station's Area of Responsibility, U.S. Border Patrol, Tucson Sector

September 2, 2011

Sent via email

Dear Mr. Guzewich:

Please accept these comments from the National Parks Conservation Association (NPCA) on the draft Environmental Assessment for the Proposed Ajo Forward Operating Base, Ajo Station's Area of Responsibility, U.S. Border Patrol, Tucson Sector. NPCA is a nonprofit citizens association, founded in 1919, dedicated to the protection and enhancement of our National Park System. NPCA has 330,000 members, including over 9,000 in the state of Arizona.

Inadequate Scoping Results in Missing Alternatives

Despite having commented on several previous Environmental Assessments in this sector, my organization – nor any other conservation group, public interest group, or private citizen to my knowledge – was involved in scoping this decision and Environmental Assessment. By beginning an environmental review without involving the public from the start results in resentment and an inadequate understanding by those preparing the document of all the issues and alternatives that should be considered.

For instance, if the reason for the Forward Operating Base (FOB) is because it takes a certain amount of time for staff to reach this region when deployed from Ajo, then one obvious alternative that should have been identified during scoping is simply improving the road. That's not to say that we necessarily endorse this alternative, but it should certainly be looked at, and might prove to be cheaper and have less impact on the environment.

Likewise, considering this facility's need in the larger context of your strategy and operations is lacking, and would have been mentioned in the scoping process. Is this the place you should be placing your resources? Would it be more effective to spend the money and personnel time closer to the actual border to prevent border crossings or intercept border crossers closer to where they enter our country? There has been some concern that backcountry interception has been emphasized over the vast amount of illegal traffic that occurs at ports of entry, such as Lukeville. Which makes us wonder why you are not planning a FOB at Lukeville, which seems both needed and useful, while proposing this isolated facility rather far from the border?

Why Must the FOB Be Tripled In Size?

The current FOB at Bates Well uses one acre, and yet this Environmental Assessment asks for three acres, stating that the footprint will be two acres. Why the 150% increase? Why the false assumption that having permission to use three acres will only result in a two-acre footprint? This is a cherish national monument, upon which development should only be done after careful, careful consideration. The need for the size of this facility has not been established in this document.

FONSI not justified at this time; full EIS needed

We have been able to review fairly final drafts of comments to be submitted to you on this matter by the Center for Biological Diversity, and jointly by the Sierra Club, Defenders of Wildlife, Sky Island Alliance, and the Arizona Wilderness Coalition. We concur with their concerns and look forward to seeing your considered responses to the points they raise, as well as ours articulated in this comment statement. This level of community controversy raises the decision-making responsibility to one that under the National Environmental Policy Act requires a full environmental impact statement process. Simply reproducing our statement, and theirs, in an appendix of a slightly revised Environmental Assessment will not be adequate.

In fact, it seems obvious that a proposal for a three-acre, staffed law enforcement facility inside a national monument would require the careful consideration that only comes with the full NEPA process. We ask that you continue your deliberations by preparing a draft environmental impact statement, one that 1) better involves the interested public, 2) looks seriously at the full range of alternatives including a smaller facility, road improvement instead of a forward operating base in this vicinity, other locations for the base, and/or re-allocating these resources to interdictions more closely along the border or at ports of entry, and 3) includes in more detail and substance the impacts that your proposed facility would have on the natural and cultural resources of Organ Pipe Cactus National Monument as well as on wildlife and wildlife habitat as a component of your total strategy and operations in the area.

Thank you.

Sincerely,

Kevin Dahl
Arizona Program Manager
National Parks Conservation Association
738 N. Fifth Ave. Suite 222
Tucson, AZ 85705
kdahl@npca.org
520-624-2014
520-603-6430 mobile

From: Kevin Dahl [mailto:kevindahl@yahoo.com]
Sent: Friday, September 02, 2011 4:07 PM
To: GUZEWICH, DAVID C
Subject: personal comment for the record on draft EA for Ajo Forward Operating Base

Mr. Guzewich (and Mr. Hodapp by forward of this):

I am writing personally, as a member and employee of National Parks Conservation Association (NPCA), in support of the statement NPCA has submitted to you today on the draft Environmental Assessment for the proposed Ajo Forward Operating Base.

Since the early 1970s I have visited and enjoyed Organ Pipe Cactus National Monument. This incredible public resource is under siege, having become what I call our latest "battlefield" monument. The construction of an advance law enforcement base in a remote section of the monument deserves the scrutiny and consideration that only comes when NEPA, ESA, and other environmental and cultural protection laws are followed. I urge that this occur before plans to construct the base are finalized. The draft EA is insufficient, as expressed by NPCA comments and the comments of other organizations, and certainly doesn't warrant a finding of FONSI. Please continue with the process and do a full environmental impact statement.

Thank you.

-Kevin

Kevin Dahl
1609 E. Spring St.
Tucson, AZ 85719



Mr. David C. Guzewich
Environmental Planning
Border Patrol Facilities and Tactical Infrastructure
Program Management Office
1301 Constitution Avenue NW, Suite B-155
Washington, DC 20229
202-344-1250 (FAX)
David.Guzewich@dhs.gov

**RE: Draft Environmental Assessment for the
Proposed Ajo Forward Operating Base
Ajo Station's Area of Responsibility
U.S. Border Patrol
Tucson Sector**

September 2, 2011

Sent via email and certified mail this date
#7011 0470 0001 6721 0502

Dear Mr. Guzewich,

The Center for Biological Diversity appreciates the opportunity to comment upon the Draft Environmental Assessment (EA) for this project. The Center is a national, non-profit conservation organization whose 325,000 members and supporters, approximately 13,000 of whom reside in Arizona, highly value the wildlife and recreational resources of Organ Pipe National Monument and Cabeza Prieta National Wildlife Refuge. The Center and its members have a keen interest in the actions of federal agencies that take place in, and will impact both the Refuge and the Monument. The Center's interests include impacts to threatened and endangered species, including Sonoran pronghorn (*Antilocapra Americana sonoriensis*, endangered), lesser long-nosed bat (*Leptonictes curasoae yerbabuena*, endangered), Acuña cactus (*Echinomastus erectocentrus acuñaensis*, candidate for listing) Sonoran desert tortoise (*Gopherus agassizi*, candidate for listing), cactus ferruginous pygmy-owl (*Glaucidium brasilianum cactorum*, endangered), and jaguar (*Panthera onca*, endangered).

It is inappropriate to tier the analysis for the Forward Operating Base (FOB) expansion project to the 2009 analysis because the 2009 SBI*net* Finding of No Significant Impact (FONSI) and Environmental Assessment (EA) did not adequately analyze the impacts of off-road vehicle use and travel by U.S. Border Patrol agents and the expected benefits of the 2009 FONSI and EA for the SBI*net* project have not occurred, This is a critical point given that the current project seeks

to triple the footprint of the FOB, yet there is no analysis of the impacts of a three-fold increase in the number of U.S. Border Patrol agents who could all potentially engage in off-road travel for interdiction or other purposes.

We offer the following comments on the Draft Environmental Assessment (DEA):

I. Scope of the Analysis Must Include U.S. Border Patrol Operations Conducted in the Field and Away from the Ajo Station

The EA for the FOB expansion project erroneously states that the 2009 SBInet Ajo-1 Tower Project EA addresses the impacts of U.S. Border Patrol activities away from the Ajo Station and the FOB. This is not correct. Therefore, the current EA must address the impacts of U.S. Border Patrol activities, especially off-road motorized travel during interdiction activities.

This project will increase the number of U.S. Border Patrol agents on the ground on both the Cabeza Prieta National Wildlife Refuge (CPNWR) and the Organ Pipe Cactus National Monument (OPCNM). The Fish and Wildlife Service (FWS) has documented extensive unauthorized road and trail development on the CPNWR that is largely attributable to the U.S. Border Patrol's interdiction activities but has never been fully or adequately analyzed in any project NEPA documentation. This oversight must be corrected. We provide further information on this issue in the sections below.

II. Impacts to Pronghorn

As FWS has stated:

“[Cross border violators] and U.S. Border Patrol enforcement activities occur throughout the range of the pronghorn, and evidence suggests pronghorn are avoiding areas of high CBV [cross border violator] and enforcement activities. Historically, pronghorn tended to migrate to the southeastern section of their range (southeastern CPNWR, such as south of El Camino del Diablo, and OPCNM, such as the Valley of the Ajo) during drought and in the summer. Within the last several years, very few pronghorn have been observed south of El Camino del Diablo on CPNWR. This suggests CBV and the interdiction of these illegal activities have resulted in pronghorn avoiding areas south of El Camino del Diablo; these areas are considered important summer habitat for pronghorn and may have long-term management and recovery implications... Additionally, after the establishment of a Forward Operating Base (FOB) at Bates Well, which was located in the middle of an extremely critical and narrow Sonoran pronghorn movement corridor (Bates Pass) on OPCNM, few pronghorn have been documented using the Valley of the Ajo, and no pronghorn have been documented entering the Valley of the Ajo through the Bates Pass area... The valleys at CPNWR and OPCNM, which were once nearly pristine Sonoran Desert Wilderness, now have many braided, unauthorized routes through them and significant vehicle use by USBP pursuing CBVs[.]”¹

¹ Fish and Wildlife Letter in Response to request for Reinitiation of Formal Consultation on the SBInet Ajo-1 Tower Project, Ajo Area of Responsibility, U.S. Border Patrol, Tucson Sector, Arizona, pages 6-7.

At the same time, “vehicle barriers on the international border on the CPNWR and OPCNM are facilitating recovery of pronghorn by drastically reducing the amount of CBV vehicle traffic in pronghorn habitat.”²

Unfortunately, “CBV foot traffic and off-road vehicle activity and required Federal law enforcement response have been and continue to be significant threats to the pronghorn and its habitat[.]”³ FWS has not analyzed the impacts from U.S. Border Patrol agents located at the FOB nor the amount of off-road vehicle activity associated with the number of agents on the ground. For this project expansion, the FWS and U.S. Department of Homeland Security must analyze the existing impacts of current off-road vehicle traffic by U.S. Border Patrol agents as well as the anticipated increase in those impacts by an expansion of this FOB.

Despite statements in the 2009 *SBI*net Ajo-1 Final EA and FONSI that the Ajo-1 Tower Project was needed to, among other things, “reduce environmental impacts and enhance restoration efforts[.]”⁴ it appears that cross-country or off-road driving by U.S. Border Patrol agents has not been reduced, thereby failing to reduce the environmental impacts of border enforcement activities.⁵

The FWS compatibility determination for the *SBI*net Ajo-1 Tower Project clearly identifies U.S. Border Patrol activities as having a significant negative impact on pronghorn:

“The Sonoran pronghorn population within the U.S. has failed to increase since 2004; likely because of the level of activity occurring within this area. Furthermore, a significant portion of pronghorn are currently occupying habitat within the tactical ranges of the Barry M. Goldwater Range, affecting the ability of the U.S. Air Force to conduct training missions. Pronghorn are staying on the tactical ranges and avoiding their traditional, seasonal migration routes to important summer habitat areas in the southeast portion of their current range. I believe this is due to the level of impacts associated with smuggling and resulting interdiction activities occurring along the routes pronghorn take to access this summer habitat.”⁶

Unfortunately, the highest level of personnel stationed at the expanded FOB will take place from April through September (24-32 personnel),⁷ which corresponds to the pronghorn fawning period, a time during which impacts from motorized and other uses should be minimized.

It appears as though the impacts from the FOB expansion on Sonoran pronghorn have not been adequately analyzed, rendering this draft FONSI and EA inadequate.

² *Id.* at 7.

³ *Id.*

⁴ U.S. Department of Homeland Security, U.S. Customs and Border Protection, Final Environmental Assessment and Finding of No Significant Impact for The Proposed *SBI*net Ajo-1 Tower Project, Ajo Station’s Area of Responsibility, Tucson Sector, December 2009, page 2.

⁵ USFWS Compatibility Determination for *SBI*net Ajo-1 Tower, page 4.

⁶ USFWS Compatibility Determination for *SBI*net Ajo-1 Tower, page 4.

⁷ 2011 Ajo FOB EA at 2-4.

Formal consultation under Section 7 of the Endangered Species Act is warranted for this EA, especially in light of the inconsistent statements of fact regarding the intensity of enforcement in the 2009 EA and the current EA, which render previous FWS opinions unreliable.

III. There has Been No Reduction in Impacts from Off-road Driving as Anticipated in the 2009 SBInet NEPA FONSI

The U.S. Department of Homeland Security stated in the 2009 FONSI and EA for the SBInet Ajo-1 Tower Project that the proposed project would result in an overall beneficial impact within the region through a reduction in illegal activities and resulting decreased human activity in sensitive areas.⁸ This reduction in illegal activities was supposed to reduce law enforcement interdiction efforts and reduce adverse impacts to natural resources. In fact, the Department of Homeland Security expected to see a drastic reduction of illegal activities.⁹

“The construction of [the SBInet Ajo-1 Towers Project] is an attempt to minimize the need for all interdiction efforts through deterrence based upon improved enforcement[.]” and U.S. Border Patrol agents understanding of the impacts of driving off-road into the wilderness was supposed to be improved.¹⁰ Reporting of incursions was a part of the 2009 plan to reduce impacts from U.S. Border Patrol enforcement activities.¹¹

Unfortunately, it appears as if U.S. Border Patrol off-road vehicle traffic associated with interdiction activities has not decreased on the CPNWR and reporting is spotty at best. We ask the U.S. Customs and Border Patrol and Department of Homeland Security to review the U.S. Department of Interior, July 2011 report entitled Vehicle Trails Associated with Illegal Border Patrol Activities on Cabeza National Wildlife Refuge.

Growler Valley, one of the areas the SBInet towers were supposed to protect, is one of the areas most heavily impacted by off-road motorized uses. *See* Figure 3, page 9 of the Department of Interior’s July 2011 report.

The reduction in off-road vehicle traffic was used as a benefit in the analysis for the 2009 SBInet Ajo-1 Tower Project FONSI and EA, as well as in the January 2011 Supplemental EA for the same project:

“The proposed project would result in overall beneficial impacts within the region through a reduction in illegal activities and the resulting decrease in human activity in sensitive areas such as designated wilderness and protected species habitat. A reduction in illegal activities ***and resulting law enforcement surveillance and interdiction efforts would reduce adverse impacts to the natural and human environment and allow currently disturbed areas to rehabilitate through natural processes or restoration efforts.***”¹²

⁸ USFWS Compatibility Determination for SBInet Ajo-1 Tower, page 5.

⁹ *Id.*

¹⁰ 2009 SBInet FONSI and EA, page 61.

¹¹ *Id.*

¹² 2009 SBInet Supplemental EA, January 2011 FONSI page FONSI-10, emphasis added.

“[T]he Proposed Action would have an indirect beneficial impact on land use, including designated wilderness, as a result of enhanced CBV detection capabilities, improved CBV interdiction capabilities, increased deterrence of CBVs, **and a reduced enforcement footprint for CBV interdiction activities.**”¹³

“Reduction of illegal traffic **and enforcement areas** would have long-term, indirect, beneficial effects on vegetation communities used by lesser long-nosed bats...”¹⁴

“**[I]n the absence of the Proposed Action** or one of the action alternatives proposed in this SEA, illegal traffic and **the creation of new unauthorized roads and trails is likely to increase.** The No Action Alternative would have a permanent, moderate adverse effect on designated wilderness.”¹⁵

“Beneficial effects [of decreased law enforcement footprint] **would be noticeable throughout the wilderness and not localized near the proposed tower sites.** Beneficial effects would include reduced vehicle traffic within designated wilderness, reduced degradation of the landscape, and reduced litter and human waste...”¹⁶

“**In the absence of the fully operational SBInet Ajo-1 Tower Project, unauthorized roads and trails would continue to be created and used** by CBVs and subsequently **by law enforcement personnel in their required interdiction efforts.**”¹⁷

“The objective of this enforcement strategy is to maximize interdiction capabilities so that traffic levels are reduced to a level where border control can ultimately be achieved on or as close to the actual border as practical. It should be recognized that in areas where enforcement is not focused on the immediate border for operational reasons, the effect would still be to reduce traffic.”¹⁸

There are many more examples from the 2009 SBInet Ajo-1 Towers Project FONSI and EA as well as the 2011 Supplemental EA to which this current project is tiered. However, the reduction in interdiction activities is not occurring. Therefore, a significant assumption upon which the original 2009 SBInet analysis was premised has proven invalid, but this is not addressed in the current analysis for the expansion of the FOB.

The 2009 SBInet FONSI and EA, at page 57, indicated that U.S. Border Patrol agents would, in most cases, follow CBV sign on foot and only “at times” respond on horseback, all terrain

¹³ *Id.* at ES-4, emphasis added.

¹⁴ *Id.* at ES-5, emphasis added.

¹⁵ *Id.* at 3-7, emphasis added.

¹⁶ *Id.* at 3-9, emphasis added.

¹⁷ *Id.* at 3-23, emphasis added.

¹⁸ 2009 SBInet Ajo-1 Towers Project FONSI and EA at 53.

vehicle or motorcycle. The 2009 *SBI*net FONSI and EA describe U.S. Border Patrol agent responses using vehicles as taking place only “when necessary” (at page 57) and only in compliance with the 2006 Memorandum of Understanding (MOU) between the Department of Homeland Security, U.S. Forest Service, U.S. FWS, and Department of Interior. However, the actual practice appears to be, in most cases, with the use of a motorized, wheeled vehicle and the MOU is not being complied with.

During a July 31, 2011 tour of the CPNWR by the Center, we did not encounter any agents on horseback, did not identify any foot traffic sign nor any sign of horse use, but we encountered a tremendous amount of off-road vehicle use and 12 U.S. Border Patrol vehicles, one helicopter and one agent on an ATV driving just a few yards off the Camino del Diablo and clearly not in pursuit of a CBV. In August 2011, a meeting to discuss border impacts on the CPNWR was held. Several non-governmental organizations, including the Center attended. OPCNM and CPNWR staff members were present, yet the U.S. Border Patrol and Department of Homeland Security chose not to attend despite (we were told by the Refuge staff) repeated invitations and a clause in the MOU indicating participation in such discussions is required.

Despite U.S. Department of Homeland Security’s prediction¹⁹ that the towers would lead to a decrease in damage associated with off road interdiction activities, there is no evidence that this is, in practice, occurring. Rather, it appears that the opposite may be taking place. In 2007, OPCNM and CPNWR documented a combined 1,564 miles of illegal off-road routes. In 2011 there are an estimated 8,000 miles of illegal off-road vehicle routes in the CPNWR alone.²⁰

The Center submitted a Freedom of Information Request to FWS for incursion reports from U.S. Border Patrol to the Fish and Wildlife Service in January 2011. We were informed that over 700 reports existed from the Ajo and Camp Grip station. These reports were not released by FWS, but were referred back to the U.S. Customs and Border Enforcement agency for release to the Center in April 2011. To date, the Center has received no response from the U.S. Border Patrol or Department of Homeland Security and we have discovered that the referral from FWS was apparently lost at the Customs and Border Patrol or Homeland Security office. The Center believes that the 700+ incursion reports are an inadequate number to cover the number of off-road vehicle trips taken by U.S. Border Patrol and the documented 8,000+ miles of unauthorized roads and trails in designated Wilderness in the CPNWR. Therefore, the Center believes the MOU between the agencies is currently being violated.

Tiering the FONSI and EA for the current project to expand the FOB to the 2009 FONSI and EA requires the agency to rely upon information that is known to be incorrect and/or invalid. Tiering to the 2009 *SBI*net Ajo-1 Tower Project analysis and failing to include any reference to continued, significant impacts from cross-country travel by U.S. Border Patrol agents renders this current analysis completely inadequate and invalid.

IV. Documentation of damage

¹⁹ USFWS Compatibility Determination for *SBI*net Ajo-1 Tower, page 7.

²⁰ 2011 Ajo FOB EA at 3-2 and July 2011 CPNWR report, Vehicle Trails Associated with Illegal Border Activities on CPNWR, page 1.

The Center has recently visited both the OPCNM and the CPNWR and viewed first hand the impacts of CBVs and the interdiction activities of U.S. Border Patrol. Our brief visit made clear that the majority of impacts to the refuge are from off-road vehicle uses. We observed no foot traffic. Given that border enforcement activities such as *SBI_{net}* and the vehicle barriers at the border have reduced vehicle traffic from CBVs, it is painfully clear that the majority of impacts to both the refuge and the monument are from U.S. Border Patrol agents driving off-road, though the purpose of the agents' off-road driving is not clear.

While the Center was visiting the area, we toured the area on foot with several other individuals, including a FWS agent working at the CPNWR. The Center expressed our concern that the U.S. Border Patrol may see our foot tracks leaving El Camino del Diablo and use this as a reason to drive off-road, increasing damage to the area we walked along, which was already heavily impacted by U.S. Border Patrol agents driving off-road. The Fish and Wildlife Service agent informed the Center that the U.S. Border Patrol was notified of the location of our tour, but that they would likely visit the area we walked using off-road vehicles regardless. This is apparently common practice.

During our visit to the area, the Center did not find any tracks from horses, despite the "Offsetting Measures" identified in the 2009 FONSI and EA that, "[c]onsistent with the 2006 MOU, USBP will conduct patrol activities by horseback to the greatest extent practicable within the Sonoran pronghorn range, particularly from March 15 to July 31 (the Sonoran pronghorn closure season)." The Center's tour of the refuge took place on July 31, 2011. During this tour we identified many off-road vehicle tracks, and as we describe above, saw 12 U.S. Border Patrol vehicles, on helicopter and one agent on an ATV driving off-road just a yards from the main road, but not a single U.S. Border Patrol agent on horseback nor any horse trailers.

The Compatibility Determination for the *SBI_{net}* Ajo-1 Tower Project documents the fact that U.S. Border Patrol agents are traveling off-road following tire and foot tracks and that a "tremendous network of foot trails, two tracks, and illegal roads" exists throughout the Ajo-1 project area.²¹ "Off road interdiction activities have resulted in a proliferation of roads on the refuge. [The Fish and Wildlife Service] conservatively estimate[s] there are at least three times as many frequently used roads present on the refuge than at the time of wilderness designation[.]" not including the lesser used trails that "wind through virtually every valley within the refuge."²² The FWS believed that the Ajo-1 tower would, if effective, "lead to a cessation of off-road travel" in the area of the tower.²³

The purpose of the *SBI_{net}* Ajo-1 Tower Project was to reduce the number of off-road incursions by U.S. Border Patrol, but our recent visit makes clear the towers are not working as planned. As stated in the 2009 *SBI_{net}* Ajo-1 Tower Project FONSI and EA, at page 167, "CBV traffic and the consequent law enforcement response is the largest contributor to the cumulative effects of soil disturbance in the project area[.]" and this traffic has apparently not been reduced by the

²¹ USFWS Compatibility Determination for *SBI_{net}* Ajo-1 Tower, page 3.

²² *Id.* at 3.

²³ *Id.* at 5.

SBI*net* Ajo-1 Tower Project because U.S. Border Patrol continues to drive off-road into wilderness areas and there is no evidence that this traffic has been reduced in the current project EA. The lack of a decrease in off-road vehicle traffic is despite the statement in the 2009 FONSI and EA that “vehicle seizures decreased from 456 in (FY2004) to 248 (FY2008) [because of the vehicle barrier at the border] and the construction of the SBI*net* Ajo-1 Tower Project “would enhance USBP agents’ enforcement efficiency, and thus compress[] the primary enforcement footprint closer to the U.S./Mexico border.”²⁴

The Center has received, from the FWS via a Freedom of Information Act request, reports that the U.S. Border Patrol agents may be driving off-road in the Wilderness area of the CPNWR for purposes other than interdiction activities. Please see Attachment A.

V. Border Patrol Agent Time in the Field Will Increase, Increasing Impacts to the Ground

As documented in the July 2011 CPNWR Vehicle Trails Report, off-road vehicle traffic has significantly impacted designated wilderness areas in the refuge. The EA for the FOB expansion project states that vehicle commutes between the FOB and Route 85 will be decreased by 12,000 trips annually, while approximately 15,000 trips are made annually in the western portion of the Ajo Area of Responsibility (AOR).²⁵ The EA suggests that there will be no change in enforcement activity as a result of the FOB expansion, yet with a reduction in vehicle trips between the Ajo Station and the FOB juxtaposed with 15,000 patrol trips in the AOR it seems clear that there will be an increase in the intensity of patrols in the western portion of the AOR.

The EA for the FOB expansion project does not analyze the impacts of this increase, which are likely to be significant, especially for the endangered Sonoran pronghorn. Formal consultation with FWS under Section 7 of the Endangered Species Act is warranted for this project.

VI. Border Enforcement Activities Should Take Place on the Border, not North of El Camino del Diablo

In the 2009 FONSI and EA for the SBI*net* Ajo-1 Tower Project, the intent of the “tolerance to the depth of intrusion” was to be “as close to the international border as practical” (at page 52). However, during the Center’s tour of the CPNWR, we found far more off-road vehicle tracks, presumably from U.S. Border Patrol interdiction efforts, on the north side of El Camino del Diablo than on the south side of the road. A walking tour of the south side of El Camino del Diablo did not reveal the extent of damage from off-road vehicle use that was found on the north side. This would appear to be in conflict with the “tolerance to depth of intrusion” information that was made available in the 2009 FONSI and EA, and to which this EA is tiered. Please see photos in Attachment B.

VII. Septic system

²⁴ SBI*net* 2009 FONSI and EA at page 171.

²⁵ 2011 Ajo FOB EA at 1-5.

In the 2009 FONSI and EA for the SBInet Ajo-1 Tower Project, the septic system is described with a capacity for “up to 10 people” (at page 51). Yet in the current DEA for the Ajo FOB expansion project, the septic system is described (at page 2-6) as a “32-person, deep-discharge septic system [] installed as part of the agreement with OPCNM and USFWS when the camp moved from the Bates Well site to the current location.”

It is not clear how the septic system described in the 2009 FONSI and EA will accommodate a three-fold increase in use. It is not clear when the septic system was expanded to a 32-person deep discharge unit. It is also not clear where the NEPA documentation for the three-fold increase in septic system capacity is, or when the NEPA process for said increase occurred. This information must be made publicly available immediately.

Conclusion

The Center for Biological Diversity maintains that it is absolutely essential that border enforcement activities conform with federal laws, especially those designed to protect resources such as the OPNM and CPNWR, and endangered species such as the Sonoran pronghorn. A crucial aspect of that obligation is the need for border security agencies and personnel to observe the MOU that is place between DHS and DOI and work closely with land managers on the ground in the OPNM and CPNWR.

The profound inadequacy of the Ajo FOB EA indicates that none of the above is occurring. Neither a good faith effort to ensure that border security activities conform with relevant laws nor a conscientious effort to honor the agreements and procedures outlined in the MOU are being made. The FOB expansion project EA also indicates that, rather than concentrating enforcement efforts along the border as CBP has stated as a goal in the past, the primary focus of interdiction activities now and moving forward will be located north of Bates Well and Camino del Diablo, to the detriment of the habitat and species in the area. As an obvious remedy to the significant negative impacts now occurring, this EA should analyze an alternative enforcement strategy that focuses such activities further south, much closer to the actual border and the area in which illegal activities first impact U.S. territory and the OPNM and CPNWR.

Thank you for the opportunity to comment,

Cyndi Tuell

Southwest Conservation Advocate
ctuell@biologicaldiversity.org
520-623-5262 ext. 308



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Arizona Wilderness Coalition * Defenders of Wildlife * Sierra Club * Sky Island
Alliance

September 2, 2011

Submitted electronically to: David.Guzewich@dhs.gov and via fax to: (202) 344-1250

Mr. David C. Guzewich,
Environmental Planning, Border Patrol Facilities and Tactical Infrastructure, Program
Management Office
U.S. Customs and Border Protection, Department of Homeland Security
1301 Constitution Avenue NW, Suite B-155
Washington DC 20229

**RE: Draft Environmental Assessment for the Proposed Ajo Forward Operating
Base, Ajo Station Area of Responsibility, U.S. Border Patrol, Tucson Sector**

To Whom It May Concern:

We are in receipt of the Draft Environmental Assessment for the Proposed Ajo Forward Operating Base dated August 2011. We, the undersigned organizations, appreciate the opportunity to provide comment on this matter.

The Arizona Wilderness Coalition (AWC) is a state-based not-for-profit organization whose mission is to permanently protect and restore wildlands and waters in Arizona for the enjoyment of all citizens while ensuring that Arizona's native plants and animals have a lasting home in wild nature. Formed in 1979, AWC has helped facilitate the designation of more than 3.5 million acres of wilderness in Arizona, including lands currently protected in Cabeza Prieta National Wildlife Refuge (CPNWR). Our 2000+ Arizona supporters are keenly interested in the health and integrity of wilderness and non-wilderness lands in Organ Pipe Cactus National Monument (OPCNM) and CPNWR.

Defenders of Wildlife (Defenders) is a national, not-for-profit conservation organization with over 522,000 members, including more than 16,500 members and activists that reside in Arizona. Defenders is dedicated to the protection of all native wild animals and plants in their natural communities. With offices throughout the United States as well as in Canada and Mexico, we work to protect and restore North America's native wildlife, safeguard habitat, resolve conflicts, work across international borders and educate and mobilize the public. Defenders has a long history of proactive work on public lands and border policy along the U.S.-Mexico border, and thus are uniquely positioned to

substantively engage on the challenging issue of safeguarding irreplaceable natural and cultural resources while also securing our southern boundary.

Founded in 1892, the Sierra Club is the oldest and largest conservation organization in the United States, with over 1.3 million members and supporters, including 12,000 here in Arizona. The purposes of the Sierra Club are to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. We have been campaigning with a specific focus on the protection and preservation of the U.S.-Mexico borderlands in southern Arizona since 2006, and our nationally-organized Borderlands Team works to educate lawmakers, members, and the public at large about border environmental issues. Our members enjoy and have long advocated protecting the lands and wildlife affected by this action.

Sky Island Alliance (SIA) is a non-profit conservation organization dedicated to the protection and restoration of the rich natural heritage of native species and habitats in the Sky Island region of the southwestern United States and northwestern Mexico. We work with many partners to establish protected areas, restore healthy landscapes, and promote public appreciation of the region's unique biological diversity.

Below are substantive comments regarding the Draft Environmental Assessment (EA) for the Ajo Forward Operating Base (FOB):

Introduction

We support enforcement efforts within OPCNM and CPNWR that reduce impacts to the wilderness resource and ecological attributes found there, while also contributing to our border security efforts. Unfortunately, the Draft EA does not sufficiently provide appropriate analysis of major affected elements, including air, water, wildlife, and wilderness resources. A Finding of No Significant Impact (FONSI) is unwarranted and inappropriate. We note that apprehension numbers within the Tucson Sector are at their lowest level since 1994, and illegal vehicle entries have been drastically reduced as a result of vehicle barriers placed along the southern border of OPCNM and CPNWR. The SBInet Ajo-1 Tower Project EA of 2009 promised to "reduce the enforcement footprint" in the region that includes OPCNM and CPNWR, and to move "USBP traffic closer to the border." Since then, USBP vehicle traffic and associated impacts emanating from the FOB location remain intense. Increasing the capacity and footprint of the FOB would only exacerbate these impacts, and would act in contradiction to the intent of the SBInet Ajo-1 Tower Project.

Analysis of resulting increases in off-road vehicle traffic, including mitigation is lacking

In July of 2011, CPNWR issued the report "Vehicle Trails Associated with Illegal Border Activities on Cabeza Prieta National Wildlife Refuge" (CPNWR Vehicle Trails Report), which attributes the majority of 7,968 miles of vehicle ways to Border Patrol interdiction and patrol activities. The majority of these travelways are north of the Camino del

Diablo and away from the border. A large percentage of these travelways are within the coverage zone of the Ajo FOB. The Ajo FOB EA tiers upon a number of previously conducted National Environmental Policy Act (NEPA) analyses, including the 2009 Final Environmental Assessment for the Proposed SBInet Ajo-1 Tower Project (2009 EA).

Over the course of the last several years, Border Patrol has installed a number of surveillance towers in and around OPCNM. A core assumption made by the 2009 EA states that while increased construction of roads is necessary for implementation,

“the proposed project would decrease CBV and resulting required law enforcement traffic on public roads on OPCNM and to some extent CPNWR. Increased deterrence of CBVs resulting from the proposed project would reduce the enforcement footprint generally closer to the international border, thus reducing illegal traffic and moving USBP traffic closer to the border.”¹

The 2009 EA goes further to state that the tower project will result in *“a reduced enforcement footprint for CBV interdiction activities”²*

The stated objectives and goals of the 2009 EA are inconsistent with the goals and objectives of this EA, which continues to focus law enforcement activities within the same location (whether Bates Well or the current FOB site) as that previous to installation of surveillance towers. After the construction of the SBInet infrastructure, it was our assumption and was clearly stated by Border Patrol that enforcement efforts would be “moving USBP traffic closer to the border.”³ We request clarification on how the Ajo FOB reconciles with facts and projections provided by the SBInet Ajo-1 Final EA in this regard.

The EA does not provide information or analysis of increases or decreases of all-terrain vehicle patrols as a result of the FOB expansion.

The EA states that in 2007, there were 1,564 miles of undesignated travelways in CPNWR and OPCNM. In 2011, based from field work and aerial surveys in 2008, CPNWR now estimates nearly 8000 miles of undersigned travelways in the wilderness of CPNWR alone. The Refuge states, “We believe that the pursuit of UDAs /drug smugglers has created the greater proportion of trails.”⁴ While the 2006 Memorandum of Understanding Among U.S. Department of Homeland Security and U.S. Department of Interior and U.S. Department of Agriculture Regarding Cooperative National Security and Counterterrorism Efforts on Federal Lands along the United States’ Borders (MOU) provides clear direction on how the Border Patrol should engage in motorized pursuit within designated wilderness, there is evidence that such agreement is currently not being complied with. CPNWR states that “{t}he USBP interprets this requirement (*MOU*) broadly and often goes off approved administrative trails in pursuit of fresh tracks or

¹ 2009 EA at 3.16.2.2

² Id at ES-4

³ Id

⁴ CPNWR. Vehicle Trails Associated with Illegal Border Activities on Cabeza Prieta National Wildlife Refuge – July 2011 Report.

other sign, or to respond to a signal fire or other information that may lead an agent to believe that UDAs or drug smugglers are in the area.”⁵ There is also suggestive evidence that the Border Patrol currently does not report all pursuit-related entries in the wilderness. While data have not been released from Border Patrol or CPNWR, it is difficult to assume that incursion reports fairly document the majority of off-road travelways created across the landscape.

As the CPNWR Vehicle Trails Report documents, all-terrain and four-wheel drive vehicle incursions into designated wilderness have significantly impacted the refuge. While the EA suggests that there is no net change in enforcement intensity as a result of the FOB expansion, it does state that vehicle commutes between the FOB and state route 85 will be decreased by 12,000 trips annually.⁶ The EA also states that approximately 15,000 trips are made annually in the western portion of the Ajo area of responsibility (AOR). With a reduction in vehicle trips between the FOB and the Ajo Station, but retention of 15,000 patrol trips within the AOR, it is clear that intensities of patrol will increase in the western portion of AOR. No analysis of this shift in patrol intensities and time is reflected in the draft EA though there are large consequences to such shifts. The area west of the FOB includes important habitat for species such as the endangered Sonoran pronghorn, though the draft EA does not disclose or analyze the potential for additional time, miles, and trips that would emanate from the FOB westward.

Changes in patrol intensities west of the FOB require analysis of impacts to Sonoran pronghorn

As summarized above, the draft EA does not analyze how patrol intensities will increase west of the FOB as a result of additional agents stationed there. In relation to issues regarding endangered species, the draft EA states that

“Since CBP would continue to deploy resources to achieve its border security mission within the Ajo Station AOR regardless of the establishment of the Ajo FOB, there are no interrelated or interdependent activities to be analyzed for ESA compliance”.⁷

While the premise of the project is to decrease commute times between the Ajo station and the FOB, it also increases the frequency of patrols in the western portion of AOR. The western portion of AOR includes Sonoran pronghorn occupied habitat; there is evidence that pronghorn avoid areas with high intensities of traffic.

USFWS states that *“evidence suggests pronghorn are avoiding areas of high CBV [cross border violator] and enforcement activities. Historically, pronghorn tended to migrate to the southeastern section of their range (southeastern CPNWR, such as south of El Camino del Diablo, and OPCNM, such as the Valley of the Ajo) during drought and in the summer. Within the last several years, very few pronghorn have been observed south of El Camino del Diablo*

⁵ Id

⁶ EA at 3-21, line 7

⁷ EA at 3-15, Lines 12-14

on CPNWR. This suggests CBV and the interdiction of these illegal activities have resulted in pronghorn avoiding areas south of El Camino del Diablo; these areas are considered important summer habitat for pronghorn and may have long-term management and recovery implications... Additionally, after the establishment of a Forward Operating Base (FOB) at Bates Well, which was located in the middle of an extremely critical and narrow Sonoran pronghorn movement corridor (Bates Pass) on OPCNM, few pronghorn have been documented using the Valley of the Ajo, and no pronghorn have been documented entering the Valley of the Ajo through the Bates Pass area... The valleys at CPNWR and OPCNM, which were once nearly pristine Sonoran Desert Wilderness, now have many braided, unauthorized routes through them and significant vehicle use by USBP pursuing CBVs[.]”⁸

As such, formal consultation under Section 7 of the Endangered Species Act is warranted for this draft EA. Given the inconsistency of statements facts regarding enforcement intensity shifts between the 2009 EA and this draft EA, which increases patrol intensity within occupied pronghorn habitat, Border Patrol cannot rely on previous opinions provided by USFWS.

The use of horse patrols is not addressed

The FONSI of 2009 Final Environmental Assessment for the Proposed SBInet Ajo-1 Tower Project provided a clear commitment by Border Patrol to emphasize horse patrols in the AOR. During appropriate times of year, we support the use of horse patrols as a practical, conforming enforcement strategy. The EA states:

“Consistent with 2006 MOU, USBP will conduct patrol activities by horseback to the greatest extent practicable within the Sonoran pronghorn range, particularly from March 15 to July 31 (the Sonoran pronghorn closure season). DHS will follow all horse patrol BMPs coordinated with resource agencies (i.e., feed horses weed free pellets).”

The EA for FOB expansion makes no mention of facilities and capabilities directed at use of horse patrols within designated wilderness and sensitive habitat areas. Any apparatus aimed at patrolling these areas should focus primarily on horse patrols for maximum protection of wilderness resources. Horse patrol units within the Border Patrol have a long history of success and provide agents with unique capabilities for patrol and interdiction. Does the expanded FOB include infrastructure for the eminence of stock during appropriate times of year?

Conclusion

Our organizations support border enforcement activities that act in conformance with federal laws, such as those that govern the management of OPCNM and CPNWR. We believe that the protection of natural resources is not incompatible with the protection of our national security, and support Border Patrol efforts to conform with its own

⁸ Fish and Wildlife Letter in Response to request for Re-initiation of Formal Consultation on the SBInet Ajo-1 Tower Project, Ajo Area of Responsibility, U.S. Border Patrol, Tucson Sector, Arizona, pages 6-7.

guidelines and procedures, as well as to work in collaboration with federal land management agencies. The analysis of impacts associated with the expansion of the Ajo FOB is woefully inadequate, and cannot be represented as a fair attempt to conform to the laws that govern our nation. The draft EA also contradicts previous plans by the Border Patrol to focus enforcement efforts at the border in this exceptionally fragile region rather than a primary strategy of interdiction efforts north of Bates Well and the Camino del Diablo Roads. To expand the FOB while unauthorized crossing numbers are exceptionally low would unnecessarily endanger the fragile and precious resources of the OPCNM and CPNWR.

Thank you for this opportunity to comment.

Sincerely,

Matt Skroch
Executive Director
Arizona Wilderness Coalition
PO Box 40340
Tucson, AZ 85717

Matt Clark
Southwest Representative
Defenders of Wildlife
110 S. Church Ave. #4292
Tucson, AZ 85701

Dan Millis
Borderlands Campaign Coordinator
Sierra Club
738 N. 5th Ave, #214
Tucson, AZ 85705

Jenny Neeley
Conservation Policy Director
Sky Island Alliance
300 E University Blvd #270
Tucson, AZ 85705

From: laura chamberlin <johnsol@hotmail.com>

To: GUZEWICH, DAVID C

Sent: Sat Sep 03 13:44:33 2011

Subject: comment on Cabeza Prieta

Dear Mr. Guzewich,

As a concerned citizen I appreciate the opportunity to comment upon the Department of Homeland Security's proposal to expand the Ajo Forward Operating Base.

I have been visitng Cabeza Prieta National Wildlife Refuge and Oregon Pipe National Park for over a decade. With each passing visit I noticed more and more border patrol presence. While I appreciate the need to protect our borders I think a precious resource has been sacraficed. I have personally witnessed destruction to cryptogamic soils by off road vehicle use. At a qucik glance the soil may not be noticed but when one looks closely, it is every where. These soils take decades to form and are imparative to desert life as they provide a healthy environment.

Many plants (420) and animals (300) depend on this area for life and it all revolves around a delicate balance of their environment. The endangered Sonoran Pronghorn and The Lesser Long-Nosed bats are just a few of the animals that need our attention. If the off road presence continues with no regard to their lively hood than it pains me to think of their future.

My experience at Cabeza Prieta leads me to believe that Border Patrol agents need to be educated on the impacts they are having to Refuge resources and visitors to the Refuge.

I have reluctantly stopped visitng the Refuge to do this activity. I go to "get away from it all," but no longer feel it is a tranquil experience. I have always had pleasant experiences with the border patrol agents and appreciate that we need their presence. However, I believe a balance needs to be struck and wilderness preservation should be paramount. We have a beautiful National treasure that deserves protection for our generation and the future.

I ask that the Department of Homeland Security take another look at the need for this project and develop alternatives that address the need to secure the border while at the same time the need to protect America's natural treasures.

Sincerely,
Laura Chamberlin

From: Keri Dixon [mailto:keribdixon@gmail.com]
Sent: Friday, September 02, 2011 5:10 PM
To: GUZEWICH, DAVID C
Subject: Ajo, AZ FOB

Dear Mr. Guzewich,

As a member of the Center for Biological Diversity and Sky Island Alliance, and as a visitor to the Organ Pipe National Monument and Cabeza Prieta National Wildlife Refuge, I appreciate the opportunity to comment upon the Department of Homeland Security's proposal to expand the Ajo Forward Operating Base.

I adopt and incorporate by reference the comments submitted by the Center for Biological Diversity.

My first hand experiences on the Refuge in the area of the Forward Operating Base leads me to believe that Border Patrol agents need to be educated on the impacts they are having to Refuge resources and visitors to the Refuge. I have many friends who used to visit the refuge regularly but who no longer visit at all because of the excessive number of Border Patrol agents driving around 24 hours a day. Not one of the people I know has ever had a negative experience with "cross border violators" and it seems as if "CBV" numbers are significantly down for this area.

I personally visited the refuge and monument less often in the past few years because of the excessive noise, dust and degraded landscapes. However, I miss the picturesque views and wildlife experiences I used to have when there was less border patrol presence.

I sincerely ask that the Department of Homeland Security take another look at the need for this project. I urge you to develop alternatives that address the need to secure the border while at the same time the need to protect America's natural treasures.

Best regards,
Keri Dixon
Tucson, AZ

--

"Unless someone like you cares a whole awful lot, nothing is going to get better, it's not."
The Lorax, by Dr. Seuss

From: Cyndi Tuell [mailto:cctuell@hotmail.com]

Sent: Friday, September 02, 2011 4:18 PM

To: GUZEWICH, DAVID C

Subject: Draft Environmental Assessment for the Proposed Ajo Forward Operating Base Ajo Station's Area of Responsibility U.S. Border Patrol Ajo Sector

Dear Mr. Guzewich,

As a member of the Center for Biological Diversity and a recent visitor to the Organ Pipe National Monument and Cabeza Prieta National Wildlife Refuge, I appreciate the opportunity to comment upon the Department of Homeland Security's proposal to expand the Ajo Forward Operating Base.

I adopt and incorporate by reference the comments submitted by the Center for Biological Diversity.

My first hand experiences on the Refuge in the area of the Forward Operating Base leads me to believe that Border Patrol agents need to be educated on the impacts they are having to Refuge resources and visitors to the Refuge. I have many friends who used to visit the refuge regularly but who no longer visit at all because of the excessive number of Border Patrol agents driving around 24 hours a day. Not one of the people I know has ever had a negative experience with "cross border violators" and it seems as if "CBV" numbers are significantly down for this area.

I ask that the Department of Homeland Security take another look at the need for this project and develop alternatives that address the need to secure the border while at the same time the need to protect America's natural treasures.

Sincerely,
Cyndi Tuell

APPENDIX C
FEDERAL AND STATE PROTECTED SPECIES LISTS



U.S. Fish & Wildlife Service

Endangered Species List

[Back to Start](#)

List of species by county for Arizona:



























Counties Selected: Pima














Select one or more counties from the following list to view a county list:

Apache
Cochise
Coconino
Gila
Graham

[View County List](#)

Pima County

Common Name	Scientific Name	Species Group	Listing Status	Species Image	Species Distribution Map	Critical Habitat	More Info
Acuna Cactus	<i>Echinomastus erectocentrus</i> var. <i>acunensis</i>	Flowering Plants	C				F
California least tern	<i>Sterna antillarum browni</i>	Birds	E	No Image			P
Chiricahua leopard frog	<i>Rana chiricahuensis</i>	Amphibians	T				P
desert pupfish	<i>Cyprinodon macularius</i>	Fishes	E			Final	P
Gila chub	<i>Gila intermedia</i>	Fishes	E			Final	P
Gila topminnow (incl. Yaqui)	<i>Poeciliopsis occidentalis</i>	Fishes	E				P
Huachuca water-umbel	<i>Lilaeopsis schaffneriana</i> var. <i>recurva</i>	Flowering Plants	E				P
jaguar	<i>Panthera onca</i>	Mammals	E				P
Kearney's blue-star	<i>Amsonia kearneyana</i>	Flowering Plants	E				P
lesser long-nosed bat	<i>Leptonycteris curasoae yerbabuenae</i>	Mammals	E				P
masked bobwhite (quail)	<i>Colinus virginianus ridgwayi</i>	Birds	E				P
Mexican spotted owl	<i>Strix occidentalis lucida</i>	Birds	T			Final	P
Nichol's Turk's head cactus	<i>Echinocactus horizonthalonius</i> var. <i>nicholii</i>	Flowering Plants	E				P
Northern Mexican	<i>Thamnophis eques megalops</i>	Reptiles	C	No Image			P

gartersnake							
ocelot	<i>Leopardus (=Felis) pardalis</i>	Mammals	E				
Pima pineapple cactus	<i>Coryphantha scheeri var. robustispina</i>	Flowering Plants	E				
Sonoran pronghorn	<i>Antilocapra americana sonoriensis</i>	Mammals	E				
Sonoyta mud turtle	<i>Kinosternon sonoriense longifemorale</i>	Reptiles	C				
southwestern willow flycatcher	<i>Empidonax traillii eximius</i>	Birds	E			Final	
yellow-billed Cuckoo	<i>Coccyzus americanus</i>	Birds	C				

COUNTY	TAXON	SCIENTIFIC NAME	COMMON NAME	ELCODE	ESA	BLM	USFS	NESL	MEXFED	STATE	GRANK	S RANK
Navajo	PLANT	Pediocactus peeblesianus var. peeblesianus	Peebles Navajo Cactus	PDCAC0E053	LE					HS	G1G2T1	S1
Navajo	PLANT	Penstemon nudiflorus	Flagstaff Beardtongue	PDSCR1L4A0			S				G2G3	S2S3
Navajo	PLANT	Platanthera zothecina	Alcove Bog orchid	PMORC1Y130	SC		S	3			G2	S2
Navajo	REPTILE	Thamnophis eques megalops	Northern Mexican Gartersnake	ARADB36061	C		S		A	WSC	G5T5	S1
Navajo	REPTILE	Thamnophis rufipunctatus	Narrow headed Gartersnake	ARADB36110	SC	S	S			WSC	G3G4	S1
Pima	AMPHIBIAN	Craugastor augusti cactorum	Western Barking Frog	AAABD04171		S	S			WSC	G5T5	S2
Pima	AMPHIBIAN	Gastrophryne olivacea	Western Narrow mouthed Toad	AAABE01020		S	S		PR	WSC	G5	S3
Pima	AMPHIBIAN	Rana chiricahuensis	Chiricahua Leopard Frog	AAABH01080	LT				A	WSC	G3	S2
Pima	AMPHIBIAN	Rana yavapaiensis	Lowland Leopard Frog	AAABH01250	SC	S	S		PR	WSC	G4	S3
Pima	AMPHIBIAN	Smilisca fodiens	Lowland Burrowing Treefrog	AAABC06010		S				WSC	G4	S2
Pima	BIRD	Accipiter gentilis	Northern Goshawk	ABNKC12060	SC	S	S	4	A	WSC	G5	S3B
Pima	BIRD	Ammodramus bairdii	Baird's Sparrow	ABPBXA0010	SC	S	S			WSC	G4	S2N
Pima	BIRD	Ammodramus savannarum amolegus	Arizona grasshopper sparrow	ABPBXA0021			S				G5TU	S2
Pima	BIRD	Athene cunicularia hypugaea	Western Burrowing Owl	ABNSB10012	SC	S	S	4	A		G4T4	S3
Pima	BIRD	Buteo albonotatus	Zone tailed Hawk	ABNKC19090			S				G4	S4
Pima	BIRD	Buteo nitidus maxima	Northern Gray Hawk	ABNKC19011	SC	S	S		PR	WSC	G5T4Q	S3
Pima	BIRD	Buteo swainsoni	Swainson's Hawk	ABNKC19070		S	S				G5	S3
Pima	BIRD	Buteogallus anthracinus	Common Black Hawk	ABNKC15010		S	S		A	WSC	G4G5	S3
Pima	BIRD	Camptostoma imberbe	Northern Beardless Tyrannulet	ABPAE04010			S				G5	S4
Pima	BIRD	Caprimulgus ridgwayi	Buff collared Nightjar	ABNTA07060			S				G5	S2S3
Pima	BIRD	Caracara cheriway	Crested Caracara	ABNKD02020	No Status					WSC	G5	S1S2
Pima	BIRD	Coccyzus americanus	Yellow billed Cuckoo (Western U.S. DPS)	ABNRB02020	C		S	2		WSC	G5	S3
Pima	BIRD	Colinus virginianus ridgwayi	Masked Bobwhite	ABNLC21022	LE				P	WSC	G5T1	S1
Pima	BIRD	Dendrocygna autumnalis	Black bellied Whistling Duck	ABNJB01040						WSC	G5	S3
Pima	BIRD	Dendrocygna bicolor	Fulvous Whistling Duck	ABNJB01010	SC						G5	SAN
Pima	BIRD	Empidonax fulvifrons pygmaeus	Northern Buff breasted Flycatcher	ABPAE33141	SC		S			WSC	G5T5	S1
Pima	BIRD	Empidonax traillii extimus	Southwestern Willow Flycatcher	ABPAE33043	LE			2		WSC	G5T1T2	S1
Pima	BIRD	Falco peregrinus anatum	American Peregrine Falcon	ABNKD06071	SC	S	S	4	A	WSC	G4T4	S4
Pima	BIRD	Glaucidium brasilianum cactorum	Cactus Ferruginous Pygmy owl	ABNSB08041	SC	S	S		A	WSC	G5T3	S1

BW1 FOIA CBP 007242

COUNTY	TAXON	SCIENTIFIC NAME	COMMON NAME	ELCODE	ESA	BLM	USFS	NESL	MEXFED	STATE	GRANK	S RANK
Pima	BIRD	Pachyramphus aglaiae	Rose throated Becard	ABPAE53070			S			WSC	G4G5	S1
Pima	BIRD	Pandion haliaetus	Osprey	ABNKC01010		S				WSC	G5	S2B,S4N
Pima	BIRD	Poliophtila nigriceps	Black capped Gnatcatcher	ABPBJ08040						WSC	G5	S1
Pima	BIRD	Rallus longirostris yumanensis	Yuma Clapper Rail	ABNME0501A	LE				P	WSC	G5T3	S3
Pima	BIRD	Strix occidentalis lucida	Mexican Spotted Owl	ABNSB12012	LT			3	A	WSC	G3T3	S3S4
Pima	BIRD	Trogon elegans	Elegant Trogon	ABNWA02070						WSC	G5	S3
Pima	BIRD	Tyrannus crassirostris	Thick billed Kingbird	ABPAE52040		S	S			WSC	G5	S2
Pima	BIRD	Tyrannus melancholicus	Tropical Kingbird	ABPAE52010						WSC	G5	S3
Pima	FISH	Agosia chrysogaster chrysogaster	Gila Longfin Dace	AFCJB37151	SC	S	S		A		G4T3T4	S3S4
Pima	FISH	Catostomus clarkii	Desert Sucker	AFCJC02040	SC	S	S				G3G4	S3S4
Pima	FISH	Cyprinodon eremus	Quitobaquito Pupfish	AFCNB02140	LE					WSC	G1	S1
Pima	FISH	Cyprinodon macularius	Desert Pupfish	AFCNB02060	LE				P	WSC	G1	S1
Pima	FISH	Gila intermedia	Gila Chub	AFCJB13160	LE				P	WSC	G2	S2
Pima	FISH	Poeciliopsis occidentalis occidentalis	Gila Topminnow	AFCNC05021	LE				A	WSC	G3T3	S1S2
Pima	INVERTEBRATE	Argia sabino	Sabino Canyon Dancer	IIDO068100	SC		S				G1G2	S2
Pima	INVERTEBRATE	Sonorella eremita	San Xavier Talussnail	IMGASC9240	SC						G1	S1
Pima	INVERTEBRATE	Sonorella rosemontensis	Rosemont Talussnail	IMGASC9520	C						G3	S1
Pima	INVERTEBRATE	Tryonia quitobaquiae	Quitobaquito Tryonia	IMGASJ7130	SC						G1	S1
Pima	MAMMAL	Antilocapra americana sonoriensis	Sonoran Pronghorn	AMALD01012	LE				P	WSC	G5T1	S1
Pima	MAMMAL	Baiomys taylori	Northern Pygmy Mouse	AMAFF05010			S				G4G5	S3
Pima	MAMMAL	Choeronycteris mexicana	Mexican Long tongued Bat	AMACB02010	SC	S	S		A	WSC	G4	S3
Pima	MAMMAL	Corynorhinus townsendii pallascens	Pale Townsend's Big eared Bat	AMACC08014	SC	S	S	4			G4T4	S3S4
Pima	MAMMAL	Cynomys ludovicianus	Black tailed Prairie Dog	AMAFB06010	SC	S	S		A	WSC	G4	SXS1
Pima	MAMMAL	Eumops perotis californicus	Greater Western Bonneted Bat	AMACD02011	SC	S	S				G5T4	S3
Pima	MAMMAL	Eumops underwoodi	Underwood's Bonneted Bat	AMACD02020	SC						G4	S1
Pima	MAMMAL	Lasiurus blossevillei	Western Red Bat	AMACC05060		S	S			WSC	G5	S3
Pima	MAMMAL	Lasiurus xanthinus	Western Yellow Bat	AMACC05070		S	S			WSC	G5	S2S3
Pima	MAMMAL	Leptonycteris curasoae yerbabuenae	Lesser Long nosed Bat	AMACB03030	LE					WSC	G4	S2S3
Pima	MAMMAL	Macrotus californicus	California Leaf nosed Bat	AMACB01010	SC	S	S			WSC	G4	S3

COUNTY	TAXON	SCIENTIFIC NAME	COMMON NAME	ELCODE	ESA	BLM	USFS	NESL	MEXFED	STATE	GRANK	S RANK
Pima	MAMMAL	Myotis occultus	Arizona Myotis	AMACC01160	SC						G3G4	S3
Pima	MAMMAL	Myotis thysanodes	Fringed Myotis	AMACC01090	SC						G4G5	S3S4
Pima	MAMMAL	Myotis velifer	Cave Myotis	AMACC01050	SC						G5	S3S4
Pima	MAMMAL	Notiosorex cockrumi	Cockrum's Desert Shrew	AMABA05020			S				GNR	S1
Pima	MAMMAL	Nyctinomops femorosaccus	Pocketed Free tailed Bat	AMACD04010			S				G4	S3
Pima	MAMMAL	Nyctinomops macrotis	Big Free tailed Bat	AMACD04020	SC						G5	S3
Pima	MAMMAL	Panthera onca	Jaguar	AMAJH02010	LE				P	WSC	G3	S1
Pima	MAMMAL	Peromyscus merriami	Merriam's Mouse	AMAFF03020			S				G5	S2
Pima	MAMMAL	Reithrodontomys fulvescens	Fulvous Harvest Mouse	AMAFF02050			S				G5	S4
Pima	MAMMAL	Reithrodontomys montanus	Plains Harvest Mouse	AMAFF02010			S				G5	S3
Pima	MAMMAL	Sciurus arizonensis	Arizona Gray Squirrel	AMAFB07060			S		A		G4	S4
Pima	MAMMAL	Sigmodon ochrognathus	Yellow nosed Cotton Rat	AMAFF07040	SC		S				G4G5	S4
Pima	PLANT	Abutilon parishii	Pima Indian Mallow	PDMAL020E0	SC	S	S			SR	G2	S2
Pima	PLANT	Abutilon thurberi	Thurber Indian Mallow	PDMAL020P0						SR	G2?	S1
Pima	PLANT	Agave parviflora ssp. parviflora	Santa Cruz Striped Agave	PMAGA010L2	SC		S		A	HS	G3T3	S3
Pima	PLANT	Agave schottii var. treleasei	Trelease Agave	PMAGA010N2	SC		S			HS	G5T1Q	S1
Pima	PLANT	Allium gooddingii	Goodding Onion	PMLIL02120	SC		S	3		HS	G4	S3S4
Pima	PLANT	Allium plummerae	Plummer Onion	PMLIL021V0						SR	G4	S3
Pima	PLANT	Amoreuxia gonzalezii	Saiya	PDBIX01010	SC		S			HS	G1	S1
Pima	PLANT	Amsonia grandiflora	Large flowered Blue Star	PDAP03060	SC		S				G2	S2
Pima	PLANT	Amsonia kearneyana	Kearney's Blue star	PDAP030M0	LE					HS	G1	S1
Pima	PLANT	Arabis tricornuta	Chiricahua Rock Cress	PDBRA06200			S				G1?	S1?
Pima	PLANT	Asclepias lemmonii	Lemmon Milkweed	PDASC020Z0			S				G4?	S2
Pima	PLANT	Asplenium dalhousiae	Dalhousie Spleenwort	PPASP020A0		S					GNR	S1
Pima	PLANT	Berberis harrisoniana	Kofa Mt Barberry	PDBER02030		S					G1G2	S1S2
Pima	PLANT	Capsicum annuum var. glabriusculum	Chiltepin	PDSOL06012			S				G5T5	S2
Pima	PLANT	Carex chihuahuensis	Chihuahuan Sedge	PMCYP032T0			S				G3G4	S2S3
Pima	PLANT	Carex ultra	Arizona Giant Sedge	PMCYP03E50		S	S				G3?	S2
Pima	PLANT	Coryphantha scheeri var. robustispina	Pima Pineapple Cactus	PDCAC040C1	LE					HS	G4T2	S2

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COUNTY	TAXON	SCIENTIFIC NAME	COMMON NAME	ELCODE	ESA	BLM	USFS	NESL	MEXFED	STATE	GRANK	S RANK
Pima	PLANT	Cylindropuntia x kelvinensis	Kelvin Cholla	PDCAC0D2M0						SR	GNA	SHYB
Pima	PLANT	Dalea tentaculoides	Gentry Indigo Bush	PDFAB1A1K0	SC	S	S			HS	G1	S1
Pima	PLANT	Echinocactus horizonthalonius var. nicholii	Nichol Turk's Head Cactus	PDCAC05022	LE					HS	G4T2	S2
Pima	PLANT	Echinocereus fasciculatus	Magenta flower Hedgehog cactus	PDCAC06065						SR	G4G5T4T5	S3
Pima	PLANT	Echinomastus erectocentrus var. acunensis	Acuna Cactus	PDCAC0J0E1	C				P	HS	G3T1T2Q	S1
Pima	PLANT	Echinomastus erectocentrus var. erectocentrus	Needle spined Pineapple Cactus	PDCAC0J0E2	SC					SR	G3T3Q	S3
Pima	PLANT	Erigeron arisolius	Arid Throne Fleabane	PDAST3M510			S				G2	S2
Pima	PLANT	Eriogonum capillare	San Carlos Wild buckwheat	PDPGN08100	SC					SR	G4	S4
Pima	PLANT	Eriogonum ericifolium var. ericifolium	Heathleaf Wild buckwheat	PDPGN08231			S				G3T2	S2
Pima	PLANT	Eriogonum terrenatum	San Pedro River Wild Buckwheat	PDPGN08760		S					G1	S1
Pima	PLANT	Ferocactus cylindraceus	Desert Barrel Cactus	PDCAC08080					PR	SR	G5	S4
Pima	PLANT	Ferocactus emoryi	Emory's Barrel cactus	PDCAC08090						SR	G4	S1S2
Pima	PLANT	Graptopetalum bartramii	Bartram Stonecrop	PDCRA06010	SC	S	S			SR	G3	S3
Pima	PLANT	Heterotheca rutteri	Huachuca Golden Aster	PDAST4V0J0	SC	S	S				G2	S2
Pima	PLANT	Hexalectris revoluta	Chisos Coral root	PMORC1C030			S				G1G2	S1
Pima	PLANT	Hexalectris spicata	Crested Coralroot	PMORC1C040						SR	G5	S3S4
Pima	PLANT	Hieracium pringlei	Pringle Hawkweed	PDAST4W170	SC						G2Q	S1
Pima	PLANT	Lilaeopsis schaffneriana var. recurva	Huachuca Water umbel	PDAPI19051	LE					HS	G4T2	S2
Pima	PLANT	Lilium parryi	Lemmon Lily	PMLIL1A0J0	SC		S			SR	G3	S2
Pima	PLANT	Listera convallarioides	Broadleaf Twayblade	PMORC1N050						SR	G5	S1
Pima	PLANT	Lophocereus schottii	Senita	PDCAC14010						SR	G4	S1S2
Pima	PLANT	Lupinus huachucanus	Huachuca Mountain Lupine	PDFAB2B210			S				G2	S2
Pima	PLANT	Lysiloma watsonii	Littleleaf False Tamarind	PDFAB2C040						SR	G4?	S1
Pima	PLANT	Malaxis tenuis	Slender Adders Mouth	PMORC1R090						SR	G4	S1
Pima	PLANT	Mammillaria mainiae	Counter Clockwise Fishhook Cactus	PDCAC0A060			S			SR	G3	S1
Pima	PLANT	Mammillaria thornberi	Thornber Fishhook Cactus	PDCAC0A0C0						SR	G4	S4
Pima	PLANT	Mammillaria viridiflora	Varied Fishhook Cactus	PDCAC0A0D0						SR	G4	S4
Pima	PLANT	Manihot davisiae	Arizona Manihot	PDEUP0Z010			S				G4	S2
Pima	PLANT	Metastelma mexicanum	Wiggins Milkweed Vine	PDASC050P0	SC		S				G3G4	S1S2

COUNTY	TAXON	SCIENTIFIC NAME	COMMON NAME	ELCODE	ESA	BLM	USFS	NESL	MEXFED	STATE	GRANK	S RANK
Pima	PLANT	Muhlenbergia dubioides	Box Canyon Muhly	PMPOA480G0			S				G1Q	S1
Pima	PLANT	Muhlenbergia xerophila	Weeping Muhly	PMPOA48220			S				G3	S1
Pima	PLANT	Notholaena lemmonii	Lemmon Cloak Fern	PPADI0G0D0	SC						G3?	S1S2
Pima	PLANT	Opuntia engelmannii var. flavispina		PDCAC0D224						SR	G5T3?	S3?
Pima	PLANT	Opuntia versicolor	Stag horn Cholla	PDCAC0D1K0						SR	G4	S2S3
Pima	PLANT	Passiflora arizonica	Arizona Passionflower	PDPAS01073			S				G5T3T5	S2
Pima	PLANT	Pectis imberbis	Beardless Chinch Weed	PDAST6W0A0	SC		S				G3	S1
Pima	PLANT	Peniocereus greggii var. transmontanus	Desert Night blooming Cereus	PDCAC0V012					PR	SR	G3G4T3T4	S3S4
Pima	PLANT	Peniocereus striatus	Dahlia Rooted Cereus	PDCAC0V020						SR	G4	S1
Pima	PLANT	Penstemon discolor	Catalina Beardtongue	PDSCR1L210			S			HS	G2	S2
Pima	PLANT	Perityle ajoensis	Ajo Rock Daisy	PDAST700Y0						SR	G1	S1
Pima	PLANT	Physalis latiphysa	Broad leaf Ground cherry	PDSOL0S0H0			S				G1	S1
Pima	PLANT	Platanthera limosa	Thurber's Bog Orchid	PMORC1Y0G0						SR	G4	S4
Pima	PLANT	Psilotum nudum	Whisk Fern	PPPSI01020			S			HS	G5	S1
Pima	PLANT	Samolus vagans	Chiricahua Mountain Brookweed	PDPRI09040			S				G2?	S2
Pima	PLANT	Schiedeella arizonica	Fallen Ladies' tresses	PMORC67020						SR	GNR	S4
Pima	PLANT	Senecio neomexicanus var. toumeyi	Toumey Groundsel	PDAST8H274			S				G5T2Q	S2
Pima	PLANT	Sisyrinchium cernuum	Nodding Blue eyed Grass	PMIRI0D0B0			S				G5	S2
Pima	PLANT	Stenocereus thurberi	Organ Pipe Cactus	PDCAC10020						SR	G5	S4
Pima	PLANT	Stevia lemmonii	Lemmon's Stevia	PDAST8V010			S				G3G4	S2
Pima	PLANT	Thelypteris puberula var. sonorensis	Aravaipa Wood Fern	PPTHE05192		S	S				G5T3	S2
Pima	PLANT	Tragia laciniata	Sonoran Noseburn	PDEUP1D060			S				G3G4	S3?
Pima	PLANT	Triteleopsis palmeri	Blue Sand Lily	PMLIL22010		S				SR	G3	S1
Pima	PLANT	Tumamoca macdougalii	Tumamoc Globeberry	PDCUC0S010		S	S			SR	G4	S3
Pima	PLANT	Vauquelinia californica ssp. sonorensis	Arizona Sonoran Rosewood	PDROS1R024		S					G4T1	S1
Pima	PLANT	Viola umbraticola	Shade Violet	PDVIO042E0			S				G3G4	S2?
Pima	REPTILE	Aspidoscelis burti stictogrammus	Giant Spotted Whiptail	ARACJ02011	SC		S				G4T4	S2
Pima	REPTILE	Aspidoscelis xanthonota	Redback Whiptail	ARACJ02012	SC						G4T2	S2
Pima	REPTILE	Chionactis occipitalis klauberi	Tucson Shovel nosed Snake	ARADB05012	C	S					G5T3Q	S1

COUNTY	TAXON	SCIENTIFIC NAME	COMMON NAME	ELCODE	ESA	BLM	USFS	NESL	MEXFED	STATE	GRANK	S RANK
Pima	REPTILE	Gopherus agassizii (Sonoran Population)	Sonoran Desert Tortoise	ARAAF01013	SC	S	S		A	WSC	G4T4	S4
Pima	REPTILE	Heloderma suspectum suspectum	Reticulate Gila Monster	ARACE01012			S		A		G4T4	S4
Pima	REPTILE	Kinosternon sonoriense longifemorale	Sonoyta Mud Turtle	ARAAE01041	C						G4T1	S1
Pima	REPTILE	Lichanura trivirgata trivirgata	Mexican Rosy Boa	ARADA01023	SC	S					G4G5T3	S1S2
Pima	REPTILE	Oxybelis aeneus	Brown Vinesnake	ARADB24010			S			WSC	G5	S1
Pima	REPTILE	Phrynosoma cornutum	Texas Horned Lizard	ARACF12010	SC				A		G4G5	S3S4
Pima	REPTILE	Phyllorhynchus browni	Saddled Leaf nosed Snake	ARADB25010			PS		PR		G5	S5
Pima	REPTILE	Plestiodon callicephalus	Mountain Skink	ARACH01030			S				G4G5	S2
Pima	REPTILE	Sceloporus slevini	Slevin's Bunchgrass Lizard	ARACF14180			S				G4	S2
Pima	REPTILE	Senticolis triaspis intermedia	Northern Green Ratsnake	ARADB44011			S				G5T4	S3
Pima	REPTILE	Thamnophis eques megalops	Northern Mexican Gartersnake	ARADB36061	C		S		A	WSC	G5T5	S1
Pima	REPTILE	Uma rufopunctata	Yuman Desert Fringe toed Lizard	ARACF15040	SC	S			A	WSC	G3	S2
Pinal	AMPHIBIAN	Gastrophryne olivacea	Western Narrow mouthed Toad	AAABE01020		S	S		PR	WSC	G5	S3
Pinal	AMPHIBIAN	Rana yavapaiensis	Lowland Leopard Frog	AAABH01250	SC	S	S		PR	WSC	G4	S3
Pinal	BIRD	Ardea alba	Great Egret	ABNGA04040		S				WSC	G5	S1B,S4N
Pinal	BIRD	Athene cunicularia hypugaea	Western Burrowing Owl	ABNSB10012	SC	S	S	4	A		G4T4	S3
Pinal	BIRD	Buteo albonotatus	Zone tailed Hawk	ABNKC19090			S				G4	S4
Pinal	BIRD	Buteo nitidus maxima	Northern Gray Hawk	ABNKC19011	SC	S	S		PR	WSC	G5T4Q	S3
Pinal	BIRD	Buteo swainsoni	Swainson's Hawk	ABNKC19070		S	S				G5	S3
Pinal	BIRD	Buteogallus anthracinus	Common Black Hawk	ABNKC15010		S	S		A	WSC	G4G5	S3
Pinal	BIRD	Camptostoma imberbe	Northern Beardless Tyrannulet	ABPAE04010			S				G5	S4
Pinal	BIRD	Caprimulgus ridgwayi	Buff collared Nightjar	ABNTA07060			S				G5	S2S3
Pinal	BIRD	Coccyzus americanus	Yellow billed Cuckoo (Western U.S. DPS)	ABNRB02020	C		S	2		WSC	G5	S3
Pinal	BIRD	Dendrocygna autumnalis	Black bellied Whistling Duck	ABNJB01040						WSC	G5	S3
Pinal	BIRD	Empidonax traillii extimus	Southwestern Willow Flycatcher	ABPAE33043	LE			2		WSC	G5T1T2	S1
Pinal	BIRD	Falco peregrinus anatum	American Peregrine Falcon	ABNKD06071	SC	S	S	4	A	WSC	G4T4	S4
Pinal	BIRD	Glaucidium brasilianum cactorum	Cactus Ferruginous Pygmy owl	ABNSB08041	SC	S	S		A	WSC	G5T3	S1
Pinal	BIRD	Haliaeetus leucocephalus (wintering pop.)	Bald Eagle Winter Population	ABNKC10015	SC	S	S	2	P	WSC	G5TNR	S4N
Pinal	BIRD	Haliaeetus leucocephalus pop. 3	Bald Eagle Sonoran Desert area Population	ABNKC10014	LT,DPS	S	S	2	P	WSC	G5TNR	S2S3

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APPENDIX D
AIR QUALITY CALCULATIONS

CALCULATION SHEET-COMBUSTIBLE EMISSIONS-CONSTRUCTION

Assumptions for Combustible Emissions					
Type of Construction Equipment	Num. of Units	HP Rated	Hrs/day	Days/yr	Total hp-hrs
Water Truck	2	300	8	240	1152000
Diesel Road Compactors	1	100	8	60	48000
Diesel Dump Truck	1	300	8	240	576000
Diesel Excavator	1	300	8	180	432000
Diesel Hole Trenchers	1	175	8	180	252000
Diesel Bore/Drill Rigs	1	300	8	180	432000
Diesel Cement & Mortar Mixers	1	300	8	240	576000
Diesel Cranes	1	175	8	240	336000
Diesel Graders	1	300	8	40	96000
Diesel Tractors/Loaders/Backhoes	1	100	8	180	144000
Diesel Bull Dozers	1	300	8	180	432000
Diesel Front End Loaders	2	300	8	180	864000
Diesel Fork Lifts	2	100	8	240	384000
Diesel Generator Set	2	40	8	240	153600

Emission Factors							
Type of Construction Equipment	VOC g/hp-hr	CO g/hp-hr	NOx g/hp-hr	PM-10 g/hp-hr	PM-2.5 g/hp-hr	SO2 g/hp-hr	CO2 g/hp-hr
Water Truck	0.440	2.070	5.490	0.410	0.400	0.740	536.000
Diesel Road Compactors	0.370	1.480	4.900	0.340	0.330	0.740	536.200
Diesel Dump Truck	0.440	2.070	5.490	0.410	0.400	0.740	536.000
Diesel Excavator	0.340	1.300	4.600	0.320	0.310	0.740	536.300
Diesel Trenchers	0.510	2.440	5.810	0.460	0.440	0.740	535.800
Diesel Bore/Drill Rigs	0.600	2.290	7.150	0.500	0.490	0.730	529.700
Diesel Cement & Mortar Mixers	0.610	2.320	7.280	0.480	0.470	0.730	529.700
Diesel Cranes	0.440	1.300	5.720	0.340	0.330	0.730	530.200
Diesel Graders	0.350	1.360	4.730	0.330	0.320	0.740	536.300
Diesel Tractors/Loaders/Backhoes	1.850	8.210	7.220	1.370	1.330	0.950	691.100
Diesel Bull Dozers	0.360	1.380	4.760	0.330	0.320	0.740	536.300
Diesel Front End Loaders	0.380	1.550	5.000	0.350	0.340	0.740	536.200
Diesel Fork Lifts	1.980	7.760	8.560	1.390	1.350	0.950	690.800
Diesel Generator Set	1.210	3.760	5.970	0.730	0.710	0.810	587.300

CALCULATION SHEET-COMBUSTIBLE EMISSIONS-CONSTRUCTION

Emission factors (EF) were generated from the NONROAD2005 model for the 2006 calendar year. The VOC EFs includes exhaust and evaporative emissions. The VOC evaporative components included in the NONROAD2005 model are diurnal, hotsoak, running loss, tank permeation, hose permeation, displacement, and spillage. The construction equipment age distribution in the NONROAD2005 model is based on the population in U.S. for the 2006 calendar year.

Emission Calculations							
Type of Construction Equipment	VOC tons/yr	CO tons/yr	NOx tons/yr	PM-10 tons/yr	PM-2.5 tons/yr	SO2 tons/yr	CO2 tons/yr
Water Truck	0.559	2.628	6.970	0.520	0.508	0.939	680.454
Diesel Road Paver	0.020	0.078	0.259	0.018	0.017	0.039	28.363
Diesel Dump Truck	0.279	1.314	3.485	0.260	0.254	0.470	340.227
Diesel Excavator	0.162	0.619	2.190	0.152	0.148	0.352	255.313
Diesel Hole Cleaners\Trenchers	0.142	0.678	1.613	0.128	0.122	0.206	148.794
Diesel Bore/Drill Rigs	0.286	1.090	3.404	0.238	0.233	0.348	252.171
Diesel Cement & Mortar Mixers	0.387	1.473	4.621	0.305	0.298	0.463	336.228
Diesel Cranes	0.163	0.481	2.118	0.126	0.122	0.270	196.318
Diesel Graders	0.037	0.144	0.500	0.035	0.034	0.078	56.736
Diesel Tractors/Loaders/Backhoes	0.294	1.303	1.146	0.217	0.211	0.151	109.669
Diesel Bull Dozers	0.171	0.657	2.266	0.157	0.152	0.352	255.313
Diesel Front End Loaders	0.362	1.476	4.761	0.333	0.324	0.705	510.531
Diesel Aerial Lifts	0.838	3.284	3.622	0.588	0.571	0.402	292.324
Diesel Generator Set	0.205	0.636	1.011	0.124	0.120	0.137	99.411
Total Emissions	3.903	15.860	37.965	3.202	3.115	4.912	3561.853

Conversion factors	
Grams to tons	1.102E-06

CALCULATION SHEET-TRANSPORTATION COMBUSTIBLE EMISSIONS-CONSTRUCTION

Construction Worker Personal Vehicle Commuting to Construction Site-Passenger and Light Duty Trucks									
	Emission Factors		Assumptions				Results by Pollutant		
Pollutants	Passenger Cars g/mile	Pick-up Trucks, SUVs g/mile	Mile/day	Day/yr	Number of cars	Number of trucks	Total Emissions Cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	1.36	1.61	60	240	20	20	0.43	0.51	0.94
CO	12.4	15.7	60	240	20	20	3.94	4.98	8.92
NOx	0.95	1.22	60	240	20	20	0.30	0.39	0.69
PM-10	0.0052	0.0065	60	240	20	20	0.00	0.00	0.00
PM 2.5	0.0049	0.006	60	240	20	20	0.00	0.00	0.00
CO2	369	511	60	240	20	20	117.11	162.18	279.29

Heavy Duty Trucks Delivery Supply Trucks to Construction Site									
	Emission Factors		Assumptions				Results by Pollutant		
Pollutants	10,000-19,500 lb Delivery Truck	33,000-60,000 lb semi trailer rig	Mile/day	Day/yr	Number of trucks	Number of trucks	Total Emissions Cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	0.29	0.55	60	240	2	2	0.01	0.02	0.03
CO	1.32	3.21	60	240	2	2	0.04	0.10	0.14
NOx	4.97	12.6	60	240	2	2	0.16	0.40	0.56
PM-10	0.12	0.33	60	240	2	2	0.00	0.01	0.01
PM 2.5	0.13	0.36	60	240	2	2	0.00	0.01	0.02
CO2	536	536	60	240	2	2	17.01	17.01	34.02

Daily Commute New Staff Associated with Proposed Action									
	Emission Factors		Assumptions				Results by Pollutant		
Pollutants	Passenger Cars g/mile	Pick-up Trucks, SUVs g/mile	Mile/day	Day/yr	Number of Cars	Number of trucks	Total Emissions cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	1.36	1.61	40	365			-	0.00	-
CO	12.4	15.7	40	365			-	0.00	-
NOx	0.95	1.22	40	365			-	0.00	-
PM-10	0.0052	0.0065	40	365			-	0.00	-
PM 2.5	0.0049	0.006	40	365			-	0.00	-
CO2	369	511	40	365			-	0.00	-

Truck Emission Factor Source: MOBILE6.2 USEPA 2005 Emission Facts: Average annual emissions and fuel consumption for gasoline-fueled passenger cars and light trucks. EPA 420-F-05-022 August 2005. Emission rates were generated using MOBILE.6 highway.

CALCULATION SHEET-TRANSPORTATION COMBUSTIBLE EMISSIONS-CONSTRUCTION

Conversion factor:	gms to tons
	0.000001102

Carbon Equivalents	Conversion Factor
N2O or NOx	311
Methane or VOCs	25

Source: EPA 2010 Reference, Tables and Conversions, Inventory of U.S. Greenhouse Gas Emissions and Sinks;
<http://www.epa.gov/climatechange/emissions/usinventoryreport.html>

CARBON EQUIVALENTS

Construction Commuters	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	23.57	
NOx	311	0.69	
Total		24.25	303.54

Delivery Trucks	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	0.67	
NOx	311	173.42	
Total		174.09	208.11

Kirtland AFB staff and Students	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	-	
NOx	311	-	
Total		-	-

ONGOING EMISSIONS FROM DISEIL GENERATOR

Assumptions for Combustible Emissions					
Type of Construction Equipment	Num. of Units	HP Rated	Hrs/day	Days/yr	Total hp-hrs
Diesel Generator Set	1	286	4	24	27456

Emission Factors							
Type of Construction Equipment	VOC g/hp-hr	CO g/hp-hr	NOx g/hp-hr	PM-10 g/hp-hr	PM-2.5 g/hp-hr	SO2 g/hp-hr	CO2 g/hp-hr
Diesel Generator Set	1.21	3.76	5.97	0.73	0.71	0.81	587.3

Emission factors (EF) were generated from the NONROAD2005 model for the 2006 calendar year. The VOC EFs includes exhaust and evaporative emissions. The VOC evaporative components included in the NONROAD2005 model are diurnal, hotsoak, running loss, tank permeation, hose permeation, displacement, and spillage. The construction equipment age distribution in the NONROAD2005 model is based on the population in U.S. for the 2006 calendar year.

Emission Calculations							
Type of Construction Equipment	VOC tons/yr	CO tons/yr	NOx tons/yr	PM-10 tons/yr	PM-2.5 tons/yr	SO2 tons/yr	CO2 tons/yr
Diesel Generator Set	0.037	0.114	0.181	0.022	0.021	0.025	17.770
Total Emissions	0.037	0.114	0.181	0.022	0.021	0.025	17.770

Conversion factors	
Grams to tons	1.102E-06

CALCULATION SHEET-FUGITIVE DUST-CONSTRUCTION

Construction Fugitive Dust Emissions

Construction Fugitive Dust Emission Factors

	Emission Factor	Units	Source
General Construction Activities	0.19 ton PM10/acre-month		MRI 1996; EPA 2001; EPA 2006
New Road Construction	0.42 ton PM10/acre-month		MRI 1996; EPA 2001; EPA 2006

PM2.5 Emissions

PM2.5 Multiplier	0.10	(10% of PM10 emissions assumed to be PM2.5)	EPA 2001; EPA 2006
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Control Efficiency

0.50	(assume 50% control efficiency for PM10 and PM2.5 emissions)	EPA 2001; EPA 2006
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Project Assumptions

Construction Area (0.19 ton PM10/acre-month)

Duration of Construction Project	3	months
Length		miles
Length (converted)	0	feet
Width		feet
Area	6.00	acres

Conversion Factors

0.000022957	acres per foot
5280	feet per mile

Staging Areas

Duration of Construction Project	12	months
Length		miles
Length (converted)		feet
Width		feet
Area	0.00	acres

	Project Emissions (tons/year)			
	PM10 uncontrolled	PM10 controlled	PM2.5 uncontrolled	PM2.5 controlled
Construction Area (0.19 ton PM10/acre-month)	3.42	1.71	0.34	0.17
Staging Areas	0.00	0.00	0.00	0.00
Total	3.42	1.71	0.34	0.17

References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

Construction Fugitive Dust Emission Factors

General Construction Activities Emission Factor

0.19 ton PM10/acre-month Source: MRI 1996; EPA 2001; EPA 2006

The area-based emission factor for construction activities is based on a study completed by the Midwest Research Institute (MRI) Improvement of Specific Emission Factors (BACM Project No. 1), March 29, 1996. The MRI study evaluated seven construction projects in Nevada and California (Las Vegas, Coachella Valley, South Coast Air Basin, and the San Joaquin Valley). The study determined an average emission factor of 0.11 ton PM10/acre-month for sites without large-scale cut/fill operations. A worst-case emission factor of 0.42 ton PM10/acre-month was calculated for sites with active large-scale earth moving operations. The monthly emission factors are based on 168 work-hours per month (MRI 1996). A subsequent MRI Report in 1999, Estimating Particulate Matter Emissions from Construction Operations, calculated the 0.19 ton PM10/acre-month emission factor by applying 25% of the large-scale earthmoving emission factor (0.42 ton PM10/acre-month) and 75% of the average emission factor (0.11 ton PM10/acre-month).

The 0.19 ton PM10/acre-month emission factor is referenced by the EPA for non-residential construction activities in recent procedures documents for the National Emission Inventory (EPA 2001; EPA 2006). The 0.19 ton PM10/acre-month emission factor represents a refinement of EPA's original AP-42 area-based total suspended particle (TSP) emission factor in Section 13.2.3 Heavy Construction Operations. In addition to the EPA, this methodology is also supported by the South Coast Air Quality Management District and the Western Regional Air Partnership (WRAP) which is funded by the EPA and is administered jointly by the Western Governor's Association and the National Tribal Environmental Council. The emission factor is assumed to encompass a variety of non-residential construction activities including building construction (commercial, industrial, institutional, governmental), public works, and travel on unpaved roads. The EPA National Emission Inventory documentation assumes that the emission factors are uncontrolled and recommends a control efficiency of 50% for PM10 and PM2.5 in PM nonattainment areas.

New Road Construction Emission Factor

0.42 ton PM10/acre-month Source: MRI 1996; EPA 2001; EPA 2006

The emission factor for new road construction is based on the worst-case conditions emission factor from the MRI 1996 study described above (0.42 tons PM10/acre-month). It is assumed that road construction involves extensive earthmoving and heavy construction vehicle travel resulting in emissions that are higher than other general construction projects. The 0.42 ton PM10/acre-month emission factor for road construction is referenced in recent procedures documents for the EPA National Emission Inventory (EPA 2001; EPA 2006).

PM2.5 Multiplier

0.10

PM2.5 emissions are estimated by applying a particle size multiplier of 0.10 to PM10 emissions. This methodology is consistent with the procedures documents for the National Emission Inventory (EPA 2006).

Control Efficiency for PM10 and PM2.5

0.50

The EPA National Emission Inventory documentation recommends a control efficiency of 50% for PM10 and PM2.5 in PM nonattainment areas. Wetting controls will be applied during project construction (EPA 2006).

References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

CALCULATION SHEET-SUMMARY OF EMISSIONS

Alternative 1 Construction Emissions for Criteria Pollutants (tons per year)									
Emission Source	VOC	CO	NOx	PM-10	PM-2.5	SO2	CO2	CO2 Equivalents	Total CO2
Combustible Emissions	3.90	15.86	37.97	3.20	3.12	4.91	3561.85	11904.82	15466.67
Construction Site-Fugitive PM-10	NA	NA	NA	1.71	0.17	NA	NA	NA	NA
Construction Workers Commuter & Trucking	0.97	9.06	1.25	0.02	0.02	NA	279.29	411.84	691.13
Total emissions-CONSTRUCTION	4.87	24.92	39.21	4.93	3.31	4.91	3,841	12,317	16,158
Ongoing Operational Emission Source									
Diesel Generators	0.04	0.11	0.18	0.02	0.02	0.02	17.77	57.09	74.86
Total Ongoing Operational Emissions	0.04	0.11	0.18	0.02	0.02	0.02	17.77	57.09	74.86
De minimis Threshold (1)	100	100	100	100	100	100	NA	NA	27,557

1. Pima County is in moderate non-attainment for PM-10

Carbon Equivalents	Conversion Factor
N2O or NOx	311
Methane or VOCs	25

Source: EPA 2010 Reference, Tables and Conversions, Inventory of U.S. Greenhouse Gas Emissions and Sinks;
<http://www.epa.gov/climatechange/emissions/usinventoryreport.html>

CALCULATION SHEET-COMBUSTIBLE EMISSIONS-CONSTRUCTION-ALTERNATIVE FOSSILE FUEL

Assumptions for Combustible Emissions					
Type of Construction Equipment	Num. of Units	HP Rated	Hrs/day	Days/yr	Total hp-hrs
Water Truck	2	300	8	240	1152000
Diesel Road Compactors	1	100	8	60	48000
Diesel Dump Truck	1	300	8	240	576000
Diesel Excavator	1	300	8	180	432000
Diesel Hole Trenchers	1	175	8	180	252000
Diesel Bore/Drill Rigs	1	300	8	180	432000
Diesel Cement & Mortar Mixers	1	300	8	240	576000
Diesel Cranes	1	175	8	240	336000
Diesel Graders	1	300	8	40	96000
Diesel Tractors/Loaders/Backhoes	1	100	8	180	144000
Diesel Bull Dozers	1	300	8	180	432000
Diesel Front End Loaders	2	300	8	180	864000
Diesel Fork Lifts	2	100	8	240	384000
Diesel Generator Set	2	40	8	240	153600

Emission Factors							
Type of Construction Equipment	VOC g/hp-hr	CO g/hp-hr	NOx g/hp-hr	PM-10 g/hp-hr	PM-2.5 g/hp-hr	SO2 g/hp-hr	CO2 g/hp-hr
Water Truck	0.440	2.070	5.490	0.410	0.400	0.740	536.000
Diesel Road Compactors	0.370	1.480	4.900	0.340	0.330	0.740	536.200
Diesel Dump Truck	0.440	2.070	5.490	0.410	0.400	0.740	536.000
Diesel Excavator	0.340	1.300	4.600	0.320	0.310	0.740	536.300
Diesel Trenchers	0.510	2.440	5.810	0.460	0.440	0.740	535.800
Diesel Bore/Drill Rigs	0.600	2.290	7.150	0.500	0.490	0.730	529.700
Diesel Cement & Mortar Mixers	0.610	2.320	7.280	0.480	0.470	0.730	529.700
Diesel Cranes	0.440	1.300	5.720	0.340	0.330	0.730	530.200
Diesel Graders	0.350	1.360	4.730	0.330	0.320	0.740	536.300
Diesel Tractors/Loaders/Backhoes	1.850	8.210	7.220	1.370	1.330	0.950	691.100
Diesel Bull Dozers	0.360	1.380	4.760	0.330	0.320	0.740	536.300
Diesel Front End Loaders	0.380	1.550	5.000	0.350	0.340	0.740	536.200
Diesel Fork Lifts	1.980	7.760	8.560	1.390	1.350	0.950	690.800
Diesel Generator Set	1.210	3.760	5.970	0.730	0.710	0.810	587.300

CALCULATION SHEET-COMBUSTIBLE EMISSIONS-CONSTRUCTION-ALTERNATIVE FOSSILE FUEL

Emission factors (EF) were generated from the NONROAD2005 model for the 2006 calendar year. The VOC EFs includes exhaust and evaporative emissions. The VOC evaporative components included in the NONROAD2005 model are diurnal, hotsoak, running loss, tank permeation, hose permeation, displacement, and spillage. The construction equipment age distribution in the NONROAD2005 model is based on the population in U.S. for the 2006 calendar year.

Emission Calculations							
Type of Construction Equipment	VOC tons/yr	CO tons/yr	NOx tons/yr	PM-10 tons/yr	PM-2.5 tons/yr	SO2 tons/yr	CO2 tons/yr
Water Truck	0.559	2.628	6.970	0.520	0.508	0.939	680.454
Diesel Road Paver	0.020	0.078	0.259	0.018	0.017	0.039	28.363
Diesel Dump Truck	0.279	1.314	3.485	0.260	0.254	0.470	340.227
Diesel Excavator	0.162	0.619	2.190	0.152	0.148	0.352	255.313
Diesel Hole Cleaners\Trenchers	0.142	0.678	1.613	0.128	0.122	0.206	148.794
Diesel Bore/Drill Rigs	0.286	1.090	3.404	0.238	0.233	0.348	252.171
Diesel Cement & Mortar Mixers	0.387	1.473	4.621	0.305	0.298	0.463	336.228
Diesel Cranes	0.163	0.481	2.118	0.126	0.122	0.270	196.318
Diesel Graders	0.037	0.144	0.500	0.035	0.034	0.078	56.736
Diesel Tractors/Loaders/Backhoes	0.294	1.303	1.146	0.217	0.211	0.151	109.669
Diesel Bull Dozers	0.171	0.657	2.266	0.157	0.152	0.352	255.313
Diesel Front End Loaders	0.362	1.476	4.761	0.333	0.324	0.705	510.531
Diesel Aerial Lifts	0.838	3.284	3.622	0.588	0.571	0.402	292.324
Diesel Generator Set	0.205	0.636	1.011	0.124	0.120	0.137	99.411
Total Emissions	3.903	15.860	37.965	3.202	3.115	4.912	3561.853

Conversion factors	
Grams to tons	1.102E-06

CALCULATION SHEET-TRANSPORTATION COMBUSTIBLE EMISSIONS-CONSTRUCTION-ALTERNATIVE FOSSILE FUEL

Construction Worker Personal Vehicle Commuting to Construction Site-Passenger and Light Duty Trucks									
	Emission Factors		Assumptions				Results by Pollutant		
Pollutants	Passenger Cars g/mile	Pick-up Trucks, SUVs g/mile	Mile/day	Day/yr	Number of cars	Number of trucks	Total Emissions Cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	1.36	1.61	60	240	20	20	0.43	0.51	0.94
CO	12.4	15.7	60	240	20	20	3.94	4.98	8.92
NOx	0.95	1.22	60	240	20	20	0.30	0.39	0.69
PM-10	0.0052	0.0065	60	240	20	20	0.00	0.00	0.00
PM 2.5	0.0049	0.006	60	240	20	20	0.00	0.00	0.00
CO2	369	511	60	240	20	20	117.11	162.18	279.29

Heavy Duty Trucks Delivery Supply Trucks to Construction Site									
	Emission Factors		Assumptions				Results by Pollutant		
Pollutants	10,000-19,500 lb Delivery Truck	33,000-60,000 lb semi trailer rig	Mile/day	Day/yr	Number of trucks	Number of trucks	Total Emissions Cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	0.29	0.55	60	240	2	2	0.01	0.02	0.03
CO	1.32	3.21	60	240	2	2	0.04	0.10	0.14
NOx	4.97	12.6	60	240	2	2	0.16	0.40	0.56
PM-10	0.12	0.33	60	240	2	2	0.00	0.01	0.01
PM 2.5	0.13	0.36	60	240	2	2	0.00	0.01	0.02
CO2	536	536	60	240	2	2	17.01	17.01	34.02

Daily Commute New Staff Associated with Proposed Action									
	Emission Factors		Assumptions				Results by Pollutant		
Pollutants	Passenger Cars g/mile	Pick-up Trucks, SUVs g/mile	Mile/day	Day/yr	Number of Cars	Number of trucks	Total Emissions cars tns/yr	Total Emissions Trucks tns/yr	Total tns/yr
VOCs	1.36	1.61	40	365			-	0.00	-
CO	12.4	15.7	40	365			-	0.00	-
NOx	0.95	1.22	40	365			-	0.00	-
PM-10	0.0052	0.0065	40	365			-	0.00	-
PM 2.5	0.0049	0.006	40	365			-	0.00	-
CO2	369	511	40	365			-	0.00	-

Truck Emission Factor Source: MOBILE6.2 USEPA 2005 Emission Facts: Average annual emissions and fuel consumption for gasoline-fueled passenger cars and light trucks. EPA 420-F-05-022 August 2005. Emission rates were generated using MOBILE.6 highway.

CALCULATION SHEET-TRANSPORTATION COMBUSTIBLE EMISSIONS-CONSTRUCTION-ALTERNATIVE FOSSILE FUEL

Conversion factor:	gms to tons
	0.000001102

Carbon Equivalents	Conversion Factor
N2O or NOx	311
Methane or VOCs	25

Source: EPA 2010 Reference, Tables and Conversions, Inventory of U.S. Greenhouse Gas Emissions and Sinks;
<http://www.epa.gov/climatechange/emissions/usinventoryreport.html>

CARBON EQUIVALENTS

Construction Commuters	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	23.57	
NOx	311	0.69	
Total		24.25	303.54

Delivery Trucks	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	0.67	
NOx	311	173.42	
Total		174.09	208.11

Kirtland AFB staff and Students	Conversion	Emissions CO2 tons/yr	Total CO2
VOCs	25	-	
NOx	311	-	
Total		-	-

ONGOING EMISSIONS FROM DIESEL GENERATOR

Assumptions for Combustible Emissions					
Type of Construction Equipment	Num. of Units	HP Rated	Hrs/day	Days/yr	Total hp-hrs
Diesel Generator Set	2	286	24	365	5010720

Emission Factors							
Type of Construction Equipment	VOC g/hp-hr	CO g/hp-hr	NOx g/hp-hr	PM-10 g/hp-hr	PM-2.5 g/hp-hr	SO2 g/hp-hr	CO2 g/hp-hr
Diesel Generator Set	1.21	3.76	5.97	0.73	0.71	0.81	587.3

Emission factors (EF) were generated from the NONROAD2005 model for the 2006 calendar year. The VOC EFs includes exhaust and evaporative emissions. The VOC evaporative components included in the NONROAD2005 model are diurnal, hotsoak, running loss, tank permeation, hose permeation, displacement, and spillage. The construction equipment age distribution in the NONROAD2005 model is based on the population in U.S. for the 2006 calendar year.

Emission Calculations							
Type of Construction Equipment	VOC tons/yr	CO tons/yr	NOx tons/yr	PM-10 tons/yr	PM-2.5 tons/yr	SO2 tons/yr	CO2 tons/yr
Diesel Generator Set	6.681	20.762	32.965	4.031	3.920	4.473	3242.961
Total Emissions	6.681	20.762	32.965	4.031	3.920	4.473	3242.961

Conversion factors	
Grams to tons	1.102E-06

CALCULATION SHEET-FUGITIVE DUST-CONSTRUCTION-ALTERNATIVE FOSSILE FUEL

Construction Fugitive Dust Emissions

Construction Fugitive Dust Emission Factors

Emission Factor	Units	Source
General Construction Activities	0.19 ton PM10/acre-month	MRI 1996; EPA 2001; EPA 2006
New Road Construction	0.42 ton PM10/acre-month	MRI 1996; EPA 2001; EPA 2006

PM2.5 Emissions

PM2.5 Multiplier	0.10	(10% of PM10 emissions assumed to be PM2.5)	EPA 2001; EPA 2006
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Control Efficiency

0.50	(assume 50% control efficiency for PM10 and PM2.5 emissions)	EPA 2001; EPA 2006
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Project Assumptions

Construction Area (0.19 ton PM10/acre-month)

Duration of Construction Project	3	months
Length		miles
Length (converted)	0	feet
Width		feet
Area	6.00	acres

Conversion Factors

0.000022957	acres per foot
5280	feet per mile

Staging Areas

Duration of Construction Project	12	months
Length		miles
Length (converted)		feet
Width		feet
Area	0.00	acres

	Project Emissions (tons/year)			
	PM10 uncontrolled	PM10 controlled	PM2.5 uncontrolled	PM2.5 controlled
Construction Area (0.19 ton PM10/ac)	3.42	1.71	0.34	0.17
Staging Areas	0.00	0.00	0.00	0.00
Total	3.42	1.71	0.34	0.17

References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

Construction Fugitive Dust Emission Factors

General Construction Activities Emission Factor

0.19 ton PM10/acre-month Source: MRI 1996; EPA 2001; EPA 2006

The area-based emission factor for construction activities is based on a study completed by the Midwest Research Institute (MRI) Improvement of Specific Emission Factors (BACM Project No. 1), March 29, 1996. The MRI study evaluated seven construction projects in Nevada and California (Las Vegas, Coachella Valley, South Coast Air Basin, and the San Joaquin Valley). The study determined an average emission factor of 0.11 ton PM10/acre-month for sites without large-scale cut/fill operations. A worst-case emission factor of 0.42 ton PM10/acre-month was calculated for sites with active large-scale earth moving operations. The monthly emission factors are based on 168 work-hours per month (MRI 1996). A subsequent MRI Report in 1999, Estimating Particulate Matter Emissions from Construction Operations, calculated the 0.19 ton PM10/acre-month emission factor by applying 25% of the large-scale earthmoving emission factor (0.42 ton PM10/acre-month) and 75% of the average emission factor (0.11 ton PM10/acre-month).

The 0.19 ton PM10/acre-month emission factor is referenced by the EPA for non-residential construction activities in recent procedures documents for the National Emission Inventory (EPA 2001; EPA 2006). The 0.19 ton PM10/acre-month emission factor represents a refinement of EPA's original AP-42 area-based total suspended particle (TSP) emission factor in Section 13.2.3 Heavy Construction Operations. In addition to the EPA, this methodology is also supported by the South Coast Air Quality Management District and the Western Regional Air Partnership (WRAP) which is funded by the EPA and is administered jointly by the Western Governor's Association and the National Tribal Environmental Council. The emission factor is assumed to encompass a variety of non-residential construction activities including building construction (commercial, industrial, institutional, governmental), public works, and travel on unpaved roads. The EPA National Emission Inventory documentation assumes that the emission factors are uncontrolled and recommends a control efficiency of 50% for PM10 and PM2.5 in PM nonattainment areas.

New Road Construction Emission Factor

0.42 ton PM10/acre-month Source: MRI 1996; EPA 2001; EPA 2006

The emission factor for new road construction is based on the worst-case conditions emission factor from the MRI 1996 study described above (0.42 tons PM10/acre-month). It is assumed that road construction involves extensive earthmoving and heavy construction vehicle travel resulting in emissions that are higher than other general construction projects. The 0.42 ton PM10/acre-month emission factor for road construction is referenced in recent procedures documents for the EPA National Emission Inventory (EPA 2001; EPA 2006).

PM2.5 Multiplier

0.10

PM2.5 emissions are estimated by applying a particle size multiplier of 0.10 to PM10 emissions. This methodology is consistent with the procedures documents for the National Emission Inventory (EPA 2006).

Control Efficiency for PM10 and PM2.5

0.50

The EPA National Emission Inventory documentation recommends a control efficiency of 50% for PM10 and PM2.5 in PM nonattainment areas. Wetting controls will be applied during project construction (EPA 2006).

References:

EPA 2001. *Procedures Document for National Emissions Inventory, Criteria Air Pollutants, 1985-1999*. EPA-454/R-01-006. Office of Air Quality Planning and Standards, United States Environmental Protection Agency. March 2001.

EPA 2006. *Documentation for the Final 2002 Nonpoint Sector (Feb 06 version) National Emission Inventory for Criteria and Hazardous Air Pollutants*. Prepared for: Emissions Inventory and Analysis Group (C339-02) Air Quality Assessment Division Office of Air Quality Planning and Standards, United States Environmental Protection Agency. July 2006.

MRI 1996. *Improvement of Specific Emission Factors (BACM Project No. 1)*. Midwest Research Institute (MRI). Prepared for the California South Coast Air Quality Management District, March 29, 1996.

CALCULATION SHEET-SUMMARY OF EMISSIONS-ALTERNATIVE FOSSILE FUEL

Alternative 1 Construction Emissions for Criteria Pollutants (tons per year)									
Emission Source	VOC	CO	NOx	PM-10	PM-2.5	SO2	CO2	CO2 Equivalents	Total CO2
Combustible Emissions	3.90	15.86	37.97	3.20	3.12	4.91	3561.85	11904.82	15466.67
Construction Site-Fugitive PM-10	NA	NA	NA	1.71	0.17	NA	NA	NA	NA
Construction Workers Commuter & Trucking	0.97	9.06	1.25	0.02	0.02	NA	279.29	411.84	691.13
Total emissions-CONSTRUCTION	4.87	24.92	39.21	4.93	3.31	4.91	3,841	12,317	16,158
Ongoing Operational Emission Source									
Diesel Generators	6.68	20.76	32.97	4.03	3.92	4.47	3242.96	10419.22	13662.18
Total Ongoing Operational Emissions	6.68	20.76	32.97	4.03	3.92	4.47	3242.96	10419.22	13662.18
De minimis Threshold (1)	100	100	100	100	100	100	NA	NA	27,557

1. Pima County is in moderate non-attainment for PM-10

Carbon Equivalents	Conversion Factor
N2O or NOx	311
Methane or VOCs	25

Source: EPA 2010 Reference, Tables and Conversions, Inventory of U.S. Greenhouse Gas Emissions and Sinks;
<http://www.epa.gov/climatechange/emissions/usinventoryreport.html>

Date: 9/24/2004 1:35 PM

Sender: (b) (6)

Priority: Normal

Subject: FW: TCA PDT Draft Meeting Minutes of 21 September 2004

Author: (b) (6)

Date: 9/24/2004 1:35:00 PM

Priority: Normal

bcc:

To:

<SM

Subject: FW: TCA PDT Draft Meeting Minutes of 21 September 2004

(b) (6) here is the PDF just in case the download does not work from your system....

<<092104.pdf>>

From: (b) (6)

Sent: Friday, September 24, 2004 10:33 AM

(b) (6)

Subject: TCA PDT Draft Meeting Minutes of 21 September 2004

Please find attached links to the PDT meeting minutes and other recent uploads to the AERC webpage.... Our most recent activities includes a JTF-North deployment into Douglas, east of the POE, to constructed roadway and bollard fence. Two deployments are scheduled for 1 October, including lighting, roadway, and bollard fence into Naco, and lighting retro-fit, roadway and bollard fence into Douglas east of the POE....

Should you have additions, corrections, or comments on the meeting minutes, please reply directly back to this e-mail....

Meeting Minutes

<[https://\(b\) \(7\)\(E\)](https://(b) (7)(E))

Spending Plan

<[https://\(b\) \(7\)\(E\)](https://(b) (7)(E))

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(b)(6)

Senior Project Manager

(b)(6)



092104.PDF

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

MEETING MINUTES

Meeting Date and Time: 21 September 2004 @ 10:00 am
Meeting Location: Tucson Station
Meeting Purpose: TCA PDT Meeting
Distribution Date: 23 September 2004
Distributor: (b)(6)
Distribution:

(b) (6)

ACTION ITEMS

ACTION	RESPONSIBLE	STATUS
1. Contract for GSRC to prepare EA for RVS in Douglas AO - AERC has not received any funding for Douglas/Wilcox RVS project. Follow up with HQ BOR to determine status. (b)(6)	(b)(6)	Pending
2. Ephraim Ridge Report & Discussion should be started with Ephraim Ridge property owner regarding the appraisal. Report due 14 September.		Pending
3. Move the 1- 1/2" HDPEP waterline in Naco		Done
4. ROEs for Nogales Schematic Design for environmental surveys		Pending
5. Nogales - Rinker Materials bill follow-up		Pending – follow-up by (b)(6)

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

ACTION		RESPONSIBLE	STATUS
6.	Notify (b)(6) of Nogales Tunnels project and required coordination with GSA and the Deconcini POE	(b)(6)	Done
7.	FedEx out lighting plans to JTF-6 ASAP		Done
8.	Check on up coming deployments to determine if ROEs need to be extened or modified. A map showing where we have ROEs is to be provided.		Done
9.	APS needs to energize and de-energize the lighting project for JTF-6		Pending HDR & (b)(6)
10.	Need direction from DHS CBP on condemnation issue		Done
11.	Water Trucks into Naco for next deployment. To be driven by OBP personnel hauling water from DGL		Pending
12.	Fence repairs in NGL needed due deployment on Nogales ½ roadway construction. Need a 410D backhoe and a 14G Grader.		Done
Environmental Working Group			
1.	Multi Agency Coordination Meeting on Cabeza Preita NWR EA/EIS to be held 31 August in Phoenix. (b)(6) is the POC.	EWG	Done

MILITARY DEPLOYMENTS

Arizona Army National Guard

(b)(6)

WWD – West of DGL POE

- Whitewater Draw is open to Patrol traffic. Final grading and paving scheduled next spring & summer.

Scheduled Deployments FY'05

- Alaska ANG in February @ WWD
- Colorado ANG in May @ WWD
- Alabama ANG in June and July (3 rotations)
- Arizona National Guard – June 2005 (tentative to pave WWD)
- Arizona National Guard – July 2005 (tentative to pave Nogales ½ mile roadway)

JTF-6

(b)(6)

Scheduled Deployments FY'05

- Douglas (Roadway Sta. 151+73E to Sta. 230+00E & LWCs) CSE Co, 41st Engr Bn JT3995-05 12 Sept – 28 Oct
- Naco/Douglas (as noted) 46th Engr Bn 27 Sept – 6 Nov
 - **Naco**
 - Roadway Sta. 16+00W to Sta. 83+00W & LWCs
 - **Douglas**
 - Retro-fit of lights East of Airport Road (note: this is replacement of existing fixtures and assemblies. The full retro-fit will require additional poles between the existing ones)
 - Roadway Sta. 230+00E to 334+00E & LWCs, including Dip #5
- Naco (New Lighting East of POE, working east for 2.5 miles) 917th Prime Beef Squadron

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

ENGINEERING

Baker Eng.

(b)(6)

- Naco 10 Mile Roadway Project
 - Naco 4 Miles East (Eastern portion of Naco 10 Mile Roadway) 100%
- Nogales 10 Mile Schematic Design, (significant real estate issues and concerns regarding slopes)
- Douglas, Lighting, design needed for October deployment by JTF-6 (Retro-fit complete – current deployment will install new lights on existing poles only – future deployments will place additional poles)
- Douglas, Construction Oversight, and Staking. (see project completion reports and pending deployments)
- Douglas, International Ditch, No activity
- Naco, Lighting (5 Miles) Split East and West of the POE
- Naco, Construction Oversight and Staking (see project completion reports and pending deployments)
- Nogales, 1-1/2 Miles Roadway (design complete, Real Estate underway)
- Nogales, Construction Oversight and Staking (see deployments)
- Permanent Survey Markers, being placed with deployments, No Activity
- Temporary Vehicle Barriers (SON, NGL, TUC Stations) No activity

FY'05 Engineering Projects

(b)(6)

SOW for these items below into AERC for processing:

- 2 additional miles of roadway in Douglas
- 10 additional miles of roadway in Naco
- relocation of lights in Nogales
- 2 additional miles of roadway in Nogales
- 5 miles in Sonoita
- Construction management services will be required for at least a 90 day deployment of 300 soldiers by JTF-6 and a 2 week deployment by a National Guard Unit.
- Engineering support for Cabeza Prieta EA

ENVIRONMENTAL

GSRC

(b)(6)

- **PEIS Tucson & Yuma (AERC 225).** The Revised Draft PEIS for the Tucson/Yuma Sectors will be delivered on Monday to (b)(6) for submittal to the EPA. (b)(6) will need to hand-deliver 5 copies to the EPA Monday or Tuesday in order to have the NOA published in the Federal Register on Friday 1 Oct. The PEIS modification will be negotiated by the end of the week. (b)(6) will coordinate with GSRC to determine the number of hard copies versus CD copies.
- **Ephraim Ridge (Phase I ESA for Ephraim Ridge)** GSRC's cost estimate for Ephraim Ridge ESA is still at Fort Worth. (b)(6) sent an e-mail mandating the ESA to cover the entire 82 acres. The EWG agreed to proceed with the entire site.
- **Whitewater Draw 404 Permit.** GSRC is awaiting comments from (b)(6) on the Whitewater Draw Mitigation plan. (b)(6) sent a copy of the MOA to CBP Office of Counsel (OC) for review; it is currently at Indianapolis. OC has requested that a copy of the MOA not be sent to City of Douglas until review is complete.

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
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OFFICE OF BORDER PATROL - TUCSON SECTOR

- **Naco BA** GSRC is currently revising the Tucson BA to include ABCI issues in order to cover the emergency consultation.
- **The San Pedro River LWC BA** The San Pedro River LWC BA was submitted 20 August for internal review. Comments deadline has been extended to 6 October. (b)(6) suggested that we send the cost estimates and preliminary engineering to BLM and USFWS prior to revising the BA. GSRC will need more engineering designs prior to completing the BA and submittal to the BLM and USFWS. (b)(6) will investigate the possibility of having Baker provide preliminary designs.
- **Vehicle Barriers - Tohono O'odham Nation (TON) (AJO & CAG Stations)** The draft SOW for the permanent vehicle barriers on the TON (which covers CAG and AJO) has been forwarded to Fort Worth for staffing. (b)(6) is going to follow up to determine existing funding sources and what our direction will be. This project might be included as part of the West Arizona Tactical Infrastructure project.
- **Temporary Vehicle Barriers**, The Temporary Vehicle Barriers preliminary final EA is being revised and should be sent out for internal review next week.
- **Nogales Schematic Design**, GSRC needs ROEs to initiate surveys in Nogales for the 10-mile road project. About 30% of the ROEs have been returned, most of which are favorable. However, some (on east side of POE) have rejected the ROEs. Might have to condemn--but will need to get decision from Indianapolis. See Real Estate.
- **The Ajo and Tucson Station RVS** The Ajo and Tucson Station RVS EAs are still on holding pending information regarding the access road and power ROWs. GSRC is completed the reconnaissance surveys on the new sites on the Organ Pipe Cactus National Monument. L3 is supposed to have an access road report, including RVS coverage maps, by Wednesday, 22 September 2004.
- **Ajo Station Expansion** GSRC submitted the preliminary draft EA (PDEA) for the Ajo Station expansion on 3 September and is waiting for comments.
- **Sonoita Border Road** The Sonoita border road preliminary draft EA comments were due 17 September. (b)(6) reported that (b)(6) was concerned that a preferred alternative was not identified; GSRC intentionally did not identify one since we felt BP should make that decision. Alternative 4 and 5 might push the project into an EIS. Will discuss in a conference call at 3:00 CDT on Friday. Northland Research will excavate the funerary site as soon as GSRC receives the NTP from the USACE.
- **(b)(7)(E) checkpoint** near (b)(7)(E) has not been started -- AERC has not received the funds and GSRC has not been scoped to prepare the supplemental EA.
- **Douglas/Willcox RVS** No indication has been provided regarding the funding for the Douglas/Willcox RVS project. (b)(6) is now an A-Chief at HQ BOR and is in charge of RVS.
- **Interagency Coordination** EWG met with Federal and state agencies, and TON on 30 August 2004 to plan the western Arizona infrastructure project. A lot of good input and feedback. (b)(6) has provided seed money to start the environmental analysis process. (b)(6) is staffing this work order and has received Resources Manage P and INRMP from BLM and BMGR, respectively. (b)(6) need to get copies of the minutes from that meeting-- (b)(6) is making the final revisions to the minutes and will forward to all participants. (b)(6) is drafting a letter to agencies requesting their participation in another planning meeting and their status of as a cooperating agency. We will still need to decide whether to segment the vehicle barriers from the rest of the road improvements projects, but there has been some indication that this will be the case [FYI--in Yuma PDT today, 22 Sept, Yuma Sector indicated their agreement to separate the two projects]

**TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR**

- **Naco RVS** GSRC visited a new alternate site for the Arnie's Trestle RVS site in Naco. (b)(6) is staffing the mod for this effort and the additional work items for the Tucson/Ajo RVS projects.

(b)(6) is staffing the work order for GSRC for the Agency Coordination Technical Assistance Upcoming FY 05 environmental work: Nogales lights relocation--will modify current 092 contracts. (b)(6)

(b)(6) felt that the FY 05 SOW needs to include tasks for GSRC to prepare background information (PCN) to ensure that we have authority to work under NWP for all border road work (b)(6)

(b)(6) agreed to send draft SOWs to (b)(6)

REAL ESTATE

USACE

(b)(6)

- Douglas Lighting (5 Miles) Split East and West of the POE, No Activity
- Douglas, 13-Miles Roadway West of POE, No Activity
- Douglas, International Ditch, No Activity
- Naco, Lighting (5 Miles) Split East and West of the POE, No Activity
- Nogales, 2-Miles Roadway East of POE, see attached update from (b)(6)
- Nogales, Construction & ROW Acquisition, see attached update from (b)(6)
- Nogales, Schematic Design, see attached update from (b)(6)
- Sonoita, Preliminary Design, and Coordination, see attached update from (b)(6)
- Permanent Survey Markers, No Activity
- Temporary Vehicle Barriers, No Activity

NLC Laguna Nigel

(b)(6)

- Ephraim Ridge Reclamation, rescheduled report due 24 September 2004

PROCUREMENT

AERC

(b)(6)

- Naco & Douglas deployments (JTF-6) upcoming deployments in September through November, BOMs in place and most items procured. Remaining miscellaneous items for lighting projects pending information from (b)(6) (subsequently, these items under procurement)
- Nogales deployment (JTF-6) completed, follow-up repair work by (b)(6) is underway

CONSTRUCTION

Kleinfelder

(b)(6),
(b)(7)

Report on current Douglas deployments. To access a website that has updates, go to:

www.kleinfelder.com

-Click on the **Client Link** link at the left of the page.

-Select **Border Patrol Construction Oversight** from the drop-down menu.

-For a User Name enter (b)(7)(E)

-For a Password enter (b)(7)(E)

(The User Name and Password are case-sensitive, so make sure you don't capitalize.)

-Select the deployment you wish to view

OTHER ITEMS

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

(b)(6) reported that (b)(6) is in charge of Tactical Infrastructure at HQ BOR;
(b)(6) is in charge of leasing; (b)(6) is in charge of facilities. (b)(6) replaced
(b)(6) as the Deputy Chief over the entire team.

NEXT MEETING

26 October 2004 @ 10:00 – (Tentative) Tucson Station
23 November 2004 @ 10:00 – Tucson Station
21 December 2004 @ 10:00 – (Tentative) Tucson Station

(b)(6)

From: (b)(6)
Sent: Wednesday, September 15, 2004 9:19 AM
To: (b)(6)
Cc:
Subject: RE: TCA PDT Meeting next Tuesday

(b)(6)

Please remove my name from the mailing list. The L-3/GSI RVS contract expires at the end of this month. Future coordination of RVS with PDT Projects will probably pick up again once the Border Patrol awards a new contract sometime in the future.

(b)(6)

From: (b)(6)
Sent: Wednesday, September 15, 2004 9:48 AM

(b)(6)

Subject: TCA PDT Meeting next Tuesday

This is a reminder of the meeting next Tuesday at the Tucson Station. The Agenda can be found at the following link.

[\(b\)\(7\)\(E\)](https://(b)(7)(E))

We will be having an Environmental Working Group meeting at 8:30 Arizona Time (8:30 PDT.....10:30 CDT..... 11:30 EDT) at (b)(7)(E)

(b)(6)

Senior Project Manager

(b)(6)

9/15/2004

(b)(6)

From: (b)(6)
Sent: Monday, September 13, 2004 8:27 AM
To: (b)(6)
Subject: Border Patrol PDT Meeting

(b)(6)

I'll be out of town and unable to participate in next weeks PDT meeting. (b)(6) will try to be available but just in case he can't participate here is my latest information.

If you have any questions, please give me a call.

(b)(6)

Action Item 4 - All ROE's have gone out. Currently, we have received approximately 30% back. While we have received several favorable responses, there are several owners who have refused to grant access. A decision needs to be made whether or not the Border Patrol wants to take an aggressive approach to obtain these rights.

Action Item 8 - Information has been provided on the Douglas and Naco deployments

Real Estate Issues:

1. Douglas Lighting - No action at this time
2. Douglas, 13 Mile Roadway West of POE - ROE's and necessary permissions have been obtained
3. Douglas International Ditch - No activity
4. Naco Lighting - West of the POE - Access rights have been obtained from the State of Arizona, (b)(6);(b)(7)(C)
(b)(6) In addition, the Roosevelt Area access issue between Border Patrol and BLM has been resolved.

East of the POE - All work must be confined to the Roosevelt Area. Access must be over public roads and streets.

5. Nogales 2 Miles Roadway East of the POE - The first 0.5 mile of the project has been completed. Survey and mapping for the 1.5 mile project has been completed. The appraisal for this portion of the project will be restarted next week.
6. Nogales Construction and ROW Acquisition - No activity
7. Nogales Schematic Design - See Action Item 4
8. Sonita, Preliminary Design and Coordination - ROE's have been obtained
9. Permanent Survey Markers - No activity
10. Temporary Vehicle Barriers - No activity

9/15/2004

(b)(6)

From:

(b)(6)

Sent:

Thursday, September 16, 2004 10:32 AM

To:

(b)(6)

Cc:

Subject:

Ephraim Ridge

(b)(6)

I just spoke to (b)(6) and there may be some confusion regarding what we need for Ephraim Ridge relative to the ASTM Phase I ESA and the amount of acreage. Whether we lease or purchase the property, we may not be able to leave an unusable remnant. In that event, we need to consider the entire property. As a result, we need to have the Phase I to cover the entire 82-acre site.

(b)(6) just told me his report would be completed next Friday (9/24/04).

(b)(6)

Environmental Officer

United States Department of Homeland Security Customs and Border Protection
National Logistics Center, Laguna 24000 Avila Road, P.O. Box 30800 Laguna
Niguel, CA 92607-0080

Phone:

Fax:

E-Mail

(b)(6)

Date: 7/9/2004 2:31 PM

Sender:

To:

(b)(6)(b)(7)(C)

bcc:

Priority: Normal

Subject: Draft Agenda

Author:

(b)(6)

Date: 7/9/2004 2:31:00 PM

Priority: Normal

bcc:

To:

(b)(6)

To:

(b)(6)

Subject: Draft Agenda

(b)(6)

Please let me know if you need any changes to this

agenda.... I

plan to send it out the end of next week...

<<072704AD.pdf>>

(b)(6)

Senior Project Manager

(b)(6)



072704AD.PDF

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

MEETING AGENDA

Meeting Date and Time: 27 July 2004 @ 10:00 am
Meeting Location: Tucson Station

MEETING PURPOSE

TCA PDT Meeting

INTRODUCTIONS

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION		RESPONSIBLE
1.	Follow up on contract for GSRC to prepare EA for RVS in Douglas AO - AERC still has not received any funding for Douglas/Wilcox RVS project. (b)(6) will follow up with HQ BOR to determine status. (b)(6)	(b)(6)
2.	Lighting design test follow up with Castro Electric. Scope for Baker Design.	
3.	Ephraim Ridge Report (pending appraisal)	
4.	Move the 1½" HDPEP waterline in Naco	
5.	Asphaltic Concrete arranged for August National Guard deployment	
6.	Need pictures and limits of project for "project description" forwarded to HDR	
7.	Support Request for large contingent of soldiers into TCA, including Cabeza Preita	
8.	Comments due 27 July 2004 on Naco Roadway – 6 Miles west on the Naco 10 Mile Roadway Project	
9.	Discussion should be started with Ephraim Ridge property owner regarding the appraisal.	
ACTION Environmental Working Group		RESPONSIBLE
1.	Cabeza Prieta EA SOW 13 July Conference Call – include coordination with Yuma Sector / SOW / funding issues	(b)(6)
2.	Contract for GSRC (404 permitting issues)	

10:15 – 10:20 RVS (information only)

From (b)(6) ".....RVS coordination with the Border Barrier PDT is not being discontinued – however our current focus is on establishing a forum where support of RVS is its primary objective. At the present time L-3/GSI will attend the RVS Meetings in lieu of the PDT Meetings."

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

10:20 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard (note schedule at the end of this agenda)

(b)(6)

WWD – West of DGL POE

- Oregon National Guard – June 2004 (Completed)
- Alaska National Guard - May 2004 (Completed)

Douglas Roadway West of POE

- Illinois N.G. 10 July 2004 (underway @ WWD and 1000' of Bollard Fence and Landing Mat Fence)

JTF-6 (note schedule at the end of this agenda)

(b)(6)

Scheduled Deployments FY'04

- Naco (Fence & Barriers) 917th Prime Beef Squadron 1 May - 18 Jun (Complete)
- Douglas (Low-water crossings and Bollard Fence) MWSS 373 1-30 Jun (Complete)
- Naco (Low-water crossings) MWSS 371 6 Jul - 6 Aug (Underway)
- Nogales (Patrol Roads) 10 Jul - 23 Aug (Underway)
- Douglas (Patrol Roads & Fence) CSE Co, 41st Engr Bn JT3995-05 12 Sept – 28 Oct
- Naco/Douglas (as noted) 46th Engr Bn 27 Sept – 6 Nov (tentative deployment and approximate dates)

Naco

- Lights (2.5 miles) west of the Naco POE.
- 1.2 miles of road, 5 LWC, 5 Bollard Fence west of the Naco POE. Note: the waterline must be moved.
- 1.0 mile of road past the last road project in Naco west of the POE.

Douglas

- Retro fit of lights.
- LWC #5

10:45 – 11:15 ENGINEERING

Baker Eng. -

Douglas, 13 Miles of Roadway
Douglas, Lighting
Douglas, Construction Oversight, and Staking.
Douglas, International Ditch, Preliminary and Final Design
Naco, Lighting (5 Miles) Split East and West of the POE,
Naco, Primary Fencing, Preliminary and Final Design
Naco, Construction Oversight and Staking
Naco, 10-miles Roadway, Preliminary and Final Design
Nogales, 1-1/2 Miles Roadway
Nogales, Construction Oversight and Staking
Nogales, Aerial West of Nogales
Nogales, Schematic Design
Sonoita, Preliminary Design (map not shown)
Permanent Survey Markers (all stations)
Temporary Vehicle Barriers (all stations)

11:15 – 12:00 ENVIRONMENTAL

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

GSRC - updates and discussion
PEIS Tucson & Yuma (AERC 225)
BA - Operations - Tucson & Yuma (AERC 51)
Whitewater Draw 404 Permit
Checkpoint - SR 85 (AERC 227)
Checkpoints TON (AERC 499)
Naco BA
Temporary Vehicle Barriers (AJO, TUC, CAG, NGL, & SON Stations)
Nogales Schematic Design
Cabeza Prieta Road Report
Ephraim Ridge
Sonoita Roadway

12:00 – 1:00 LUNCH

1:00 – 1:30 REAL ESTATE

USACE – (b)(6)
Douglas Lighting (5 Miles) Split East and West of the POE
Douglas, 13-Miles Roadway West of POE
Douglas, International Ditch
Naco, Lighting (5 Miles) Split East and West of the POE
Nogales, 2-Miles Roadway East of POE
Nogales, Construction & ROW Acquisition
Nogales, Schematic Design
Sonoita, Preliminary Design, and Coordination
Permanent Survey Markers
Temporary Vehicle Barriers
(b)(6)
Ephraim Ridge Reclamation

1:30 – 1:45 PROCUREMENT

Whitewater Draw (National Guard)
Naco & Douglas deployments (JTF-6)
Nogales deployment (JTF-6)

1:45 – 2:00 CONSTRUCTION

Report on Whitewater Draw, Naco, Douglas, and Nogales deployments by Kleinfelder

To access a website that has updates, go to:

www.kleinfelder.com

-Click on the **Client Link** link at the left of the page.

-Select **Border Patrol Construction Oversight** from the drop-down menu.

-For a User Name enter (b)(7)(E)

-For a Password enter:

(The User Name and Password are case-sensitive, so make sure you don't capitalize.)

-Select the deployment you wish to view

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

OTHER ITEMS

NEXT MEETINGS

24 August 2004 – HDR Phoenix, 10:00 am

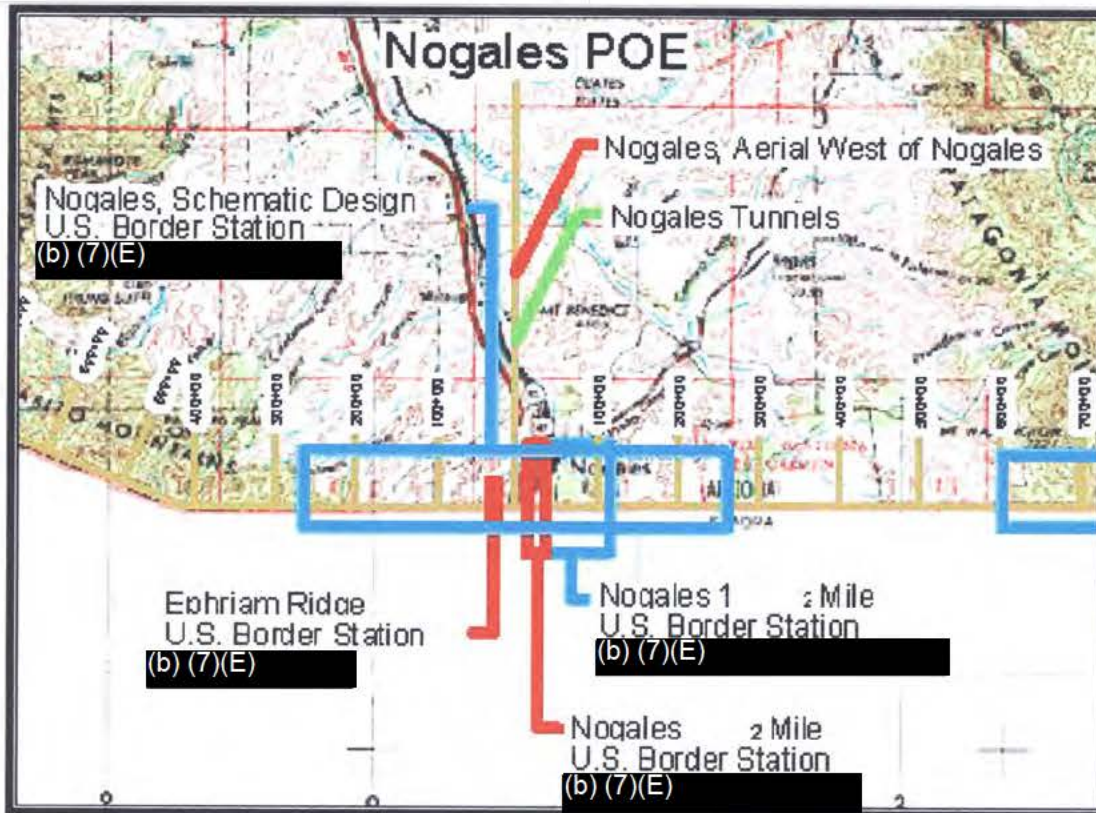
14 September 2004 – Tucson Station, 10:00 am



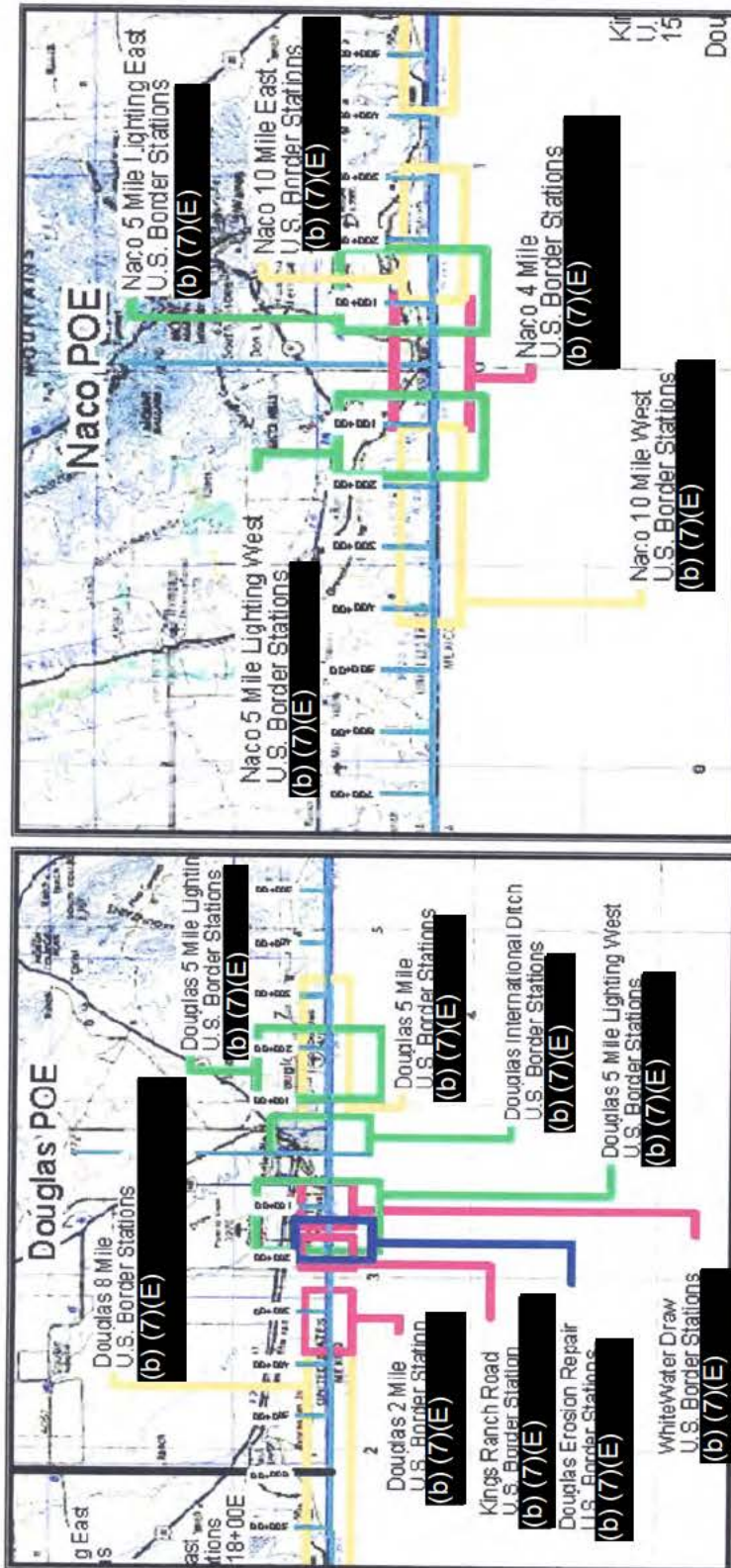
Before and After Picture of Low Water Crossing Number 11 (Provided by (b)(6) USMC)

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

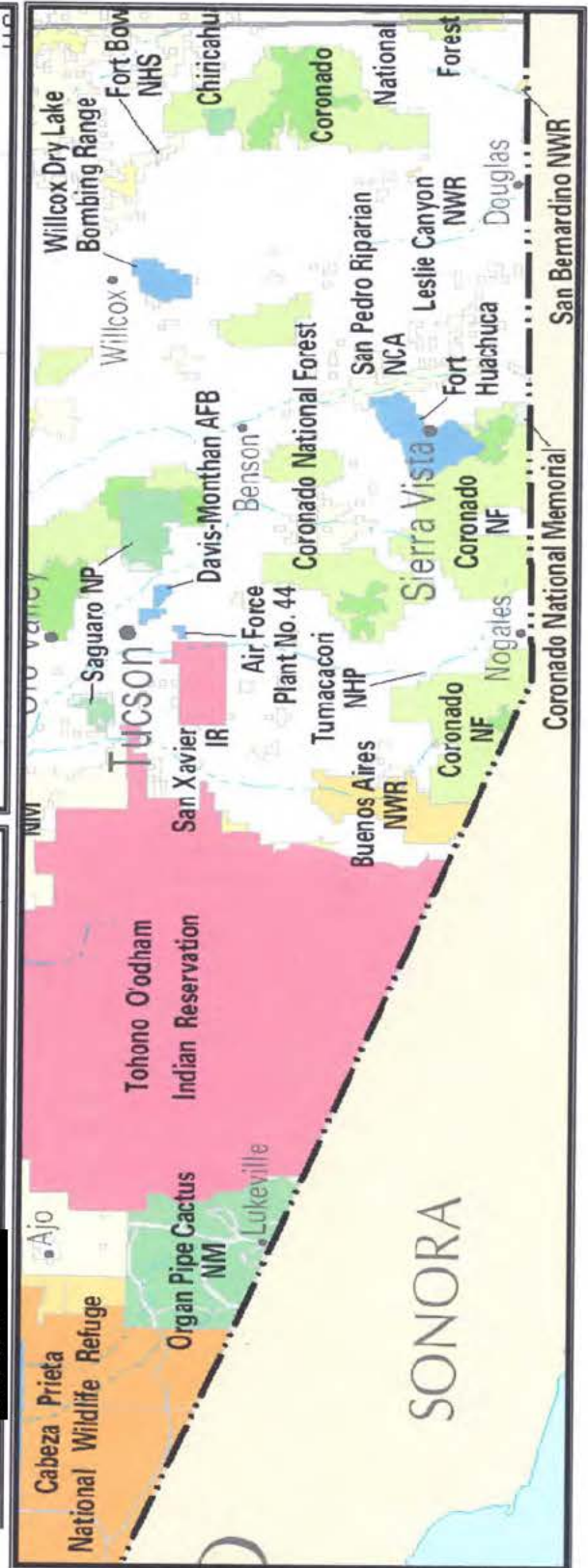
FY04 TUCSON SECTOR DEPLOYMENTS									
Task Name	Start	2nd Quarter			3rd Quarter			4th Quarter	
		Feb	Mar	Apr	May	Jun	Jul	Aug	
Naco, Az									
JTF-6 (MWSS 272 - LWC/Road/Bollard Fence) JT-3706-0	Tue 2/10/04								
JTF-6 (917th Prime Beef - 2 Miles Primary Fence) JT-3998	Mon 5/3/04								
JTF-6 (MWSS 371 - 4 Caps for the LWC's) JT-4070-04	Tue 7/6/04								
Douglas, Az East of POE									
JTF-6 (B Co, 8th ESB - 1.5 Miles of Road) JT-2795-04	Tue 2/10/04								
JTF-6 (MWSS 373 - LWC's 10, 11 & 12) JT-4070-04	Wed 5/2/04								
Nogales, Az									
JTF-6 (854th En. Bn. - CbtHvy) JT-2793-04	Mon 7/12/04								
Douglas, Az (Whitewater Draw - West of POE)									
Oregon National Guard - 30 Soldiers	Sat 5/5/04								
Alaska National Guard	Mon 5/3/04								
Arizona National Guard - Paving WWD (Tentative)	Fri 8/6/04								
Douglas, Az (West of POE)									
Illinois National Guard (LWCs @ King Ranch Rd.)	Sat 7/10/04								



BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL



6 of 6



Date: 6/2/2004 11:34 AM

Sender:

To:

(b)(6)(b)(7)(C)

bcc:

Priority: Normal

Subject: FW: TCA PDT Meeting Minutes

Author:

(b)(6)

Date: 6/2/2004 11:34:00 AM

Priority: Normal

bcc:

To:

To:

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HQ-

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(b)(6)

(b)(6)

Subject: FW: TCA PDT Meeting Minutes

Please find attached the revised (based on comments from (b)(6) meeting minutes from the TCA PDT held on Tuesday at the Tucson Station.

Accomplishments this month include successful completion of a very difficult mission at Whitewater Draw (Douglas) by the Alaska National Guard, 100% design submittal for 3.6 miles of roadway east of Douglas POE, and the procurement of material for 2 deployments and fence material for USBP forces to construct.

Also, the construction progress can be followed on the web page listed below:

To access the site go to:

(b) (7)(E)

- Click on the Client Link link at the left of the page.
- Select Border Patrol Construction Oversight from the drop-down menu.
- For a User Name enter (b) (7)(E)

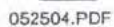
For a Password enter:

The User Name and Password are case-sensitive, so make sure you don't capitalize.

- Select the deployment you wish to view
- Click on one of the following links:

<<052504.pdf>>

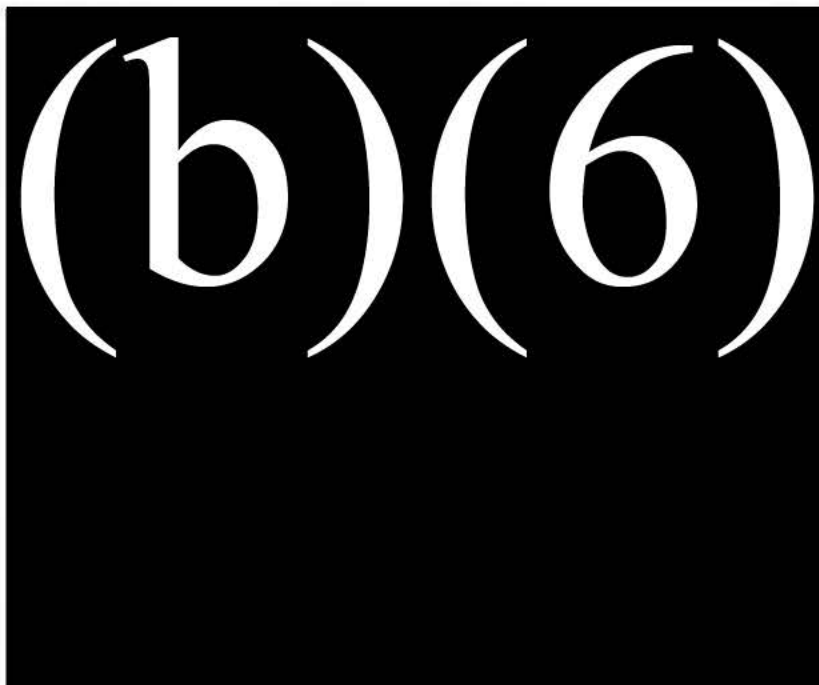
(b)(6)



**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

MEETING MINUTES

Meeting Date and Time: 25 May 2004 – 10:00 am
Meeting Location: Tucson Station
Distribution Date: 28 May 2004
Distributor: (b)(6)
Distribution:



MEETING PURPOSE

TCA PDT Meeting

ACTION ITEMS

ACTION		RESPONSIBLE	STATUS
1.	Follow up on contract for GSRC to prepare EA for RVS in Douglas AO - AERC still has not received any funding for Douglas/Willcox RVS project. (b)(6) will follow up with HQ BOR to determine status. (b)(6)	(b)(6)	Pending, (b)(6) to Check
2.	Lighting design test follow up with Castro Electric. Scope for Baker Design.		Done, Pending Baker Response
3.	Ephraim Ridge Report		Pending
4.	Move the 1" HDPEP waterline in Naco		Pending
5.	100% Naco 10 mile 22 June 2004		Pending
6.	100% remainder of 5 miles DGL East of POE 27 May 2004		Done

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

ACTION	RESPONSIBLE	STATUS
7. Asphaltic Concrete arranged for August National Guard deployment	(b)(6)	Douglas contract in place, (b)(6) to provide quantity, (b)(6) to procure
8. BOM and order for USBP landing mat fence construction in DGL	(b)(6)	Done
9. 3.6 Miles Douglas comments due 11 May	(b)(6)	Done
10. Corridor Report comments due 11 May	(b)(6)	Done
11. 15% Nogales Design due 11 May	(b)(6)	Done (at PDT)
12. SOW for GSRC to do a Phase I on Ephraim Ridge property	(b)(6)	Done
ACTION		
Environmental Working Group		
1. San Pedro engineering recommendations, due 11 May	(b)(6)	Done (follow-up based on (b)(6) comments)
2. Copies of UAV environmental documents for JTF-6 missions to (b)(6)	(b)(6)	Pending
3. Narrow down options on San Pedro water mitigation plans	(b)(6)	Pending data from (b)(6)
4. WWD 404 permit mitigation plan – GSRC contract to contracting.	(b)(6)	Pending, (b)(6) to follow-up

RVS

IMC update attached to these minutes provided by (b)(6) (correction per (b)(6) IMC was purchased by L-3/GSI and is no longer in existence. All RVS activities are not under L-3/GSI; correction per (b)(6) noted that RVS was on hold pending contract resolution with GSA)

MILITARY DEPLOYMENTS

Arizona National Guard

(b)(6)

WWD – West of DGL POE

- Successful mission by the Alaska National Guard in placing WWD foundation during May. Photos and reports of construction can be found at the Kleinfelder Webpage (SEE CONSTRUCTION FOR LINK)
- Oregon National Guard – 5 to 19 June, 30 soldiers

Douglas Roadway West of POE

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JTF-6

(b)(6)

Scheduled Deployments FY'04

- Naco (Fence & Barriers) 917th Prime Beef Squadron 1 May - 15 June

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
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BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

- Douglas (LWCs 11, 12, & 13 and Bollard Fence) MWSS 373 1-30 June. (b)(6) to arrange survey support prior to units arrival.
- Naco (Low-water crossings) MWSS 371 6 Jul - 6 Aug ((b)(6)(b)(7)(C))
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ENGINEERING

Baker Eng. - (b)(6) delivered the following products at the PDT meeting:

100% Douglas 3.6 Miles West of Douglas POE

Geotechnical Study Report Naco 10-Mile Roadway

Geotechnical Study Report Douglas 3.6 Miles ((b)(7)(E))

Nogales Schematic Design (15% Design Nogales 10 Mile Roadway)

Discussions centered on the Nogales schematic design. Baker presented a GIS overview and detail of the design, including land ownership. This facilitated answers to questions on environmental survey corridors and real estate issues.

Maps at the end of these minutes depict the active projects and where deliverables pertain. (b)(6) requested maps depicting both facilities constructed and those under design. (b)(6) was tasked with development of this map.

- Douglas, Lighting, pending NTP
- Douglas, Construction Oversight, and Staking. (see project completion reports and pending deployments)
- Douglas, International Ditch, Preliminary Design to begin
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- Naco, Lighting (5 Miles) Split East and West of the POE, Pending NTP
- Naco, Primary Fencing,
- Naco, Construction Oversight and Staking (see project completion reports and pending deployments)
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- Nogales, 1-1/2 Miles Roadway (design complete, note Real Estate)
- Nogales, Construction Oversight and Staking (pending deployment)
- Nogales, Aerial West of Nogales (done)
- Nogales, Schematic Design (complete, pending comments from PDT)
- Permanent Survey Markers, being placed with deployments
- Temporary Vehicle Barriers (SON, NGL, TUC Stations). note EA development below

ENVIRONMENTAL

(b)(6) from GSRC updated the PDT
PEIS Tucson & Yuma (AERC 225)

The Revised Draft PEIS for the Tucson/Yuma Sector Operations is on hold pending receipt of information concerning expanded operations relative to the ABC Initiative. (b)(6) has requested this information from each line station and provided a deadline of 28 May. GSRC has received information regarding the number of ground sensors and agents assigned to each station. Schedule of the next version of the Revised Draft PEIS is dependent upon receipt of this information and the UAV documentation from OSI.

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

BA – Operations – Tucson & Yuma (AERC 51)

The Tucson BA is also on hold pending receipt of the information described above. (b)(6)(b)(7)(E)

(b)(6) still needs information regarding agents and their dependents for the Naco Station in order to narrow down options for water mitigation within the San Pedro Basin. Conceptual designs of the crossing at San Pedro were provided by HDR. (b)(6) will provide comments to (b)(6) and the revised description will be distributed by 4 June. (b)(6) stated that the (b)(7)(E) Station would prefer to have a low water crossing at the border, with vehicle barriers to halt cattle traffic.

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Cabeza Prieta Road Report

The Cabeza Prieta road report has been finalized. A SOW for an EA to complete the work on the remaining 18 miles has been forwarded to (b)(6) for staffing, (b)(6) to follow up. (b)(6) is still attempting to get funds to construct vehicle barriers on the Cabeza Prieta NWR as a mitigation action. The PDT agreed to go forward with the Cabeza Prieta road EA (subsequent decisions were made to add the vehicle barriers to this EA as well). A SOW for an EA to complete the work on the remaining 18 miles has been forwarded to (b)(6) for staffing.

Ephraim Ridge Reclamation

The SOW for a Phase I ESA for Ephraim Ridge has been submitted to (b)(6)(b)(7)(E) for staffing. The Phase I ESA will address the entire 82-acre parcel (expanded from 70 acres). (b)(6) reminded the PDT to use the term Phase I instead of ESA due to possible conflicting terminology.

Checkpoints (b)(7)(E) (AERC 499) and (b)(7)(E) (AERC 227)

The (b)(7)(E) checkpoint near (b)(7)(E) has not been started--AERC has not received the funds and GSRC has not been scoped to prepare a supplemental EA. (b)(6) stated that (b)(6) (Luke AFB/BMGR) will need to be coordinated with during the preparation of the EA.

Douglas/Willcox RVS project

AERC still has not received any funding for Douglas/Willcox RVS project. (b)(6) will follow up with HQ BOR to determine status.

Nogales Schematic Design

The 15% design was received from Baker. GSRC will need to identify the proposed survey corridor and then Sacramento will obtain the ROEs.

Ajo Phase I ESA

Comments were received from (b)(6) on the Ajo Phase I ESA; revisions are being made. The draft EA for the expansion is still on hold pending coordination. (b)(6) reported that the BLM withdrawal application was submitted to BLM on 21 May.

Temporary Vehicle Barriers (SON, NGL, TUC Stations)

The Temporary Vehicle Barriers preliminary draft EA was sent out on 24

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
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TUCSON SECTOR - U.S. BORDER PATROL**

Monday. The deadline for comments is 15 June. The draft SOW for the permanent vehicle barriers on the TON (which covers CAG and AJO) has been forwarded to Fort Worth for staffing.

Sonoita Roadway

GSRC has completed the biological surveys for the Sonoita border road project; cultural resources surveys were scheduled to start but will now be on hold pending the receipt of a final ROE for access road A. GSRC had understood that all ROEs had been obtained.

The Ajo and Tucson Station RVS EAs are still on hold pending information regarding the access road and power ROWs, as well as any alternate locations. (per (b)(6))

(b)(6) (BLM) stated that the 3 Points site was owned by BLM but that the School District has a Recreation and Public Purposes lease on the property and has two more years to prove up on it. Thus, the Tucson Sector needs to work out an arrangement with the school district.")

under Checkpoints, you need to complete the first sentence; 3) under Ajo Phase I ESA-

I would change the name to just Ajo Land or Ajo Expansion and it was the draft withdrawal application that was submitted for review by BLM.

REAL ESTATE

USACE - (b)(6)

Douglas Lighting (5 Miles) Split East and West of the POE, pending NTP Douglas, 13-Miles Roadway West of POE, ROEs out for signature and (b)(6) (b)(6) is coordinating with BLM. Deployments have ROEs in place for FY'04 Douglas, International Ditch, pending NTP

Naco, Lighting (5 Miles) Split East and West of the POE, pending NTP Nogales, 2-Miles Roadway East of POE, (b)(6) beginning acquisition process, boundary surveys and legal description due from Baker Eng. And decision on aquastion of land between the border and the roadway Nogales, Construction & ROW Acquisition (Pending Alignments) Nogales, Schematic Design, USFS ROEs in place, private property pending final alignments

Sonoita, Preliminary Design, and Coordination, USFS in place, continuing ROE issues on private property, one owner to be followed up with ASAP based on Baker GIS data, see Sonoita Station US/Mexico Corridor Report Permanent Survey Markers, pending NTP Temporary Vehicle Barriers, Pending NTP

(b)(6) Ephraim Ridge Reclamation, Final report pending, (b)(6) assigned development of an appraisal for the entire property.

PROCUREMENT

Whitewater Draw (National Guard), BOM in place material ordered and ready for next deployment in June. (b)(6) requested that BOMs be placed into categories as defined in the cost matrix. (b)(6) will e-mail the cost matrix to the team again.

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
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TUCSON SECTOR - U.S. BORDER PATROL**

CONSTRUCTION

Kleinfelder inspectors ready for WWD deployment (National Guard) for superstructure placement and for Douglas LWC deployments (JTF-6). Kleinfelder has a web site where reports and photographs can be viewed.

To access the site go to:

(b) (7)(E)

- Click on the **Client Link** link at the left of the page.
- Select **Border Patrol Construction Oversight** from the drop-down menu.
- For a User Name enter (b) (7)(E)
- For a Password enter: (b) (7)(E)
- (The User Name and Password are case-sensitive, so make sure you don't capitalize.)
- Select the deployment you wish to view

OTHER ITEMS

The USBP TCA plans to construct landing mat fence in DGL with its own forces as needed. Procurement is underway and this project will probably begin 1 June

ACTION ITEMS

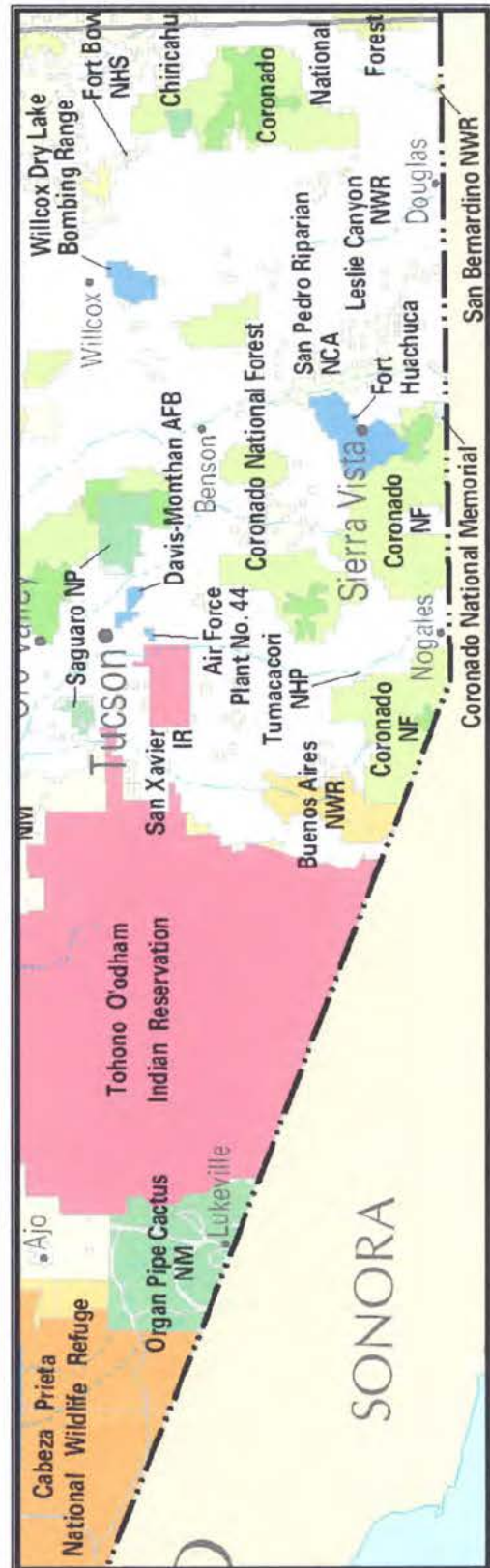
ACTION		RESPONSIBLE
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2.	Lighting design test follow up with Castro Electric. Scope for Baker Design.	
3.	Ephraim Ridge Report	
4.	Move the 1" HDPEP waterline in Naco	
5.	100% Naco 10 mile 22 June 2004	
6.	100% remainder of 5 miles DGL East of POE comments due 11 June	
7.	Asphaltic Concrete arranged for August National Guard deployment	
8.	15% Nogales Design comments due 22 June	
9.	(b)(6) need to know if ROW for Nogales 1.5 mile will include area between roadway and border	
10.	Project Maps - existing & in design to (b)(6) due 4 June	GSRC & Baker
ACTION		RESPONSIBLE
Environmental Working Group		
1.	Cabeza Prieta EA SOW status - needs follow up w/ (b)(6)	(b)(6)
2.	Temp. Vehicle Barrier EA comments due by 15 June	All
3.	Contract for GSRC (404 permitting issues)	(b)(6)

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
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ACTION		RESPONSIBLE
4.	San Pedro Crossing Report revised based on (b)(6) comments, due 4 June	(b)(6)

NEXT MEETINGS

25 May 2004 – Tucson Station, 10:00 am
22 June 2004 – HDR Phoenix, 10:00 am
27 July 2004 – Tucson Station, 10:00 am
24 August 2004 – HDR Phoenix, 10:00 am
14 September 2004 – Tucson Station, 10:00 am

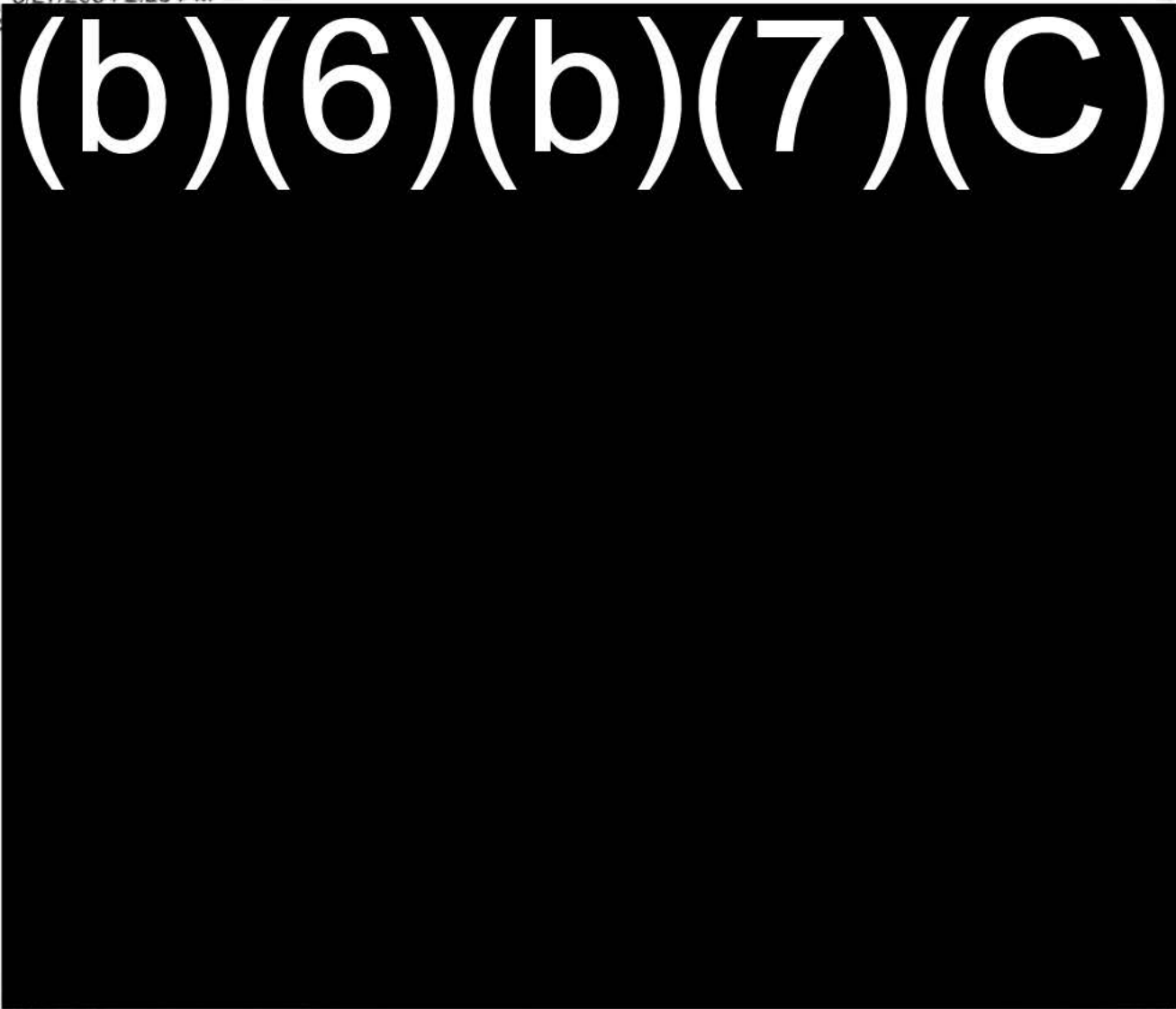


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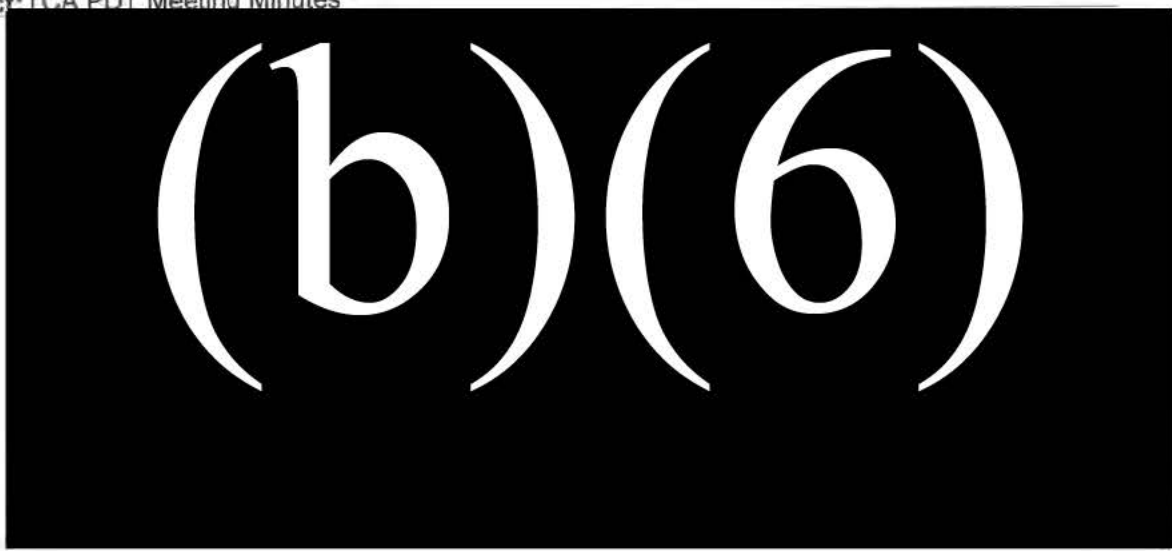


bcc:

Priority: Normal

Subject: TCA PDT Meeting Minutes

(b)(6)



(b)(6)

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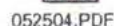
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<<052504.pdf>>

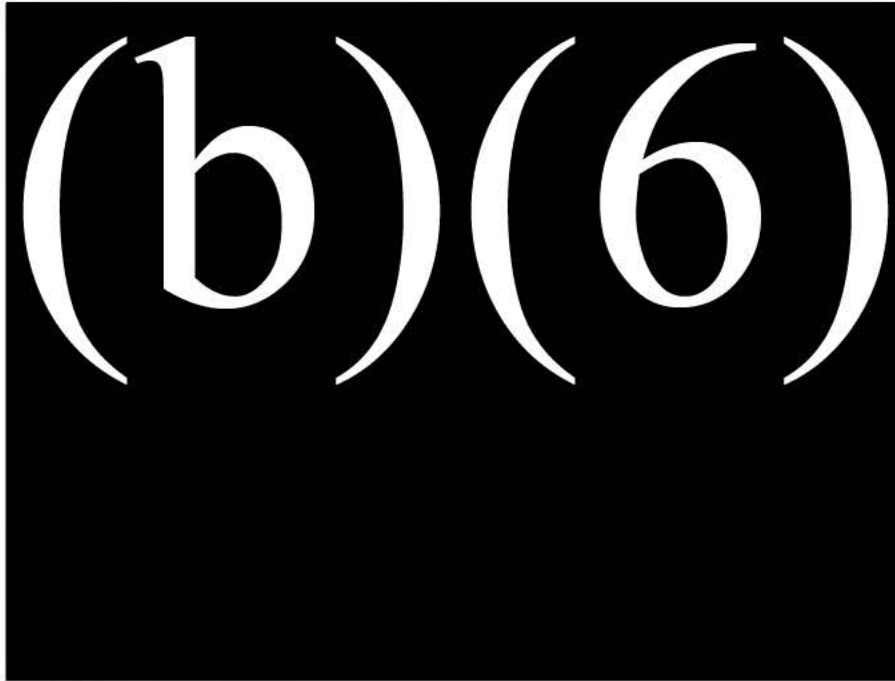
(b)(6)



**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
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MEETING MINUTES

Meeting Date and Time: 25 May 2004 – 10:00 am
Meeting Location: Tucson Station
Distribution Date: 28 May 2004
Distributor: (b) (6)
Distribution:



MEETING PURPOSE

TCA PDT Meeting

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12. SOW for GSRC to do a Phase I on Ephraim Ridge property		Done
ACTION		
Environmental Working Group		
1. San Pedro engineering recommendations, due 11 May		Done (follow-up based on (b)(6) comments)
2. Copies of UAV environmental documents for JTF-6 missions to (b)(6)		Pending
3. Narrow down options on San Pedro water mitigation plans		Pending data from (b)(6)
4. WWD 404 permit mitigation plan – GSRC contract to contracting.		Pending, (b)(6) to follow-up

RVS

IMC update attached to these minutes provided by (b)(6)

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Arizona National Guard

(b)(6)

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(b)(6)(b)(7)(C)

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Ephraim Ridge Reclamation

The SOW for a Phase I ESA for Ephraim Ridge has been submitted to (b)(6) for staffing. The Phase I ESA will address the entire 82-acre parcel (expanded from 70 acres). (b)(6) reminded the PDT to use the term Phase I instead of ESA due to possible conflicting terminology. This is needed for Real Estate.

Checkpoints (b)(7)(E) (AERC 499) and (b)(7)(E) (AERC 227)

The Tucson checkpoints (b)(7)(E) Final EAs and FONSI's have been The (b)(7)(E) checkpoint near (b)(7)(E) has not been started--AERC has not received the funds and GSRC has not been scoped to prepare a supplemental EA. (b)(6) stated that (b)(6) (Luke AFB/BMGR) will need to be coordinated with during the preparation of the EA.

Douglas/Willcox RVS project

AERC still has not received any funding for Douglas/Willcox RVS project. (b)(6) will follow up with HQ BOR to determine status.

Nogales Schematic Design

The 15% design was received from Baker. GSRC will need to identify the proposed survey corridor and then Sacramento will obtain the ROEs.

Ajo Phase I ESA

Comments were received from (b)(6) on the Ajo Phase I ESA; revisions are being made. The draft EA for the expansion is still on hold pending coordination. (b)(6) reported that the BLM withdrawal application was submitted to BLM on 21 May.

Temporary Vehicle Barriers (SON, NGL, TUC Stations)

The Temporary Vehicle Barriers preliminary draft EA was sent out on 24 Monday. The deadline for comments is 15 June. The draft SOW for the permanent vehicle barriers on the TON (which covers CAG and AJO) has been forwarded to Fort Worth for staffing.

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

Sonoita Roadway

GSRC has completed the biological surveys for the Sonoita border road project; cultural resources surveys were scheduled to start but will now be on hold pending the receipt of a final ROE for access road A. GSRC had understood that all ROEs had been obtained.

The Ajo and Tucson Station RVS EAs are still on hold pending information regarding the access road and power ROWs, as well as any alternate locations. (b)(6) (BLM) stated that the 3 Points site was owned by BLM but that the School District had a long-term easement on the property. (b)(6) indicated that if the ROE to conduct surveys had been signed by the School District, then BLM would not have an issue.

REAL ESTATE

USACE – (b)(6)

Douglas Lighting (5 Miles) Split East and West of the POE, pending NTP Douglas, 13-Miles Roadway West of POE, ROEs out for signature and D. Fodrini is coordinating with BLM. Deployments have ROEs in place for FY'04 Douglas, International Ditch, pending NTP

Naco, Lighting (5 Miles) Split East and West of the POE, pending NTP Nogales, 2-Miles Roadway East of POE (b)(6) beginning acquisition process, boundary surveys and legal description due from Baker Eng. And decision on aquastiiion of land between the border and the roadway Nogales, Construction & ROW Acquisition (Pending Alignments)

Nogales, Schematic Design, USFS ROEs in place, private property pending final alignments

Sonoita, Preliminary Design, and Coordination, USFS in place, continuing ROE issues on private property, one owner to be followed up with ASAP based on Baker GIS data, see Sonoita Station US/Mexico Corridor Report

Permanent Survey Markers, pending NTP

Temporary Vehicle Barriers, Pending NTP

(b)(6)

Ephraim Ridge Reclamation, Final report pending, (b)(6) assigned development of an appraisal for the entire property.

PROCUREMENT

Whitewater Draw (National Guard), BOM in place material ordered and ready for next deployment in June. (b)(6) requested that BOMs be placed into categories as defined in the cost matrix. (b)(6) will e-mail the cost matrix to the team again.

CONSTRUCTION

(b) (7)(E) inspectors ready for WWD deployment (National Guard) for superstructure placement and for Douglas LWC deployments (JTF-6). Kleinfelder has a web site where reports and photographs can be viewed.

To access the site go to:

www.kleinfelder.com

-Click on the **Client Link** link at the left of the page.

-Select **Border Patrol Construction Oversight** from the drop-down menu.

-For a User Name enter (b) (7)(E)

-For a Password enter:

(The User Name and Password are case-sensitive, so make sure you don't capitalize.)

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

-Select the deployment you wish to view

OTHER ITEMS

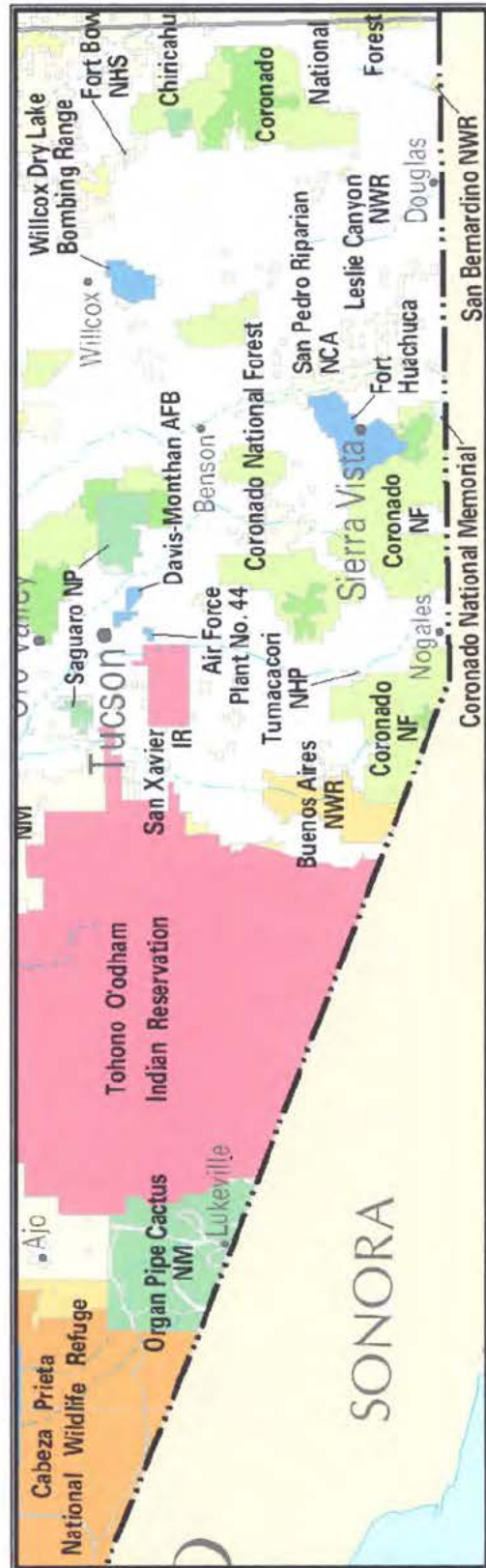
The USBP TCA plans to construct landing mat fence in DGL with its own forces as needed. Procurement is underway and this project will probably begin 1 June

ACTION ITEMS

ACTION		RESPONSIBLE
1.	Follow up on contract for GSRC to prepare EA for RVS in Douglas AO - AERC still has not received any funding for Douglas/Willcox RVS project. (b)(6) will follow up with HQ BOR to determine status. (b)(6)	(b)(6)
2.	Lighting design test follow up with Castro Electric. Scope for Baker Design.	
3.	Ephraim Ridge Report	
4.	Move the 1" HDPEP waterline in Naco	
5.	100% Naco 10 mile 22 June 2004	
6.	100% remainder of 5 miles DGL East of POE comments due 11 June	
7.	Asphaltic Concrete arranged for August National Guard deployment	
8.	15% Nogales Design comments due 22 June	
9.	(b)(6) need to know if ROW for Nogales 1.5 mile will include area between roadway and border	
10.	Project Maps - existing & in design to (b)(7)(E) due 4 June	
ACTION		RESPONSIBLE
Environmental Working Group		
1.	Cabeza Prieta EA SOW status - needs follow up w/ (b)(6)	(b)(6)
2.	Temp. Vehicle Barrier EA comments due by 15 June	
3.	Contract for GSRC (404 permitting issues)	
4.	San Pedro Crossing Report revised based on (b)(6) comments, due 4 June	

NEXT MEETINGS

22 June 2004 - HDR Phoenix, 10:00 am
27 July 2004 - Tucson Station, 10:00 am
24 August 2004 - HDR Phoenix, 10:00 am
14 September 2004 - Tucson Station, 10:00 am



**Tucson Sector PDT Meeting
RVS Update – 5/25/04**

RVS Is Part of DHS' ABC Initiative

- **RVS Installations**
- **Move RVS TD's into Phase 2 –Installation**
- **Address Specifically Identified Sector**
- **Maintenance Issues**

RVS Installations

- TD #106 Nogales Retrofit
 - Upgrade to Existing RVS System
 - 9 Existing Sites & 1 New Site
 - July 30th Initial Operation Capability (IOC)
- TD #107 Naco Installation
 - Add 7 New Sites
 - 3 Land Agreements with State of Arizona - pending
 - Resolution of GSA Contract Issues - pending
 - APS Applications Filed by Sector - pending
 - August 30th Initial Operation Capability (IOC)
- TD #108 Douglas
 - Add 2 New Sites
 - Land Agreements for Both Sites - pending
 - Both Sites to be Monitored at Naco BPS
 - APS Applications Filed by Sector – pending
 - August 30th *

Move TD's into Phase 2

- TD #129 Tucson "A"

- 7 New Sites Near Sasabe POE
 - Must Have TD #136 Tucson "B" to Have Working System
 - LFE/ROE in Place
 - Pre-EA Survey Completed by GSRC
 - Sept. 30th Possible for Phase 2
- TD #135 Ajo
 - 10 New Sites + 2 Relays
 - Site Placement Issues with NPS & Local Indian Tribes
 - Culturally Sensitive Areas
 - Protected Biological Species Throughout Park
 - Construction Concerns
 - Access Route Concerns
 - Recent TD #135 EA meeting
 - GSRC Wants to Begin EA
 - Sept. 30th Possible for Phase 2 But Need Quick Resolution of Issues

Move TD's into Phase 2 – continued

- TD #136 Tucson "B"
 - 5 sites
 - 2 Remote Sites – Fresno & Cumero
 - 3 Relays – Arivaca Junction, Wells, Three Points
 - LFE's / ROE's in Place
 - Some Open Issues
 - Both Remote Sites Have Difficult Access and Construction
 - USF&WS Has Concern About Tower Height At Wells Relay, per (b)(6)
 - Develop Requirements For Three Points Monitoring Site At Old School
 - Tucson Sector needs to Submit Plan for Property Use to BLM for Permit



- Issues Are Resolvable But Need Quick Action To Make Phase 2 By Sept. 30th

Move TD's into Phase 2 – continued

- TD#137 Douglas East
 - 10 New Sites + 3 Alternates
 - Numerous Site Acquisition Issues
 - LFE's/ROE's in Process
 - DGL Working Issues
 - Numerous System Design Issues
 - Line of Sight
 - Power for Relay Sites
 - Phase 2 in Sept 30th – Very Difficult

Specifically Identified Sector Maintenance Issues

- Tucson Sector Only
- L-3 GSI Has a Small Maintenance Team in Sierra Vista, AZ
- Work Coordinated by TCS Director of Communications, (b)(6) and Coordinated with Designated Local BP Technicians
- Augments BP Technicians and O&M Center



DATE: 25 May 2004 TIME: 10:00

LOCATION: USBP Tucson Station

US BORDER PATROL BORDER BARRIER PROJECTS
TUCSON SECTOR PROJECT DELIVERY TEAM
MEETING CHECK IN AND SIGN IN

TUCSON SECTOR

☐ (b)(6)
☐
☐

NOGALES STATION

☒ (b)(6)
☐
☐

DOUGLAS STATION

☐ (b)(6)
☒
☒

SONOITA STATION

☐ (b)(6)
☒

NACO STATION

☒ (b)(6)
☐ (b)(7)(E)
☐ (b)(6)(b)(7)(C)

YUMA SECTOR

☐ (b)(6)

CONSULTANT TEAM

HDR

☒ (b)(6)
☐
☐

IMC

☒ (b)(6)

BAKER

☒ (b)(6)
☒
☒

GSRC

☒ (b)(6)

Kleinfelder

☒ (b)(6)
☐
☐
☐

BPSCC

☐ (b)(6)
☐
☒

DHS

☒ (b)(6)
☒
☐
☐
☐

CORPS OF ENGINEERS

☒ (b)(6)
☒
☒
☐
☐
☒
☒

IBWC

☐ (b)(6)
☒

JTF-6

☐ (b)(6)
☐
☐
☒

AZ NATIONAL GUARD

☐ (b)(6)
☐

OTHER GOVERNMENT AGENCIES

USFS

☐ (b)(6)
☒
☒

AG&FD

☐ (b)(6)

USF&WS

☐ (b)(6)

BLM

☒ (b)(6)

OTHER

NAME: (b)(6)

AFFILIATION: USACE - Sacramento Real Estate

ADDRESS: _____

E-MAIL: _____

PHONE: (b)(6) FAX: _____

(b)(6)

Date: 4/19/2004 5:12 PM

Sender: (b)(6)

Priority: Normal

Subject: TCA PDT Meeting 27 April

Author: (b)(6)

Date: 4/19/2004 5:12:00 PM

Priority: Normal

(b)(6)(b)(7)(C)

Subject: TCA PDT Meeting 27 April

Tucson Sector PDT meeting will be held at the HDR Offices in Phoenix on 27 April 2004. The regular PDT starts at 10:00. An Environmental Working Group meeting will begin at 8:30 for those on the EWG committee or other interested parties.

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(b)(6)



042704AD.PDF

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

MEETING AGENDA

Meeting Date and Time: 27 April 2004 – HDR Phoenix, 10:00 am
Meeting Location: HDR – Phoenix
3200 E. Camelback Road, Suite 250
Map Attached

MEETING PURPOSE

TCA PDT Meeting

INTRODUCTIONS

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Follow up on contract for GSRC to prepare EA for RVS in Douglas AO	(b)(6)
2. WWD foundation change to grouted rock – Baker to check on Geotech – AzANG to check with constructing unit	
3. Baker needs official comment resolution sign off on Nogales Tunnels from the PDT.	
4. Lighting design test follow up with Castro Electric. Scope for Baker Design.	
5. Ephraim Ridge Report	
6. 60% DGL 3.6 miles due 27 April 2004	
7. 100% sealed DGL 4.3 miles due 27 April 2004	
8. 100% Naco 10 mile 22 June 2004	
9. 100% remainder of 5 miles East of POE 27 May 2004	
10. Move the 1” HDPEP waterline in Naco	
11. Inventory of materials after deployments in Naco and Douglas, possibly by JTF-6, otherwise by local agent	
12. Copies of BLM ownership data to Baker Eng. (b)(6)	
13. Assist Baker Eng. On ROW for waterline relocation in Naco	
14. Data on Sonoita access to (b)(6) Sonoita Station, (b)(6)	
15. Check with (b)(6) on sole source for WWD precast box.	
ACTION	
Environmental Working Group	
1. San Pedro engineering recommendations	
2. Copies of Casa Grande Station communications with TON to (b)(6)	
3. Copies of UAV environmental documents for JTF-6 missions to (b)(6)	
4. 2 April follow-up on PEIS with legal review	

MAN 11

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

10:15 – 10:20 RVS

No Monthly report from IMC

10:20 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

(b)(6)

WWD – West of DGL POE

- Oregon National Guard – June 2004, 30 soldiers for two 2-week deployments
- Alaska National Guard – 15 soldiers, 1 to 15 May 2004

Douglas Roadway West of POE

- Illinois N.G. 10 July 2004 (70 troops, LWCs on Kings Ranch Road – possible backup on WWD)

JTF-6

(b)(6)

Scheduled Deployments FY'04

- Naco (Fence & Barriers)
- Nogales, Az USBP (Patrol Roads) Jul & Aug

10:45 – 11:15 ENGINEERING

Baker Eng. - updates, discussion and map of projects

Douglas, 13 Miles of Roadway

Nogales, 1-1/2 Miles Roadway

Douglas, Lighting

Douglas, Construction Oversight, and Staking.

Douglas, International Ditch, Preliminary and Final Design

Naco, Lighting (5 Miles) Split East and West of the POE,

Naco, Primary Fencing, Preliminary and Final Design

Naco, Construction Oversight and Staking

Nogales, Construction Oversight and Staking

Nogales, Aerial West of Nogales

Nogales, Schematic Design

Sonoita, Preliminary Design

Permanent Survey Markers

Temporary Vehicle Barriers

Naco, 10-miles Roadway, Preliminary and Final Design

11:15 – 12:00 ENVIRONMENTAL

GSRC - updates and discussion

PEIS Tucson & Yuma (AERC 225)

BA – Operations – Tucson & Yuma (AERC 51)

Whitewater Draw 404 Permit

Checkpoint - (b)(7)(E) (AERC 227)

Checkpoints (b)(7)(E) (AERC 499)

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

Naco BA
Temporary Vehicle Barriers (Nogales & Sonoita Stations)
Sonoita
Nogales Schematic Design
RVS EA for Tucson and Ajo Station
Cabeza Prieta Road Report
ESA for the Ajo garage

12:00 – 1:00 LUNCH

1:00 – 1:30 REAL ESTATE

USACE – (b)(6)
Douglas Lighting (5 Miles) Split East and West of the POE
Douglas, 13-Miles Roadway West of POE
Douglas, International Ditch
Naco, Lighting (5 Miles) Split East and West of the POE
Nogales, 2-Miles Roadway East of POE
Nogales, Construction & ROW Acquisition (Pending Alignments)
Nogales, Schematic Design
Sonoita, Preliminary Design, and Coordination
Permanent Survey Markers
Temporary Vehicle Barriers
(b)(6)
Ephraim Ridge Reclamation

1:30 – 1:45 PROCUREMENT

Naco & Douglas deployments (JTF-6)
May deployment into Douglas at Whitewater Draw (National Guard)

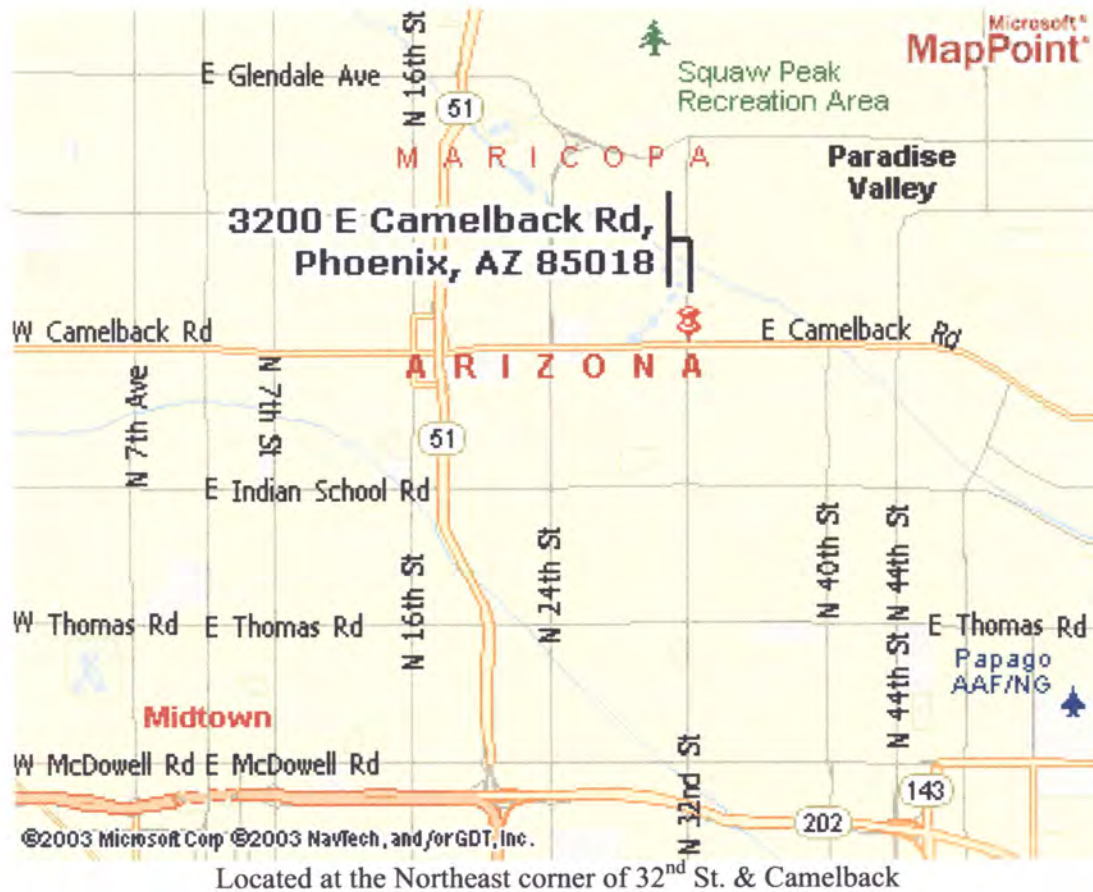
1:45 – 2:00 CONSTRUCTION

OTHER ITEMS

NEXT MEETINGS

25 May 2004 – Tucson Station, 10:00 am
22 June 2004 – HDR Phoenix, 10:00 am
27 July 2004 – Tucson Station, 10:00 am
24 August 2004 – HDR Phoenix, 10:00 am
14 September 2004 – Tucson Station, 10:00 am

Phoenix – HDR Offices
Suite #350 3200 E. Camelback Road
Phoenix, AZ 85018-2311
(602) 522-7700



Suite 350 is on the south end of the building, 3rd floor. Please use the elevator at the far southern end of the building.



4/27/04 Environmental Working Group

WDA - Tier 1 on Skywatch for 120+ days
take off & landing from Ft. H.

For PEIS Ft. H., Castle Rock, Gila sand

NOA & EA out this week

BO you have mitigation measures

F&WS asked for \$100K / yrs \Rightarrow provide vehicle kanens
needs priority planning to set up BO

Travel w/ (b)(6) at BT coordination.

TOW met (b)(6)

Sensors - any where w/ N Station AO

HAUS take off & landing from Ft. H.

REC from Ft. H & JTF-6

* distribute contact w/ (b)(6)

* follow up on projects w/ USIP
- B.P. may need to be priority to USIP

Cabeza Prieta - Cijo border road can work under
canine road - can be maintained

Temp vehicle kanens - (b)(6) locations - out small work in May 2004

Southern Station - asking for new access on dung road

regulate Sherriter Design - 2% design from Baker
500' corridor

NS - mats w/ Oregon pipe
- 3 new alternate sites
- last LOE

- GPO Gange ESA early next week - set
Plan 1 ESA



①

4/17/04 PPT meeting

Action Items

- 1) Pending funding ~~was~~ (b)(6) POC
No direction to begin Project
- 2) WWD Foundation change
- WWD revision sheets
- stop drawing on passivity
- 3) Baker comment resolution - says off - not done
- 4) Lighting test - SOW - ask other electrical design companies if they can do retrofit
- 5) Ephraim ridge - draft in December
- 2 appendices to be complete
- Corps
- Final report as best as he can
Survey 7 acres for restoration
legal description for entire redridge
- 10) Drop line or move line take decision
- 6, 7, 8, 9 tabled to Eng presentation
- Easement in US Gov name
- What is BLM's position on water line
- ask (b)(6)
- 11) Water clarity - If T&E can add to after action report
- better to have QC person - send to ADT
- done
- 12) Copies of BLM ownership - done
- 13) don't make tables
- 14) Sonata Access - new GPS tech
New cone tower site - private land
- 15) Sprinkler on Sole Source - done utility vault padmounting

KUS

IMCL, - doesn't provide monthly report
- can call in



4/27/04 PDT

(2)

Military Explorations

AZ-06 all outcrops

Alaska on 5/3

orig. 4 in June

Tellus in July

Paving in August

Concerns: materials, geotechnical maps, Survey Support driving on-site

Baker not secured for on-site all time

Baker requested 5/3, 7, 12, 2x in June
Nobles saying not on schedule

JTF-6

~~Ballad~~ Ballad Fence - need to deconstruct pig

Naco continue on 5/3

~~second~~ second in June

Douglas June 11, 12, 13

373 in after July 4 on East Naco

Norfolk 10-23

Douglas in Oct

Building materials - all present except welding sticks / rods

Engineering

4.3 ^{miles} ~~mi~~ west side of Douglas

3.6 miles reroute commits due in 2 weeks 5/11/04

Sonoma Access Report

adding drag road to south side

Grade & widen

Grading report 5/11/04 commits due



(3)

Real Estate

- Longley 13 miles w/ ROE - out
- Nogles 5 miles need ROE for site
- Nogles 5 miles - needs new road locations
- out next week
- Switzer - need new road
- Ephraim ridge relocation

Environmental

- PEIS T&Y - carry on w/ CI for Customs
 - ABC operations
 - Sensor info
 - UAV mission
- BA - T - water snowwater agents & miles & ABC
- WWD - Phoenix 45ACE - sent by 1 June or had integration
- check point (b) (7)(E) some
 - new BS & pt road
- has a BA - conceptual design in May
- Tex Vehicle - in May
- Nogles - FOEs & design plans
- LVS EA T&Y - Tucson & Phil ROE
 - a/o - 3 new alternate sites
- Cakey/Lieth - Road report done
 - SOW for work
- ESA Ajo garage - phase 1 next week
 - coordination w/ BLM et to be done
- Switzer - Access roads
 - alternatives
 - 1) road grading
 - 2) major road improvements
 - 3) major + new roads
 - 4) major, new construction, bag road
 - 5) no action
- Ephraim Ridge Phase 1 ESA → SOW on 80± acres
- Condon mount vehicle barriers - SA



(4)

Present

Mass 1/6
Douglas County 7 lot of building materials

Constitutions

talk on WWS mostly out week
WWS low water crisis May
Oregon WWS constitution
JTF6 July August
talk on JTF6 processing - none needed

Action Items

SOW GSKC

GA Forum \Rightarrow me

Coordon report \Rightarrow due 11 May 2004

3.5 Roadway comments \Rightarrow due 11 May 2004

Waterline movement \Rightarrow (b)(6)

GSKC Funding Report \Rightarrow (b)(6)

(b)(6)

\Rightarrow capture

USBP water \Rightarrow esp

(b)(6) - Ephant

Date: 5/17/2004 1:03 PM

Sender: (b)(6)

Priority: Normal

Subject: TCA PDT Agenda For 25 May 2004

Author: (b)(6)

Date: 5/17/2004 1:03:00 PM

Priority: Normal

(b)(6)(b)(7)(C)

Subject: TCA PDT Agenda For 25 May 2004

Please find attached the agenda for the Tucson Sector PDT meeting to be held at the Tucson Station (Swan Entrance to Davis Monthan AFB) starting at 10:00 on Tuesday the 25th.....

Conference call in number is: (b)(7)(E)

For those in the EWG a meeting will begin at 8:30.....

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(b)(6)

Senior Project Manager

(b)(6)



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**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

MEETING AGENDA

Meeting Date and Time: 25 May 2004, 10:00 am
Meeting Location: Tucson Station

MEETING PURPOSE

TCA PDT Meeting

INTRODUCTIONS

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION		RESPONSIBLE
1.	Follow up on contract for GSRC to prepare EA for RVS in Douglas AO – AERC still has not received any funding for Douglas/Willcox RVS project. (b)(6) will follow up with HQ BOR to determine status. (b)(6)	(b)(6)
2.	Lighting design test follow up with Castro Electric. Scope for Baker Design.	
3.	Ephraim Ridge Report	
4.	Move the 1" HDPEP waterline in Naco	
5.	100% Naco 10 mile 22 June 2004	
6.	100% remainder of 5 miles DGL East of POE 27 May 2004	
7.	Asphaltic Concrete arranged for August National Guard deployment	
8.	BOM and order for USBP landing mat fence construction in DGL	
9.	3.6 Miles Douglas comments due 11 May	
10.	Corridor Report comments due 11 May	
11.	15% Nogales Design due 11 May	
12.	SOW for GSRC to do a Phase I on Ephraim Ridge property	
ACTION		(b)(6)
Environmental Working Group		
1.	San Pedro engineering recommendations, due 11 May	
2.	Copies of UAV environmental documents for JTF-6 missions to (b)(6)	
3.	Narrow down options on San Pedro water mitigation plans	
4.	WWD 404 permit mitigation plan – GSRC contract to contracting.	(b)(6)

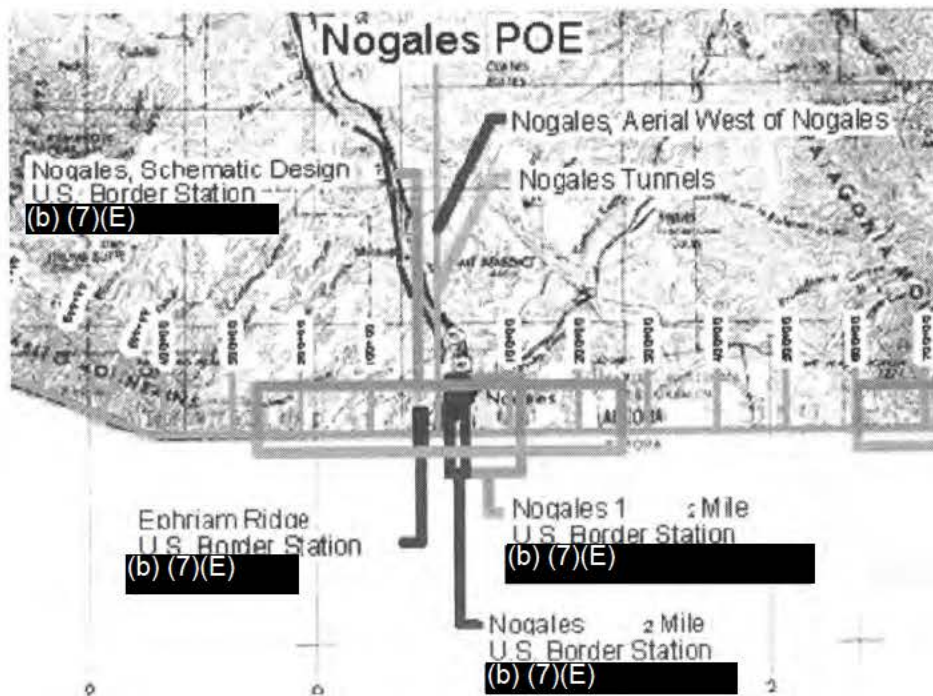
10:15 – 10:20 RVS

No report from IMC

10:20 – 10:45 MILITARY DEPLOYMENTS

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

Nogales, 1-1/2 Miles Roadway
Nogales, Construction Oversight and Staking
Nogales, Aerial West of Nogales
Nogales, Schematic Design

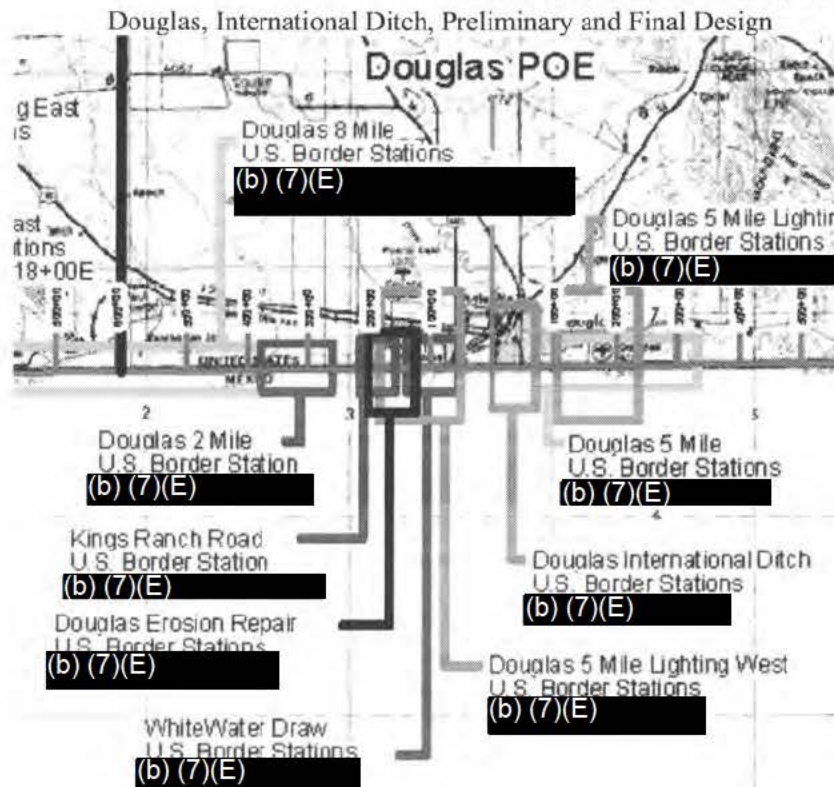


Sonoita, Preliminary Design (map not shown)
Permanent Survey Markers (all stations)
Temporary Vehicle Barriers (all stations)

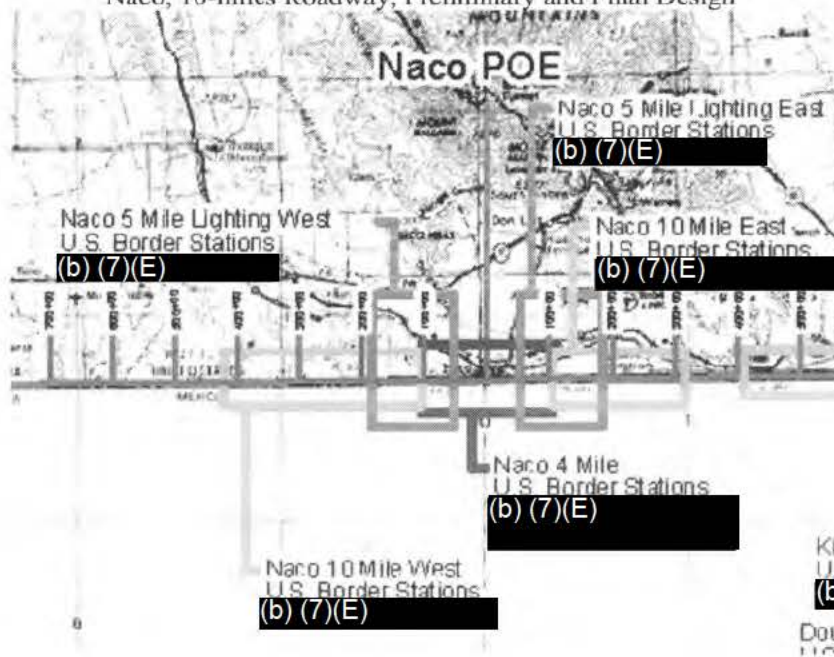
11:15 – 12:00 ENVIRONMENTAL

GSRC - updates and discussion
PEIS Tucson & Yuma (AERC 225)
BA – Operations – Tucson & Yuma (AERC 51)
Whitewater Draw 404 Permit
Checkpoint - (b) (7)(E) (AERC 227)
Checkpoints (b) (7)(E) (AERC 499)
Naco BA
Temporary Vehicle Barriers (AJO, TUC, CAG, NGL, & Son Stations)
Nogales Schematic Design
RVS EA for Tucson and Ajo Station
Cabeza Prieta Road Report
ESA for the Ajo garage

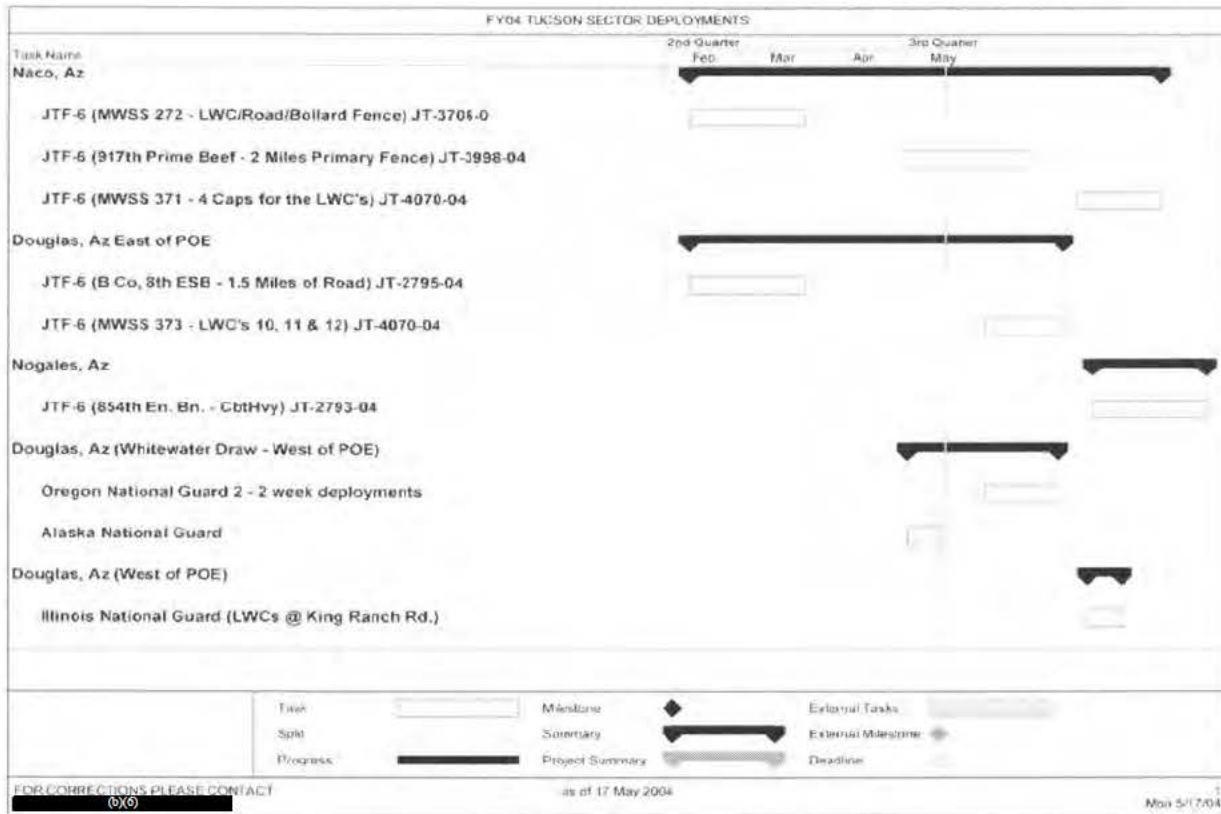
BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL



Naco, Lighting (5 Miles) Split East and West of the POE,
 Naco, Primary Fencing, Preliminary and Final Design
 Naco, Construction Oversight and Staking
 Naco, 10-miles Roadway, Preliminary and Final Design



BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL



Arizona National Guard

(b)(6)

WWD – West of DGL POE

- Oregon National Guard – June 2004, 30 soldiers for two 2-week deployments
- Alaska National Guard – 15 soldiers, 1 to 15 May 2004 (Completed)

Douglas Roadway West of POE

- Illinois N.G. 10 July 2004 (70 troops, LWCs on Kings Ranch Road – possible backup on WWD)

JTF-6

(b)(6)

Scheduled Deployments FY'04

- Naco (Fence & Barriers) 917th Prime Beef Squadron 1 May - 18 Jun (Underway)
- Douglas (Low-water crossings and Bollard Fence) MWSS 373 1-30 Jun
- Naco (Low-water crossings) MWSS 371 6 Jul - 6 Aug (b)(6)
- Nogales, Az USBP (Patrol Roads) 10 Jul - 23 Aug

10:45 – 11:15 ENGINEERING

Baker Eng. – updates, discussion and map of projects
 Douglas, 13 Miles of Roadway
 Douglas, Lighting
 Douglas, Construction Oversight, and Staking.

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

12:00 – 1:00 LUNCH

1:00 – 1:30 REAL ESTATE

USACE – (b)(6)

Douglas Lighting (5 Miles) Split East and West of the POE
Douglas, 13-Miles Roadway West of POE
Douglas, International Ditch
Naco, Lighting (5 Miles) Split East and West of the POE
Nogales, 2-Miles Roadway East of POE
Nogales, Construction & ROW Acquisition
Nogales, Schematic Design
Sonoita, Preliminary Design, and Coordination
Permanent Survey Markers
Temporary Vehicle Barriers

(b)(6)

Ephraim Ridge Reclamation

1:30 – 1:45 PROCUREMENT

Naco & Douglas deployments (JTF-6)
Follow-up on Whitewater Draw (National Guard)

1:45 – 2:00 CONSTRUCTION

Follow-up on Whitewater Draw by Kleinfelder

OTHER ITEMS

NEXT MEETINGS

22 June 2004 – HDR Phoenix, 10:00 am
27 July 2004 – Tucson Station, 10:00 am
24 August 2004 – HDR Phoenix, 10:00 am
14 September 2004 – Tucson Station, 10:00 am

Date: 3/15/2004 2:45 PM

Sender: (b)(6)

Priority: Normal

Subject: TCA PDT Meeting Agenda for 23 March 2004

Author: (b)(6)

Date: 3/15/2004 2:45:00 PM

Priority: Normal

(b)(6)(b)(7)(C)

Subject: TCA PDT Meeting Agenda for 23 March 2004

Please find attached the draft agenda for next Tuesday's meeting in Tucson.....
Should you have any questions, comments, or additions, please reply directly to this e-mail.

(b)(6)

<<032304AD.pdf>>

(b)(6)

Senior Project Manager

(b)(6)

(b)(6)



032304AD.PDF

(b)(6)

(b)(6)

(b)(6)

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

MEETING AGENDA

Meeting Date and Time:
 Meeting Location:

03 March 2004 – HDR Tucson Architecture Office, 10:00 am
 HDR – Phoenix (Map Attached)
 5210 E Williams Cir, Suite 530

MEETING PURPOSE

TCA PDT Meeting

INTRODUCTIONS

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION		RESPONSIBLE
1.	Follow up on contract for GSRC to prepare EA for RVS in Douglas AO – need survey and engineering support – need purpose statement developed by HDR – access to sites reviewed by (b)(6) and HDR	(b)(6)
2.	WWD foundation change to grouted rock – Baker to check on Geotech – AzANG to check with constructing unit	
3.	Baker needs official comment resolution sign off on Nogales Tunnels from the PDT.	
4.	Follow up on fencing for Puzzi property in Douglas	
5.	Temporary Vehicle Barrier locations for EA development, Various stations	
6.	(b)(6) to come up with acquisition plan and proceed with appraisals for Nogales 1 ½ mile roadway	
7.	Lighting design test follow up with Castro Electric	
8.	Fence details and BOM for Naco 4 Mile roadway deployment – redirected units from Organ Pipe	
9.	Corrected Ephraim Ridge Report	
10.	60% DGL 3.6 miles due 27 April 2004	
11.	100% DGL 4.3 miles due 23 March 2004	
12.	100% Naco 10 mile 22 June 2004	
13.	100% remainder of 5 miles East of POE 27 May 2004	
14.	Follow up meeting with (b)(6) 2 March in Phoenix, conference call in legal	
15.	Check on unit capability in Naco to see if they can move the 1" pvc waterline in the way.	
16.	Conference call on budgets within the next few weeks	
17.	e-mail DGL & NCO deployment contacts	
18.	(b)(6) to provide BLM ownership to (b)(6) (b)(6) for distribution to the PDT	
19.	New roadway alignments in NGL to be provided to the USFS by (b)(6) once information is provided by (b)(6)	
ACTION		
Environmental Working Group		
1.	(b)(6) to contact (b)(6) regarding draft BO	

discussed letter to project owner and last week. appraisals in few weeks for easement plans sent to property owner
(b)(6) *recy for others will get time AZ lands OKAY*
1 or 2 not computer make relevant - NO K - need to AZ lands have and call

DRAFT

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

ACTION	RESPONSIBLE
2. SOW development and processing for GSRC continued work on WWD	(b)(6)
3. Contact (b)(6) regarding 404 permit issuance on a government to government level	
4. Revised Sonoita alignments and possible SOW revisions ASAP	
5. Check on MOU / MOA and the Southwest Strategy, report back next PDT	

10:15 – 10:20 RVS

No Monthly report from IMC

Access for RVS in the Douglas AO. Note Action Item 1.

10:20 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

(b)(6)

WWD – West of DGL POE

- Oregon National Guard – June 2004, 30 soldiers for two 2-week deployments
- Alaska National Guard – 15 soldiers, 1 to 15 May 2004

Douglas Roadway West of POE

- Illinois N.G. 10 July 2004 (70 troops, LWCs on Kings Ranch Road – possible backup on WWD)

JTF-6

(b)(6)

Scheduled Deployments FY'04

- Naco, Az USBP (Patrol Roads) 10-Feb to 30-Mar
- Douglas, Az USBP (Patrol Roads) 10-Feb to 30-Mar
- Naco (Fence & Barriers) 15-Mar to 15-Apr
- Nogales, Az USBP (Patrol Roads) Jul & Aug

10:45 – 11:15 ENGINEERING

Baker Eng. - updates, discussion and map of projects

Douglas, 13 Miles of Roadway

Nogales, Tunnels, Preliminary & Final Design

Formal comment matrix pending. Comments from Union Pacific Rail Road are outstanding.

Nogales, 1-1/2 Miles Roadway, follow up on Geotech with (b)(6)

Douglas, Lighting

(5 Miles) Split East and West of the POE, Preliminary and Final Design. No

Not started

Douglas, Construction Oversight, and Staking. No

Note JTF-6 deployment

Douglas, International Ditch, Preliminary and Final Design No

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

Not started
Naco, Lighting (5 Miles) Split East and West of the POE, Preliminary and Final Design *NO*
Not started
Naco, Primary Fencing, Preliminary and Final Design *NO*
Not started
Naco, Construction Oversight and Staking *NO*
Note JTF-6 deployment
Nogales, Construction Oversight and Staking *NO*
Not started
Nogales, Aerial West of Nogales *complete*
Not started
Nogales, Schematic Design *3 miles west & 7 miles east of POE near water road*
Not started
Sonoita, Preliminary Design *10 of road improvements, access road changes & foot print*
Not started
Permanent Survey Markers *some in & some still needed*
Not started
Temporary Vehicle Barriers
Not started
Naco, 10-miles Roadway, Preliminary and Final Design *on-going 1st sent the de June 22, 04*

11:15 – 12:00 ENVIRONMENTAL

GSRC - updates and discussion
PEIS Tucson & Yuma (AERC 225)
BA - Operations - Tucson & Yuma (AERC 51)
Whitewater Draw 404 Permit
Checkpoint (b)(7)(E) (AERC 227)
Checkpoints (b)(7)(E) (AERC 499)
Naco BA
Temporary Vehicle Barriers (Nogales & Sonoita Stations)
Sonoita
Nogales Schematic Design
RVS EA for Tucson and Ajo Station
Cabeza Prieta Road Report
ESA for the Ajo garage

12:00 – 1:00 LUNCH

1:00 – 1:30 REAL ESTATE

USACE - (b)(6)
Douglas Lighting (5 Miles) Split East and West of the POE
No action at this time
Douglas, 13-Miles Roadway West of POE
Douglas, International Ditch
No action at this time
Naco, Lighting (5 Miles) Split East and West of the POE
No action at this time

> nothing

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

Nogales, 2-Miles Roadway East of POE

Nogales, Construction & ROW Acquisition (Pending Alignments)

No action at this time

Nogales, Schematic Design

All ROE's have gone out for 10 miles west and 5 miles east of POE

Sonoita, Preliminary Design, and Coordination

Permanent Survey Markers

No action at this time

Temporary Vehicle Barriers

No action at this time

Western Region - (b)(6)

Ephraim Ridge Reclamation

(b)(6) provided an incomplete report on Ephraim Ridge land acquisition. Report must be resubmitted due to technical errors.

REPORT COMPLETE UPON LAND ACQUISITION INFORMATION

1:30 - 1:45 PROCUREMENT

Naco & Douglas deployments (JTF-6)

April deployment into Naco (JTF-6)

May deployment into Douglas at Whitewater Draw (National Guard)

1:45 - 2:00 CONSTRUCTION
Report from Kleinfelder

OTHER ITEMS

NEXT MEETINGS

27 April 2004 - HDR Phoenix, 10:00 am

25 May 2004 - Tucson Station, 10:00 am

22 June 2004 - HDR Phoenix, 10:00 am

27 July 2004 - Tucson Station, 10:00 am

24 August 2004 - HDR Phoenix, 10:00 am

14 September 2004 - Tucson Station, 10:00 am

Meeting Location

HDR's office
for 23 March
PDT Meeting

(b) (7)(E)

700m
2100ft

© 2003 MapQuest.com, Inc.; © 2003 Navigation Technologies

BW1 FOIA CBP 007327

FY04 TUCSON SECTOR DEPLOYMENTS

Task Name	2nd Quarter		3rd Quarter			4th Quarter	
	Feb	Mar	Apr	May	Jun	Jul	Aug
Naco, Az							
JTF-6 (MWSS 272 - LWC/Road/Bollard Fence) JT-3706-0							
JTF-6 (307th Red Horse - 4 Miles of AM2 Matting Fence) JT-3998-04							
JTF-6 (MWSS 373 - 4 Caps for the LWC's) JT-4070-04							
Douglas, Az East of POE							
JTF-6 (B Co, 8th ESB - 1.5 Miles of Road) JT-2795-04							
JTF-6 (MWSS 373 - LWC's 10, 11 & 12) JT-4070-04							
Nogales, Az							
JTF-6 (854th En. Bn. - CbtHvy) JT-2793-04							
Douglas, Az (Whitewater Draw - West of POE)							
Oregon National Guard 2 - 2 week deployments							
Alaska National Guard							
Douglas, Az (West of POE)							
Illinois National Guard (LWCs @ King Ranch Rd.)							

Task		Milestone		External Tasks	
Split		Summary		External Milestone	
Progress		Project Summary		Deadline	

FOR CORRECTIONS PLEASE CONTACT

as of 8 December 2003

1
 Sat 2/7/04

Date: 3/16/2004 10:54 AM

Sender: (b)(6)

Priority: Normal

Subject: RE: TCA PDT Meeting Agenda for 23 March 2004

(b)(6)

Subject: RE: TCA PDT Meeting Agenda for 23 March 2004

Conference call number and passcode for next Tuesday's PDT meeting
beginning at
10:00 Mountain Time:

(b) (7)(E)

(b) (6) P.E.

Senior Project Manager

(b) (7)(E)

From: (b)(6)

Sent: Monday, March 15, 2004 12:46 PM

(b)(6)

Date: 3/19/2004 12:39 PM
Sender: (b)(6)
Priority: Urgent
Subject: Telephone for HQ Poly-Com Video Conferencing

Author: (b)(6)
Date: 3/19/2004 12:39:49 PM
Priority: Urgent
To: (b)(6)
Subject: Telephone for HQ Poly-Com Video Conferencing

(b)(6)

Here is the telephone for (b)(6) in HQ. They are the people working on fixing the bridge for the video conferencing.

(b)(6)

The number for the ACLDIR Picture-Tel equipment is: (b)(6)

If (b)(6) thinks the bridge is fixed on Monday, give me a call at (b)(6)(b)(7)(C) and we can arrange to put our equipment on test it with HQ.

Also, if the bridge does get fixed, you may want to ask your people in Arizona again what the name of their video equipment is, as (b)(6) said he had never heard of that brand and it may not be compatible with the rest.

FYI - Our Picture-Tel was taken over by Poly-com which is what HQ has for the bridge.

(b)(6)



ELWG - POT 3/23/04

Road alignment - ~~the~~ Sonoma
& diag road - Survey needs

Moa - Southwest stationing
- all agencies' signature will participate & cooperate on enviro

- training by
Moa rep of agencies will engage other agency
- training

Work protocol - invite them to become cooperative agency

Anyon Plan ABC - wants in
F&WS stopped looking at our BA until we send them info
slight increase in ATU's at stations (DOESTAR/DOETAR)
on WEST DESERT

NACO WATCH Supply for AGENTS

- BASSER SEWER SYSTEM
- FAMILIES MAYBE INCLUDED

WWDRAW - MITIGATION for wetlands disturbed
& parts - done

NACO BA - Regulated help - POSSIBLE BRIDGES
- FUTURE BENEFITS / COST ANALYSIS
- (b)(6) TO ASSESS ON DESIGNS
- HAZLEY BRIDGE - YES OR NO

Temp Vehicle Barrier - Naco, Tucson, Casa Grande, Nogales stations
- Maps / GPS coordinate
- EA stated - mid way for draft
- Exclusion of TOA
- Learning action of ~~from~~ funds provide to TOA

RUS - EA Tucson / Ajo

CASERA future roads done - MAY need EA for ~~various~~

ESA Ajo Gauge - DONE



EWG - 80T

3/23/04

Submitted PEIS on WATS - (b)(6) -

PEIS date - next week APRIL 2, 2004
- Legal Review

Nogales - mill bro - LVS on Hold

AIO LVS - on Hold

- (b)(6) MEI - send newsletters

(b)(6)

BP w/



②

14) Done

15) A212 can't move pipe - need contractor
specifically pipe

16) Budgets - spending plans went to G.P

17) Replant done

18) Blot info done

19) New road alignments -

(b)(6)

- 3 mile alignment

- 7 mile alignment

Small Group

1) Done

2/3) Done

4) Eastern parking

5) Mon on southern streets

& Mon w/ State of AZ & DOI

- POST on ASRC website

crisis

Knapville

Website up - (b)(6) To get Link

may need to modify FOR for state lands for pipeline

NVS - no months report

9 phases on getting thing done

38 system in Nogales / Douglas

- Crawford Hill retrofit 4/12

- 3 systems no leases - need 3.

afire 3/1 March

A2 state leases 4/8 meting on leases & ROW

1 BLM leases being processed

NPS lease

AJO EA survey ready

turnover

Quena Vista project site covered w/ altitude site needs EA
water shut & 130 cten - 020 road altitude on FS land



③

RVS - TD 106, 107, 129, 136, 135
Real Estate issues - critical
ways to reductions
all road access

militer
AZ AK

(b)(6) to look for water tank, building, track hoe, crane
(b)(6) needs instructions on assembly of components

JTF-6

Cover

Douglas 13 miles 100% on ^{4 miles} Apr 27th for new hydrology data
60% 3.6 miles at same time

roughly through ~~road~~
tail road

Douglas lift

Sonata - GIS to go to (b)(6)

- Sonata road - gravel cover after initial grading

Environment

PEIS legal comments add actions

BA Tucson - update NACO etc & ATUS ops

WWD put review, mitigation plan ongoing

need approval by 31 April

NACO BIA - create any take done

unfavorable basis - life provided

- Town present on nation

Sonata Road impact - need access roads

- no ROEs on private

Ajo/Tucson station RVS - need ROE

Cajon Mtn Road - sent to FWS

Ajo Range - done

Tucson Range - draft out

Ajo land - Swags being done



(4)

Real Estate

USACE

Douglas Lybly - no action

13 miles - now 8 ES - need to discuss w/

Sonster - access roads - 3 people refused to sign ROEs
2 may come off list

Cyprus bridge 7 acres funding in spending plan
\$250K set aside

can obligate approved value
boundary survey need to be done

Promont

Nate / Douglas - (b)(6) wants overhead pipe for next deployment
price looks good for very limited hours
shopper can deliver y pipe for \$100K
diff. sizes

Other mill can produce same size for \$140K

Action Item

Inventory of natural

Sonster aligns

Right of Way & water line relocation

1" pde line move

after action meeting on Thursday to discuss w/ JTF-6

- ask for inventory not done

tasking - Funding for RVS

labor price for military

Legal descriptions for Nogales

Date: 5/24/2004 12:54 PM

(b)(6)

Sender: [REDACTED]

(b)(6)

Priority: Normal

Subject: FW: TCA PDT Agenda For 25 May 2004

(b)(6)

Author: [REDACTED]

(b)(6)

(b)(6)

Date: 5/24/2004 12:54:00 PM

(b)(6)

cc: [REDACTED]

(b)(6)

Subject: FW: TCA PDT Agenda For 25 May 2004

Reminder.....

(b)(6)

Subject: TCA PDT Agenda For 25 May 2004

Please find attached the agenda for the Tucson Sector PDT meeting to be held at the Tucson Station (Swan Entrance to Davis Monthan AFB) starting at 10:00 on Tuesday the 25th.....

Conference call in number is:

(b)(7)(E)

For those in the EWG a meeting will begin at 8:30.....

<<052504AD.pdf>>

(b)(6)

Senior Project Manager

(b)(6)



052504AD.PDF

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

MEETING AGENDA

Meeting Date and Time: 25 May 2004, 10:00 am
Meeting Location: Tucson Station

MEETING PURPOSE

TCA PDT Meeting

INTRODUCTIONS

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION		RESPONSIBLE
1.	Follow up on contract for GSRC to prepare EA for RVS in Douglas AO - AERC still has not received any funding for Douglas/Wilcox RVS project. (b)(6) will follow up with HQ BOR to determine status. (b)(6)	(b)(6)
2.	Lighting design test follow up with Castro Electric. Scope for Baker Design.	
3.	Ephraim Ridge Report	
4.	Move the 1" HDPEP waterline in Naco	
5.	100% Naco 10 mile 22 June 2004	
6.	100% remainder of 5 miles DGL East of POE 27 May 2004	
7.	Asphaltic Concrete arranged for August National Guard deployment	
8.	BOM and order for USBP landing mat fence construction in DGL	
9.	3.6 Miles Douglas comments due 11 May	
10.	Corridor Report comments due 11 May	
11.	15% Nogales Design due 11 May	
12.	SOW for GSRC to do a Phase I on Ephraim Ridge property	
ACTION		
Environmental Working Group		
1.	San Pedro engineering recommendations, due 11 May	
2.	Copies of UAV environmental documents for JTF-6 missions to (b)(6)	
3.	Narrow down options on San Pedro water mitigation plans	
4.	WWD 404 permit mitigation plan - GSRC contract to contracting.	

*See
mitt to speak
to me
perly GE info
padded to track
plan*

10:15 – 10:20 RVS

No report from IMC

10:20 – 10:45 MILITARY DEPLOYMENTS

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

FY04 TUCSON SECTOR DEPLOYMENTS							
Task Name	2nd Quarter		3rd Quarter		4th Quarter		
Naco, Az	Feb	Mar	Apr	May	Jun	Jul	Aug
JTF-6 (MWSS 272 - LWC/Road/Bollard Fence) JT-3708-0							
JTF-6 (917th Prime Beef - 2 Miles Primary Fence) JT-3988-04							
JTF-6 (MWSS 371 - 4 Caps for the LWC's) JT-4070-04							
Douglas, Az East of POE							
JTF-6 (B Co, 8th ESB - 1.5 Miles of Road) JT-2795-04							
JTF-6 (MWSS 373 - LWC's 10, 11 & 12) JT-4070-04							
Nogales, Az							
JTF-6 (854th En. Bn. - Cbt/Hvy) JT-2793-04							
Douglas, Az (Whitewater Draw - West of POE)							
Oregon National Guard 2 - 2 week deployments							
Alaska National Guard							
Douglas, Az (West of POE)							
Illinois National Guard (LWCs @ King Ranch Rd.)							

Arizona National Guard

(b)(6)

WWD - West of DGL POE

- Oregon National Guard - June 2004, 30 soldiers for two 2-week deployments
- Alaska National Guard - 15 soldiers, 1 to 15 May 2004 (Completed)

Douglas Roadway West of POE

- Illinois N.G. 10 July 2004 (70 troops, LWCs on Kings Ranch Road - possible backup on WWD)

JTF-6

(b)(6)

Scheduled Deployments FY'04

- Naco (Fence & Barriers) 917th Prime Beef Squadron 1 May - 18 Jun (Underway)
- Douglas (Low-water crossings and Bollard Fence) MWSS 373 1-30 Jun
- Naco (Low-water crossings) MWSS 371 6 Jul - 6 Aug (b)(6)
- Nogales, Az USBP (Patrol Roads) 10 Jul - 23 Aug

10:45 - 11:15 ENGINEERING

Baker Eng. - updates, discussion and map of projects

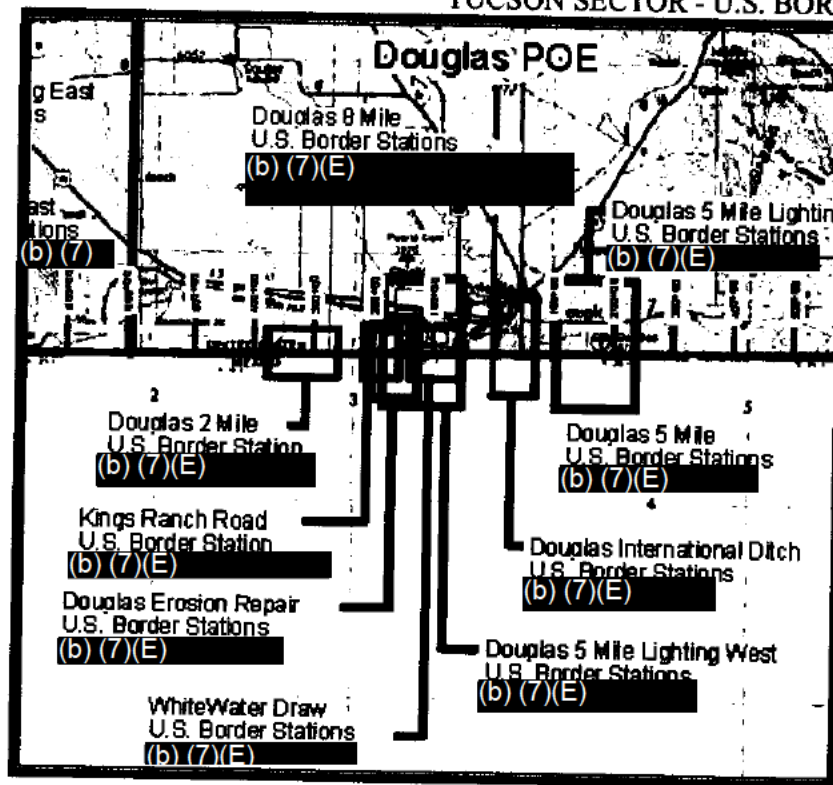
Douglas, 13 Miles of Roadway

Douglas, Lighting

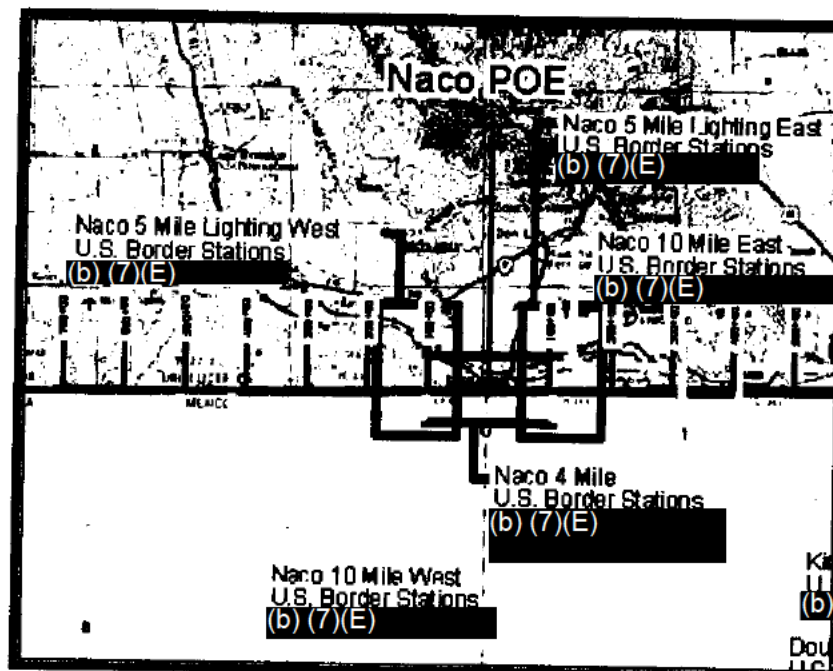
Douglas, Construction Oversight, and Staking.

Douglas, International Ditch, Preliminary and Final Design

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

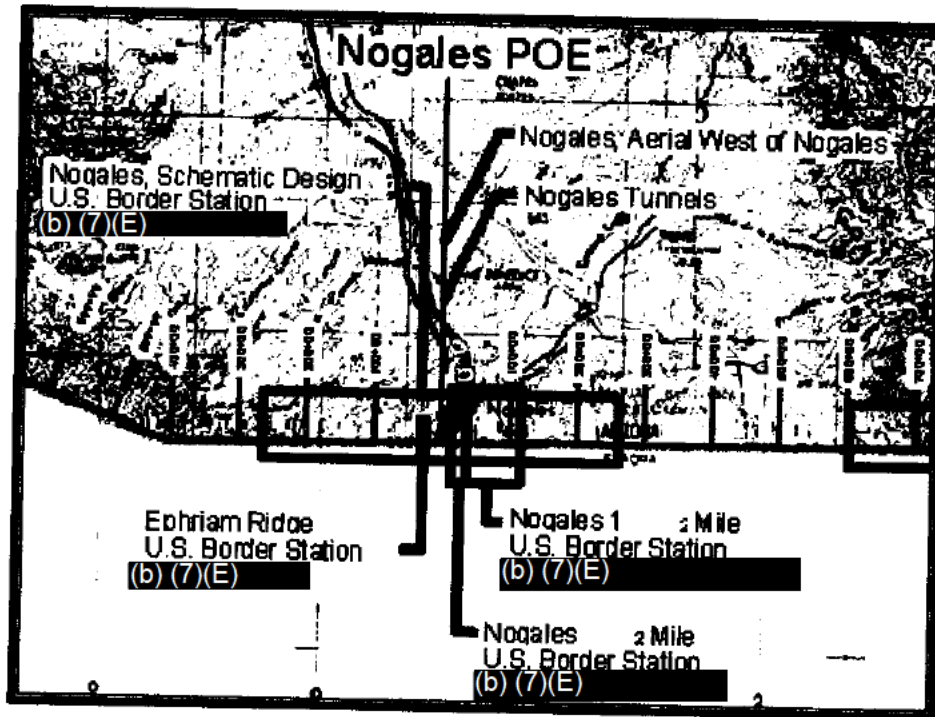


Naco, Lighting (5 Miles) Split East and West of the POE,
Naco, Primary Fencing, Preliminary and Final Design
Naco, Construction Oversight and Staking
Naco, 10-miles Roadway, Preliminary and Final Design



BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

Nogales, 1-1/2 Miles Roadway
Nogales, Construction Oversight and Staking
Nogales, Aerial West of Nogales
Nogales, Schematic Design



Sonoita, Preliminary Design (map not shown)
Permanent Survey Markers (all stations)
Temporary Vehicle Barriers (all stations)

11:15 – 12:00 ENVIRONMENTAL

GSRC - updates and discussion
PEIS Tucson & Yuma (AERC 225)
BA – Operations – Tucson & Yuma (AERC 51)
Whitewater Draw 404 Permit
Checkpoint (b)(7)(E) (AERC 227)
Checkpoints (b)(7)(E) (AERC 499)
Naco BA
Temporary Vehicle Barriers (AJO, TUC, CAG, NGL, & Son Stations)
Nogales Schematic Design
RVS EA for Tucson and Ajo Station
(b)(6) Cabeza Prieta Road Report
ESA for the Ajo garage

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

12:00 – 1:00 LUNCH

1:00 – 1:30 REAL ESTATE

USACE – (b)(6)

Douglas Lighting (5 Miles) Split East and West of the POE
Douglas, 13-Miles Roadway West of POE
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Nogales, Schematic Design
Sonoita, Preliminary Design, and Coordination
Permanent Survey Markers
Temporary Vehicle Barriers

(b)(6)

Ephraim Ridge Reclamation

1:30 – 1:45 PROCUREMENT

Naco & Douglas deployments (JTF-6)
Follow-up on Whitewater Draw (National Guard)

1:45 – 2:00 CONSTRUCTION

Follow-up on Whitewater Draw by Kleinfelder

OTHER ITEMS

NEXT MEETINGS

**22 June 2004 – HDR Phoenix, 10:00 am
27 July 2004 – Tucson Station, 10:00 am
24 August 2004 – HDR Phoenix, 10:00 am
14 September 2004 – Tucson Station, 10:00 am**



Tucson PDT 7/25/04

①

EWG summary

- 1) costs for ~~can be~~ ~~not~~ recommendations
options for bridges - rock bascule or gabion best options
(b) (4) for bascule bridge
(b) (4) Gabion
(b) (4) low water

BA schedule needs to focus on 1 alternative

- * DOI ⇒ decided not negotiated
⇒ don't know what they want to do
⇒ backed drawing
Should be completed projects
organ pipe & Cabeza Prieta
24" x 36"

3.4d

2) not received WDU request yet

3) On Hold partly personnel etc

- 4) WWD - Robert ^{USACE} ~~sumner~~ not identify city of Douglas - request
will identify others as partners
others okay

^{1st} PEIS Tucson (Yuma - waiting on UAW's

- operations of stations expanded } waiting on info

- deadline 28 May 2004

Has sensor info

UAW done take out private land ownership

mutuals ~~are~~ probably were early than Indian mutuals with

Epinephrine

Chad Ford (b) (7)(E) - original BA done - redacted to PMGW near border
- GSKC has not been contacted

Chad Ford (b) (7)(E) - done
(b) (7)(E)



5/25/04

②

ELUG - Cont:

~~NAO~~ NACO GA - SPKman

Conf vehicle leaving - ~~they~~ left out yesterday

- Sonoma / Nogales / Tucson AOs

Peterson & Co on Casa Grande & Ajo on TOW

Reunion comments June 15

Nogales Schuster Design - was due 5/11/04 15%

- No received

RVS - Tucson & Ajo Station - EA need access roads & bot mts, COE, 3 parts confusion - private or BLM ownership

Cajon Litter road report - done for 5 miles

- Reviewer of work not under contract

- Requested another copy of report

- **(b)(6)** has said yes / no on report

* - GA Requir - Team decision

Ajo Garage - Phase I ESA

Ephraim Ridge - needs ^{Phase I} EA for land acquisition

Douglas/Wildcat RVS no word - no funds

PDT Meeting @ 10:00 am

Action items

1) Douglas & RVS - EA pending

2) Lightly design - Castro working on design contract

3) Ephraim Ridge - Plat still waiting on USACE approval

4) Time move lower and re-install

No private person is getting benefit from mining here

up to 60' looseout production lands

- Title of ownership needs to be checked

- When did go out of ownership - if prior to 1907

5/26/

7) AC on **(b)(6)** credit card



⑧ Leading rail fence on order due 1 June 2004
 take control by BP
 Bullard fence by JTF-6

12) SOW for Ephraim bridge - done

RVS - (b)(6)

no monthly reports last comprehensive
 TD pending has stopped - content review of GSA
 NACO & Douglas pending
 Contract expires Sept 29, 2004
 Agreement between LCI & BP
 Naco 7 new sites - all addressed in SA
 Ag state to correct land agreement wording
 Tucson stations not started because of roads location & ownership
 Nogales litigat - 13 sites void injunct order ?
 pg 5 of 6 change no funds @ AERC for work

Stations - no news

Military Requirements

AZ Not Guard

WWD started last week

Alaska NB 90% complete on construction

water is flowing by footing & ariz well

Exceeded Capacity of SD Tan Ariz

Bullard Fencing for Douglas

allinois - in July

Steel cost prev Thursday last week went up 3 times



(4)

JTF-6

- Naco - June 1st on ground
 - but hard digging
- Douglas - advanced party present
 - surveys scheduled prior to June 2
- Nogales - materials on site

Geotechnical

- Douglas -
- Naco -
- Nogales - schematic designs

Environment

- See previous notes

Real Estate

- Douglas 13 miles - BLM due back 10-15 days
- Nogales 2 miles - everything done for 1/2 mile
 - 1 1/2 " - survey done complete weeks ago - due land but 4 weeks
 - narrow easement possible
- Soaneta - private road issue - 2 property owners report ROES

Prominent

- June order
- July - needs info

Construction

- WWQ - progressing well - difficult construction

Date: 2/7/2004 12:31 PM

Sender: (b)(6)

Priority: Normal

Subject: FW: TCA PDT Meeting 17 Feb. in Phoenix

(b)(6)

Author: (b)(6) <SMTP: (b)(6)>

Date: 2/7/2004 12:31:00 PM

Priority: Normal

bcc:

To:

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Subject: FW: TCA PDT Meeting 17 Feb. in Phoenix

> -----Original Message-----

> From: (b)(6)

> Sent: Saturday, February 07, 2004 10:24 AM

(b)(6)

(b)(6)

(b)(6)

> Subject: TCA PDT Meeting 17 Feb. in Phoenix

>

> Please find attached the agenda for the meeting 17 February 2004.... A conference call number will be arranged for those unable to travel due to the holiday the precedes this meeting. Any corrections or additions to this agenda can be replied directly back to me.

(b)(6)

> > <<021704AD.pdf>>

(b)(6) (b)(7)(C)

(b)(6)



021704AD.PDF

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

MEETING AGENDA

Meeting Date and Time: 17 February 2004 – HDR Phoenix, 10:00 am
 Meeting Location: HDR – Phoenix (Map Attached)
 3200 E. Camelback, Suite 350

MEETING PURPOSE

TCA PDT Meeting

INTRODUCTIONS

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Follow up on contract for GSRC to prepare EA for RVS in Douglas AO – need survey and engineering support – need purpose statement developed by HDR – access to sites reviewed by (b)(6) and HDR	(b)(6)
2. SWPPP training – need proposed dates and costs for training	
3. WWD foundation change to grouted rock – Baker to check on Geotech – AzANG to check with constructing unit	
4. Baker needs official comment resolution sign off on Nogales Tunnels from the PDT.	
5. Rent 6" forms for next JTF-6 deployment	
6. 28 and 29 January 2004, the AzANG will tour the border with representatives from several units. Baker will provide technical support.	
7. Follow up on fencing for (b)(6) property in Douglas	
8. Temporary Vehicle Barrier locations for EA development, Various stations	
9. (b)(6) to come up with acquisition plan and proceed with appraisals for Nogales 1 ½ mile roadway	
10. Puzzi Property fence SOW to (b)(6)	
11. Lighting design test follow up with Castro Electric	
12. Fence details and BOM for Naco 4 Mile roadway deployment – redirected units from Organ Pipe	
13. Materials in La Tune re-ship to Nogales	
14. ROEs for 10 February deployment copied to (b)(6)	
15. Corrected Ephraim Ridge Report	
16. NGL Schematic Design Alignments to (b)(6)	
17. Blanket ROE to USFS (b)(6)	
18. Geotechnical Report on NGL 1 ½ mile to (b)(6)	
19. 60% DGL 3.6 miles due 27 April 2004	
20. 100% sealed DGL 4.3 miles due 23 March 2004	
21. 100% Naco 10 mile 23 March 2004	
22. 100% remainder of 5 miles East of POE 27 April 2004	
ACTION Environmental Working Group	RESPONSIBLE

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

ACTION	RESPONSIBLE
1. Mitigation costs possible from BA to be provided to (b) (6) (b) (6) Due 27 January	(b) (6)
2. Letter drafted to USF&WS Phoenix Field Office for CBP signature regarding Yuma BO and Tucson/Yuma BA; the letter should also acknowledge the USFWS cooperation – Due 31 December	
3. (b) (6) e-mail those items he needs GSRC and HDR to prepare for development of mitigation costs.	

10:15 – 10:20 RVS

Monthly report from IMC forwarded to interested parties via e-mail.

Access for RVS in the Douglas AO

10:20 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

(b) (6) updated the PDT:

WWD – West of DGL POE

- Oregon National Guard – June 2004, 30 soldiers for two 2-week deployments
- Alaska National Guard – 15 soldiers, 1 to 15 May 2004

Douglas Roadway West of POE

- Illinois N.G. 10 July 2004 (70 troops, LWCs on Kings Ranch Road – possible backup on WWD)
- 28 and 29 January 2004, the AzANG tour of the border with representatives from several units. Baker provided technical support.

JTF-6

(b) (6)

Scheduled Deployments FY'04

- Naco, Az USBP (Patrol Roads) 10-Feb to 30-Mar
- Douglas, Az USBP (Patrol Roads) 10-Feb to 30-Mar
- Naco (Fence & Barriers) 15-Mar to 15-Apr
- Nogales, Az USBP (Patrol Roads) Jul & Aug

10:45 – 11:15 ENGINEERING

Baker Eng. - updates, discussion and map of projects

Douglas, 13 Miles of Roadway

Nogales, Tunnels, Preliminary & Final Design

Formal comment matrix pending. Comments from Union Pacific Rail Road are outstanding.

Nogales, 1-1/2 Miles Roadway, follow up on Geotech with (b) (6)

Douglas, Lighting

(5 Miles) Split East and West of the POE, Preliminary and Final Design.

Not started

Douglas, Construction Oversight, and Staking.

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

Note JTF-6 deployment
Douglas, International Ditch, Preliminary and Final Design - *no study*
Not started
Naco, Lighting (5 Miles) Split East and West of the POE, Preliminary and Final Design
Not started
Naco, Primary Fencing, Preliminary and Final Design *not started*
Not started
Naco, Construction Oversight and Staking *at least on-going*
Note JTF-6 deployment
Nogales, Construction Oversight and Staking *not study*
Not started
Nogales, Aerial West of Nogales *1 mile completed*
Not started
Nogales, Schematic Design *3 miles completed & sketching on going*
Not started
Sonoita, Preliminary Design *going*
Not started
Permanent Survey Markers *some completed*
Not started
Temporary Vehicle Barriers *not started*
Not started
Naco, 10-miles Roadway, Preliminary and Final Design *ok+7*

11:15 – 12:00 ENVIRONMENTAL

GSRC - updates and discussion
PEIS Tucson & Yuma (AERC 225)
BA – Operations – Tucson & Yuma (AERC 51)
Whitewater Draw 404 Permit
Checkpoint - (b) (7)(E) AERC 227)
Checkpoints [REDACTED] AERC 499)
Naco BA
Temporary Vehicle Barriers (Nogales & Sonoita Stations)
Sonoita
Nogales Schematic Design
RVS EA for Tucson and Ajo Station
Cabeza Prieta Road Report
phase / ESA for the Ajo garage

12:00 – 1:00 LUNCH

1:00 – 1:30 REAL ESTATE

USACE - (b)(6)
Douglas Lighting (5 Miles) Split East and West of the POE
No action at this time
Douglas, 13-Miles Roadway West of POE
Douglas, International Ditch
No action at this time

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

Naco, Lighting (5 Miles) Split East and West of the POE

No action at this time

Nogales, 2-Miles Roadway East of POE

Nogales, Construction & ROW Acquisition (Pending Alignments)

No action at this time

Nogales, Schematic Design

All ROE's have gone out for 10 miles west and 5 miles east of POE

Sonoita, Preliminary Design, and Coordination

Permanent Survey Markers

No action at this time

Temporary Vehicle Barriers

No action at this time

Western Region – (b)(6)

Ephraim Ridge Reclamation

(b)(6) provided an incomplete report on Ephraim Ridge land acquisition. Report must be resent due to technical errors.

1:30 – 1:45 PROCUREMENT

Naco & Douglas deployments (JTF-6)

April deployment into Naco (JTF-6)

May deployment into Douglas at Whitewater Draw (National Guard)

1:45 – 2:00 CONSTRUCTION
Report From Kleinfelder

OTHER ITEMS

NEXT MEETINGS

23 March 2004 – Tucson Station, 10:00 am

27 April 2004 – HDR Phoenix, 10:00 am

25 May 2004 – Tucson Station, 10:00 am

22 June 2004 – HDR Phoenix, 10:00 am

27 July 2004 – Tucson Station, 10:00 am

24 August 2004 – HDR Phoenix, 10:00 am

14 September 2004 – Tucson Station, 10:00 am

FY04 TUCSON SECTOR DEPLOYMENTS

Task Name	2nd Quarter			3rd Quarter			4th Quarter	
	Feb	Mar	Apr	May	Jun	Jul	Aug	
Naco, Az								
JTF-6 (MWSS 272 - LWC/Road/Bollard Fence) JT-3706-0								
JTF-6 (307th Red Horse - 4 Miles of AM2 Matting Fence) JT-3998-04								
JTF-6 (MWSS 373 - 4 Caps for the LWC's) JT-4070-04								
Douglas, Az East of POE								
JTF-6 (B Co, 8th ESB - 1.5 Miles of Road) JT-2795-04								
JTF-6 (MWSS 373 - LWC's 10, 11 & 12) JT-4070-04								
Nogales, Az								
JTF-6 (854th En. Bn. - CbtHvy) JT-2793-04								
Douglas, Az (Whitewater Draw - West of POE)								
Oregon National Guard 2 - 2 week deployments								
Alaska National Guard								
Douglas, Az (West of POE)								
Illinois National Guard (LWCs @ King Ranch Rd.)								

Task	Milestone	External Tasks
Split	Summary	External Milestone
Progress	Project Summary	Deadline



①

PDT meeting 4/17/04

@ 8:55 today struggle shot @ USBP & names w/ JTF6 - no one hurt near Naco

Action items

- 1) EA-KOS Douglas AO - Feb 25-26 site walk
- 2) SWIFT Planning - Kleinfelder Thursday / Friday Douglas / Nogales
- Travel 4 hours
- 3) WWD Foundation charge to gravel rock
- test pits done on 3/6/04
- 4) Baker needs access off on Nogales tunnel
- 5) 6" Forms - shipped Friday to Sierra Vista
- 6) 20229 January AARG tour - done
- 7) (b)(6) Property - show seat - secured by Douglas
- trying to find @ EA contractor
- 8) Temp vehicle leaves locations - (b)(6) has map
- 9) REstate need to come up w/ acquisition plan
- having access problems
- 2 hours in phone 8:30 am at HOK
- Attorney to be confirmed in
- 11) Lighting design - retrofit may not work due to pole height
- looking
- 12) Naco 4 miles - construction for fence openings
- Fence details & Building Materials - P
- details can only do landing mat
- Pos. 'bly in M naco
- 13) Shipped to Nogales
- 14) ROE's to write Blankship - done
- 15) Gherin Ridge report - have had costs w/ draft report
- 16) NOL given to (b)(6)
- 17) Done
- 18) Done
- 19) 60% Douglas 3.6 miles looking
- 20-24 Done
- 22) move to 27 May 04



(2)

Current Working Group

All around the group met

DMC Report sent to (b)(6) & (b)(6)

— to go to the env/ohrc.

Deployment

AZ N - Alaska guard still on task in phase

— may have 2 deployment in line @ 15+ each

Alaska & Oregon concentrate on WWD.

Illinois in July 80 personnel

— Kings Ranch Road

— 1000' of Ballade 1000' of Lubjant

Will need 6" Forms rented

Equipment - 6" bl pump water tower & trailer

— Truck hoe need over crane - common cost

— \$7000 per week w/ \$6,000 delivery

Culvert pre-cast bid out? (b)(6) to look "approved equal"

design capact 20,000 pounds

JTF-6 - Bill Smith General

— Fence extensions going along okay

Engineering

Sooner 24 miles lateral distances

— approved w/ crushed rock & all weather top

Bozler 13 miles

Bozler Nogales tunnels

Bozler 1 1/2 roads

Bozler lighting no started

" Overweight loading being done

" chicken



③

Procurement

- Madhry & Sons - Dallas HRC can't find anyone

Environmental

PEFS to lawyers.

(b) (6) has reviewed w/ internal comments

BA - Tucson @ FEWS went 12/10 1/14 addendum 1/28

WWD Part - USACE has reviewed

1 part (b) (7)(E) - Filled in June

1 part (b) (7)(E) - Fills

NACo 4A - (b) (6), (b) (7)(C)

site visit done - USFWS significant problems

Temporary vehicle barrier - working on project mapster - Nogales

- Sonora - get maps

- owner ^{ROE} access problem for access roads

- BP will seek road charges for access

- Road to be done by March 04

PVS - needs city of Tucson & NPS w/ ROE

Cabaca hwy to road

Phase 1 ESA - w/ done

" 1 ESA Tucson - in progress

REAL ESTATE

Nogales projects tabled to meet 3/2/04

Smith - Nogales land exchange - area toward east of project area

- USFS & loan with land

Meeting w/ (b) (6) for access road @ Douglas

- Property owner station to border

- locate road to edge of property

- meeting on 3/22/04

Construction

NACo - utility line problem - vertical adjustments

- Communication OK



(4)

(b)(6)(b)(7)(C)

(b)(6)

Resubmission

Maps showing SCM lands on arc info

Actions after

- 1) Follow up on Bonds - Union Grants
- 2) Sonoma - determine revised access agreements
any SOW changes by 3/3/04
- 3) ~~3)~~ Conference on Monday
- 4) " " " " Lead Estimate
- 5) (b)(6) on relocation of rifle
- 6) Delivery Dates items 19, 20, 21, 22
- 7) SWPPP training ~~complete~~
- 8) Separate meeting SOP w/ ADR

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

MEETING AGENDA

Meeting Date and Time: 17 February 2004 – HDR Phoenix, 8:30 am
Meeting Location: HDR – Phoenix (Map Attached)
3200 E. Camelback, Suite 350

MEETING PURPOSE

TCA PDT EWG Meeting

ACTION Environmental Working Group	RESPONSIBLE
Mitigation costs possible from BA to be provided to (b)(6) Due 27 January	(b)(6)
Letter drafted to USF&WS Phoenix Field Office for CBP signature regarding Yuma BO and Tucson/Yuma BA; the letter should also acknowledge the USFWS cooperation – Due 31 December	
(b)(6) to e-mail those items he needs GSRC and HDR to prepare for development of mitigation costs.	

NON-PDT

- a) PEIS Tucson & Yuma (AERC 225)
- b) Checkpoints (b)(7)(E) AERC 499
- c) Checkpoint (b)(6) (AERC 227)
- d) BA – Operations – Tucson & Yuma (AERC 51)
- e) RVS EA for Tucson and Ajo Station

PDT

- a) Douglas Whitewater Draw
- b) Sonoita
- c) Nogales Schematic Design
- d) Temporary Vehicle Barriers (Nogales & Sonoita Stations)
- e) Naco BA
- f) Douglas Dip 5
- g) Strategy Document

NEXT MEETINGS

23 March 2004 – Tucson Station, 10:00 am
27 April 2004 – HDR Phoenix, 10:00 am
25 May 2004 – Tucson Station, 10:00 am
22 June 2004 – HDR Phoenix, 10:00 am
27 July 2004 – Tucson Station, 10:00 am
24 August 2004 – HDR Phoenix, 10:00 am
14 September 2004 – Tucson Station, 10:00 am



2/17/04 Environmental Working Group

action items -

(A) - mitigation for WWD

sent SOI to ~~DE~~ AEC C for GSKC

for Monitoring Plan & Monitoring

- need funds

- Plan that lays out how you are going to accomplish mitigation for permit

- permit timeline out

(b)(6)

is regulatory person for USACE in LA

mitigation costs \$12,000 for plan & monitoring

(B) BA mitigation costs done

2) just sent info to USFWS. Do we send letter?

will call (b)(6) to ask time frame

(b)(6), (b)(7)(C)

GSKC will help draft SO if needed

PEFS 27 Feb review to stand by attorney

3) Done

Non POT

PEFS - legal review to stand on 2/27/04

- other agency reviews in

didn't like coordination

- List what are we going to share w/ other agencies

- send out letters at begin of action to affected agencies

(b)(6)

will contact Southwest border task force

Vents - GSKC got Fowls

Vents CSRS " " "

BA Trans/area - BA team @ F&US

CA AJO RUS - waiting on COEs



DDT

- Douglas WWP - GSA and letter from Robert Brown
- Sanitar - moving some private property ROEC
- Nogah Schenckler design - waiting on ROEC
- Nogah & Son's Temp Vehicle Corridor - involves Casa Grande, Big Spring, Tucson
 - will increase mileage length beyond 55 miles
- Nogah & Son's - 3 Feb site visit to look at site
 - options for crossing
 - Sanitar - Rock Gabbers
 - BLM water gabbers on border so cattle can't cross
 - DANCEY BRIDGE

Douglas & S - done

Shanty down -

- B BLM site visit discussion w/ (b)(6) - vehicle comes with mail
 - joining conference call - want us to apply for permits
 - USACE responded - (b)(6) not as comfortable
 - CBP legal will respond

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

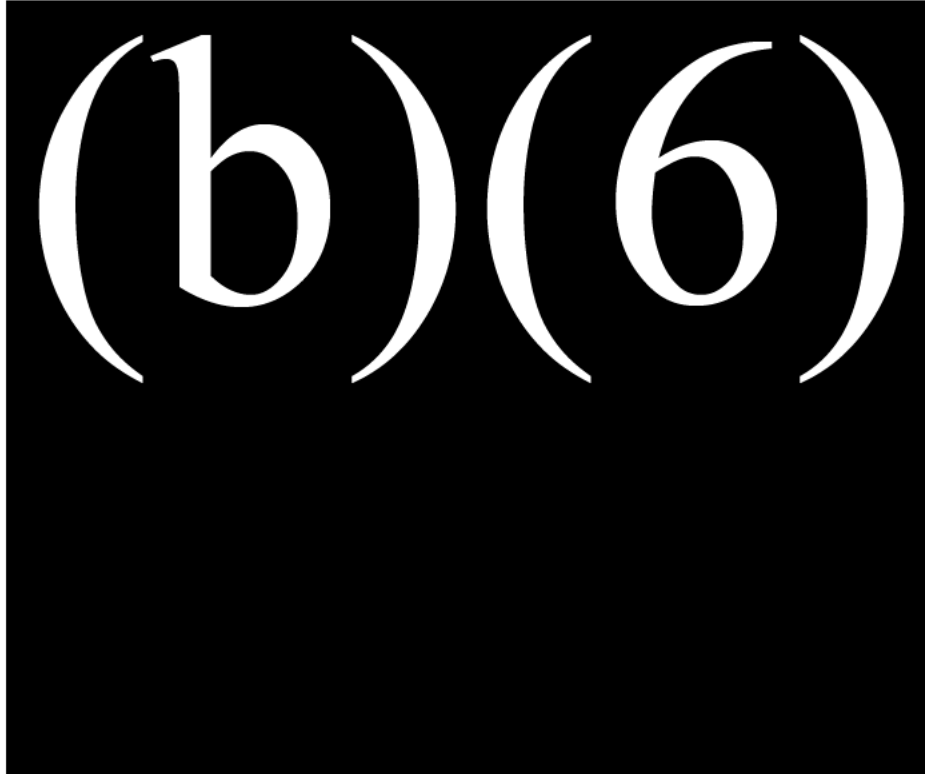
MEETING MINUTES

Meeting Date and Time: 17 February 2004 – HDR Phoenix, 10:00 am
Meeting Location: HDR – Phoenix
3200 E. Camelback, Suite 350

Distribution Date: 18 February 2004

Distributor: (b)(6)

Distribution:



ACTION	RESPONSIBLE	STATUS
1. Follow up on contract for GSRC to prepare EA for RVS in Douglas AO – need survey and engineering support – need purpose statement developed by HDR – access to sites reviewed by (b)(6)	(b)(6)	Pending visit by HDR, GSRC, AERC, & USBP on 25 & 26 Feb.
2. SWPPP training – need proposed dates and costs for training	(b)(6)	Kleinfelder conducting training this week
3. WWD foundation change to grouted rock – Baker to check on Geotech – AzANG to check with constructing unit	(b)(6)	Pending – (b)(6) to revise – test pits to be excavated by National Guard
4. Baker needs official comment resolution sign off on Nogales Tunnels from the PDT.	(b)(6)	Pending comments from UPRR
5. Rent 6" forms for next JTF-6 deployment	(b)(6)	Done

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

ACTION	RESPONSIBLE	STATUS
6. 28 and 29 January 2004, the AzANG will tour the border with representatives from several units. Baker will provide technical support.	(b)(6)	Done
7. Follow up on fencing for (b)(6) property in Douglas	(b)(6)	Done
8. Temporary Vehicle Barrier locations for EA development, Various stations	(b)(6)	pending
9. (b)(6) to come up with acquisition plan and proceed with appraisals for Nogales 1 1/2 mile roadway	(b)(6)	Pending meeting with (b)(6) 2 March
10. (b)(6) Property fence SOW to (b)(6)	(b)(6)	Done
11. Lighting design test follow up with Castro Electric	(b)(6)	Pending information from Castro Electric
12. Fence details and BOM for Naco 4 Mile roadway deployment - redirected units from Organ Pipe	(b)(6)	Done
13. Materials in La Tune re-ship to Nogales	(b)(6)	Done
14. ROEs for 10 February deployment copied to (b)(6)	(b)(6)	Done
15. Corrected Ephraim Ridge Report	(b)(6)	Pending
16. NGL Schematic Design Alignments to (b)(6)	(b)(6)	Done
17. Blanket ROE to USFS (b)(6)	(b)(6)	Done
18. Geotechnical Report on NGL 1 1/2 mile to (b)(6)	(b)(6)	Done
19. 60% DGL 3.6 miles due 27 April 2004	(b)(6)	pending
20. 100% scaled DGL 4.3 miles due 23 March 2004	(b)(6)	pending
21. 100% Naco 10 mile 23 March 2004	(b)(6)	pending
22. 100% remainder of 5 miles East of POE 27 April 2004	(b)(6)	pending
ACTION		
Environmental Working Group		
1. Mitigation costs possible from BA to be provided to (b)(6) - Due 27 January	(b)(6)	Done
2. Letter drafted to USF&WS Phoenix Field Office for CBP signature regarding Yuma BO and Tucson/Yuma BA; the letter should also acknowledge the USFWS cooperation - Due 31 December	(b)(6)	pending
3. (b)(6) to e-mail those items he needs GSRC and FDR to prepare for development of mitigation costs.	(b)(6)	Done

RVS

Monthly report from IMC forwarded to interested parties via e-mail.

Access for RVS in the Douglas AO, see action item number 1 above.

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

MILITARY DEPLOYMENTS

Arizona National Guard (see attached schedule)

(b)(6)

WWD – West of DGL POE

Discussion of materials & equipment needed for deployment including 100 ton track hoe, temp water tank, precast box culvert and construction trailer all on site by 1 May.

- Oregon National Guard – June 2004, 30 soldiers for two 2-week deployments
- Alaska National Guard – 20 soldiers, 1 to 15 May 2004

Douglas Roadway West of POE

- Illinois N.G. 10 July 2004 (70 troops, LWCs on Kings Ranch Road – possible backup on WWD)

28 and 29 January 2004, the AzANG toured the border with representatives from several units. Baker provided technical support.

JTF-6

(b)(6)

Scheduled Deployments FY'04

- Naco, Az USBP (Patrol Roads) 10-Feb to 30-Mar
- Douglas, Az USBP (Patrol Roads) 10-Feb to 30-Mar
- Naco (Fence & Barriers) 15-Mar to 15-Apr
- Nogales, Az USBP (Patrol Roads) Jul & Aug

ENGINEERING

Baker Eng. - updates, discussion and map of projects (see attached map)

Douglas, 13 Miles of Roadway (see action items)

Nogales, 1-1/2 Miles Roadway, follow up on Geotech with (b)(6)

Douglas, Lighting (5 Miles) Split East and West of the POE, Pre. & Final Design.

Pending NTP

Douglas, Construction Oversight, and Staking.

Underway now, Note JTF-6 deployment

Douglas, International Ditch, Preliminary and Final Design

Pending NTP

Naco, Lighting (5 Miles) Split East and West of the POE, Preliminary and Final Design

Pending NTP

Naco, Primary Fencing, Preliminary and Final Design

Pending NTP

Naco, Construction Oversight and Staking

Underway now, Note JTF-6 deployment

Nogales, Construction Oversight and Staking

Pending deployments and NTP, Not started

Nogales, Aerial West of Nogales

Example of photos presented by Baker Eng. in working drafts of deliverables

Nogales, Schematic Design

Preliminary layout presented

Sonoita, Preliminary Design

Preliminary layout presented

Permanent Survey Markers

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

Not started
Temporary Vehicle Barriers
Not started
Naco, 10-miles Roadway, Preliminary and Final Design

ENVIRONMENTAL

GSRC - updates and discussion

PEIS Tucson & Yuma (AERC 225)

The Revised Draft PEIS for the Tucson/Yuma Sector Operations is still under review by the CBP Legal Counsel. Tucson PEIS will not begin until Feb 27th. Some comments have been received from outside agencies, such as BLM, and have already been incorporated to the Revised Draft. GSRC can provide an estimate for delivery of the public-ready draft until receipt of the legal comments.

BA - Operations - Tucson & Yuma (AERC 51)

The Tucson BA was submitted to the USFWS on 14 January. No comments have been received thus far. The USFWS (Phoenix) is still working on the Draft BO for the Yuma operations. The group decided not to send an official letter to the USFWS, but wait until the end of February to reconsider whether one should be sent. In the meantime, (b)(6) will contact (b)(6) and urge him to get us a draft BO. The group also discussed the future standard procedures for providing internal copies to outside agencies. The consensus was to send an early coordination letter to affected agencies, particularly to those with lands in the project area and request their participation as a cooperating agency. If an affirmative response is received, then a project specific MOA would be developed. GSRC cautioned the team about releasing Section 7 consultation documents to outside agencies, other than Native American Nations whose lands are affected.

Whitewater Draw 404 Permit

The Whitewater Draw permit application is still in process. (b)(6) is developing a SOW to send to GSRC for the development of a mitigation plan at the City of Douglas' restoration project. (b)(6) will call (b)(6) and urge him to issue the 404 permit with the condition that the restoration plan be completed and implemented by a certain date. (b)(6) requested authorization to conduct geo-technical investigations within WWD in early March. Kleinfelder will send GSRC the testing plan, with hole locations and volumes. GSRC will contact (b)(6) to see if this action can be completed under NWP 18 (minor discharges) while the 404 IP is still pending.

Checkpoint - (b)(7)(E) AERC 227)

The Tucson checkpoint (b)(7)(E) Final EA and FONSI has been distributed.

Checkpoints (b)(7)(E) AERC 499)

The Tucson checkpoints (on (b)(7)(E) FONSI has been signed and sent to GSRC. The Final EA will be sent out by the end of this week or early next week depending upon the NOA being published.

Cabeza Prieta Road Report

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

The Cabeza Prieta road report has been finalized and submitted.

The Tucson Phase I ESA will be sent out this week or early next week.

(b)(6) has requested that on future documents, we refer to these as Environmental Baseline Surveys (EBS) to avoid confusion with the Endangered Species Act (ESA).

Phase I for the Ajo garage

The Phase I ESA for the Ajo garage has been approved by (b)(6) (no need to change from ESA to EBS for this project). GSRC will send the final out this week.

Ajo Station expansion EA

GSRC has been waiting for access to conduct the field surveys for the Ajo Station expansion EA. (b)(6) indicated that we had all the ROEs and approval from BLM to conduct the surveys.

Naco BA

(b)(6) GSRC, HDR and Naco Station OBP conducted a site visit with the USFWS, BLM, AzDGF, and IBWC on 3 February 2004. Various alternative designs including Bailey bridge, concrete low water crossing, culverts, gabions, were discussed. An alternate location at the border was also discussed and was actually preferred by BLM to help deter ICs.

Temporary Vehicle Barriers (Nogales, Sonoita, Tucson, Casa Grande & Ajo Stations)

(b)(6) provided project locations from Tucson, Casa Grande and Ajo stations for the Temporary Vehicle Barriers. There is still some data needed from Sonoita. (b)(6) stated that TON has requested permanent VB on the Nation rather than TVB. These changes will require a modification and possibly a separate EA for the permanent VB. GSRC will map out the locations and inform (b)(6) about out of scope items. The group agreed that the TON project be a complete separate document since it is a different type of barrier requiring ground disturbances and is wholly on the TON.

(b) (7)(E)

(b)(6) completed the ROEs for the Sonoita road work, but not all of the ROEs for all of the access roads were granted. Sonoita is considering looking at other access roads. (b)(6) will coordinate with Sonoita to identify these new access roads. GSRC also reminded the group that the current SOW includes only improvements to the existing roads; if engineering designs indicate that cut and fill activities (or new roads) are needed that go beyond the survey corridor that is scoped, a modification might be necessary. Once the new roads and the preliminary designs are developed, GSRC will assess whether a modification is necessary.

Nogales Schematic Design

The ROEs for Nogales are also dependent upon the 15% design from Baker, which has recently changed. The ROEs are needed prior to the conduct of GSRC's field surveys.

RVS EA for Tucson and Ajo Station

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

The Ajo and Tucson Station RVS EAs require ROEs in order to initiate the field surveys. (b)(6) has one more ROE to obtain from the City for the Tucson Station. One ROE from the NPS is also needed for the Ajo Station RVS.

Additional items:

(b)(6) needs to resubmit the Tucson strategy document.

GSRC will develop a map of the completed environmental projects along the Arizona border.

REAL ESTATE

USACE - (b)(6)

2 March 2004 meeting and conference call scheduled in Phoenix with (b)(6) regarding Nogales RE issues and acquisition plan. (b)(6) conducted a site visit and contacted land owners last week in Nogales. (b)(6) plans 22 March 2004 meeting with (b)(6) in Douglas to discuss Cattleman's road alignment.

Douglas Lighting (5 Miles) Split East and West of the POE

No action at this time

Douglas, 13-Miles Roadway West of POE

Douglas, International Ditch

No action at this time

Naco, Lighting (5 Miles) Split East and West of the POE

No action at this time

Nogales, 2-Miles Roadway East of POE (see notes above)

Nogales, Construction & ROW Acquisition (Pending Alignments)

No action at this time

Nogales, Schematic Design

All ROE's have gone out for 10 miles west and 5 miles east of POE

Sonoita, Preliminary Design, and Coordination

Alignments must be revised due to private property owner issues. (see action items regarding Sonoita EA.

Permanent Survey Markers

No action at this time

Temporary Vehicle Barriers

No action at this time, pending location from (b)(6) and possible revised SOW for GSRC to work on the TON. (see action items)

Western Region - (b)(6)

Ephraim Ridge Reclamation

(b)(6) provided an incomplete report in December on Ephraim Ridge land acquisition. Pending

PROCUREMENT

Naco & Douglas deployments (JTF-6)

April deployment into Naco (JTF-6)

May deployment into Douglas at Whitewater Draw (National Guard)

CONSTRUCTION

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

Report from (b)(6) on shooting incident in Naco
Report From Kleinfelder, deployments just beginning, (b)(6) working on issues
regarding survey concerns in east of POE in Douglas.

ACTION ITEMS

ACTION	RESPONSIBLE
1. Follow up on contract for GSRC to prepare EA for RVS in Douglas AO – need survey and engineering support – need purpose statement developed by HDR – access to sites reviewed by (b)(6) and HDR	(b)(6)
2. WWD foundation change to grouted rock – Baker to check on Geotech – AzANG to check with constructing unit	
3. Baker needs official comment resolution sign off on Nogales Tunnels from the PDT.	
4. Follow up on fencing for (b)(6) property in Douglas	
5. Temporary Vehicle Barrier locations for EA development, Various stations	
6. (b)(6) to come up with acquisition plan and proceed with appraisals for Nogales 1 ½ mile roadway	
7. Lighting design test follow up with Castro Electric	
8. Fence details and BOM for Naco 4 Mile roadway deployment – redirected units from Organ Pipe	
9. Corrected Ephraim Ridge Report	
10. 60% DGL 3.6 miles due 27 April 2004	
11. 100% sealed DGL 4.3 miles due 23 March 2004	
12. 100% Naco 10 mile 22 June 2004	
13. 100% remainder of 5 miles East of POE 27 May 2004	
14. Follow up meeting with (b)(6) 2 March in Phoenix, conference call in legal	
15. Check on unit capability in Naco to see if they can move the 1" pvc waterline in the way.	
16. Conference call on budgets within the next few weeks	
17. e-mail DGL & NCO deployment contacts	
18. (b)(6) to provide BLM ownership to (b)(6) (b)(6) for distribution to the PDT	
19. New roadway alignments in NGL to be provided to the USFS by (b)(6) once information is provided by (b)(6)	
ACTION	
Environmental Working Group	
1. (b)(6) to contact (b)(6) regarding draft BO	
2. SOW development and processing for GSRC continued work on WWD	
3. Contact (b)(6) regarding 404 permit issuance on a government to government level	
4. Revised Sonoita alignments and possible SOW revisions ASAP	

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

ACTION	RESPONSIBLE
5. Check on MOU / MOA and the Southwest Strategy, report back next PDT	(b) (6) (b) (6)

NEXT MEETINGS

23 March 2004 – Tucson Station, 10:00 am
27 April 2004 – HDR Phoenix, 10:00 am
25 May 2004 – Tucson Station, 10:00 am
22 June 2004 – HDR Phoenix, 10:00 am
27 July 2004 – Tucson Station, 10:00 am
24 August 2004 – HDR Phoenix, 10:00 am
14 September 2004 – Tucson Station, 10:00 am

DATE: 17 February 2004 TIME: 10:00

**US BORDER PATROL BORDER BARRIER PROJECTS
TUCSON SECTOR PROJECT DELIVERY TEAM
MEETING CHECK IN AND SIGN IN**

LOCATION: HDR -

TUCSON SECTOR

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(b)(6)

NOGALES STATION

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(b)(6)

DOUGLAS STATION

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(b)(6)

SONOITA STATION

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(b)(6)

NACO STATION

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(b)(6)

CASA GRANDE STATION

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(b)(6)

YUMA SECTOR

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(b)(6)

CONSULTANT TEAM

HDR

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(b)(6)

IMC

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(b)(6)

BAKER

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GSRC

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Kleinfelder

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AZ NATIONAL GUARD

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(b)(6)

OTHER GOVERNMENT AGENCIES

USFS

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(b)(6)

AG&FD

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(b)(6)

USE&WS

☐

(b)(6)

OTHER

NAME: (b)(6), (b)(6)
ADDRESS: 1300 Pennsylvania Avenue
Room 3.5B
Washington D.C.

AFFILIATION: DHS

E-MAIL:

PHONE:

(b)(6)

FAX:

(b)(6)

DATE: 17 February 2004 TIME: 10:00

LOCATION: HDR -

**US BORDER PATROL BORDER BARRIER PROJECTS
TUCSON SECTOR PROJECT DELIVERY TEAM
MEETING CHECK IN AND SIGN IN**

NAME: (b) (6) AFFILIATION: BLM
ADDRESS: 222 N. Central Avenue E-MAIL: (b)(6)
Phoenix, Az. 85004 PHONE: (b)(6) FAX: (b) (6), (b) (7)
(C)

NAME: _____ AFFILIATION: _____
ADDRESS: _____ E-MAIL: _____
PHONE: _____ FAX: _____

NAME: _____ AFFILIATION: _____
ADDRESS: _____ E-MAIL: _____
PHONE: _____ FAX: _____

NAME: _____
ADDRESS: _____ E-MAIL: _____
PHONE: _____ FAX: _____

NAME: _____ AFFILIATION: _____
ADDRESS: _____ E-MAIL: _____
PHONE: _____ FAX: _____

FY04 TUCSON SECTOR DEPLOYMENTS

Task Name	2nd Quarter				3rd Quarter				4th Quarter			
	Feb	Mar	Apr	May	Jun	Jul	Aug					
JTF-6 (MWSS 272 - LWC/Road/Bollard Fence) JT-3708-0												
JTF-6 (307th Red Horse - 4 Miles of AM2 Matting Fence) JT-3998-04												
JTF-6 (MWSS 373 - 4 Caps for the LWC's) JT-4070-04												
Douglas, Az East of POE												
JTF-6 (B Co, 8th ESB - 1.5 Miles of Road) JT-2795-04												
JTF-6 (MWSS 373 - LWC's 10, 11 & 12) JT-4070-04												
Nogales, Az												
JTF-6 (854th En. Bn. - CbtHvy) JT-2793-04												
Douglas, Az (Whitewater Draw - West of POE)												
Oregon National Guard 2 - 2 week deployments												
Alaska National Guard												
Douglas, Az (West of POE)												
Illinois National Guard (LWCs @ King Ranch Rd.)												

Task	Milestone	External Tasks
Split	Summary	External Milestone
Progress	Project Summary	Deadline

as of 8 December 2003

FOR CORRECTIONS PLEASE CONTACT

Sat 27/04

Minutes – Teleconference
Whitewater Draw Mitigation
30 January 2004

Attendees:

(b)(6)

A potential mitigation site for the impacts to wetlands from the Whitewater Draw construction project was the main focus of the discussion. GSRC explained that the city of Douglas was interested in allowing the Office of Border Patrol (OBP) to assist with the restoration of an unnamed drainage that is a tributary to WWD and for which the City is interested in making a natural area. The city also intends to offset impacts to jurisdictional areas they will sustain while constructing the 3rd Street extension.

Everyone was in agreement that this was a good mitigation site, since OBP would not have to incur the cost of land acquisition, but only pay for the restoration efforts and the submission of the Mitigation and Monitoring Plan. Also, since the site was recommended by (b)(6) at the USACE, it will likely be easily approved.

(b)(6) suggested that a memorandum of understanding between OBP and the city of Douglas be drafted. He stated that this could take several months. GSRC stated that a permit might be obtained through the submission of a letter to the USACE stating the intentions of the OBP to follow through on the Mitigation and Monitoring Plan as soon as possible. GSRC will submit the letter for review to (b)(6) on the 30th of January. Once the comments are received by GSRC on the letter it would be submitted to (b)(6) at the USACE for approval.

(b)(6) suggested a call be placed to (b)(6) prior to sending the letter to inform him of the content of the letter and the urgency of this project. Also, a follow up call will be placed after (b)(6) has received the letter, and record of the conversation be mailed out to all.

Conference Call concluded

(b)(6)
(b)(6)
From: (b)(6)
Sent: Monday, July 11, 2005 12:01 PM
To: (b)(6)
Cc: (b)(6), (b)(7)(C)
Subject: TCA PDT Meeting 19 July 2005

TCA PDT:.....

Attached is the agenda for next Tuesday's PDT meeting in Tucson. The meeting will take place at the Tucson Station starting at 10:00AM Arizona Time.

The conference call in number is: 866-707-6431
Participant pass code: 4709537

TIWAZ:.....

Tactical Infrastructure for Western Arizona (TIWAZ) Public Meeting will be held after the PDT at the Tucson Convention Center, from 4 to 8 PM. The Cabeza Prieta material can now be accessed via the link below:

<ftp://ftpuser:gsrctftp@ftp.gsrrcorp.com/Out/CebezaPrieta/>

Let (b)(6) (GSRC) know if you are having trouble accessing the ftp site. His contact information is below. after hours please use the cell number. GSRC (b)(6)
(b)(6)

CONSTRUCTION:.....

In June the National Guard completed another successful deployment into Whitewater Draw (Douglas, Arizona) to put the finishing touches on the approach road to the Box culvert and to construct bollard fence along the border. Active and completed construction projects can be reviewed at the following web page, including project completion reports and photographs of the deployments.

To access a website that has updates, go to:

www.kleinfelder.com

-Click on the **Client Link** link at the left of the page.

-Select **Border Patrol Construction Oversight** from the drop-down menu.

-For a User Name enter (b)(7)(E)

-For a Password enter: (b)(6)

(The User Name and Password are case-sensitive, so make sure you don't capitalize.)

-Select the deployment you wish to view

TIME ZONES:.....

For conversion of time zones the following web page can be helpful (Arizona, except the Navajo Nation, does not have daylight savings) time)

<http://www.time.gov/index.html>

(b)(6)

7/11/2005

BW1 FOIA CBP 007374

Tactical Infrastructure Program Manager (Tucson Sector)
16035 N. 43rd Street | Phoenix, Arizona | 85032 |

(b)(6)

This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secured or error-free as information could be intercepted, corrupted, lost, destroyed, received late or incomplete, or could contain viruses. The sender therefore does not accept liability for any error or omission in the contents of this message, which arises as a result of e-mail transmission. If verification is required, please request a hard-copy version from the sender.

7/11/2005

BW1 FOIA CBP 007375

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

MEETING AGENDA

Meeting Date and Time: 19 July 2005 @ 10:00
Meeting Location: Tucson Station
Meeting Purpose: TCA PDT Meeting

DISTRIBUTION

See attached Distribution list.

ACTION ITEMS

1.	GSA coordination on drainage tunnel access work. Follow-up with local contact at the POE. To be discussed in July 29 Nogales meeting	(b)(6)
2.	Follow-up on paving the Nogales ½ mile with a private contractor once funding is available. Pending with PM (b)(6)	
3.	Finalize SOW and prepare fee proposal for FY'05 engineering services by Baker Eng. (Sonoita in , need others) Reviewing cost estimates, etc.	
4.	Rental Equipment extended for Naco and Douglas fence crews, pending new vendor.	
5.	Douglas, 13-Mile Roadway 2.5 miles on the west into the Naco AO 100% plans expected by 28 June 2005. Baker is doing quality review of plan sets	
6.	Douglas, International Ditch drainage report expected 3 June 2005. Submitted to PM (b)(6) for review.	
Environmental Working Group		
1.	Set aside \$35,000 for mitigation on Whitewater Draw 404 permit	
2.	Ephraim Ridge Reclamation SOW and request for fee proposal for Phase I ESA to GSRC. GSRC & AERC to re-negotiate fees.	
3.	Tucson BA needs funding for GSRC contract modification and up-dated maps from stations. Maps completed & at GSRC.	
4.	Provide (b)(6)(b)(7)(C) with a copy of the Preliminary Draft EA for the Sonoita Border Roads to obtain feed-back on deployment operation and staging sites.	
5.	Comments needed on PEIS by 15 July	

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

MILITARY DEPLOYMENTS

Arizona Army National Guard

Scheduled Deployments FY'05

101st Engineer Company from Massachusetts. 70 personnel into Whitewater Draw to complete approaches to box culvert. Unit did outstanding job on project.

JTF-N

No Further Scheduled Deployments FY'05

Report on Potential FY'06 Deployments

ENGINEERING

Baker Eng.

Douglas, Lighting (5 Miles)

Douglas, 13-Mile Roadway

Douglas, International Ditch

Naco, Lighting (5 Miles)

Nogales, Schematic Design on hold pending resolution of real estate issues and funding to proceed. To be discussed in 29 July meeting in Nogales

FY'05 Engineering Projects

2 additional miles of roadway in Douglas
relocation of lights in Nogales

2 additional miles of roadway in Nogales

4 miles in Sonoita (fee proposal received and in process, effort will not proceed until
environmental documents are in place)

ENVIRONMENTAL

GSRC

PEIS Tucson & Yuma (AERC 225

Tucson BA

Whitewater Draw 404 Permit

San Pedro River LWC

Vehicle Barriers - Tohono O'Odham Nation (TON)

Tactical Infrastructure for Western Arizona

Public meetings are scheduled for Tucson, Gila Bend and Yuma from July 19th through July

21st. Tactical Infrastructure for Western Arizona (TIWAz) Public Meeting will be held after the PDT at the Tucson Convention Center, from 4 to 8 PM. The Cabeza Prieta material can now be accessed via the link below:

<ftp://ftpuser:gsrctftp@ftp.gsrrcorp.com/Out/CebezaPrieta/>

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

Let (b)(6) (GSRC) know if you are having trouble accessing the ftp site. His contact information is below, after hours please use the cell number. GSRC (b)(6)

(b)(6)

USPP—BMGR EA was released for public review on May 23. Initial efforts on the CPNWR EA is on-going, public scooping meetings are being coordinated.
Nogales Schematic Design –to be discussed on July 29 meeting in Nogales.
Ephraim Ridge Phase I—GSRC submitted estimate for Ephraim Ridge ESA/EA.

REAL ESTATE

USACE - Sacramento

No Report

NLC - Laguna Nigel

Ephraim Ridge Report

(document is into CBP legal review)

(b)(6)

(b)(6)

(C)

PROCUREMENT

AERC

Discussion of Hertz Rentals in Naco and Douglas

(b)(6)

CONSTRUCTION

Kleinfelder

(b)(6)

Updates (see web page below)

To access a website that has updates, go to:

www.kleinfelder.com

-Click on the **Client Link** link at the left of the page.

-Select **Border Patrol Construction Oversight** from the drop-down menu.

-For a User Name enter (b) (7)(E)

-For a Password enter:

(The User Name and Password are case-sensitive, so make sure you don't capitalize.)

-Select the deployment you wish to view

ACTION ITEMS

1.	GSA coordination on drainage tunnel access work. Follow-up with local contact at the POE. To be discussed in July 29 Nogales meeting	(b)(6) staff & Baker
2.	Follow-up on paving the Nogales ½ mile with a private contractor once funding is available. Pending with PM (b)(6)	(b)(6)
3.	Finalize SOW and prepare fee proposal for FY'05 engineering services by Baker Eng. (Sonoita in , need others) Reviewing cost estimates, etc.	

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

4.	Rental Equipment extended for Naco and Douglas fence crews, pending new vendor.	(b)(6)
5.	Douglas, 13-Mile Roadway 2.5 miles on the west into the Naco AO 100% plans expected by 28 June 2005. Baker is doing quality review of plan sets	
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1.	Set aside \$35,000 for mitigation on Whitewater Draw 404 permit	
2.	Ephraim Ridge Reclamation SOW and request for fee proposal for Phase I ESA to GSRC. GSRC & AERC to re-negotiate fees.	
3.	Tucson BA needs funding for GSRC contract modification and up-dated maps from stations. Maps completed & at GSRC.	
4.	Provide (b)(6) with a copy of the Preliminary Draft EA for the Sonora Border Roads to obtain feed-back on deployment operation and staging sites.	
5.	Comments needed on PEIS by 15 July	

NEXT MEETINGS

23 August 2005 @ 10:00 – Tucson Station

13 September 2005 @ 10:00 – Tucson Station

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

DISTRIBUTION

(b)(6)

Date: 9/23/2003 11:00 PM

Sender: (b) (6), (b) (7)(C)

To:

cc:

bcc:

Priority: Normal

Subject: Status list

Folks--attached is status matrix of environmental projects that we have on-going for the Tucson Sector. This list was developed for (b)(6) at the request of (b)(6) as a result of a meeting between CBP and DOI. Apparently DOI has agreed to help/partner with CBP to ensure a smooth decision making process. (b)(6) has forwarded the list to (b)(6) as of this morning (23 September 2003). Call if you have questions. Thanks.

(b) (6)



NEPA-Status.doc

Tucson Sector Environmental Project Status Matrix
(as of 22 September 2003)

Project Name	Project Description	Status	Issues (Affected Agency)
1. Supplemental EA for Infrastructure Along the Naco-Douglas Corridor	Project includes primary fencing along the entire Douglas AO border, secondary fencing in Douglas and Naco POE areas, vehicle barriers or fences along Naco western AO, lighting, and road improvements for Naco and Douglas	Preliminary Final EA to be prepared by end of October	1. Water withdrawal from San Pedro Basin might affect critical habitat for 2 fish and 1 plant; a BA is being prepared to address these issues (USFWS/BLM). 2. A portion of the project transects the San Pedro National Riparian Conservation Area, which contains some of the critical habitat and is sensitive wildlife area (BLM). 3. Some concerns that IAs will be pushed into remote areas to the west, which could affect the Coronado National Memorial (NPS).
2. Biological Assessment for Proposed Infrastructure in Naco Corridor	This assessment will satisfy the Section 7 requirements, mentioned above. Will need to assess potential effects on Huachuca water umbel, spikedace and longfin dace	NTP just received--no schedule developed for draft	1. Water withdrawal from San Pedro Basin will be the primary issue. Ft. Huachuca and Sierra Vista have recently implemented conservation measures to reduce water demands. USBP might have to implement similar conservation measures, which could include trucking water in from outside sources, acquiring agricultural lands for preservation, using other wetting materials for dust control, etc. (USFWS)
3. Tucson/Yuma Programmatic EIS	Programmatic evaluation of daily operations for both sectors--includes air reconnaissance, SAR, checkpoints, dragging, patrols (particularly off-road)	Revised Draft is being prepared for another internal review	1. Initial draft was sent out with BIRD projects included and confused everyone. We will need to convince all agencies that USBP is not planning to have the border completely fenced (double fencing) and leveled, as presented in the BIRD
4. Tucson Sector BA	Addresses daily operations of USBP within Tucson Sector	Revised Final BA expected by the end of October	1. Consultation shifted from Phoenix office to Tucson office, resulting in delays (additional species requested by Tucson office) (USFWS). 2. Sonoran pronghorn on brink of extirpation—all activities will be closely monitored (USFWS) 3. Push for critical habitat designation for jaguar in Nogales/Sonoita areas—will have impact on USBP projects if successful (USFWS)
5. Yuma Sector BA	Addresses daily operations of USBP Tucson Sector	Final BA accepted in January 2003	1. Need draft BO from Phoenix office (USFWS) 2. Sonoran pronghorn on brink of extirpation

Project Name	Project Description	Status	Issues (Affected Agency)
6. Three checkpoint locations on (b) (7)(E) (b) (7)(E)	Construct and operate 3 temporary checkpoints along state and Federal highways within (b) (7)(E)	Draft EA submitted for public review on (b) (7)(E) only last week—will be no review for 30 days	1. (b) (7)(E) council members might not approve locations because of fear that additional roads would be constructed to circumvent the checkpoints (BIA, (b) (7)(E))
7. Nogales Various Infrastructure EA	Project includes 2 miles of major roadway improvements on east side of POE, primary fencing on east side to parallel new road, installation of 15 RVS sites and continuation of current use of 69 portable light generators	Final EA at HQ for staffing	1. Will need to concurrence from SHPO (NPS), especially for visual impacts from RVS near POE
8. USBP Nogales Station EA and EBS	Acquisition of 30-acre site for permanent USBP station	Final EA expected to be sent to HQ within next 2 weeks; some contamination discovered at fuel tanks	1. Will need determine level of contamination, if any, and remediate site before purchasing (EPA)
9. Rescue Beacons EA (Tohono Nation)	Installation and operation of 10 rescue beacons on Tohono O'odham Nation	Preliminary draft completed; Tohono council has objected to the beacons so draft has not been released as yet	1. Tohono believe beacons will be used as staging area for smugglers; issue needs to be discussed in front of Council
10. 27-mile Road Improvements EA, Sonoita Station	Mostly road grading with some repair/installation of drainage structures	Received NTP recently; waiting for ROEs before surveys can start	No issues yet, but most of the work is on National Forest
11. 10-miles Road Construction, Nogales Station	5 miles of major road construction and improvements on either side of Nogales POE	Received NTP recently; waiting for ROEs before surveys can start	No issues yet
12. Installation of Temporary Vehicle Barriers, Tucson Sector	Installation of temporary vehicles at high traffic areas anywhere within the Tucson Sector—no ground disturbance	Received NTP recently; reconnaissance to identify sensitive areas to occur in October	No issues yet

Project Name	Project Description	Status	Issues (Affected Agency)
13. Cabeza Prieta NWR Road Improvements	5 miles of post-action surveys and 18 miles of new road construction/improvement on NWR	Field reconnaissance to occur week of 22 Sept; field surveys within the next two weeks	1. USBP graded about 5 miles of road without surveys or NEPA on the NWR within home range of Sonoran pronghorn (USFWS)

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 23 September 2003 8:30 AM

Meeting Location: Tucson Station USBP

MEETING PURPOSE

TCA PDT Environmental Working Group Meeting

INTRODUCTIONS

1. REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Nogales BPS (AERC #503 ENV #220) due out 25 July – Comments due - extended to 5 September	All
3. Tucson BA comments due - extended to 29 August	All
3. Naco-Douglas SEA – comments due to 29 August – 18 September conference call @ 9 am central time	All

2. SUMMARY OF NON-PDT ACTIVITIES (REGIONAL)

- a. PEIS Tucson & Yuma (AERC 225)
- b. RVS for TCA (AERC 255) – *Nogales defunct FCA*
- c. Rescue Beacons (AERC 497)
- d. Operation Desert Grip (AERC 497/498)
- e. Checkpoints ^{(b) (7)(E)} (AERC 499)
- f. Nogales BPS (AERC 503)
- g. BA – Operations – Tucson & Yuma (AERC 51)

3. SUMMARY OF PDT ACTIVITIES (INFRASTRUCTURE)

Review all actions pending on chart - add/delete/change –

- a. Nogales Infrastructure EA (AERC #255 & 218 ENV #225) – *FEA at HQ*
- b. Naco-Douglas SEA (AERC 218) **This Item May Be Discussed After The PDT To Review The Comment Matrix**

5. NEXT MEETING

21 October 2003 – HDR Phoenix, 8:30 am

envntal meety 8/23/03

Conservation measures due 10/3/03

Nogales EIS being revised

Final EA out 8/26/03

EIS 10/3/03

Summary

a) ~~TA~~ Tucson DA QA/QC

a) ~~ROS~~ ~~PEIS~~ 10/1/03

b) ROS for TCA - Nogales departure } need review by 10/1/03
Nogales departure

c) Lume Beacons - waiting on TOS to approve

d) ~~ROS~~ ~~Beacon~~ Trip - in operation

e) Checkpoints (b)(7)(E) - public review on (b)(7)(E) 30 days

~~Comment~~ comments on no action issue
- Station does not want to move.

f) Nogales BBS

g) DA -

3)a Nogales departure EA - Final HQ

New Commander at FT. H.

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 23 September 2003 10:00

Meeting Location: Tucson - USBP Station

MEETING PURPOSE

PDT Meeting

INTRODUCTIONS

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Scope for LWC design/permitting on LWC # 5 in Douglas, E. of POE. (for JTF-6)	(b)(6)
2. Provide JTF-6 plans for all active design & construction projects (1-1/2 miles roadway NGL, Alt. Fence Design, Ephraim Ridge NGL, rural lighting design)	HDR & Baker (b)(6)
3. Construction plans for roadway in Douglas, E. of POE. To be provided to Baker	(b)(6)
4. Contract with Baker for FY'03 Engineering	
5. Contract with GSRC for FY'03 Environmental Work (negotiated, pending award)	
6. Report on property and cost for Ephraim Ridge and area	
7. Map of TCA PDT Projects	HDR

10:15 – 10:20 RVS

10:20 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

Deployments

- Capabilities
- Schedules
- Resources Required

WWD May 2004

- Oregon National Guard
- Oklahoma National Guard

JTF-6

Current Deployment to Naco

2 Miles West of POE Naco – February 2004 (roadway and fencing)

10:45 – 11:15 ENGINEERING

Nogales, Tunnels, Preliminary & Final Design

Nogales, 1/2 Miles Roadway Maintenance

Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design

Douglas, Picket Fence Extensions

Alternative Primary Fence Designs

Lighting Design - Standard 1- Mile Rural Condition

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
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TUCSON SECTOR - U.S. BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS**

FY'03 Contracts

11:15 – 12:00 ENVIRONMENTAL

GSRC - updates and discussion
Douglas-Naco Corridor Draft SEA
Tucson & Yuma Biological Assessment
Programmatic EIS
Programmatic MOA
Douglas, Whitewater Draw 404 Permitting
Nogales, Infrastructure Improvements, DEA
Tunnels
2-Miles Roadway
Portable Lights
Sonoita Station
FY'03 Contracts

12:00 – 1:00 LUNCH

1:00 – 1:30 REAL ESTATE

USACE - (b)(6)
Douglas Lighting (5 Miles) Split East and West of the POE
Douglas, 4-Miles Roadway West of POE
Douglas, International Ditch
Naco, Lighting (5 Miles) Split East and West of the POE
Nogales, 2-Miles Roadway
Nogales, Construction & ROW Acquisition (Pending Alignments)
Nogales, Schematic Design
Sonoita, Preliminary Design and Coordination
Permanent Survey Markers
Temporary Vehicle Barriers
Western Region - (b)(6)
Report on costs and viability of acquiring additional real estate near Ephraim Ridge

1:30 – 1:45 PROCUREMENT

Naco Deployment

1:45 – 2:00 OTHER ITEMS

Cooperative Agencies – Discussion/recommendations on involvement of other agencies early in the environmental review & planning process

Scoping Issues for Engineering Contracts FY'03 and FY'04

NEXT MEETINGS

21 October 2003 – HDR Phoenix

18 November 2003 – Tucson USBP Station

Fire forces 90 from Phoenix care center

The Arizona Republic

About 90 residents, many of them with special needs, were safely evacuated Saturday evening when a transformer fire erupted at a central Phoenix care home, knocking out power to the facility.

The fire broke out about 7:50 p.m. at Maryland Gardens Care Center, 31 W. Maryland Ave., an assisted-living home for people with memory impairments or requiring skilled care for complex behaviors.

There were no reported injuries as the residents were escorted to a nearby church and then transported aboard city buses to another care facility, Scottsdale Village Square, 2620 N. 68th St., where they were expected to remain at least overnight pending efforts to restore power.

The fire broke out in a generator building attached to Maryland Gardens, said Chris Ketterer, a battalion chief for the Phoenix Fire Department. The cause of the electrical blaze had not been determined.

HEALTH BRIEFS

Conference to focus on end-of-life issues

A two-day conference on end-of-life care will be held Wednesday and Thursday at the ASU Downtown Center.

The conference is geared toward individuals, health care providers and groups interested in raising awareness and education about end-of-life options and issues. It is sponsored by Caring Choices, a coalition to improve end-of-life care. The conference runs from 8 a.m. to 5 p.m. both days at the center, 502 E. Monroe St. in Phoenix. The event is free. Information: (480) 377-1273.



Ignacio Ibarra/Arizona Daily Star

Members of the 374th Marine Wing Support Squadron are building a 12-foot-high fence to keep undocumented immigrants from crossing the U.S.-Mexican border near Naco.

Marines building fence along border near Naco

Associated Press

TUCSON — A Marine unit is building a fence nearly a half-mile long to keep people from crossing an area of the U.S.-Mexico border near Naco.

The 12-foot-high fence will be made of steel posts placed about 8 inches apart in a zig-zag pattern, said Armando Carrasco, a spokesman for the Defense Department's Joint Task Force 6, based at Fort Bliss, Texas.

The 374th Marine Wing Support Squadron, a Marine

engineering company based in Twentynine Palms, Calif., is also upgrading more than a mile of dirt road east of the Naco port of entry.

Construction will focus on several low-lying crossings that turn to slippery muck in the rainy season, making it difficult for Border Patrol vehicles to reach and get through the area, Carrasco said. Several sections of the dirt road will be paved, including one stretch more than 800 yards long.

The Marines, who began their work last week, have set

up a camp at Bisbee Municipal Airport and are expected to remain for up to a month, working under the auspices of the task force. The task force coordinates military training missions to support state, local and federal law enforcement agencies involved in drug enforcement.

The cost of the project is difficult to determine because the cost of labor and equipment is absorbed by the training mission. The cost of materials is covered by the requesting agency, Carrasco said.

Tanker full of methane overturns, stalls traffic

FLAGSTAFF — A commercial tanker truck loaded with methane rolled Saturday on Interstate 17, about 16 miles south of Flagstaff, resulting in delays and stalled traffic.

STATE POISONING

Carbon monoxide poisoning from boat exhaust has been linked to at least two deaths in the area in recent years.

A final report on an air quality evaluation on the lake is scheduled next month, but an early evaluation indicated that carbon

9/23/03 POT meeting

(1)

action items - D50W not done yet

- 2) JTF-6 plans shipped
- 3) Construction plans - NLT couldn't find plans for LWC or roadway
- 4) Baker Contract in negotiation
- 5) GSKC Contract - raised
- 6) Property cost for Ephraim Ridge - reviewed w/ GSA Market Survey
82 acres - due 10/10/03
- 7) Map of TCA POT projects - done

RV S report to be sent

Military Deployments

AZNG Deployment meeting cancelled

troops not scheduled to return for 1 Feb 04

Can't commit for FY05

Budget 25% 30% hit for FY04

Interest for Alaska in May first 2 weeks

Oklahoma last 2 weeks in May \Rightarrow may lose

Oregon 2 detachments in June

S. Carolina in June roadwork & erosion

Illinois - possibly?

WWD - moving along

Fence - international raceway not problem
letter in couple of days

JTF6

Starting to clean up 60% of project in NACO

②

Inquiries

Wegles tunnels - on Hold
" 1/2 mile done
" 1 1/2 " dilly done by Khiffle
Douglas fence Final plans (not started) done - review COS 9/24/03
Alternative fence done
Lighting very done
FTO ~~4~~ contacts - Today
Exact USACE real estate database

Environment

Neco/Douglas Gumbler - EA - comments
T/Y BA - review nodes
PEIS - info still watery - review draft in 2 weeks
PMA - (b) (6), (b) (7) (C) still working on it
Douglas WWD 404 - on going
Douglas chupstru ^{\$405} Final sent to HQ
Sonoma status contacts requested

Real Estate

(b) (6) Properties - west of POE only
USACE - POE on biological roadway alignment

Procurement

not JTF-6 done
Construction - Eric Paul & his family
- Ballad Fence - success - looks great
- Roadwork - success - roadbase & curbside very good
slab 4" not 6" concrete in truck to long
surface experienced severe cracking

OTHER ITEMS

Cooperative Agencies - better communication

Action items

Get \$5000 from USACE

Bl speed coordinator - fence extensions update on ^{later} tomorrow

Fence extensions counts tomorrow

Customs

Memo of agreement 3 October 03

DOT KVS report

Priority report on 30/10/03

Date: 8/5/2003 12:37 PM

Sender: (b) (6), (b) (7)(C)

To:

bcc:

Priority: Normal

Subject: FW: Updated TCA EWG Data Base

> -----Original Message-----

(b)(6)

> Subject: Updated TCA EWG Data Base

> (b)(6) Here is my updates along with the text portion of the last EWG minutes. I have not gone through a complete QA/QC, but I think there are in good shape, although sorting out how some of these documents have been split and combined is a pain... also I will need to document names and dates of NOI or NOA etc. at the next PDT EWG meeting.

> Please respond back with any correction or changes.

> <<TCAEWGupdate.pdf>>

> (b)(6)

> Senior Project Manager

(b)(6)



TCAEWGupdate.pdf

f

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

MEETING MINUTES

Meeting Date and Time: 22 July 2003 at 8:30 am
Meeting Location: Tucson Station
Distribution Date: 24 July 2003
Distributor: (b)(6)
Distribution:

(b)(6)

MEETING PURPOSE

PDT EWG Meeting

ATTENDEES

See Attached.

PREVIOUS ACTION ITEMS STATUS

ACTION	RESPONSIBLE	STATUS
1. Update report names within the AERC data base and forward that information to the EWG	(b)(6)	Done
2. Provide transitional statement within the data base for the Naco-Douglas Corridor Supplemental EA		Done
3. Tucson BA comments due by 25 July		Pending
4. Tucson-Yuma PEIS revised draft (AERC # 225) internal review		Done
5. Call (b)(6) to get copies of minutes from TON Council meetings		Done

ADMINISTRATIVE ITEMS

These minutes reflect the understanding of HDR Engineering, Inc. If revisions or additions are needed, contact (b)(6)
(b)(6)

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

MEMBERS

The table below depicts the revised membership and their roles pursuant to the discussions within the EWG.

MEMBERS	ROLE
(b)(6)	DHS Project manager HQ Updates
(b)(6)	DHS Environmental Representative Member – HQ Updates
(b)(6)	USBP Tucson Sector Designee Member
(b)(6)	USACE Project Manager Chairperson
(b)(6)	DHS Western Region Environmental Representative Member - Regional Updates
(b)(6)	AERC Environmental Representative Member – Environmental Administrative Record – Point of Contact on Future Documents
(b)(6)	AERC Environmental Representative Member
(b)(6)	JTF-6 Environmental Representative Member
(b)(6)	GSRC – Environmental Contractor Member – Summary of PDT & Non-PDT Activities
(b)(6)	HDR – Program Management Contractor Member - agenda & minutes

SUMMARY OF NON-PDT ACTIVITIES (REGIONAL)

(b)(6) completed the project descriptions and corrected the numbering system. (b)(6)
(b)(6) revised the database. These revised project updates are attached

As a Follow-up to 8 July 2003 Conference Call these items were covered

- a. PEIS Tucson & Yuma (AERC #225 ENV #90)

The Tucson-Yuma PEIS revised draft went out 15 July. Comments due 7 August. The EWG discussed getting together sometime in August in Phoenix to discuss any unresolved issues. Tentative dates for the meeting

These minutes reflect the understanding of HDR Engineering, Inc. If revisions or additions are needed, contact (b)(6)
(b)(6)

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

are 20 & 21 August (the next PDT meeting is 19 August in Phoenix).
HDR was assigned conference set-up duties.

- b. RVS for TCA (AERC #255 ENV #225)
(b)(6) discussed the Naco-Nogales-Douglas RVS project. One EA was prepared for Naco and Douglas, FONSI issued. One EA was prepared for the Crawford Hill relay tower in Nogales, FONSI issued. The remaining Nogales RVS sites were rolled into the Nogales Various Infrastructure EA, after both the RVS and the Various Infrastructure EAs had been developed to the pre-draft stage.
- c. Rescue Beacons (AERC #497)
The Emergency Rescue Beacons off the TON (ENV #227) has been completed, FONSI issued 19 June 2003. GSRC prepared a separate EA for the beacons on the TON, and is awaiting approval from the TON (ENV #TBA). Both of these EAs are under AERC # 497.
- d. Operation Desert Grip (AERC #497 & #498 ENV #145 & #228)
The USACE is responsible for producing and mailing CDs of the Final document to the large number of individuals who submitted form letters for Operation Desert Grip, Naco-Douglas Corridor and Nogales Infrastructure EAs. Desert Grip II out as FEA with, FONSI 18 July 2003
- e. Checkpoints (b)(7)(E) (AERC 499)
The Draft Temporary Checkpoint EA off the (b)(7)(E) went out 7 July to the public. (b)(7)(E) checkpoint comments due 7 August 2003. The preliminary Draft EA for the checkpoints on the (b)(7)(E) has been completed, but we are waiting for approval from the (b)(7)(E) to release it to the (b)(7)(E). Both of these EAs were conducted under AERC # 499.
- f. Nogales BPS (AERC #503 ENV #220)
The Nogales Station Draft EA came off the public comment period on 24 June. GSRC expects to have a preliminary final within the next two weeks. There were issues on the ESA with WRO REO, but these have been resolved. GSRC will submit the revised SEA for the Nogales Station NLT August 1. The expand record search did not reveal any additional sites beyond the original record search.
- g. BA – Operations – Tucson & Yuma (AERC #51 Yuma ENV #40, #141, & #186 Tucson #38)
The Tucson BA was shipped out Thursday (3 July). The EWG agreed to have the comments back by 25 July. The USFWS is still working on the Yuma draft BO. These 2 BA/Bos are covered under the AERC # 51.

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
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ENVIRONMENTAL WORKING GROUP

SUMMARY OF PDT ACTIVITIES (INFRASTRUCTURE)

The status of these projects, prior to this meeting, in a format created by (b)(6) is attached to these minutes.

- a. Naco-Douglas SEA (AERC #218 ENV #139, #148 & #225)
The Draft EA came off public review. A comment resolution matrix and/or preliminary Final EA are expected by the end of next week. Pre-final comments due 1 August 2003.
- b. Nogales Infrastructure Improvements Draft EA (AERC #255 & 218 ENV #225)
The Nogales Infrastructure Improvements Draft EA came off public review. A comment resolution matrix and/or preliminary Final EA are expected by the end of next week. Pre-final comments due 1 August 2003.

SUMMARY OF DHS ACTIVITIES (HQ)

SUMMARY OF ITEMS TO BE PRESENTED TO THE PDT

ACTION	RESPONSIBLE
1. Under NOI on data base add where available	HDR
2. Nogales BPS (AERC #503 ENV #220) due out 25 July – Comments due back 15 August 2003	All
3. Tucson BA comments due by 25 July	All
4. Tucson-Yuma PEIS revised draft internal review comments due 1 August – conference in phoenix scheduled 20 & 21 August 2003	All
5. Conference call on comments for Naco-Douglas DSEA	(b)(6)
6. SOW for GSRC to look at Cabeza Prieta NWR	HDR

NEXT MEETINGS

19 August 2003 HDR - Phoenix, 8:30 am

23 September 2003 – Tucson Station – USBP, 8:30 am

These minutes reflect the understanding of HDR Engineering, Inc. If revisions or additions are needed, contact (b)(6)

6-17-03 Environmental Actions Report - AZ EA

ACTION Number	7	AERC Project Number	218	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number	148		
DOCUMENT TITLE	Supplemental Environmental Assessment For Infrastructure Within U.S. Border Patrol Naco-Douglas Corridor Cochise County, Arizona				
PROJECT	Environmental Assessment for 31-mile Enforcement Zone Infrastructure System, Naco, AZ (INS AERC--GSA Contract Order No. DACA63-02-F-0005)				
PROJECT DESCRIPTION	Environmental Assessment to address implementation of a 31-mile border enforcement system through a combination of infrastructure components (roads, fences and lights)				
SUMMARY	Project being coordinated through the Tucson PDT. Comments to the Preliminary Draft have been provided. Public scoping meeting held 18 November 2002. PDT decided, based on guidance from HQ, to combine Naco and Douglas into a Supplemental EA for the Naco-Douglas Corridor. Draft SEA was distributed for public review on 7 Feb 03; comment period was extended from 7 May to 30 June. BA needs to be initiated. Naco-Douglas SEA (AERC #218 ENV #139, #148 & #225) The Draft EA came off public review. A comment resolution matrix and/or preliminary Final EA are expected by 1 August 2003. See ENV. # 139				
AERC POC	N/A at this time		DHS REGIONAL POC	(b)(6)	
USACE POC	(b)(6)		DHS FAE POC	(b)(6)	
CONTRACTOR POC	(b)(6)		USBP POC	(b)(6)	
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	5/7/2003				
Scoping					
Preliminary Draft	Naco-Douglas EAs combined into one; Due 3-12-03				
Reviewed Date	PDEA 3/13/03 to 3/26/03; DSEA released 5/7/2003				
DRAFT	Public Review Extended to June 30, 2003 by (b)(6) letter sent by (b)(6) and USACE				
FINAL	PFEA 7/10/03 FEA pending comment resolution				
FONSI	Expected around 9/20/03				
ROD	N/A				

ACTION Number	3	AERC Project Number	225	STATE	AZ
ACTION Type	EIS	DOCUMENT ENV Number	90		
DOCUMENT TITLE	Programmatic Environmental Impact Statement for USBP Yuma and Tucson Sectors				
PROJECT	EIS and Associated Tasks - USBP Yuma and Tucson Sectors, AZ (DO 007)				
PROJECT DESCRIPTION	Programmatic Environmental Impact Statement for USBP Yuma and Tucson Sectors				
SUMMARY	Public comments resulted in revision of document to remove infrastructure. Revised Preliminary Draft PEIS distributed for internal review 18 July 03 comments due 8 Aug 03.				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation				
NOI	01-Sep-00				
NOA	11/18/2002				
Scoping	Oct-Nov 2000				
Preliminary Draft	4 preliminary drafts				
Reviewed Date	extended to 14 feb				
DRAFT	During a 22 April 2003 conference call it was decided to issue a revised draft PEIS that only address potential infrastructure in a cumulative manner. GSRC was tasked with preparing a comment resolution letter informing recipients of the USBP's decision. GSRC prepared and submitted a draft resolution letter on May 17, 2003 to (b)(6) for review. See comments on Final				
FINAL	The Tucson-Yuma PEIS revised draft went out 15 July. Comments due 7 August. The EWG conference in August in Phoenix to discuss any unresolved issues. Dates for the meeting are 20 & 21 August (the next PDT meeting is 19 August in Phoenix). HDR was assigned conference set-up duties.				
FONSI	N/A				
ROD					

ACTION Number	20	AERC Project Number	255	STATE	AZ
ACTION Type	E	DOCUMENT ENV Number	225		
DOCUMENT TITLE					
PROJECT	Nogales Infrastructure Improvements (INS AERC--GSA Contract Order No. DACA63-02-F-0207)				
PROJECT DESCRIPTION	Combination of Nogales infrastructure and RVS projects. 18 RVS, 60 Portable lights. 1 mi. fence and 2mi road east of Nogales POE.				
SUMMARY	<p>Draft EA submitted for public comment on May 9, comment period extended to 30 June, See AERC # 218 RVS for TCA (AERC #255 ENV #225)</p> <p>One EA was prepared for Naco and Douglas, FONSI issued. One EA was prepared for the Crawford Hill relay tower in (b) (7)(E) FONSI issued. The remaining Nogales RVS sites were rolled into the Nogales Various Infrastructure EA, after both the RVS and the Various Infrastructure EAs had been developed.</p>				
AERC POC	(b) (6)		DHS REGIONAL POC	(b) (6)	
USACE POC	(b) (6)		DHS FAE POC	(b) (6)	
CONTRACTOR POC	(b) (6)		USBP POC	(b) (6)	
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	Nogales Draft 5/9/03				
Scoping	N/A				
Preliminary Draft	25-Apr-03				
Reviewed Date	2-May-03				
DRAFT	Draft EA submitted for public comment on May 9, comment period extended to 30 June,				
FINAL	pending comment resolution. comment resolution matrix and/or preliminary Final EA are expected by 1 August 2003.				
FONSI	see summary				
ROD	N/A				

ACTION Number	2	AERC Project Number	255	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number	94 102		
DOCUMENT TITLE					
PROJECT	RVS for USBP Tucson Sector (DO 050) AERC # 255				
PROJECT DESCRIPTION	Environmental Assessments for RVS sites in Naco, Douglas and Nogales Stations				
SUMMARY	Naco and Douglas: Final EA and FONSI signed 01/07/03. (ENV 94) Crawford Hill EA FONSI signed 11/08/02 (ENV 102) Nogales:RVS combined with Nogales infrastructure EA. See ENV 225 Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	Naco (Draft) 10/01/02; Naco (Final) 01/24/03; Crawford Hill (Draft) 10/22/02; Crawford Hill (Final) 11/15/02.				
Scoping	N/A				
Preliminary Draft	Naco-PDEA submitted 07/08/02; Nogales-PDEA submitted 08/13/02; Crawford Hill-PDEA submitted 09/18/02.				
Reviewed Date	Naco-DEA public review from 9/30/02 to 10/30/02; Crawford Hill public review from 10/22/02 to 11/06/02.				
DRAFT	Naco-DEA submitted 09/25/02; Crawford Hill DEA submitted 10/02/02.				
FINAL	Naco-PFEA submitted 11/05/02; Naco-Revised PFEA submitted 11/13/02; Naco-FEA submitted 01/03/03; Crawford Hill-PFEA submitted 10/30/02; Crawford Hill-FEA submitted 11/13/02.				
FONSI	Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02				
ROD	N/A				

ACTION Number	2	AERC Project Number	255	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number	94 102		
DOCUMENT TITLE					
PROJECT	RVS for USBP Tucson Sector (DO 050) AERC # 255				
PROJECT DESCRIPTION	Environmental Assessments for RVS sites in Naco, Douglas and Nogales Stations				
SUMMARY	Naco and Douglas: Final EA and FONSI signed 01/07/03. (ENV 94) Crawford Hill EA FONSI signed 11/08/02 (ENV 102) Nogales:RVS combined with Nogales infrastructure EA. See ENV 225 Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	Naco (Draft) 10/01/02; Naco (Final) 01/24/03; Crawford Hill (Draft) 10/22/02; Crawford Hill (Final) 11/15/02.				
Scoping	N/A				
Preliminary Draft	Naco-PDEA submitted 07/08/02; Nogales-PDEA submitted 08/13/02; Crawford Hill-PDEA submitted 09/18/02.				
Reviewed Date	Naco-DEA public review from 9/30/02 to 10/30/02; Crawford Hill public review from 10/22/02 to 11/06/02.				
DRAFT	Naco-DEA submitted 09/25/02; Crawford Hill DEA submitted 10/02/02.				
FINAL	Naco-PFEA submitted 11/05/02; Naco-Revised PFEA submitted 11/13/02; Naco-FEA submitted 01/03/03; Crawford Hill-PFEA submitted 10/30/02; Crawford Hill-FEA submitted 11/13/02.				
FONSI	Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02				
ROD	N/A				

ACTION Number	4	AERC Project Number	497	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number	226 T		
DOCUMENT TITLE					
PROJECT	EA for Rescue Beacons - Tucson/Yuma Sectors				
PROJECT DESCRIPTION	EA for placement and operation of rescue beacons to aid in rescue of UDA's who face death or severe dehydration.				
SUMMARY	Divided into two EA; one EA complete for 8 beacons off the Tohono O'odham Nation on BLM, Cabeza Prieta Nat'l Wildlife Refuge, Organ Pipe Cactus Nat'l Monument (ENV 226). The other EA for 10 Beacons on T.O.N. is held up in negotiations with TON (see ENV TBA)				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation TO0079				
NOI	N/A				
NOA	5/16/2003				
Scoping	N/A				
Preliminary Draft					
Reviewed Date	extended to June 16, 2003				
DRAFT	The review period ended on June 10, 2003.				
FINAL	See ENV # 226				
FONSI	Anticipate the FONSI being signed no later than June 20, 2003.				
ROD	N/A				

ACTION Number	22	AERC Project Number	498/497	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number	227 T		
DOCUMENT TITLE					
PROJECT	EAs are part of Operation Desert Grip II and Rescue Beacons for Tucson/Yuma Sectors. See ENV # 228 & 145				
PROJECT DESCRIPTION	Preliminary Draft EA for Ten Rescue Beacons and Four Temporary Camp Details on the Tohono O'odham Nation USBP Tucson Sector, AZ				
SUMMARY	This document was separated from the original due to delays on the Nation. To accommodate the other portions of the project, these were separated out. EA for four temporary camp details on Tohono o' odham nation, Tucson sector. Operation Desert Grip (AERC #497 & #498 ENV #145 & #228) The USACE is responsible for producing and mailing CDs of the Final document to the large number of individuals who submitted form letters for Operation Desert Grip, Naco-Douglas Corridor and Nogales Infrastructure EAs. Desert Grip II out as FEA with, FONSI 18 July 2003				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	pending				
Scoping	NA				
Preliminary Draft	30-May-03				
Reviewed Date	6-Jun-03				
DRAFT	Holding due to pending discussions with the Nation. This will go to the TON public for five days.				
FINAL	Rescue Beacons (AERC #497) The Emergency Rescue Beacons off the TON (ENV #227) has been completed, FONSI issued 19 June 2003. GSRC prepared a separate EA for the beacons on the TON, and is awaiting approval from the TON (ENV #TBA). Both of these EAs are under AERC # 497				
FONSI	See Summary				
ROD	NA				

ACTION Number	5	AERC Project Number	499	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number	227 T		
DOCUMENT TITLE					
PROJECT	Temporary USBP Checkpoints on the (b) (7)(E) in the Tucson Sector and Ajo and Casa Grande AO's.				
PROJECT DESCRIPTION	EA for placement and operation of three temporary USBP checkpoints on the (b) (7)(E)				
SUMMARY	<p>EA is being completed for four checkpoints (three on the (b) (7)(E)). Checkpoints used to identify and apprehend any UDAs or drug traffickers. These checkpoints occur along (b) (7)(E) and County Roads (b) (7)(E). The Draft Temporary Checkpoint EA off the (b) (7)(E) went out 7 July to the public. checkpoint comments due 7 August 2003. The preliminary Draft EA for the checkpoints on the (b) (7)(E) has been completed, but we are waiting for approval from the (b) (7)(E) to release it to the (b) (7)(E). Both of these EAs were conducted under AERC # 499.</p>				
AERC POC	(b) (6)		DHS REGIONAL POC	(b) (6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation DACA63-00-D-0004 T.O. (082)				
(b) (7)(E)	N/A				
(b) (7)(E)	On hold until uses issues are resolved on the (b) (7)(E)				
Scoping	N/A				
Preliminary Draft	On hold				
Reviewed Date					
DRAFT	The preliminary draft EA for one temporary checkpoint off the (b) (7)(E) will be submitted for internal review				
FINAL	on hold pending action by (b) (7)(E)				
FONSI					
ROD	N/A				

ACTION Number	6	AERC Project Number	503	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number	220		
DOCUMENT TITLE	EA/Phase I Environmental Site Assessment for the Purchase of 30 Acres of Property				
PROJECT	EA/EBS				
PROJECT DESCRIPTION	Nogales BPS. Purchase of 30 Acres of Property				
SUMMARY	EA/Phase I Environmental Site Assessment for the Purchase of 30 Acres of Property ENV # 503 & 220 Purchase of warehouse and land currently under lease in Nogales. The Phase I ESA is in the final stages.				
AERC POC	N/A at this time		DHS REGIONAL POC	(b)(6)	
USACE POC	(b)(6)		DHS FAE POC	(b)(6)	
CONTRACTOR POC	(b)(6)		USBP POC	(b)(6)	
CONTRACTOR	Gulf South Research Corporation TO0080				
NOI	N/A				
NOA					
Scoping	N/A				
Preliminary Draft	Due 12 May 03				
Reviewed Date					
DRAFT	Nogales Station Draft EA came off the public comment period on 30 June.				
FINAL	GSRC expects to have a preliminary final within the next two weeks. There were issues on the ESA with WRO REO, but these have been resolved. GSRC will submit the revised SEA for the Nogales Station NLT August 1. The expanded record search did not reveal any additional sites beyond the original record search.				
FONSI					
ROD	N/A				

ACTION Number	I	AERC Project Number	51	STATE	AZ
ACTION Type	BA	DOCUMENT ENV Number	40, 14		
DOCUMENT TITLE					
PROJECT	Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors, AZ (DO 043) ENV. # Yuma= 40, 141, 186 / Tucson= 38				
PROJECT DESCRIPTION	Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors				
SUMMARY	(Yuma ENV #40, #141, & #186 Tucson #38) The Tucson BA was shipped out 3 July. The EWG agreed to have the comments back by 25 July. The USFWS is still working on the Yuma draft BO. These 2 BA/Bos are covered under the AERC # 51.				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR			Gulf South Research Corporation		
NOI	N/A				
NOA	N/A				
Scoping					
Preliminary Draft					
Reviewed Date					
DRAFT	Yuma--9/27/02; Tucson 10/24/02				
FINAL	(b)(6) has not completed the Draft BO for the Yuma Sector as of 6/12/03. internal review 3 july 03. Internal comments due 25 July 03. Conference call scheduled 14 August				
FONSI	N/A				
ROD	N/A				

ACTION Number	19	AERC Project Number	498	STATE	SW
ACTION Type	EA	DOCUMENT ENV Number	145		
DOCUMENT TITLE					
PROJECT	EA, Operation Desert Grip II				
PROJECT DESCRIPTION	EA, for expansion of Operation Desert Grip (Desert Grip II)				
SUMMARY	Draft submitted for 30-day public review. The review period has been extended until June 16, 2003. Divided into supplemental EA for expansion of Desert Grip (ENV 228) and Ea for temp. camp details on TON (ENV TBA)				
AERC POC	N/A at this time	DHS REGIONAL POC	(b)(6)		
USACE POC	(b)(6)	DHS FAE POC			
CONTRACTOR POC		USBP POC			
CONTRACTOR	Gulf South Research Corporation TO0078				
NOI	N/A				
NOA					
Scoping	N/A				
Preliminary Draft					
Reviewed Date					
DRAFT	Public comment extended to 6/16/2003				
FINAL	Anticipate submitting a preliminary final for internal review no later than June 30, 2003.				
FONSI					
ROD	N/A				

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

MEETING MINUTES

Meeting Date and Time: 22 July 2003 at 8:30 am

Meeting Location: Tucson Station

Distribution Date: 24 July 2003

Distributor: (b)(6)

Distribution:

(b)(6)

MEETING PURPOSE
PDT EWG Meeting

ATTENDEES
See Attached.

PREVIOUS ACTION ITEMS STATUS

ACTION	RESPONSIBLE	STATUS
1. Update report names within the AERC data base and forward that information to the EWG	(b)(6)	Done
2. Provide transitional statement within the data base for the Naco-Douglas Corridor Supplemental EA		Done
3. Tucson BA comments due by 25 July		Pending
4. Tucson-Yuma PEIS revised draft (AERC # 225) internal review		Done
5. Call (b)(6) to get copies of minutes from TON Council meetings		Done

ADMINISTRATIVE ITEMS

These minutes reflect the understanding of HDR Engineering, Inc. If revisions or additions are needed, contact (b)(6)
(b)(6)

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 19 August 2003 8:30

Meeting Location: Phoenix – Mountain Shadows Resort (Marriott)
<http://www.mountainshadows.net/index.html>

MEETING PURPOSE

TCA PDT Environmental Working Group Meeting

INTRODUCTIONS

1. REVIEW OF ACTION ITEMS

ACTION		RESPONSIBLE
1.	Under NOI on data base add where available	HDR
2.	Nogales BPS (AERC #503 ENV #220) due out 25 July – Comments due back 15 August 2003	All
3.	Tucson BA comments due by 25 July	All
4.	Tucson-Yuma PEIS revised draft internal review comments due 1 August – conference in phoenix scheduled 20 & 21 August 2003	All
5.	Conference call on comments for Naco-Douglas DSEA	(b)(6)
6.	SOW for GSRC to look at Cabeza Prieta NWR	HDR

Chavez 8/29/03
(b)(6) *PASC*
Nogales

9/15/03

2. SUMMARY OF NON-PDT ACTIVITIES (REGIONAL)

- a. PEIS Tucson & Yuma (AERC 225)
- b. RVS for TCA (AERC 255)
- c. Rescue Beacons (AERC 497)
- d. Operation Desert Grip (AERC 497/498)
- e. Checkpoints **(b)(7)(E)** AERC 499
- f. Nogales BPS (AERC 503)
- g. BA – Operations – Tucson & Yuma (AERC 51)

3. SUMMARY OF PDT ACTIVITIES (INFRASTRUCTURE)

Review all actions pending on chart - add/delete/change –

- a. Naco-Douglas SEA (AERC 218)
- b. Nogales Infrastructure EA (AERC #255 & 218 ENV #225)

4. SUMMARY OF DHS ACTIVITIES (HQ)

5. SUMMARY OF ITEMS TO BE PRESENTED TO THE PDT

6. NEXT MEETING

23 September 2003 – Tucson Station – USBP, 8:30 am

ACTION Number	2	AERC Project Number	255	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number	94 102		
DOCUMENT TITLE					
PROJECT	RVS for USBP Tucson Sector (DO 050) AERC # 255				
PROJECT DESCRIPTION	Environmental Assessments for RVS sites in Naco, Douglas and Nogales Stations				
SUMMARY	Naco and Douglas: Final EA and FONSI signed 01/07/03. (ENV 94) Crawford Hill EA FONSI signed 11/08/02 (ENV 102) Nogales:RVS combined with Nogales infrastructure EA. See ENV 225 Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02				
AERC POC	(b) (6)	DHS REGIONAL POC	(b) (6)		
USACE POC		DHS FAE POC			
CONTRACTOR POC		USBP POC			
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	Naco (Draft) 10/01/02; Naco (Final) 01/24/03; Crawford Hill (Draft) 10/22/02; Crawford Hill (Final) 11/15/02.				
Scoping	N/A				
Preliminary Draft	Naco-PDEA submitted 07/08/02; Nogales-PDEA submitted 08/13/02; Crawford Hill-PDEA submitted 09/18/02.				
Reviewed Date	Naco-DEA public review from 9/30/02 to 10/30/02; Crawford Hill public review from 10/22/02 to 11/06/02.				
DRAFT	Naco-DEA submitted 09/25/02; Crawford Hill DEA submitted 10/02/02.				
FINAL	Naco-PFEA submitted 11/05/02; Naco-Revised PFEA submitted 11/13/02; Naco-FEA submitted 01/03/03; Crawford Hill-PFEA submitted 10/30/02; Crawford Hill-FEA submitted 11/13/02.				
FONSI	Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02				
ROD	N/A				

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

MEMBERS

The table below depicts the revised membership and their roles pursuant to the discussions within the EWG.

MEMBERS	ROLE
(b)(6)	DHS Project manager
(b)(6)	HQ Updates
(b)(6)	DHS Environmental Representative
(b)(6)	Member – HQ Updates
(b)(6)	USBP Tucson Sector Designee
(b)(6)	Member
(b)(6)	USACE Project Manager
(b)(6)	Chairperson
(b)(6)	DHS Western Region Environmental Representative
(b)(6)	Member - Regional Updates
(b)(6)	AERC Environmental Representative
(b)(6)	Member – Environmental Administrative Record – Point of Contact on Future Documents
(b)(6)	AERC Environmental Representative
(b)(6)	Member
(b)(6)	JTF-6 Environmental Representative
(b)(6)	Member
(b)(6)	GSRC – Environmental Contractor
(b)(6)	Member – Summary of PDT & Non-PDT Activities
(b)(6)	HDR – Program Management Contractor
(b)(6)	Member – agenda & minutes

SUMMARY OF NON-PDT ACTIVITIES (REGIONAL)

(b)(6) completed the project descriptions and corrected the numbering system. (b)(6)
(b)(6) revised the database. These revised project updates are attached

As a Follow-up to 8 July 2003 Conference Call these items were covered

- a. PEIS Tucson & Yuma (AERC #225 ENV #90)

The Tucson-Yuma PEIS revised draft went out 15 July. Comments due 7 August. The EWG discussed getting together sometime in August in Phoenix to discuss any unresolved issues. Tentative dates for the meeting

These minutes reflect the understanding of HDR Engineering, Inc. If revisions or additions are needed, contact (b)(6)

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

are 20 & 21 August (the next PDT meeting is 19 August in Phoenix).
HDR was assigned conference set-up duties.

- b. RVS for TCA (AERC #255 ENV #225)
(b)(6) discussed the Naco-Nogales-Douglas RVS project. One EA was prepared for Naco and Douglas, FONSI issued. One EA was prepared for the Crawford Hill relay tower in Nogales, FONSI issued. The remaining Nogales RVS sites were rolled into the Nogales Various Infrastructure EA, after both the RVS and the Various Infrastructure EAs had been developed to the pre-draft stage.
- c. Rescue Beacons (AERC #497)
The Emergency Rescue Beacons off the TON (ENV #227) has been completed, FONSI issued 19 June 2003. GSRC prepared a separate EA for the beacons on the TON, and is awaiting approval from the TON (ENV #TBA). Both of these EAs are under AERC # 497.
- d. Operation Desert Grip (AERC #497 & #498 ENV #145 & #228)
The USACE is responsible for producing and mailing CDs of the Final document to the large number of individuals who submitted form letters for Operation Desert Grip, Naco-Douglas Corridor and Nogales Infrastructure EAs. Desert Grip II out as FEA with, FONSI 18 July 2003
- e. Checkpoints (b)(7)(E) (AERC 499)
The Draft Temporary Checkpoint EA off the (b)(7)(E) went out 7 July to the public. (b)(7)(E) checkpoint comments due 7 August 2003. The preliminary Draft EA for the checkpoints on the (b)(7)(E) has been completed, but we are waiting for approval from the (b)(7)(E) to release it to the (b)(7)(E). Both of these EAs were conducted under AERC # 499.
- f. Nogales BPS (AERC #503 ENV #220)
The Nogales Station Draft EA came off the public comment period on 24 June. GSRC expects to have a preliminary final within the next two weeks. There were issues on the ESA with WRO REO, but these have been resolved. GSRC will submit the revised SEA for the Nogales Station NLT August 1. The expand record search did not reveal any additional sites beyond the original record search.
- g. BA – Operations – Tucson & Yuma (AERC #51 Yuma ENV #40, #141, & #186 Tucson #38)
The Tucson BA was shipped out Thursday (3 July). The EWG agreed to have the comments back by 25 July. The USFWS is still working on the Yuma draft BO. These 2 BA/Bos are covered under the AERC # 51.

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

SUMMARY OF PDT ACTIVITIES (INFRASTRUCTURE)

The status of these projects, prior to this meeting, in a format created by (b)(6) is attached to these minutes.

- a. Naco-Douglas SEA (AERC #218 ENV #139, #148 & #225)
The Draft EA came off public review. A comment resolution matrix and/or preliminary Final EA are expected by the end of next week. Pre-final comments due 1 August 2003.
- b. Nogales Infrastructure Improvements Draft EA (AERC #255 & 218 ENV #225)
The Nogales Infrastructure Improvements Draft EA came off public review. A comment resolution matrix and/or preliminary Final EA are expected by the end of next week. Pre-final comments due 1 August 2003.

SUMMARY OF DHS ACTIVITIES (HQ)

SUMMARY OF ITEMS TO BE PRESENTED TO THE PDT

ACTION	RESPONSIBLE
1. Under NOI on data base add where available	HDR
2. Nogales BPS (AERC #503 ENV #220) due out 25 July – Comments due back 15 August 2003	All
3. Tucson BA comments due by 25 July	All
4. Tucson-Yuma PEIS revised draft internal review comments due 1 August – conference in phoenix scheduled 20 & 21 August 2003	All
5. Conference call on comments for Naco-Douglas DSEA	(b)(6)
6. SOW for GSRC to look at Cabeza Prieta NWR	HDR

NEXT MEETINGS

19 August 2003 HDR - Phoenix, 8:30 am
23 September 2003 – Tucson Station – USBP, 8:30 am

These minutes reflect the understanding of HDR Engineering, Inc. If revisions or additions are needed, contact (b)(6)

(b)(6)

ACTION Number	3	AERC Project Number	225	STATE	AZ
ACTION Type	EIS	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	EIS and Associated Tasks - USBP Yuma and Tucson Sectors, AZ (DO 007)				
PROJECT DESCRIPTION	Programmatic Environmental Impact Statement for USBP Yuma and Tucson Sectors				
SUMMARY	Public comment period extended until February 7, 2003				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation				
NOI	01-Sep-00				
NOA	11/18/2002				
Scoping	Oct-Nov 2000				
Preliminary Draft	4 preliminary drafts				
Reviewed Date	extended to 14 feb				
DRAFT	<p>During a 22 April 2003 conference call it was decided to issue a revised draft PEIS that only address potential infrastructure in a cumulative manner. GSRC was tasked with preparing a comment resolution letter informing recipients of the USBP's decision. GSRC prepared and submitted a draft resolution letter on May 17, 2003 to (b)(6) for review. (b)(6) will submit the resolution letter the week of June 9, 2003. The revised draft PEIS will be submitted for internal review in mid-July.</p>				
FINAL	The revised draft PEIS should be available for public notice by the 3rd week of August.				
FONSI	N/A				
ROD					

ACTION Number AERC Project Number STATE

ACTION Type

DOCUMENT ENV Number

DOCUMENT
TITLE

PROJECT

RVS for USBP Tucson Sector (DO 050)

PROJECT
DESCRIPTION

Environmental Assessments for RVS sites in Naco, Douglas and Nogales Stations

SUMMARY

Naco and Douglas: Final EA and FONSI signed 01/07/03. Nogales: Additional biological and cultural resources surveys are required for the access roads to 3 Nogales sites. Waiting for CR clearance from SHPO for Crawford Hill site. Need to modify the contract for separate EA for Crawford Hill and for the 3 access roads.

AERC POC

(b)(6)

DHS REGIONAL POC

(b)(6)

USACE POC

DHS FAE POC

CONTRACTOR POC

USBP POC

CONTRACTOR

Gulf South Research Corporation

NOI

N/A

NOA

Naco (Draft) 10/01/02; Naco (Final) 01/24/03; Crawford Hill (Draft) 10/22/02; Crawford Hill (Final) 11/15/02.

Scoping

N/A

Preliminary Draft

Naco-PDEA submitted 07/08/02; Nogales-PDEA submitted 08/13/02; Crawford Hill-PDEA submitted 09/18/02.

Reviewed Date

Naco-DEA public review from 9/30/02 to 10/30/02; Crawford Hill public review from 10/22/02 to 11/06/02.

DRAFT

Naco-DEA submitted 09/25/02; Crawford Hill DEA submitted 10/02/02.

FINAL

Naco-PFEA submitted 11/05/02; Naco-Revised PFEA submitted 11/13/02; Naco-FEA submitted 01/03/03; Crawford Hill-PFEA submitted 10/30/02; Crawford Hill-FEA submitted 11/13/02.

FONSI

Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02

ROD

N/A

ACTION Number	4	AERC Project Number	497	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	EA for Rescue Beacons - Tucson/Yuma Sectors				
PROJECT DESCRIPTION	EA for placement and operation of rescue beacons to aid in rescue of UDA's who face death or severe dehydration.				
SUMMARY	EA complete for 8 beacons off the Tohono O'odham Nation on BLM, Cabeza Prieta Nat'l Wildlife Refuge, Organ Pipe Cactus Nat'l Monument. 10 Beacons on T.O.N. are being handled under separate EA. The comment period was extended until June 10, 2003. Currently addressing comments and working with the US Fish and Wildlife Service to resolve the BO issue raised by the BLM.				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation T00079				
NOI	N/A				
NOA	5/16/2003				
Scoping	N/A				
Preliminary Draft					
Reviewed Date	extended to June 16, 2003				
DRAFT	The review period ended on June 10, 2003.				
FINAL	The preliminary final EA will be submitted to the client no later than June 17, 2003. The final will be submitted to the client no later than June 23, 2003.				
FONSI	Anticipate the FONSI being signed no later than June 20, 2003.				
ROD	N/A				

ACTION Number	22	AERC Project Number	498/497	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	Eas are part of Operation Desert Grip II and Rescue Beacons for Tucson/Yuma Sectors				
PROJECT DESCRIPTION	Preliminary Draft EA for Ten Rescue Beacons and Four Temporary Camp Details on the Tohono O'odham Nation USBP Tucson Sector, AZ				
SUMMARY	This document was separated from the original due to delays on the Nation. To accommodate the other portions of the project, these were separated out.				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	Holding due to political problems on the Nation.				
Scoping	NA				
Preliminary Draft	30-May-03				
Reviewed Date	6-Jun-03				
DRAFT	Holding due to political problems on the Nation. This will go to the TON public for five days.				
FINAL					
FONSI					
ROD	NA				

ACTION Number	5	AERC Project Number	499	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	Temporary USBP Checkpoints on the (b) (7)(E) in the Tucson Sector and Ajo and Casa Grande AO's.				
PROJECT DESCRIPTION	EA for placement and operation of three temporary USBP checkpoints on the (b) (7)(E)				
SUMMARY	EA is being completed for four checkpoints (three on the (b) (7)(E) Checkpoints used to identify and apprehend any UDAs or drug traffickers. These checkpoints occur along (b) (7)(E) and County Roads (b) (7)(E) within the (b) (7)(E)				
AERC POC	(b) (6)		DHS REGIONAL POC	(b) (6)	
USACE POC	(b) (6)		DHS FAE POC	(b) (6)	
CONTRACTOR POC	(b) (6)		USBP POC	(b) (6)	
CONTRACTOR	Gulf South Research Corporation DACA63-00-D-0004 T.O. (082)				
(b) (7)(E)	N/A				
(b) (7)(E)	On hold until uses issues are resolved on the (b) (7)(E)				
Scoping	N/A				
Preliminary Draft	On hold				
Reviewed Date					
DRAFT	The preliminary draft EA for one temporary checkpoint off the (b) (7)(E) will be submitted for internal review no later than June 16, 2003				
FINAL	Anticipate submitting the draft EA for public review no later than June 30, 2003 for a 30-day public review period.				
FONSI					
ROD	N/A				

ACTION Number	6	AERC Project Number	503	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	EA/EBS				
PROJECT DESCRIPTION	Nogales BPS				
SUMMARY	Draft EA has been submitted for public review. The Phase I ESA is in the draft stage.				
AERC POC	N/A at this time	DHS REGIONAL POC	(b)(6)		
USACE POC	(b)(6)	DHS FAE POC	(b)(6)		
CONTRACTOR POC		USBP POC	(b)(6)		
CONTRACTOR	Gulf South Research Corporation T00080				
NOI	N/A				
NOA					
Scoping	N/A				
Preliminary Draft	Due 12 May 03				
Reviewed Date					
DRAFT	Public comment period extended to June 30, 2003 by (b)(6) Letters sent by (b)(6) and USACE.				
FINAL					
FONSI					
ROD	N/A				

ACTION Number AERC Project Number STATE

ACTION Type

DOCUMENT ENV Number

DOCUMENT
TITLE

PROJECT

Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors, AZ (DO 043)

PROJECT
DESCRIPTION

Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors

SUMMARY

Yuma Sector BA: Awaiting comments from the USFWS. Tucson Sector BA: Tentative meeting with USFWS set for 24 January 2003 in Phoenix, AZ. Meeting was conducted at the FWS office in Tucson and covered both Biological Assessments. According to (b) (6) we are at the top of the list once they complete the BOs for the military remanded BAs. FWS owes us a letter requesting an extension. (b) (6) will follow up on that letter.

AERC POC

(b)(6)

DHS REGIONAL POC

(b)(6)

USACE POC

DHS FAE POC

CONTRACTOR POC

USBP POC

CONTRACTOR

Gulf South Research Corporation

NOI

N/A

NOA

N/A

Scoping

Preliminary Draft

Reviewed Date

DRAFT

Yuma--9/27/02; Tucson 10/24/02

FINAL

The Revised Final BA will be submitted for internal review NLT 6/19/03. Pending Gov't comments, the Revised Final BA should be available for submittal to the USFWS by 3rd wee of July. (b)(6) has not completed the Draft BO for the Yuma Sector as of 6/12/03.

FONSI

N/A

ROD

N/A

ACTION Number 19 AERC Project Number 498 STATE SW

ACTION Type EA

DOCUMENT ENV Number

DOCUMENT
TITLE

PROJECT

EA, Operation Desert Grip II

PROJECT
DESCRIPTION

Southwest US

SUMMARY

Draft submitted for 30-day public review. The review period has been extended until June 16, 2003.

AERC POC

N/A at this time

DHS REGIONAL POC

(b)(6)

USACE POC

(b)(6)

DHS FAE POC

CONTRACTOR POC

USBP POC

CONTRACTOR

Gulf South Research Corporation TO0078

NOI

N/A

NOA

Scoping

N/A

Preliminary Draft

Reviewed Date

DRAFT

Public comment extended to 6/16/2003

FINAL

Anticipate submitting a preliminary final for internal review no later than June 30, 2003.

FONSI

ROD

N/A

6-17-03 Environmental Actions Report - AZ CA

ACTION Number	7	AERC Project Number	218	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	Environmental Assessment for 31-mile Enforcement Zone Infrastructure System, Naco, AZ (INS AERC--GSA Contract Order No. DACA63-02-F-0005)				
PROJECT DESCRIPTION	Environmental Assessment to address implementation of a 31-mile border enforcement system through a combination of infrastructure components (roads, fences and lights)				
SUMMARY	Technical review and coordination. Project being coordinated through the Tucson PDT. Comments to the Preliminary Draft have been provided. Public scoping meeting held 18 November 2002. PDT decided, based on guidance from HQ, to combine Naco and Douglas into a Supplemental EA for the Naco-Douglas Corridor. Draft SEA was distributed for public review on 7 Feb 03; comment period was extended from 7 May to 30 June. BA needs to be initiated.				
AERC POC	N/A at this time	DHS REGIONAL POC	(b)(6)		
USACE POC	(b)(6)	DHS FAE POC	(b)(6)		
CONTRACTOR POC	(b)(6)	USBP POC	(b)(6)		
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	5/7/2003				
Scoping					
Preliminary Draft	Naco-Douglas EAs combined into one; Due 3-12-03				
Reviewed Date	PDEA 3/13/03 to 3/26/03; DSEA released 5/7/2003				
DRAFT	Public Review Extended to June 30, 2003 by (b)(6) Letter sent by (b)(6) (b)(6) and USACE				
FINAL	PFEA 7/10/03 FEA 8/04/03				
FONSI	Expected around 8/20/03				
ROD	N/A				

ACTION Number	20	AERC Project Number	255	STATE	AZ
ACTION Type	E	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	Nogales Infrastructure Improvements (INS AERC--GSA Contract Order No. DACA63-02-F-0207)				
PROJECT DESCRIPTION	Environmental Assesment for RVS sites, 1 mile of pedestrian fence, 2 miles of patrol roads and the continued use of 60 portable lights				
SUMMARY	Draft EA submitted for public comment on May 9, comment period extended to 30 June,				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR			Gulf South Research Corporation		
NOI	N/A				
NOA	Nogales Draft 5/9/03				
Scoping	N/A				
Preliminary Draft	25-Apr-03				
Reviewed Date	2-May-03				
DRAFT	9-May-03				
FINAL	Awaiting comments from public review				
FONSI					
ROD	N/A				

DATE: 22 July 2003 TIME: 8:30

LOCATION: Tucson Station

DHS – US BORDER PATROL BORDER BARRIER PROJECTS
TCA PDT ENVIRONMENTAL WORKING GROUP
MEETING CHECK IN AND SIGN IN

TUCSON SECTOR

☐ (b)(6)
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NOGALES STATION
☐ (b)(6)
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DOUGLAS STATION
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SONOITA STATION
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NACO STATION
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CASA GRANDE STATION
☐ (b)(6)

CONSULTANT TEAM

HDR
☐ (b)(6)
☐ (b)(6)
☒ (b)(6)
IMC
☐ (b)(6)

BAKER
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GSRC
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AZ NATIONAL GUARD
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OTHER GOVERNMENT AGENCIES

USFS
☐ (b)(6)
☐ (b)(6)

OTHER

NAME: (b)(6) AFFILIATION: HDR
ADDRESS: _____ E-MAIL: (b)(6) (b)(7)(C)
PHONE: (b)(6)

Date: 7/25/2003 8:42 AM

Sender:

To:

(b)(6)

bcc:

Priority: Normal

Subject: Environmental Working Group - TCA Draft Meeting Minutes from

please find attached the draft meeting minutes from the TCA PDT EWG meeting of 22 July 2003... Updated project reports will be provided as a follow-up. Should you have any questions or comments reply directly to this e-mail...

<<072203EWG.pdf>>

(b)(6)

Senior Project Manager

(b)(6)



072203EWG.pdf

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 20 May 2003 at 10:00 am

Meeting Location: Tucson Station

MEETING PURPOSE

PDT Meeting

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Baker needs exact size and location of shower facility as defined in the environmental documents	(b)(6)
2. Cattle guard specification – revised for in ground facility	(b)(6)
3. Nogales infrastructure EA comments will be due 2 May	All
4. Naco-Douglas SEA comments due at the end of the month	All

10:15 – 10:30 RVS

10:30 – 10:45 MILITARY DEPLOYMENTS

Projects with FONSI, Engineering, Real Estate, & Funding

- Construction of temporary Vehicle Barriers (Douglas/Naco)
- Construction of Low Water Crossings (Douglas/Naco) part of previous projects not completed
- Vehicle Barrier to Landing Mat Fence (Naco)
- Primary Fencing (Naco) - FONSI for areas associated with 4-miles of roadway
- 2 Miles of Roadway West of the POE (Naco)
- Erosion Control and Modification of 10' CMP (Douglas)(part of previous projects not completed or needing repair)
- Ephraim Ridge Reclamation (Nogales) FONSI issued (can only work in 60' easement)
- Roadway East of POE in Douglas (separate request to JTF-6 outside the PDT)

Arizona National Guard

14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)

JTF-6

Possible Deployments This Fall

10:45 – 11:00 ENGINEERING

Nogales, Tunnels, Preliminary & Final Design

Nogales, 1/2 Miles Roadway Maintenance

Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design

Douglas, Picket Fence Extensions

Alternative Primary Fence Designs

Lighting Design - Standard 1- Mile Rural Condition

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

11:00 – 11:15 ENVIRONMENTAL
Biological Assessment
Programmatic EIS
Programmatic MOA
Douglas, Whitewater Draw Permitting (GRSC)
Nogales, Infrastructure Improvements, EA
Tunnels
2-Miles Roadway
Portable Lights
Sonoita Station

11:15 – 11:30 REAL ESTATE
updates

11:30 – 11:45 PROCUREMENT
Naco, 4-Miles Roadway

11:45 – 12:00 OTHER ITEMS
Current Funding Request

NEXT MEETINGS

3 June 2003 – HDR - Phoenix, 10:00 am
17 June 2003 – Tucson Station, 10:00 am

Meeting 15 May 2003
9:00 AM @ HDR Engineering
DHS, Az. Army National Guard, Baker Consultants, & HDR

Minutes

Attendees:

(b)(6)

Subject:

Bureau of Customs and Border Protection and National Guard Coordination on a Project Level (Border Barrier System Program Management)

Action Items

ACTION	RESPONSIBLE
1. Provide Schedule of Proposed Deployments to Attendees	(b)(6)
2. Letter from DHS (USBP) with Requested Projects to AzANG	
3. Schedule and Capabilities of Deployment to Fort Huachuca for Work Efforts in Naco & Douglas	
4. Provide Information on Guard Training Requirements (METL) to Tailor Projects Per Unit	
5. After Action Report for the Recent Naco Deployment Provided to HDR	
6. Utilize Previous Advertisement for Non-Compete Requirements to Develop Another Add	

Agenda Items Discussed

- 1) Letter Requesting AANG Participation on Projects

(b)(6) is preparing a Letter from USBP (DHS) with requests for projects to AzANG in accordance with their guidelines.

2) Non-Compete Letter from USBP

- (b)(6) provided the AzANG a letter informing them of the Bureau of customs and Border Protection's continued compliance with federal guidelines regarding competition with private sector vendors.
- Utilize Previous Advertisement for Non-Compete Requirements to Develop Another Add in local paper. HDR will draft this and provide it to the (b)(6)

3) Projects

A discussion of the FY'03 and FY'04 projects took place. Attached to the agenda, and provided within these minutes are the approved Current Funding Request and proposed Spending Plan FY'03 through FY'06

- FY'03
(b)(6) provided the After Action Report for the Whitewater Roadway deployment in Douglas. Some discussion about the need for passed projects that satisfy the training mission of individual units took place.
(b)(6) will provide: 1) a schedule of proposed deployments to attendees; 2) schedule and capabilities of deployment to Fort Huachuca for work efforts in Naco & Douglas; 3) information on Guard training requirements (METL) to tailor projects per Unit; and 4) After Action Report for the recent Naco deployment.

Once Baker has this data they will package projects for Units where they can, but continue to design projects as a whole.

- FY'04

Deployments for next year are being arranged. Some discussion of Whitewater Draw Box culvert followed. A unit has been sourced for the WWD Box placement next in June 2004.

4) Other Items

(b)(6) suggested that Baker assume the role of ensuring compliance with the Stormwater Pollution Prevention Plans (SWPPP). (b)(6) requested an estimated cost for this activity in Douglas for the recent border road and King Ranch Road.

(b)(6) requested that Baker deliver products under new contracts in a more expeditious manner to ensure projects "on the shelf" for military deployments. (b)(6) (b)(6) assured the meeting attendees that resources could be brought into the project to expedite accelerated delivery on final construction drawings. A tentative schedule is to include design of 18 miles of roadway by the end of the calendar year assuming scopes and contracts can be executed within the next 2 months.

Summary

The process for obtaining completed projects through coordination of engineering; with specifically packaged projects that satisfy the Guard training missions, procurement and equipment efficiencies, and long range planning was discussed. Those who attended considered the meeting successful. A better understanding was developed of how the mission of the Bureau of Customs and Border Protection can be furthered by the training missions of the National Guard.

**BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR
PROJECT DELIVERY TEAM
CURRENT FUNDING REQUEST
Issued 30 April 2003**

The following is the Current Funding Request as of April 2003. This is consistent with the attached spending plan issued February 2003, and includes those projects anticipated for construction or to be placed under contract. Please note numbers in parentheses correspond to the project line in the schedule attached in file fy03spen.pdf.

Replacement/Upgrade

Lighting Conversion – Douglas Arizona (42)

This project is for the conversion of lighting in Douglas to provide a more effective coverage and to reduce shadows. Will require replacement of most fixtures.

Funding Required= (b)(5)

Reconstruction/Reclamation

Erosion Control & Modification of 10' CMP in Douglas Arizona – 3 to 4 miles west of the POE (4)

Beginning approximately 3 miles west of the Douglas port-of-entry (POE) and continuing approximately 3.5 miles further west, construction was completed in July 2001 on a roadway and drainage project. During the monsoons of 2001 and 2002, portions of the installed erosion control failed and the functionality of a pair of 10 foot corrugated metal pipes became questionable.

Funding Required= (b)(5)

Construction of Ephraim Ridge Reclamation – Nogales Arizona (14)

Located approximately 0.5 mile west of the Nogales port-of-entry is the Ephraim Ridge Road. Over the years, several patrol roads have developed across the ridge, resulting in sedimentation and drainage issues at the border fence.

Funding Required= (b)(5)

New Construction

Construction of Temporary Vehicle Barrier – Naco & Douglas Arizona (9,5)

Throughout the approximately 54 miles of the Douglas and Naco Stations areas of operation, there is a need for temporary vehicle barriers to be placed along the border.

Funding Required=\$350,000

Construction of 8 Low Water Crossings Associated with Border Roads – Douglas & Naco Arizona (40)

Several low water crossings are required for the Naco and Douglas areas. These are associated with border roadway construction projects that have the roadway portion completed by the National Guard, but the low water crossing remain to be constructed.

Funding Required=(b)(5)

Vehicle Barrier to Landing Mat Fence – Naco Arizona (10)

The Naco area has permanent vehicle barrier that was constructed to be retrofitted as landing mat fence. Environmental documents are complete for this project.

Funding Required=(b)(5)

Primary Fencing - Naco Arizona (11)

Primary fencing east and west of the POE is proposed. Environmental documents are in place to begin this work. The National Guard has indicated that Primary Fence construction does not satisfy their training mission.

Funding Required=(b)(5)

Construction on first ½ mile of 2-mile roadway east of the POE – Nogales Arizona (13)

Beginning approximately 1000 feet east of the Nogales port-of-entry and continuing approximately 2 miles further east is a stretch of marginal and non-existent Border Patrol road. The limits of the project also includes numerous drainage crossings and the need for primary fencing.

Funding Required=(b)(5)

Construction Oversight and Staking Douglas, Naco, & Nogales Arizona (20)

Construction project listed above will require contract monitoring, construction inspection and engineering support.

Funding Required=(b)(5)

Engineering / Environmental / Real Estate

Engineering & Real Estate For Ephraim Ridge Reclamation (14)

Ephraim Ridge Reclamation is described above. Environmental documents are in place for this project, but real estate issues are being addressed.

Funding Required=(b)(5)

Project Delivery Team Meetings (27)

This item funds the PDT and it's program management and coordination activities. This item is to fund 14 PDT meetings, through the end of FY'03

Funding Required= (b)(5)

Light Project – Douglas & Naco Arizona (46, 51)

This project is to prepare the required engineering and real estate documents, and coordination in anticipation of FY'04 construction. Construction will entail 5 miles of lighting in Douglas and 5 miles of lighting in Naco, both split each side of the POE. This also includes lighting retrofit in Douglas. Beginning approximately 1 mile east and 1 mile west of the Douglas Port-of-Entry design permanent lighting 2.5 miles east and 2.5 miles west. Beginning approximately 1 mile east and 1 mile west of the Douglas Port-of-Entry design permanent lighting 2.5 miles east and 2.5 miles west. Anticipated use of the standard 2 mile rural lighting design is anticipated for this project. This project will require agency and public coordination.

Funding Required= (b)(5)

International Ditch – Douglas Arizona (43)

Approximately 1.3 miles of concrete lined ditch located on the east side of the port of entry in Douglas. Construction of this project is scheduled to occur in 2004 and will be performed by a private contractor. Design will require the preparation of plans and specifications required for construction by private contractors. The complexity and size of this project precludes JTF-6 or National Guard for this project.

Funding Required= (b)(5)

Engineering Design, Environmental Permitting, and Real Estate 8-miles Roadway – Douglas Arizona (33)

Beginning approximately 7.1 miles west of the Douglas port-of-entry and continuing for approximately 8 miles west. Six drainage crossings from the Mexico into United States will require design. Aerial mapping has been developed and schematic design completed. The Schematic design will require an alignment closer to the border for compliance with environmental documents. This project will require agency and public coordination.

Funding Required= (b)(5)

Engineering Design, Environmental Permitting, and Real Estate 10-miles Roadway – Naco Arizona (36)

Beginning approximately 2.5 miles west of the Naco port-of-entry and continuing for approximately 6 miles west and beginning 2.5 miles east of the Port-of-Entry and continuing 4 miles east. Several drainage crossings from the Mexico into United States will require design. Aerial mapping has been developed and schematic design completed. The Schematic design will require an alignment closer to the border for compliance with environmental documents. This project will require agency and public coordination.

Funding Required=(b)(5)

Schematic Design and Environmental Documents – Nogales Arizona (36)

Station level schematic design for infrastructure. This will require 15% design plans developed for approximately 5 miles east and West of the Port-of-Entry within the limits of the Nogales Station.

Funding Required=(b)(5)

Real Estate and Permits 2-miles Roadway – Nogales Arizona (25)

Beginning approximately 1000 feet east of the Nogales port-of-entry and continuing approximately 2 miles further east is a stretch of marginal and non-existent Border Patrol road. The limits of the project also includes numerous drainage crossings and the need for primary fencing. This item is to resolve and/or acquire Real Estate and obtain permits.

Funding Required=(b)(5)

Preliminary Design and Coordination, Environmental Assessment and Permitting – Sonoita (57)

The Sonoita station is in need of access maintenance through U.S. Forest service property. This will require an engineering assessment, environmental documents, and coordination with the U.S. Forest Service.

Funding Required=(b)(5)

TOTAL CRITICAL PROJECT FUNDING REQUIRED =(b)(5)

FY03 SPENDING PLAN SCHEDULE & PROJECTED FY04 - SEE DETAILED SCHEDULES FOR THOSE IN GREEN

ID	Title Name	Division	Start	Month												End
				Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
1	Assessment PFM Projects		Mon 2/24/03													
2	DCL, Wellstream Drive Bus Garage	107 days	Mon 2/24/03													
3	DCL, 17' Chip & Section Control House	71 days	Tue 2/24/03													
4	DCL, Temporary Vehicle Barrier (5 miles)	46 days	Tue 2/24/03													
5	DCL, Vertical Curve Stationing	114 days	Thu 2/24/03													
6	DCL, Vertical Curve Stationing	30 days	Mon 2/24/03													
7	DCL, Vertical Curve Stationing	14 days	Mon 2/24/03													
8	DCL, Vertical Curve Stationing	30 days	Mon 2/24/03													
9	DCL, Vertical Curve Stationing	30 days	Mon 2/24/03													
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93	DCL, Vertical Curve Stationing	30 days	Mon 2/24/03													
94	DCL, Vertical Curve Stationing	30 days	Mon 2/24/03													
95	DCL, Vertical Curve Stationing	30 days	Mon 2/24/03													
96	DCL, Vertical Curve Stationing	30 days	Mon 2/24/03													
97	DCL, Vertical Curve Stationing	30 days	Mon 2/24/03													
98	DCL, Vertical Curve Stationing	30 days	Mon 2/24/03													
99	DCL, Vertical Curve Stationing	30 days	Mon 2/24/03													
100	DCL, Vertical Curve Stationing	30 days	Mon 2/24/03													

**BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR**

SPENDING PLAN FY'03

Issued: 21 February 2003

PROPOSED SPENDING PLAN FY'04, FY'05 & FY'06

Issued: 28 April 2003

The following tables present the Tucson Sector spending plan for Fiscal Years 2003, 2004, 2005, and 2006 in four categories. These categories are:

- **Table 1: Complete Construction FY'03** – This is the funding necessary to complete all planned spring 2003 construction. This does not include funds from COW-36-6002.
- **Table 2: Prepare for FY'04 Construction** – This is the funding necessary to prepare environmental, engineering and real estate documents for construction in 2004.
- **Table 3: Construction and Engineering FY'04** – This is the funding necessary from the FY'03 budget to construct in 2004 and to provide environmental, engineering and real estate documents for FY'04 construction.
- **Table 4: Construction and Engineering FY'05** – This is the funding necessary to and provide environmental, engineering and real estate documents for FY'05 and FY'06 construction.
- **Table 5: Construction and Engineering FY'06** – This is the funding necessary to and provide environmental, engineering and real estate documents for FY'05 and FY'06 construction.

It is assumed that little or no real estate will need to be acquired for these projects. Summation of tables 1 and 2 provides the total required for FY'03.

TABLE 1: Complete Construction FY'03

PROJECT	FUNDING NEEDED
<u>Procurement</u> <ul style="list-style-type: none">▪ DGL, Whitewater Draw Box Culvert▪ DGL, 10' CMP & Erosion Control Repair▪ DGL, Temporary Vehicle Barrier (5 miles)▪ DGL, Vertical Fence Extensions▪ DGL, Monsoon Repair▪ NCO, 4 Miles Roadway▪ NCO, Temporary Vehicle Barrier▪ NCO, Vehicle Barrier to Landing Mat Fence▪ NCO, Primary Fencing (7 miles)▪ NGL, Tunnels	(b)(5)

**BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR**

SPENDING PLAN FY'03

Issued: 21 February 2003

PROPOSED SPENDING PLAN FY'04, FY'05 & FY'06

Issued: 28 April 2003

PROJECT	FUNDING NEEDED
<ul style="list-style-type: none"> ▪ NGL, 2 Miles E. of POE (Const. First ½ mile) ▪ NGL, Ephraim Ridge ▪ Temporary Vehicle Barriers for other stations <p align="right">Sub-total</p> <p><u>Engineering /Environmental/Management</u></p> <ul style="list-style-type: none"> ▪ DGL/NCO, Supplemental EA ▪ DGL, Monsoon Repair (Engr) ▪ NCO, Primary Fencing (7 miles) (Env) ▪ NCO, Construction Oversight and Staking ▪ NGL, Geotechnical for 2 Miles Roadway ▪ NGL, Construction Oversight ▪ NGL, Ephraim Ridge (Real Estate, Env. & Eng.) ▪ NGL, Tunnels Construction Admin. & Survey ▪ NGL, Real Estate & ROE Permits 2-Miles Roadway (& Construction first ½ mile) <p align="right">Sub-total</p>	(b)(5)

TABLE 2: Prepare for FY'04 Construction

PROJECT	FUNDING NEEDED
<p><u>Engineering /Environmental/Management</u></p> <ul style="list-style-type: none"> ▪ PDT Meetings (14 meetings) (Project/Program Management) ▪ DGL, 8 Low Water crossings (Engr) ▪ DGL, Lighting Conversion (1 Mile) (Engr) ▪ DGL, Lighting (5 Miles) Split E. & W. of POE ▪ DGL, Primary Fencing (Cattleman's West 4 miles) (Engr. & Env) ▪ DGL, International Ditch Preliminary & Final Plans for Private Contractor (Engr & Env) ▪ DGL, 4 Miles Roadway (W. of POE) (Env. And Engr) ▪ DGL, Acquire USF&WS Property (Env and Real Estate) ▪ NCO, Lighting (5 Miles - Split E. & W. of POE) (Engr & Env) ▪ NGL, 2 Miles Roadway & Drainage (E. of POE) (Engr & Env) ▪ NGL, EA and 15% Schematic Design <p align="right">TOTAL</p>	(b)(5)

**BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR**

SPENDING PLAN FY'03

Issued: 21 February 2003

PROPOSED SPENDING PLAN FY'04, FY'05 & FY'06

Issued: 28 April 2003

TABLE 3: Construction and Engineering FY'04

PROJECT	FUNDING NEEDED
<u>Procurement</u>	
▪ DGL, Whitewater Draw Bollard Fencing	(b)(5)
▪ DGL, Complete 8 Low Water Crossings	
▪ DGL, Kings Ranch Road Fencing	
▪ DGL, Lighting Conversion (1 Mile) (Engr)	
▪ DGL, International Ditch for Private Contractor	
▪ DGL, Dip 1 (Low Water Crossing)	
▪ DGL, Dip 7	
▪ DGL, Lighting (5 Miles) Split E. & W. of POE	
▪ DGL, Primary Fencing (Cattleman's West 4 miles) (Engr. & Env)	
▪ DGL, 5 Miles Roadway (E. of POE) (Env. And Engr)	
▪ DGL, 5 Miles Roadway & Drainage (E. of POE)	
▪ DGL, Dip 5	
▪ NCO, Lighting (5 Miles) Split E. & W. of POE	
▪ NCO, 4 Miles Roadway & Drainage (E. & W. of POE)	
▪ NGL, 4 Miles Roadway & Drainage	
▪ NGL, 2 Miles Roadway & Drainage (E. of POE)	
▪ NGL/DGL/NCO Additional Lighting (5 Miles)	
▪ Temporary Vehicle Barriers (other Stations)	
▪ Roadway for Sonoita and Other Stations	
Sub-total	
<u>Engineering /Environmental/Management</u>	
▪ DGL, 5 Miles Roadway (E. of POE) (Env. And Engr)	(b)(5)
▪ DGL, Dip 5	
▪ DGL/NCO, Construction Oversight and Staking	
▪ DGL/NCO, Construction As-Built	
▪ NCO, 4 Miles Roadway & Drainage (E. & W. of POE)	
▪ NGL, 4 Miles Roadway & Drainage	
▪ NGL/DGL/NCO, Permanent Survey Monuments (20 Miles)	
▪ NGL/DGL/NCO Additional Lighting (5 Miles)	
Sub-total	
TOTAL	

**BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR**

SPENDING PLAN FY'03

Issued: 21 February 2003

PROPOSED SPENDING PLAN FY'04, FY'05 & FY'06

Issued: 28 April 2003

TABLE 4: Construction and Engineering FY'05

PROJECT	FUNDING NEEDED
<u>Procurement</u>	
▪ DGL, 10-Miles Roadway (5 Miles Split E. & W. of POE)	(b)(5)
▪ DGL, 5-Miles Lighting (2.5 miles E. & W. split on POE)	
▪ NCO, 4-Miles Roadway & Drainage (E. & W. of POE)	
▪ NCO, 5-Miles Lighting (2.5 miles E. & W. split on POE)	
▪ NGL, 5-Miles Lighting (2.5 miles E. & W. split on POE)	
▪ TUS, Vehicle Barrier (2 Miles W. & 8 Miles East of Sasabe)	
Sub-total	
<u>Engineering /Environmental/Management</u>	
▪ DGL/NCO, Construction Oversight and Staking	(b)(5)
▪ DGL/NCO, Construction As-Built	
▪ DGL, 5-Miles Roadway (W. of POE)	
▪ NCO, 5-Miles Roadway (2.5 Miles Split on POE)	
▪ NGL/DGL/NCO, Permanent Survey Monuments (20 Miles)	
▪ NGL, 4 Miles Roadway & Drainage	
▪ TUS, Vehicle Barrier (2 Miles W. & 8 Miles East of Sasabe)	
▪ TUS, 10-Miles Roadway (2 Miles W. & 8 Miles East of Sasabe)	
▪ SON, 2-Miles Roadway	
▪ SON, 2-Miles Vehicle Barrier	
Sub-total	
TOTAL	

**BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR**

SPENDING PLAN FY'03

Issued: 21 February 2003

PROPOSED SPENDING PLAN FY'04, FY'05 & FY'06

Issued: 28 April 2003

TABLE 5: Construction and Engineering FY'06

PROJECT	FUNDING NEEDED
<u>Procurement</u>	
▪ DGL, 5-Miles Primary Fence (2.5 miles E. & W. split on POE)	(b)(5)
▪ DGL, 5-Miles Roadway (W. of POE)	(b)(5)
▪ NCO, 5-Miles Roadway (2.5 Miles Split on POE)	(b)(5)
▪ NCO, 5-Miles Primary Fence (2.5 miles E. & W. split on POE)	(b)(5)
▪ NGL, 5-Miles Primary Fence (2.5 miles E. & W. split on POE)	(b)(5)
▪ TUS, 10-Miles Roadway (2 Miles W. & 8 Miles East of Sasabe)	(b)(5)
▪ SON, 4-Miles Roadway	(b)(5)
▪ SON, 2-Miles Vehicle Barrier	(b)(5)
▪ NGL, 4 Miles Roadway & Drainage	(b)(5)
Sub-total	(b)(5)
<u>Engineering /Environmental/Management</u>	
▪ DGL/NCO, Construction Oversight and Staking	(b)(5)
▪ DGL, 5-Miles Roadway (W. of POE)	(b)(5)
▪ NCO, 5-Miles Roadway (2.5 Miles Split on POE)	(b)(5)
Sub-total	(b)(5)
TOTAL	(b)(5)

②

Tong Combs EA still waiting on info
Fonsi signed for joint use processing center
Sowter - sow to do work
- archeology - bio still pending
- sow pending

Procurement

wooden stakes ^{of all types} - can't stand in ground.

Other items - Funding report - shipped 4.9 million to F.E. Worth
- will program remainder of 1.8 million
Meaty Shells - once a month w/ fixed date
A June 2nd, next meeting - Phoenix testators

Date: 5/27/2003 8:16 AM

Sender:

To:

(b)(6)

cc:

bcc:

Priority: Normal

Subject: Meeting Minutes from TCA PDT 20 May 2003

Please find attached the meeting minutes from the Tucson Sector PDT meeting held on 20 May 2003. should you have any corrections or comments, please contact either (b)(6) or myself.

The next TCA PDT Meeting is scheduled for 24 June 2003 in Phoenix.

<<052003.pdf>> <<052003Signin.pdf>>

(b)(6)

Senior Project Manager

HDR ONE COMPANY | Many Solutions

BW1 FOIA CBP 007444

(b)(6)



RFC822.TXT



052003.pdf



052003Signin.pdf

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS

MEETING MINUTES

Meeting Date and Time: 20 May 2003 at 10:00 am

Meeting Location: Phoenix Inn - HDR

Distribution Date: 23 May 2003

Distributor: (b)(6)

Distribution:

(b)(6)

MEETING PURPOSE

PDT Meeting.

ATTENDEES

See Attached.

PREVIOUS ACTION ITEMS STATUS

ACTION	RESPONSIBLE	STATUS
1. Baker needs exact size and location of shower facility as defined in the environmental documents	(b)(6)	Done
2. Cattle guard specification – revised for in ground facility	Baker	Pending – suggested prefabricated per (b)(6)
3. Nogales infrastructure EA comments will be due 2 May	All	Done
4. Naco-Douglas SEA comments due at the end of the month	All	Done

RVS

No representative from IMC was present

- Nogales
Continuing issues with Crawford Hill. Reportedly (b)(6) from IMC will be in Nogales regarding foundations retrofit.
- (b)(6) has retired and (b)(6) has assumed most environmental responsibilities
- Stations need digital aerial photos with GPS coordinates, pending data from IMC.

MILITARY DEPLOYMENTS

Projects with FONSI, Engineering, Real Estate, & Funding

- Construction of temporary Vehicle Barriers (Douglas/Naco)
- Construction of Low Water Crossings (Douglas/Naco) part of previous projects not completed
- Vehicle Barrier to Landing Mat Fence (Naco)
- Primary Fencing (Naco) - FONSI for areas associated with 4-miles of roadway
- 2 Miles of Roadway West of the POE (Naco)
- Erosion Control and Modification of 10' CMP (Douglas)(part of previous projects not completed or needing repair)
- Ephraim Ridge Reclamation (Nogales) FONSI issued (can only work in 60' easement)
- Roadway East of POE in Douglas (separate request to JTF-6 outside the PDT)

AZ National Guard

- Meeting Minutes and handouts from the 15 May 2003 was discussed (attached)
- (b)(6) informed the PDT that a recent deployment to Ft. Huachuca will include capability to provide construction services in Naco and Douglas.

JTF-6

- A Marine Unit of 60 –70 soldiers is anticipated in Naco mid August to work 5 weeks on roadways east of the POE.
- 2 Units, from Alaska, of approximately 100 each is anticipated to deploy to Naco sometime during September & October
- the BPSCC has requested that a staff engineer be assigned to the Arizona deployments of the National Guard

ENGINEERING

Baker did not prepare a written status report for this meeting

Naco-4 Miles Roadway:

- Baker will look into repackaging portions of this project to facilitate National Guard deployments.

Nogales, Tunnels:

- Plans – 90% package under review

Nogales, ½ Miles Roadway Maintenance:

- Plans – Completing 90% Plans under review

Nogales 1-1/2 Miles Roadway:

- Revising 60% per PDT comments.
- Comments have been received from the IBWC regarding drainage, and will be addressed by Baker.
- (b)(6) asked for a timeline from Baker on resolution of the drainage issues.
- Was holding for the Go Ahead on the Geotechnical Investigation, was processed by AERC and should be awarded soon (b)(6) will check on contract progress.

Nogales, Ephraim Ridge Road Reclamation:

- Baker has provided (b)(6) with project footprint

- 100 % plans complete
- Drainage Report Approved.

Douglas, Picket Fence Extensions:

- Plans – 95% package submitted pending comments.

Alternative Primary Fence Designs:

- Plans – Researching various alternatives.
- Draft will be out soon, a copy will be forwarded to (b)(6)(b)(7)(C) for comments as well.

Lighting Design – Standard 1 – Mile Rural Condition:

- Plans – 90% plans under revision per PDT Comments.

ENVIRONMENTAL

Update: (b)(6) has provided environmental update number 20, which is attached to these minutes.

Biological Assessment

- Tucson will be out 15 June 2003

Douglas, WWD Box Culvert

- Pending issuance of Section 404 permit, 404.b.1 has been forwarded to the USACE.

Douglas and Naco Station's Environmental Documents

- The draft Naco and Douglas Station Supplemental Cumulative Effects EA out for public review, comments due by 7 June 2003.

Nogales, Ephraim Ridge

- FONSI issued

Nogales, Infrastructure Improvements, EA

- Draft Nogales Infrastructure EA is out for public review. Comments were due by 9 June 2003.
- Inclusion of RVS sites in this document has slowed progression of the document.

Sonoita Station

- SOWs to proceed with these CR and bio surveys are under development and review

REAL ESTATE

Sonoita Station

- SOWs to proceed with these CR and bio surveys are under development and review

PROCUREMENT

Naco 4-Miles Roadway

- Anticipate JTF-6 deployment this fall will require preparation of BOMs and other procurement items.
- Material left over from the National Guard deployment to Naco will be utilized with the fall JTF-6 deployments.

CONSTRUCTION

No deployments since last PDT meeting

OTHER ITEMS

It was suggest that the TCA PDT go to once a month, synchronized with the San Diego PDT meetings. Special meetings can be arranged if need. This has come up because several meetings have been canceled and those making travel plans would like more lead-time.

ACTION ITEMS

ACTION	RESPONSIBLE
1. Information on San Diego deployment projects, National Guard capabilities, and units	(b)(6)
2. Additional SRs to JTF-6	
3. Comments on Nogales Tunnels and Douglas Fence Extension Plans due 30 June 2003	
4. Check on POC in Phoenix COE-Regulatory Branch, and progress of Whitewater Draw 404 permit application	
5. Draft Naco-Douglas SEA comments due 7 June 2003	All
6. Provide data on illumination levels from recent tests in Naco	Baker - (b)(6)
7. Status of pending contracts within AERC	(b)(6)
8. Check on management and responsible party within the federal government for the PEIS	

NEXT MEETINGS

24 June 2003 – HDR Phoenix, 10:00 am

These minutes reflect the understanding of HDR Engineering, Inc. If revisions or additions are needed, contact (b)(6)
(b)(6)

-----Original Message-----

From: (b)(6)

Sent: Thursday, May 22, 2003 11:45 PM

(b)(6)

Subject: Environmental Update Number 20

All--

Here are the environmental issues discussed during the PDT meeting Tuesday, May 20, 2003.

1. The Tucson/Yuma PEIS revised draft is expected to be submitted NLT mid-July for internal review and comments. The status letter was forwarded to (b)(6) for review and distribution.
2. The revised Tucson BA is expected to be resubmitted NLT 19 June. It will include the 5 additional species.
3. The draft Nogales Infrastructure EA (roadways, RVS and portable lights) is out for public review; comment period will close on 9 June. The 14 June deployment has been cancelled, so distribution of the final EA is not as critical. Baker feels that some landing mat needs to be replaced with bollard fence and will revise the designs. Completion of the final EA will be dependent upon receipt of these designs.
4. HDR and GSRC has completed the SOW for the road maintenance at Sonoita, Nogales 10-miles of roadway, temporary vehicle barriers and various permitting actions. [subsequent discussions after the PDT resulted in the addition of a SOW for the Naco-Douglas BA to address potential T&E impacts identified in the SEA]
5. The revised draft Naco and Douglas Station Supplemental Cumulative Effects EA was submitted for public review on 7 May. The comment period closes on 9 June.
6. GSRC received comments on the Nogales Station pre-draft EBS/EA and is in the process of making revisions.
7. GSRC submitted the draft Op Desert Grip II EA and the Emergency Beacons EA for public comments; the comment periods for these two EAs close on 7 June and 30 May, respectively.
8. The Tucson Checkpoints are on hold pending receipt of information from the (b)(7)(E)
9. GSRC is proceeding with the Tohono Nation combined EA, which will include the emergency beacons and camp details that are on the Nation. The EA will be released to the Nation only for a 5-day comment period.
10. The FONSI for the Processing Center was turned around within an hour at HQ--thanks to (b)(6) for the extremely quick response.

As usual, please do not hesitate to call me if you have any questions.
Thanks.

(b)(6)

DATE: 5/20/03 TIME: 10:00

LOCATION: Tucson Station

INS – US BORDER PATROL BORDER BARRIER PROJECTS
TUCSON SECTOR PROJECT DELIVERY TEAM
MEETING CHECK IN AND SIGN IN

TUCSON SECTOR

☐ (b)(6)
☐ (b)(6)
☒ (b)(6)
☒ (b)(6)
☐ NOGALES STATION
(b)(6)
☐ (b)(6)
☒ (b)(6)

DOUGLAS STATION
☒ (b)(6)
☒ (b)(6)
☐ (b)(6)
☐ (b)(6)
TUCSON STATION

NACO STATION
☒ (b)(6)
☐ (b)(6)
☐ (b)(6)
☐ CASA GRANDE STATION
(b)(6)

CONSULTANT TEAM

HDR
☐ (b)(6)
☐ (b)(6)
☒ (b)(6)
☐ IMC
(b)(6)

BAKER
☒ (b)(6)
☒ (b)(6)
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GSRC
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CORPS OF ENGINEERS
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JTF-6
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AZ NATIONAL GUARD
☒ (b)(6)
☒ (b)(6)

OTHER

NAME: (b)(6) (b)(7) AFFILIATION: (b)(6)
ADDRESS: (b)(6) E-MAIL: (b)(6)
PHONE: (b)(6)

NAME: (b)(6) USFS
ADDRESS: (b)(6) E-MAIL: (b)(6)
PHONE: (b)(6) FAX: (b)(6)

NAME: (b)(6) AFFILIATION: _____
ADDRESS: (b)(6) E-MAIL: _____
PHONE: (b)(6)

DATE: 5/20/03 TIME: 10:00

LOCATION: Tucson Station

**INS – US BORDER PATROL BORDER BARRIER PROJECTS
TUCSON SECTOR PROJECT DELIVERY TEAM
MEETING CHECK IN AND SIGN IN**

(b)(6)

USBP-Naco

USACE-AERC

USACE-AERC

AERC

USACE-AERC

DHS

USBP-Sonoita

Kleinfelder

(b)(6)

①

PDT Meeting 4/22/03

- 1) Legal done
- 2) ANG non compete letter - (b)(6) has asked for final request
- 3) Small Business contractors - faults - information forth coming - ^{looking for} to finish work
- 4) Nozels geotechnical control mod - negotiated - not done
- 5) Legal visit - done
- 6) Water issues scheduled @ 12:00
- 7) Plan quantities - done
- ① Delivery address - done
- ② ~~Cattle~~ Cattle guards - to be to procure

RUS - zone

Grand Hill - mostly sign - price not high enough

Military deployment

INNOVIA Guard on ground - dog cattle guards

Water major issue at start of work.

NACO just about done except for cattle guards

Inc rotators - still looking as a go

Asphalt may not come - need it completed

Key deployment NG mounted to be deployed to Fort H. - could work

ANG Safety - need to look at checklist - had PE stamp -

JTF-6 now getting unit requests - expecting alot of work

arguing see agenda

✓ size of decontamination facility in Nogals
Cops of COTEX

Ephraim Ridge - foot print given to USACE

above ground cattle guard - not acceptable to station

circumstances

BA Tucson Sector - fuel issue of water & gas is
so not yet - 3rd in line

Naco Douglas support EA to Army

Nogals christine 25 April w/ RVS Lita

RVS - Nogals Ephraim - awaiting funds

Sonita SOW

Grant Trip II out on comments next wed are
check for B/beacons - waiting on TOW

WWD permit still waiting

Real Estate - USACE Filled

Procurement - okay

- (b)(6) needs to order what is only needed

Next meeting 20 May 2003

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 22 April 2003 at 10:00 am

Meeting Location: HDR @ Phoenix Inn – Phoenix Arizona

MEETING PURPOSE

PDT Meeting

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. RVS site digital aerial photos with GIS coordinates if possible provided to the NGL, NCO, and Douglas Stations	Baker and IMC
2. The Arizona national Guard has requested a non-compete letter from the USBP Tucson Sector	(b)(6)
3. Check on feasibility of small business contractors, or MATOC contractors to perform work on the border	
4. Nogales 2-miles roadway Geotechnical Contract modification for Baker	
5. Site visit to Douglas and Naco for lighting measurements	Baker
6. Conference call on water issues in Naco w/ HQ, (b)(6) (b)(6)	As Noted
7. Plan quantities for construction in Douglas last year provided to HDR	Baker
8. Delivery address for material and dates of delivery in Naco	(b)(6)
9. Resolve cattle guard specification issue and order cattle guards	

10:15 – 10:30 RVS

Nogales, access

Douglas - Naco

10:30 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

6 April 2003 through 19 April 2003 NCO (E. of POE)

24 May 2003 through 7 June 2003 NCO

14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)

ANG Safety Comments

JTF-6

10:45 – 11:00 ENGINEERING

Nogales, Tunnels, Preliminary & Final Design

Nogales, 1/2 Miles Roadway Maintenance

Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design

Douglas, Picket Fence Extensions

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

Alternative Primary Fence Designs
Lighting Design - Standard 1- Mile Rural Condition

11:00 – 11:15 ENVIRONMENTAL

Biological Assessment
Programmatic EIS
Programmatic MOA
Douglas, Whitewater Draw Permitting (GRSC)
Douglas, Whitewater Draw Env. Baseline (Kleinfelder)
Naco, 4-Miles Roadway, EA & Permitting
Nogales, Infrastructure Improvements, EA
Tunnels
2-Miles Roadway
Portable Lights
Sonoita Station

11:15 – 11:30 REAL ESTATE
updates

11:30 – 11:45 PROCUREMENT
Naco, 4-Miles Roadway

11:45 – 12:00 OTHER ITEMS

NEXT MEETINGS

6 May 2003 – Tucson Station, 10:00 am
20 May 2003 – HDR - Phoenix, 10:00 am



**TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS
BAKER STATUS REPORT – ENGINEERING**

PDT 04/22/2003

A. Naco-4 Miles Roadway:

- 100% submitted.

B. Nogales, Tunnels:

- Plans -- Submitting 90% Plans.
- Submitting to Various Agencies.
- Shower facility assumptions and questions list requesting feedback.

C. Nogales, ½ Miles Roadway Maintenance:

- Plans – Completing 90% Plans.
- Presented Intent to the City of Nogales.

D. Nogales 1-1/2 Miles Roadway:

- Revising 60% per PDT comments.
- Holding for the Go Ahead on the Geotechnical Investigation.

E. Nogales, Ephraim Ridge Road Reclamation:

- 100 % submitted and approved.

F. Douglas, Picket Fence Extensions:

- Plans – Submitting revised 95% Package.

G. Alternative Primary Fence Designs:

- Plans – Researching various alternatives – Completing first draft.

H. Lighting Design – Standard 1 – Mile Rural Condition:

- Plans –Revising per PDT Comments.

I. Douglas:

- Kings Ranch Road As-Built Submittal.
- 2 miles road Quantities.

(b)(6)

From:
Sent:
To:
Cc:
Subject:

(b)(6) (b)(7)(C)

(b)(6)

TCD PDT Meeting 22 April in Phoenix

(b)(6)

The following items are per your request:

UPDATE: Baker and Kleinfelder went to NACO East side site yesterday and met with the National Guard team, onsite inspector and the Border Patrol (b)(6) and explained the changes in design needed to adjust for Mapping errors and maintain quantities as designed. Sheets were updated and surveyors were informed. All changes do not affect any work done.

NACO EAST SIDE ENGINEERED FILL: 3000 c.y. are needed to complete the east side of NACO (Fill was originally assumed to be acquired from the West side of Naco, part of the Four Mile job) after sample tested and approved.

NACO EAST SIDE AGGREGATE: 3900 c.y. as per plan (table Pg 4). And IF aggregate is to replace the 4" Asphalt on the Low Water Crossings, then Asphalt Tons (listed on pg 4) is to be converted to Aggregate C.Y. and ordered.

PDF FILES FROM BAKER, KLEINFELDER and URBAN: In two weeks.

BAKER PDT UPDATE: Monday 21st April, AM.

BAKER SUBMITTALS WITH HDR REDLINES SETS: At PDT.

(b)(6) please call or e mail me if you need more information.

(b)(6)

(b)(6)

From:
Sent:
To:
Cc:
Subject:

(b)(6)

Nogales Infrastructure EA

(b)(6)

I wanted to give you a run down on what will have to happen to meet the June deployment for the Nogales Infrastructure project. We will send the Predraft out on the 25th of April, internal comments will have to be in no later than 2 May. The Draft EA will be mailed out on the 9th of May. Will there be a problem with a 5 day internal review, or is this okay? Also, the Cultural Resource surveys will not begin until next week for the 6 additional RVS sites, which means we may or may not have there report by the time of the Draft. Is this okay?

Just wanted to let you know where we stand.

Thanks

(b)(6)

Natural Resources
Gulf South Research Corporation
7602 GSRI Ave
Baton Rouge, LA 70820

(b)(6)

(b)(6)

From:
Sent:
To:

(b)(6)

Subject: Naco Site Visit for Rural Lighting

On April 9, 2003, (b)(6) from Baker Engineering visited the Naco area for the purpose of obtaining light meter readings on the west side of the Naco POE.

The trip was a success and (b)(6) was able to obtain the readings and convert them to LUX, LUMENS, CP or whatever the desired reading was.

The Border Patrol's minimum lighting level was determined and the Rural Standard appears to exceed that level.

Before going forward I recommend that we deploy a test. It would require the retrofit of two light poles with the Rural Standard design.

Naco has poles available for the test. It would require procurement of the new fixtures and install on existing poles and circuits. By field testing this design, we could look at problems such as glare, lighting levels and atmospheric light pollution.

This should fulfill the action item from the last meeting and generate a discussion at the next meeting.

(b)(6)

Date: 4/21/2003 11:17 AM

Sender:

To:

(b)(6)

Priority: Normal

Subject: PDT Meeting In Phoenix, 22 April 2003

Please find attached the agenda for the 22 April TCA PDT Meeting in Phoenix..

....

<<042203Ad.pdf>> <<phx_inn_map1.pdf>>

(b)(6)

Senior Project Manager

(b)(6)

Note: To assure proper delivery to all recipients, the following addresses have been moved from the header:

(b)(6)

(b)(6)



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**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 22 April 2003 at 10:00 am

Meeting Location: HDR @ Phoenix Inn – Phoenix Arizona

MEETING PURPOSE

PDT Meeting

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. RVS site digital aerial photos with GIS coordinates if possible provided to the NGL, NCO, and Douglas Stations	Baker and IMC
2. The Arizona national Guard has requested a non-compete letter from the USBP Tucson Sector	(b)(6)
3. Check on feasibility of small business contractors, or MATOC contractors to perform work on the border	
4. Nogales 2-miles roadway Geotechnical Contract modification for Baker	
5. Site visit to Douglas and Naco for lighting measurements	Baker
6. Conference call on water issues in Naco w/ HQ (b)(6) (b)(6)	As Noted
7. Plan quantities for construction in Douglas last year provided to HDR	Baker
8. Delivery address for material and dates of delivery in Naco	(b)(6)
9. Resolve cattle guard specification issue and order cattle guards	

10:15 – 10:30 RVS

Nogales, access

Douglas - Naco

10:30 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

6 April 2003 through 19 April 2003 NCO (E. of POE)

24 May 2003 through 7 June 2003 NCO

14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)

ANG Safety Comments

JTF-6

10:45 – 11:00 ENGINEERING

Nogales, Tunnels, Preliminary & Final Design

Nogales, 1/2 Miles Roadway Maintenance

Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design

Douglas, Picket Fence Extensions

***BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS***

Alternative Primary Fence Designs
Lighting Design - Standard 1- Mile Rural Condition

- 11:00 – 11:15 ENVIRONMENTAL**
Biological Assessment
Programmatic EIS
Programmatic MOA
Douglas, Whitewater Draw Permitting (GRSC)
Douglas, Whitewater Draw Env. Baseline (Kleinfelder)
Naco, 4-Miles Roadway, EA & Permitting
Nogales, Infrastructure Improvements, EA
Tunnels
2-Miles Roadway
Portable Lights
Sonoita Station
- 11:15 – 11:30 REAL ESTATE**
updates
- 11:30 – 11:45 PROCUREMENT**
Naco, 4-Miles Roadway
- 11:45 – 12:00 OTHER ITEMS**

NEXT MEETINGS

6 May 2003 – Tucson Station, 10:00 am
20 May 2003 – HDR - Phoenix, 10:00 am

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 22 April 2003 at 10:00 am

Meeting Location: HDR @ Phoenix Inn – Phoenix Arizona

MEETING PURPOSE

PDT Meeting

10:00 – 10:15 REVIEW OF ACTION ITEMS

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2. The Arizona national Guard has requested a non-compete letter from the USBP Tucson Sector	(b)(6)
3. Check on feasibility of small business contractors, or MATOC contractors to perform work on the border	
4. Nogales 2-miles roadway Geotechnical Contract modification for Baker	
5. Site visit to Douglas and Naco for lighting measurements	
6. Conference call on water issues in Naco w/ HQ, (b)(6) (b)(6)	As Noted
7. Plan quantities for construction in Douglas last year provided to HDR	(b)(6)
8. Delivery address for material and dates of delivery in Naco	
9. Resolve cattle guard specification issue and order cattle guards	

10:15 – 10:30 RVS

Nogales, access

Douglas - Naco

10:30 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

6 April 2003 through 19 April 2003 NCO (E. of POE)

24 May 2003 through 7 June 2003 NCO

14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)

ANG Safety Comments

JTF-6

10:45 – 11:00 ENGINEERING

Nogales, Tunnels, Preliminary & Final Design

Nogales, 1/2 Miles Roadway Maintenance

Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design

Douglas, Picket Fence Extensions

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

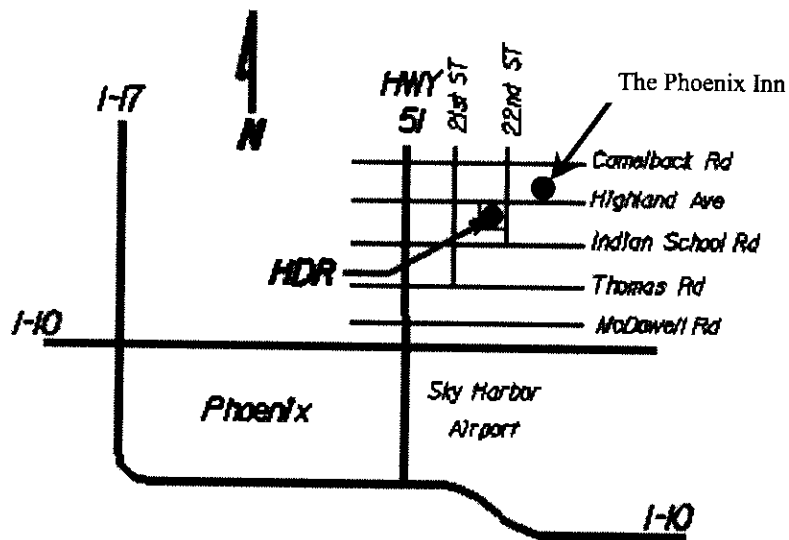
Alternative Primary Fence Designs
Lighting Design - Standard 1- Mile Rural Condition

- 11:00 – 11:15 ENVIRONMENTAL**
Biological Assessment
Programmatic EIS
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Douglas, Whitewater Draw Permitting (GRSC)
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Naco, 4-Miles Roadway, EA & Permitting
Nogales, Infrastructure Improvements, EA
 Tunnels
 2-Miles Roadway
 Portable Lights
Sonoita Station
- 11:15 – 11:30 REAL ESTATE**
updates
- 11:30 – 11:45 PROCUREMENT**
Naco, 4-Miles Roadway
- 11:45 – 12:00 OTHER ITEMS**

NEXT MEETINGS

6 May 2003 – Tucson Station, 10:00 am
20 May 2003 – HDR - Phoenix, 10:00 am

The Phoenix Inn
2310 E. Highland
Phoenix, Arizona 85016



Directions:

From I-10, follow Highway 51 to the north.

Exit at Highland Avenue.

Turn right onto Highland Avenue from the ramp.

The second traffic signal is at 22nd Street. The Phoenix Inn is half a block further on the left.

Date: 4/28/2003 12:15 PM

Sender:

To:

(b)(6)

Priority: Normal

Subject: TCA PDT Meeting Minutes

Please find attached the 22 April 2003 TCA PDT Meeting Minutes and Sign-in Sheet. Should you have any comments or corrections please reply to this e-mail...

<<042203.pdf>> <<042203Signin.pdf>>

(b)(6)

Senior Project Manager

(b)(6)

Note: To assure proper delivery to all recipients, the following addresses have been moved from the header:

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(b)(6)



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BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS

MEETING MINUTES

Meeting Date and Time: 22 April 2003 at 10:00 am
Meeting Location: Phoenix Inn - HDR
Distribution Date: 28 April 2003
Distributor: (b) (6), (b) (7)(C)
Distribution:

Administrative Record

(b)(6)

(b)(6)

MEETING PURPOSE

PDT Meeting.

ATTENDEES

See Attached.

PREVIOUS ACTION ITEMS STATUS

ACTION	RESPONSIBLE	STATUS
1. RVS site digital aerial photos with GIS coordinates if possible provided to the NGL, NCO, and Douglas Stations	Baker and IMC	Baker Complete / pending IMC
2. The Arizona National Guard has requested a non-compete letter from the USBP Tucson Sector	(b)(6)	Pending - (b)(6)
3. Check on feasibility of small business contractors, or MATOC contractors to perform work on the border	(b)(6)	Pending Information from Fort Worth - HDR
4. Nogales 2-miles roadway Geotechnical Contract modification for Baker	(b)(6)	Done
5. Site visit to Douglas and Naco for lighting measurements	Baker	Done

ACTION	RESPONSIBLE	STATUS
6. Conference call on water issues in Naco w/ HQ, (b)(6)	As Noted	Done
7. Plan quantities for construction in Douglas last year provided to HDR	Baker	Done
8. Delivery address for material and dates of delivery in Naco	(b)(6)	Done
9. Resolve cattle guard specification issue and order cattle guards		Pending, need coordination with Baker

RVS

No representative from IMC was present

- Nogales
 - (b)(6) noted some continuing issues with Crawford Hill and that (b)(6) from IMC would be in Nogales before the next PDT meeting.
- Stations need digital aerial photos with GPS coordinates, pending data from IMC
- Douglas - Naco
 - Stations needed digital aerial photos with GPS coordinates, Baker Provided Naco-Douglas.

MILITARY DEPLOYMENTS

AZ National Guard

Deployments

- Deployments
 - 6 April 2003 through 19 April 2003 NCO (E. of POE) underway as of the meeting date
 - CANCELED - 24 May 2003 through 7 June 2003 NCO
 - CANCELED - 14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)
- (b)(6) requested additional miles of roadway for construction FY'04

JTF-6

- JTF-6 has canceled deployments for Naco, other units may be available due to short duration of the war
- Looking for 2004 projects for deployments, (b)(6)(b)(7)(C) indicated JTF-6 could assist in small scale projects designed to complete portions of the existing infrastructure that has been left undone.

ENGINEERING

Update (b)(6) has provided a product deliverable status report, which is attached to these minutes

Naco-4 Miles Roadway:

- 100% plans submitted.
- Drainage Report Approved.
- BOM submitted.
- NOI Submitted to HDR 4-7-2003

Nogales, Tunnels:

- Plans – 90% package delivered to the PDT
- Contacted Various Agencies.
- Shower facility size and location in question, GSRC will check and see what the environmental documents say

Nogales, ½ Miles Roadway Maintenance:

- Plans – Completing 90% Plans-

- Presented concept to the City of Nogales.
- Nogales 1-1/2 Miles Roadway:
- Revising 60% per PDT comments.
 - Was holding for the Go Ahead on the Geotechnical Investigation, was processed by AERC and should be awarded soon
- Nogales, Ephraim Ridge Road Reclamation:
- Baker provided (b)(6) with project footprint
 - 100 % plans submitted and approved
 - Drainage Report Approved.
- Douglas, Picket Fence Extensions:
- Plans – 95% package submitted to PDT for comments.
- Alternative Primary Fence Designs:
- Plans – Researching various alternatives.
- Lighting Design – Standard 1 – Mile Rural Condition:
- Plans – Submitted 90%-2/18/2003-Revising per PDT Comments.
- Douglas, Kings Ranch Road
- Kings Ranch Road “As Built” delivered to the PDT.
 - 2 miles of roadway quantities from last years deployment
- Naco – 4-Miles Roadway
- Field redesign was required during the current deployment when the existing grade was lower than the design anticipated.

ENVIRONMENTAL

Update (b)(6) has provided environmental update number 19, which is attached to these minutes.

Biological Assessment

- Yuma pending B.O. from USF&WS, (b)(6) will contact USFWS to determine status
- Programmatic MOA

- Revised CR report were received forwarded (b)(6), pending forward to SHPO

Douglas, WWD Box Culvert

- Pending issuance of Section 404 permit, 404.b.1 has been forwarded to the USACE.

Douglas and Naco Station’s Environmental Documents

- The pre-draft Naco and Douglas Station Supplemental Cumulative Effects EA sent out for internal review.
- Water usage is one comment that is requiring additional research

Douglas, Whitewater Draw Environmental Baseline Study on Phelps Dodge Property

- Kleinfelder has prepared final report

Nogales, Ephraim Ridge

- FONSI issued

Nogales, Infrastructure Improvements, EA

- Pre-draft Nogales Infrastructure EA (roadways and portable lights) will be reissued 30 April for internal review. Comments were due by 4 May.
- Inclusion of RVS sites in this document has delayed progression of Draft document.

Sonoita Station

- SOWs to proceed with these CR and bio surveys are under development

REAL ESTATE

(b)(6) Sacramento COE, was not present but provided an update that he had no new items or activities.

PROCUREMENT

Naco 4-Miles Roadway

- Additional fill material was required to build subgrade for the area under construction. Because less than the full 2 miles will be constructed material orders appear acceptable.

CONSTRUCTION

Arizona National Guard should complete 6000 linear feet of roadway their deployment underway in Naco. Work was completed for the Whitewater Draw roadway in Douglas during the march deployment. Two other deployments were cancelled by the Guard. These were for the Naco 2-mile roadway east of the POE and the half-mile of asphalt at Nogales. (b)(6) indicated he needed a non-compete letter for his records.

Kleinfelder reported on construction progress (daily field reports have been posted on the AERC web page)

ACTION ITEMS

ACTION	RESPONSIBLE
1. Baker needs exact size and location of shower facility as defined in the environmental documents	(b)(6)
2. Cattle guard specification – revised for in ground facility	Baker
3. Nogales infrastructure EA comments will be due 2 May	All
4. Naco-Douglas SEA comments due at the end of the month	All

NEXT MEETINGS

20 May 2003 – Tucson Station, 10:00 am

3 June 2003 – HDR Phoenix, 10:00 am

These minutes reflect the understanding of HDR Engineering, Inc. If revisions or additions are needed, contact (b)(6)

(b)(6)

**TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS
BAKER STATUS REPORT – ENGINEERING
PDT 04/22/2003**

- A. Naco-4 Miles Roadway:
 - 100% submitted.
- B. Nogales, Tunnels:
 - Plans – Submitting 90% Plans.
 - Submitting to Various Agencies.
 - Shower facility assumptions and questions list requesting feedback.
- C. Nogales, ½ Miles Roadway Maintenance:
 - Plans – Completing 90% Plans.
 - Presented Intent to the City of Nogales.
- D. Nogales 1-1/2 Miles Roadway:
 - Revising 60% per PDT comments.
 - Holding for the Go Ahead on the Geotechnical Investigation.
- E. Nogales, Ephraim Ridge Road Reclamation:
 - 100 % submitted and approved.
- F. Douglas, Picket Fence Extensions:
 - Plans – Submitting revised 95% Package.
- G. Alternative Primary Fence Designs:
 - Plans – Researching various alternatives – Completing first draft.
- H. Lighting Design – Standard 1 – Mile Rural Condition:
 - Plans –Revising per PDT Comments.
- I. Douglas:
 - Kings Ranch Road As-Built Submittal.
 - 2 miles road Quantities.

-----Original Message-----

From: (b) (6)

Sent: Tuesday, April 22, 2003 6:37 PM

(b)(6)

Subject: Environmental Update #19

All--

Here are the environmental issues discussed during the PDT meeting Tuesday, April 22, 2003.

1. The Tucson/Yuma PEIS comment resolution log was distributed on 8 April. A conference call was conducted after the PDT meeting to discuss the comments/responses as well as other environmental issues affecting the PEIS, Tucson BA, Naco-Douglas SEA and Operation Desert Grip II. The major agreements reached during this conference call are described later; official minutes will be drafted by GSRC by the end of the week.

2. No word on the draft Yuma BO yet; (b)(6) will follow up with (b)(6) to determine the status.

3. The pre-draft Nogales Infrastructure EA (roadways and portable lights) has been revised to include the 6 new RVS sites and will be distributed NLT end of this week. The PDT agreed to providing comments by 2 May in order to make the 10 May deadline for public release. This will allow the FONSI, if appropriate, to be signed before the 14 June deployment.

4. HDR is in the process of completing the SOW for the road maintenance at Sonoita.

5. The revised draft Naco and Douglas Station Supplemental Cumulative Effects EA and comments resolution matrix were submitted last Thursday (17 April). The PDT agreed to have comments/approval for release to the public NLT 30 April.

6. The Nogales Station pre-draft EBS/EA is scheduled for 12 May, but will be submitted before the end of the month.

7. GSRC submitted the pre-draft Op Desert Grip II on 10 April and comments are due 30 April. The EAs for the Emergency Beacons and Tucson Checkpoints are on hold pending notification/approval of the (b)(7)(E) CAG PAIC (b)(6) has been coordinating with the (b)(7)(E)

The major agreements reached during the conference call are:

PEIS--The Tucson/Yuma PEIS will be released as a Revised Draft again (for 45 day review). The PEIS will be re-focused to its original intent of addressing daily operations. A letter will be sent to all recipients of the first draft to inform them of our intent. GSRC will draft the letter for review/approval of the PDT et al. The infrastructure identified in internal reference documents will be analyzed in the cumulative effects section, but will not be discussed in the body of the text.

Tucson/Yuma BA/BO--the 5 additional species requested by the USFWS will be added.

PEIS/Tucson BA/Naco-Douglas SEA--water demand studies will address only construction requirements and operational needs for Stations. The agent dependents will not be included in the analyses.

Operation Desert Grip--it is not clear if there was a commitment from HQ to conduct a follow-up report for the 2002 emergency consultation or if the \$50K "mitigation" satisfied these requirements. (b)(6) will send a letter to the USFWS informing them that we are waiting for a response from the Service regarding this consultation and any requirements for consultation for Operation Desert Grip II.

As usual, please do not hesitate to call me if you have any questions.
Thanks.

(b) (6)

DATE: 4/22/03 TIME: 10:00

LOCATION: Phoenix Inn - HDR

INS - US BORDER PATROL BORDER BARRIER PROJECTS
TUCSON SECTOR PROJECT DELIVERY TEAM
MEETING CHECK IN AND SIGN IN

TUCSON SECTOR

☐ ☒ ☒
(b)(6)

NOGALES STATION
☐ ☐ ☒
(b)(6)

DOUGLAS STATION
☐ ☒ ☒ ☐
(b)(6)

TUCSON STATION
☐ (b)(6)

NACO STATION
☒ ☐ ☐
(b)(6)

CASA GRANDE STATION
☐ (b)(6)

CONSULTANT TEAM

HDR
☐ ☐ ☒
(b)(6)

JMC
☐ (b)(6)

BAKER
☒ ☐ ☐ ☒
(b)(6)

GSRC
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(b)(6)
Kleinfelder
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BPSCC
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DHS
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CORPS OF ENGINEERS
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IBWC
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JTF-6
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AZ NATIONAL GUARD
☒ ☐
(b)(6)

OTHER

NAME: _____ AFFILIATION: _____
ADDRESS: _____ E-MAIL: _____
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NAME: _____ AFFILIATION: _____
ADDRESS: _____ E-MAIL: _____
PHONE: _____ FAX: _____

Date: 4/14/2003 12:20 PM

Sender:

To:

(b)(6)

Priority: Normal

Subject: TCD PDT Meeting 22 April in Phoenix

Please find attached the agenda for the next PDT Meeting. This will be held at the Phoenix Inn (map attached) next Tuesday at 10:00 am. Should you have any questions or comments please respond to this e-mail (please try to avoid a "reply to all" response unless absolutely necessary due to the high volume of e-mails we all receive).

(b)(6)

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Note: To assure proper delivery to all recipients, the following addresses have been moved from the header:

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**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 22 April 2003 at 10:00 am

Meeting Location: HDR @ Phoenix Inn – Phoenix Arizona

MEETING PURPOSE

PDT Meeting

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. RVS site digital aerial photos with GIS coordinates if possible provided to the NGL, NCO, and Douglas Stations	Baker and IMC
2. The Arizona national Guard has requested a non-compete letter from the USBP Tucson Sector	(b)(6)
3. Check on feasibility of small business contractors, or MATOC contractors to perform work on the border	(b)(6)
4. Nogales 2-miles roadway Geotechnical Contract modification for Baker	(b)(6)
5. Site visit to Douglas and Naco for lighting measurements	Baker
6. Conference call on water issues in Naco w/ HQ, (b)(6)(b)(7)(C) & (b)(6)(b)(7)(C)	As Noted
7. Plan quantities for construction in Douglas last year provided to HDR	Baker
8. Delivery address for material and dates of delivery in Naco	(b)(6)
9. Resolve cattle guard specification issue and order cattle guards	(b)(6)

10:15 – 10:30 RVS

Nogales, access

Douglas - Naco

10:30 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

6 April 2003 through 19 April 2003 NCO (E. of POE)

24 May 2003 through 7 June 2003 NCO

14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)

ANG Safety Comments

JTF-6

10:45 – 11:00 ENGINEERING

Nogales, Tunnels, Preliminary & Final Design

Nogales, 1/2 Miles Roadway Maintenance

Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design

Douglas, Picket Fence Extensions

***BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS***

Alternative Primary Fence Designs
Lighting Design - Standard 1 - Mile Rural Condition

11:00 – 11:15 ENVIRONMENTAL

Biological Assessment
Programmatic EIS
Programmatic MOA
Douglas, Whitewater Draw Permitting (GRSC)
Douglas, Whitewater Draw Env. Baseline (Kleinfelder)
Naco, 4-Miles Roadway, EA & Permitting
Nogales, Infrastructure Improvements, EA
 Tunnels
 2-Miles Roadway
 Portable Lights
Sonoita Station

11:15 – 11:30 REAL ESTATE

updates

11:30 – 11:45 PROCUREMENT

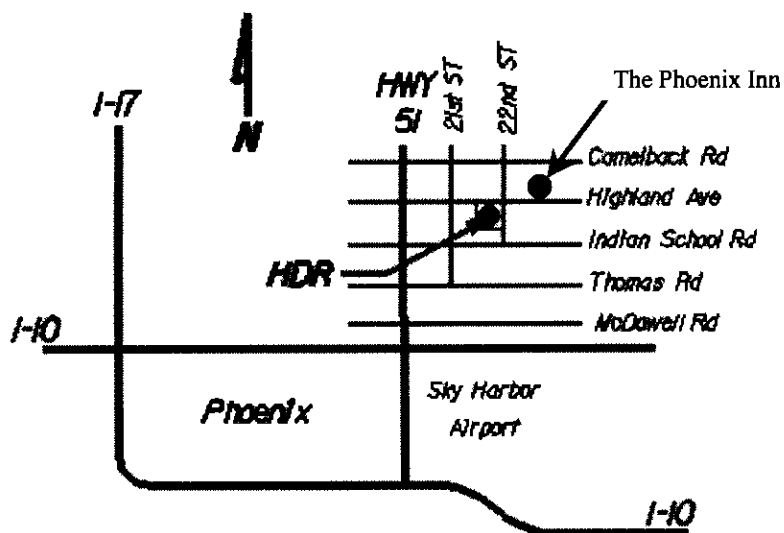
Naco, 4-Miles Roadway

11:45 – 12:00 OTHER ITEMS

NEXT MEETINGS

6 May 2003 – Tucson Station, 10:00 am
20 May 2003 – HDR - Phoenix, 10:00 am

The Phoenix Inn
2310 E. Highland
Phoenix, Arizona 85016



Directions:

From I-10, follow Highway 51 to the north.

Exit at Highland Avenue.

Turn right onto Highland Avenue from the ramp.

The second traffic signal is at 22nd Street. The Phoenix Inn is half a block further on the left.

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 8 April 2003 at 10:00 am

Meeting Location: Tucson Station

MEETING PURPOSE

PDT Meeting

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Determine Point-of-Contact for JTF-6 mapping products	(b)(6)
2. (b)(6)(b)(7)(C) needs data for Cat. Ex. in DGL for cable on fence. Requires description of material and photograph. (b)(6)(b)(7)(C) to check on status.	
3. Preconstruction meeting with project inspector, Az NG, Baker, & Kleinfelder	
4. Comments from JTF-6 on construction plans, specifically any safety concerns	
5. Comments on typical electrical/lighting design to Baker by 18 March 2003	
6. 404.b.1 comments back to GSRC	
7. Naco EA comments by 12 March 2003	
8. Template for new agency and nomenclature	
9. Check inventory in Douglas and coordinate utilization of existing materials.	

10:15 – 10:30 RVS

Nogales, Crawford Hill

Nogales, access

Douglas - Naco

10:30 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

15 March 2003 through 29 March 2003 DGL (WWD Roadway)

6 April 2003 through 19 April 2003 NCO (E. of POE)

24 May 2003 through 7 June 2003 NCO

14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)

ANG Safety Comments

JTF-6

11:00 – 11:30 ENGINEERING

Nogales, Tunnels, Preliminary & Final Design

Nogales, 1/2 Miles Roadway Maintenance

Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design

Douglas, Picket Fence Extensions

Alternative Primary Fence Designs

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**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

Lighting Design - Standard 1- Mile Rural Condition

- 11:30 – 12:00 ENVIRONMENTAL**
Biological Assessment
Programmatic EIS
Programmatic MOA
Douglas, Whitewater Draw Permitting (GRSC)
Douglas, Whitewater Draw Env. Baseline (Kleinfelder)
Naco, 4-Miles Roadway, EA & Permitting
Nogales, Infrastructure Improvements, EA
 Tunnels
 2-Miles Roadway
 Portable Lights
Nogales, Ephraim Ridge Road Reclamation
Sonoita Station
- 12:00 – 1:00 LUNCH**
- 1:00 – 1:15 REAL ESTATE**
Naco, ROEs
- 1:15 – 1:30 PROCUREMENT**
Naco, 4-Miles Roadway
- 1:30 – 2:30 OTHER ITEMS**

NEXT MEETINGS

**22 April 2003 - HDR Phoenix, 10:00 am
6 May 2003 – Tucson Station, 10:00 am**

Date: 4/1/2003 4:34 PM

Sender:

To:

(b)(6)

Priority: Normal

Subject: 8 April TCA PDT Meeting in Tucson

Please find attached the agenda for next weeks PDT meeting in Tucson.

Should

you have any additions or corrections please respond back to me.

<<040803Agenda.pdf>>

(b)(6)

(b)(6)

Note: To assure proper delivery to all recipients, the following addresses have been moved from the header:

(b)(6)

(b)(6)



040803AG.PDF

HDR Computation

HDR

Project	Computed	Date 4.8.03
Subject	Checked	Date
Task	Sheet	Of

(b)(6)

HDR
HDR
BPSCC
INC

KLEINFELDER
Baker

Baker

DHS
DHS-UNAP

HDR, Inc.

USDA/INS

DHS/INCL

CORPS OF ENGINEERS
GSRC

HDR

USBP - NACD

U.S.I.B.W.C.

USBP/DOUGLAS

USBP/Tucson Sector

AERC

USBP/Tucson Sector

WACE

AZ National Guard

USBP/TUCSON

(b)(6)

4/8/03

①

Action items

JTF-6 Mapping products - not of engineering quality.

Douglas Cable - done

Naco EA Comments I+DR ICR

Template for New Agency

Douglas diverts - can use materials

RVS

Nogales Crawford Hill aerial photo of all sites & GPS locations

Guard Deployment

4/12 - 28/03 East of Naco 1-1 1/4 miles of 2 miles

2 low water crossings done

Naco Road lost

~~the~~ Nogales 1/2 mile road ~~that~~ may be done early

any USACE - Contractors

all USACE personnel need to be paid for project

all Contract analysis

Engineering

Reliability

NACO - Constructors study started 4/12-28

Tunnels - engineering comments

Nogales - 1/2 mile presented to City of Nogales

- Site Visit

Nogales - 1 1/2 miles - add geotechnical needed
- away from road

Chen Ridge Complete

Douglas Pickel Fence complete at rest points

Altitude Marker - 11 11 11

low water draw - problem due to aerial photo survey

- was corrected

Equian

Need to consider a construction manager
lighting - Rural Standard design

- Lighting level
- Glare in other areas

design on parking lights ≈ 15 foot candles

below lights trails off to 5 " "

will be placing shields

Check EA on light for Naco & Nogales
Will that cause plant growth?

Curricula

Tucson BA - hold 5 or 8 additional species to be addressed

Conference call next week

Water issues

PETS - Comment water out today

MOA - (b)(6) working w/ STHO

Douglas - WWD - HPR Counts on 4415 point

" WWD baseline

Naco 4 miles roadway - out

Nogales - distribution agreements need ROS included
- EAT by end of summer

Equian - done

Nogales - Station EA / Phase 1 May 1

Sonora Station Pending ROW / Contract

Naco Douglas Supplemental - 20 April \Rightarrow ext 30 April
due to comments

WWD Phase 1 - To be finalized

Departmental Memoranda - Construction OKAY

③

Real Estate

- Miller not going to regis
- must stay w/ a 60 foot Roosevelt - East side of POE

Procurement

Naco - fabrics

- Culvert - needs delivery address

Water produced - does any purchase not go to
conservation?
Naco water

(b)(6)

Spending plan

Actions shut
cattle guard
Delivery
Remove Legal
Corporate calls
Site Visit
Baker Control and

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 8 April 2003 at 10:00 am

Meeting Location: Tucson Station

MEETING PURPOSE

PDT Meeting

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Determine Point-of-Contact for JTF-6 mapping products	(b)(6)
2. (b)(6) needs data for Cat. Ex. in DGL for cable on fence. Requires description of material and photograph. (b)(6) to check on status.	
3. Preconstruction meeting with project inspector, Az NG, Baker, & Kleinfelder	
4. Comments from JTF-6 on construction plans, specifically any safety concerns	(b)(6)
5. Comments on typical electrical/lighting design to Baker by 18 March 2003	All
6. 404.b.1 comments back to GSRC	(b)(6)
7. Naco EA comments by 12 March 2003	All
8. Template for new agency and nomenclature	(b)(6)
9. Check inventory in Douglas and coordinate utilization of existing materials.	

10:15 – 10:30 RVS

Nogales, Crawford Hill

Nogales, access

Douglas - Naco

10:30 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

15 March 2003 through 29 March 2003 DGL (WWD Roadway)

6 April 2003 through 19 April 2003 NCO (E. of POE)

24 May 2003 through 7 June 2003 NCO

14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)

ANG Safety Comments

JTF-6

11:00 – 11:30 ENGINEERING

Nogales, Tunnels, Preliminary & Final Design

Nogales, 1/2 Miles Roadway Maintenance

Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design

Douglas, Picket Fence Extensions

Alternative Primary Fence Designs

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

Lighting Design - Standard 1- Mile Rural Condition

- 11:30 – 12:00 ENVIRONMENTAL**
Biological Assessment
Programmatic EIS
Programmatic MOA
Douglas, Whitewater Draw Permitting (GRSC)
Douglas, Whitewater Draw Env. Baseline (Kleinfelder)
Naco, 4-Miles Roadway, EA & Permitting
Nogales, Infrastructure Improvements, EA
 Tunnels
 2-Miles Roadway
 Portable Lights
Nogales, Ephraim Ridge Road Reclamation
Sonoita Station
- 12:00 – 1:00 LUNCH**
- 1:00 – 1:15 REAL ESTATE**
Naco, ROEs
- 1:15 – 1:30 PROCUREMENT**
Naco, 4-Miles Roadway
- 1:30 – 2:30 OTHER ITEMS**

NEXT MEETINGS

22 April 2003 - HDR Phoenix, 10:00 am
6 May 2003 – Tucson Station, 10:00 am

TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS
BAKER STATUS REPORT – ENGINEERING
PDT 04/08/2003

A. Naco-4 Miles Roadway:

- 100% plans submitted.
- Drainage Report Approved.
- BOM submitted.
- NOI Submitted to HDR 4-7-2003
- Staking to Begin 4-7-2003

B. Nogales, Tunnels:

- Plans – Revising 50% package per PDT comments received 04/02/2003
- Contacted Various Agencies.

C. Nogales, ½ Miles Roadway Maintenance:

- Plans – Completing 90% Plans-Revising per PDT comments received 3-14-2003
- Presented Intent to the City of Nogales.
- Baker – Site Visit with (b)(6) 3-28-2003

D. Nogales 1-1/2 Miles Roadway:

- Revising 60% per PDT comments.
- Holding for the Go Ahead on the Geotechnical Investigation.
- Baker – Site Visit with (b)(6) 3-28-2003

E. Nogales, Ephraim Ridge Road Reclamation:

- 100 % plans submitted.
- Drainage Report Approved.

F. Douglas, Picket Fence Extensions:

- Plans – Completing 95% package- Revising per PDT Comments.

G. Alternative Primary Fence Designs:

- Plans – Researching various alternatives – Completing first draft for next PDT.

H. Lighting Design – Standard 1 – Mile Rural Condition:

- Plans – Submitted 90%-2/18/2003-Revising per PDT Comments.

BAKER REQUESTS FOR 3/11/2003

- **Comments on: (PDT Supplied Baker with requested comments-All being revised)**
 - **90% Nogales 0.5 half mile.**
 - **95% Fence Extension Plans.**
 - **50% Nogales Tunnels**
 - **90% Electrical Design Plans.**

(b) (5)

(b)(6)

From: (b)(6)

Sent: Tuesday, April 01, 2003 1:38 PM

To: (b)(6)

(b)(6)

Here is the project update that you requested.

Douglas/Whitewater Draw 1.5 Mile Roadway - All ROE's have been obtained.

Nogales - Property owner notifications have been completed.

The BLM has informed me that they do not have a property interest within the project footprint. As a courtesy, I informed (b)(6) of the IBWC of the upcoming project. (b)(6) didn't seem that concerned and (b)(6) has never returned any of telephone calls. (b)(6) you and I have discussed this matter and have concluded that we have adequate authority to initiate the project and that someone from the Nogales Station would notify the City of Nogales prior to commencing work.

Naco 4 Mile Roadway - ROE's from Thompson, Eberwein and Naco Industrial Park LLC have been secured. The State of Arizona has granted us a permit to use State property. The permit was mailed to me on 3-31-03. The City of Naco has agreed to assist us in any way they can. Contact with Sandy Davis of Cochise County should be made prior to commencing work.

No lands rights will be required for the use of the fire hydrant. (b)(6) has approved using gravel around the hydrant site.

Ephraim Ridge - No action taken to date.

If you have any questions, give me a call.

(b)(6)

**US BORDER PATROL
TUCSON SECTOR**

SPENDING PLAN FY'03

Issued: February 21, 2003

The following tables present the Tucson Sector spending plan for Fiscal Year 2003 in three categories. These categories are:

- **Table 1: Complete Construction FY'03** – This is the funding necessary to complete all planned spring 2003 construction. This does not include funds from COW-36-6002.
- **Table 2: Prepare for FY'04 Construction** – This is the funding necessary to prepare environmental, engineering and real estate documents for construction in 2004.
- **Table 3: Construction and Engineering FY'04** – This is the funding necessary from the FY'03 budget to construct in 2003 and to provide environmental, engineering and real estate documents for FY'04 construction.

It is assumed that little or no real estate will need to be acquired for these projects. Summation of tables 1 and 2 provides the total required for FY'03, (does not include funds received in COW-36-6002) of (b)(5)

TABLE 1: Complete Construction FY'03

PROJECT	FUNDING NEEDED
<u>Procurement</u>	
▪ DGL, Whitewater Draw Box Culvert	(b)(5)
▪ DGL, 10' CMP & Erosion Control Repair	
▪ DGL, Temporary Vehicle Barrier (5 miles)	
▪ DGL, Vertical Fence Extensions	
▪ DGL, Monsoon Repair	
▪ NCO, 4 Miles Roadway	
▪ NCO, Temporary Vehicle Barrier	
▪ NCO, Vehicle Barrier to Landing Mat Fence	
▪ NCO, Primary Fencing (7 miles)	
▪ NGL, Tunnels	
▪ NGL, 2 Miles E. of POE (Const. First ½ mile)	
▪ NGL, Ephraim Ridge	
▪ Temporary Vehicle Barriers for other stations	
Sub-total	
<u>Engineering /Environmental/Management</u>	
▪ DGL/NCO, Supplemental EA	(b)(5)
▪ DGL, Monsoon Repair (Engr)	
▪ NCO, Primary Fencing (7 miles) (Env)	
▪ NCO, Construction Oversight and Staking	

**US BORDER PATROL
TUCSON SECTOR**

SPENDING PLAN FY'03

Issued: February 21, 2003

PROJECT	FUNDING NEEDED
<ul style="list-style-type: none"> ▪ NGL, Geotechnical for 2 Miles Roadway ▪ NGL, Construction Oversight ▪ NGL, Ephraim Ridge (Real Estate, Env. & Eng.) ▪ NGL, Tunnels Construction Admin. & Survey ▪ NGL, Real Estate & ROE Permits 2-Miles Roadway (& Construction first ½ mile) 	(b)(5)
Sub-total	

TABLE 2: Prepare for FY'04 Construction

PROJECT	FUNDING NEEDED
<u>Engineering /Environmental/Management</u>	
<ul style="list-style-type: none"> ▪ PDT Meetings (14 meetings) (Project/Program Management) ▪ DGL, 8 Low Water crossings (Engr) ▪ DGL, Lighting Conversion (1 Mile) (Engr) ▪ DGL, Lighting (5 Miles) Split E. & W. of POE ▪ DGL, Primary Fencing (Cattleman's West 4 miles) (Engr. & Env) ▪ DGL, International Ditch Preliminary & Final Plans for Private Contractor (Engr & Env) ▪ DGL, 4 Miles Roadway (W. of POE) (Env. And Engr) ▪ DGL, Acquire USF&WS Property (Env and Real Estate) ▪ NCO, Lighting (5 Miles - Split E. & W. of POE) (Engr & Env) ▪ NGL, 2 Miles Roadway & Drainage (E. of POE) (Engr & Env) ▪ NGL, EA and 15% Schematic Design 	(b)(5)
TOTAL	

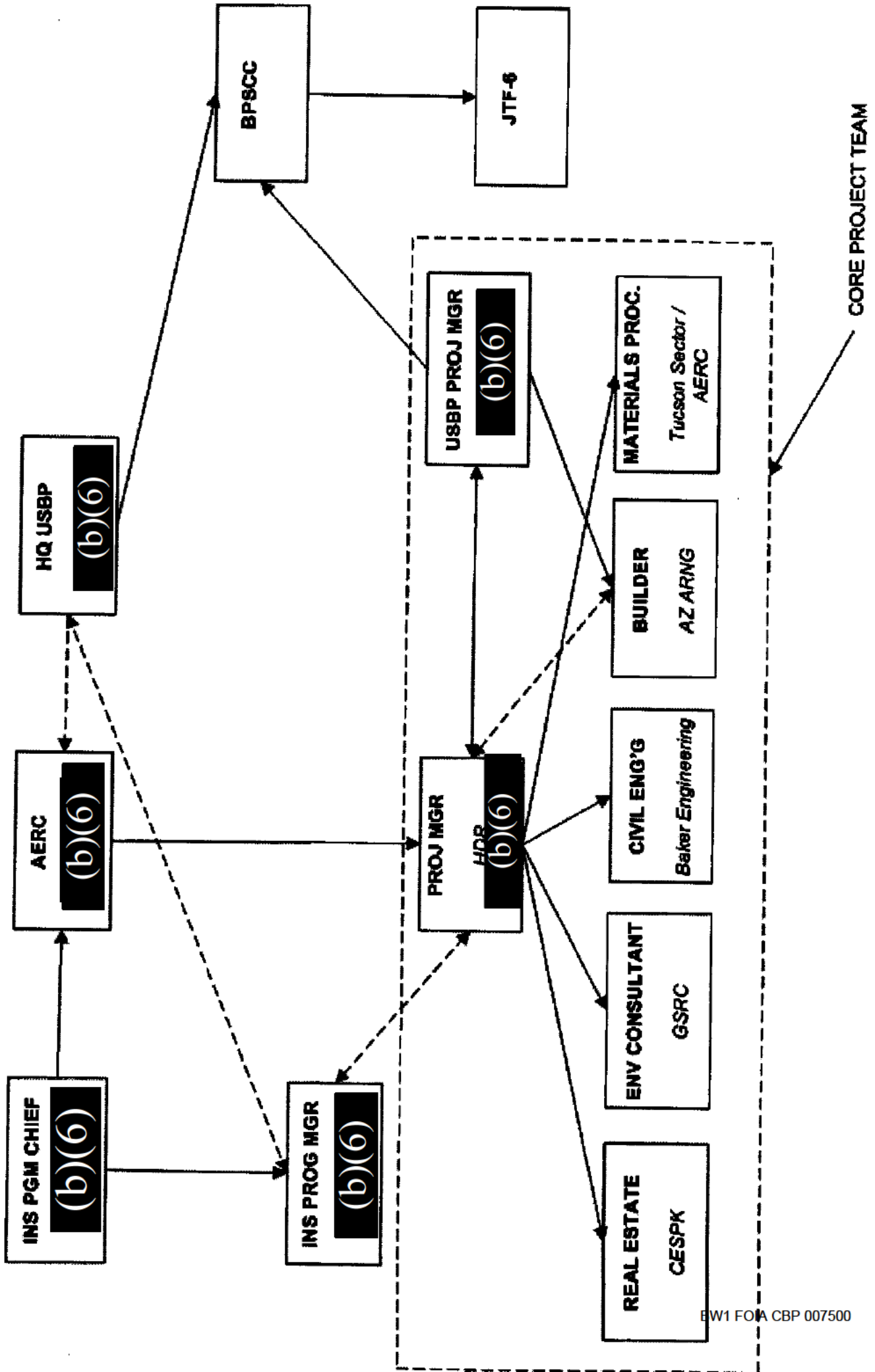
**US BORDER PATROL
TUCSON SECTOR**

SPENDING PLAN FY'03

Issued: February 21, 2003

TABLE 3: Construction and Engineering FY'04

PROJECT	FUNDING NEEDED
<u>Procurement</u>	
<ul style="list-style-type: none">▪ DGL, Whitewater Draw Bollard Fencing▪ DGL, Complete 8 Low Water Crossings▪ DGL, Kings Ranch Road Fencing▪ DGL, Lighting Conversion (1 Mile) (Engr)▪ DGL, International Ditch for Private Contractor▪ DGL, Dip 1 (Low Water Crossing)▪ DGL, Dip 7▪ DGL, Lighting (5 Miles) Split E. & W. of POE▪ DGL, Primary Fencing (Cattleman's West 4 miles) (Engr. & Env)▪ DGL, 5 Miles Roadway (E. of POE) (Env. And Engr)▪ DGL, 5 Miles Roadway & Drainage (E. of POE)▪ DGL, Dip 5▪ NCO, Lighting (5 Miles) Split E. & W. of POE▪ NCO, 4 Miles Roadway & Drainage (E. & W. of POE)▪ NGL, 4 Miles Roadway & Drainage▪ NGL, 2 Miles Roadway & Drainage (E. of POE)▪ NGL/DGL/NCO Additional Lighting (5 Miles)▪ Temporary Vehicle Barriers (other Stations)▪ Roadway for Sonoita and Other Stations	(b)(5)
Sub-total	
<u>Engineering /Environmental/Management</u>	
<ul style="list-style-type: none">▪ DGL, 5 Miles Roadway (E. of POE) (Env. And Engr)▪ DGL, Dip 5▪ DGL/NCO, Construction Oversight and Staking▪ DGL/NCO, Construction As-Builts▪ NCO, 4 Miles Roadway & Drainage (E. & W. of POE)▪ NGL, 4 Miles Roadway & Drainage▪ NGL/DGL/NCO, Permanent Survey Monuments (20 Miles)▪ NGL/DGL/NCO Additional Lighting (5 Miles)	(b)(5)
Sub-total	
TOTAL	



FY'03 SPENDING PLAN SCHEDULE & PROJECTED FY'04 - SEE DETAILED SCHEDULES FOR THOSE IN GREEN

[illegible]

Date: 4/9/2003 2:08 AM

Sender:

To:

(b)(6)

cc:

Priority: Normal

Subject: Environmental Update #18

All--

Here are the environmental issues discussed during the PDT meeting Tuesday, April 8, 2003.

1. The Tucson/Yuma PEIS comment resolution log has taken longer than anticipated. It will be sent out via e-mail today. GSRC recommended a conference call or meeting after review of the matrix to finalize responses and to develop a schedule and approach for completion.
2. No word on the draft Yuma BO yet. The Tucson BA is on hold until a decision is made regarding whether to address the additional species identified by the USFWS and the water demand issues. GSRC recommended that conference call be conducted next week to resolve these issues.
3. The Naco fence and roadway Final EA was distributed Friday, 4 April.
4. The Ephraim Ridge reclamation Final EA was distributed Friday, 4 April.
5. The pre-draft Nogales Infrastructure EA (roadways and portable lights) is on hold waiting for funding approval for the 5 new RVS sites and combining the two EAs. The NG has a unit currently scheduled to begin the roadway work on 14 June. This EA will need to go to the public for review NLT 10 May in order to have a chance to meet this schedule.
6. The WWD 404(b)(1) evaluation, brief EA and public notice was revised according to comments provided by HDR and finalized. GSRC recommended that the PDT attempt to arrange a field visit with (b)(6) (USACE Regulatory Functions Branch) in an attempt to expedite his review of this and future applications.
7. HDR is in the process of developing a SOW for the road maintenance at Sonoita.
8. Comments on the pre-draft Naco and Douglas Station Supplemental Cumulative Effects EA have been coming in, although some are little late. GSRC requested and received an extension until the end of April for the draft SEA. The group also agreed to use actual water quantities that were purchased by AERC last year in Douglas in estimating water demand for this SEA. A contingency factor of 50% will be added to these quantities to ensure that the demand is not underestimated. The amount of water needed could influence the need to initiate formal Section 7 consultation with the USFWS. (b)(6) will also check with the Naco Water Company to see if any revenues they receive from such purchases are used for conservation measures, which could reduce the USBP mitigation requirements.
9. The Nogales Station EBS/EA is underway. GSRC should be able to meet or beat the scheduled 12 May delivery of the Pre-draft EA and Phase I ESA.

10. Although not discussed in the PDT, GSRC expects to submit the pre-draft EAs as follows: Op Desert Grip II--10 April; Emergency Beacons--17 April; Tucson Checkpoints--17 April.

As usual, please do not hesitate to call me if you have any questions.
Thanks.

(b)(6)

Date: 1/6/2003 11:00 AM

Sender:
To:
cc:

(b)(6)(b)(7)(C)

Priority: Normal

Subject: Re[2]: RE: PEIS Tucson-Yuma

OK, after 25 exchanges on this issue, and it looks like I have at least that many more to go in my inbox, I am compelled to break in here and stop this vicious circle.

1) If we send something out that is part of the required NEPA process and requires feedback, we should keep a log of who we sent it to, when it was sent and how many copies were transmitted. That is just good business practice.

2) I do not want to get caught sending 25 paper copies of a huge document to environmental organizations - someone has already mentioned the tree issue. Send what is required by law for sure. In this day of modern technology, I am of the opinion that I am obligated to provide an easy and fairly universal outlet for the information to be displayed or downloaded. It is not my problem that the environmental organizations' equipment is one step above an abacus - they can go to the library or upgrade to Windows 98 and a Pentium III...!

3) Perhaps it would be prudent to consider CD ROMs for the larger documents - the technology is cheap, it is not hard to do and it would save on postal expenses.

4) While I appreciate being included in the traffic on this subject and understand the relevance it has to some important issues currently before us, I am not sure that I or (b)(6) need to be included in ALL of the detail. Include me when (b)(6) is not available or when (b)(6) and (b)(6) are not around. I want to be kept informed, but do not need to know that DOW has requested more copies of the PEIS, etc.

Keep up the good work. Thanks (b)(6)

Reply Separator

Subject: Re: RE: RE: PEIS Tucson-Yuma
Author: (b)(6)
Date: 1/2/2003 12:03 PM

I have one more suggestion that HQ would have to approve. That is to tell the requester how much it will cost to have the document prepared and mailed. Can you let me know what it costs to reproduce and ship?

Reply Separator

Subject: RE: RE: PEIS Tucson-Yuma
Author: (b)(6)
Date: 1/2/2003 2:41 PM

(b)(6)

Two more copies of the Draft PEIS will be sent to (b)(6). However, there are no more hard copies of the document available and therefore these two additional copies will have to be reproduced and can not be mailed out until sometime tomorrow. If additional request for copies are made I have three recommendations: 1) the DPEIS can be provided via cd (no more hard copies) 2) refer to section 9 of the DPEIS and see at what libraries DPEIS can be viewed or 3) go to the following web site:
<http://www.swf.usace.army.mil/ins/Pages/Publicreview.cfm>. In either case there are a number of alternatives available where the DPEIS can be read

Without requesting additional copies when one has already been provided.

(b)(6)

-----Original Message-----

From: (b)(6) (b)(6)
Sent: Thursday, January 02, 2003 9:27 AM
To: (b)(6)

(b)(6)

Subject: Re:RE: PEIS Tucson-Yuma

(b)(6)

Just got your message. One copy was sent by GSRC and recieved by (b)(6)

(b)(6)

(according to (b)(6) DOW) on 12/30/02. (b)(6) requested 2 additional copies on 12/30/02 which was the substance of my e-mail on that day.

HQ-INS okayed the release of those copies to DOW. I am assuming that GSRC will be sending those copies.

Reply Separator

Subject: RE: PEIS Tucson-Yuma
Author: (b)(6)
Date: 1/2/2003 12:16 PM

(b)(6)

As a follow-up to this message, I believe that the DOW did receive the requested additional copy of the draft PEIS and wanted still more copies to review. Is this still the case and if so how many additional copies are they requesting? I hate to have the additional copies of this document sent only to find out that it was in their possession all along, as was the case with the EPA.

Please have (b)(6) go the following web site: (b)(6) to review the document.

Thanks

(b)(6)

-----Original Message-----

From: (b)(6) (b)(6)
Sent: Monday, December 30, 2002 1:22 PM
To: (b)(6)

(b)(6)

(b)(6)
Subject: PEIS (b)(7)(E)

(b)(6)
I just received a call from (b)(6) at the Defenders of Wildlife (DOW). Apparently they have not received a copy of the PEIS for Tucson / Yuma Sectors. (b)(6) also indicated that several other organizations have not received the report. He was very interested in reviewing the Endangered Species List. He further indicated that he has been trying to download the report from the web site with much trouble. I suspect the document is a very big file and takes a lot of time to download. I spoke to (b)(6) at Gulf South Research Corporation (GSRC). (b)(6) said that he mailed the document regular mail to (b)(6) on October 30, 2002 without a Return Receipt Requested.

On your behalf, I have requested GSRC (b)(6) to send the DOW a copy of the document with a Return Receipt Requested. He was going to send it FEDEX overnight. In addition, I have requested that GSRC change (b)(6) to (b)(6) on the stakeholders list for DOW. I have called (b)(6) back and informed him that we are having the report sent to him at DOW.

It is recommended that all future governmental or public submittals be sent Return Receipt Requested in order to ascertain whether the submittals are being received at their appropriate destinations.


TMP.HTM

Date: 1/8/2003 4:04 PM

Sender:

To:

(b)(6)(b)(7)(C)

Priority: Normal

Subject: TCA PDT Meeting - Change of Location!

Attached is the meeting agenda for the 14 January 2003, Tucson Sector PDT Meeting. Due to the number of attendees and the duration of the meeting, we have relocated to a roomier facility. We will be meeting at the Phoenix Inn

just 1/2 a block east of the HDR Phoenix office. This is the same meeting location where the 9 July 2002 PDT and Lessons Learned meeting were conducted. A map is attached for your use.

<<phx_inn_map1.pdf>>
<<011403_Agenda.pdf>>

(b)(6)

Note: To assure proper delivery to all recipients, the following addresses have

(b)(6)

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS

MEETING AGENDA

Meeting Date and Time: January 14, 2003 at 10:00 am
Meeting Location: HDR Phoenix

MEETING PURPOSE

PDT Meeting

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Naco 90% plan review by 19 December 2002	All
2. Ephriam Ridge 90% plan review by 19 December 2002	All
3. Typical Lighting Design (Baker SOW & Contract)	(b)(6)
4. Kleinfelder to provide (b)(6) with WWD Env. Baseline Doc.	(b)(6)
5. Naco 4-miles Roadway EA comments by 19 December 2002	All
6. Ephriam Ridge EA comments by 19 December 2002	All
7. Update schedules and Web Page	HDR
8. Check on Roosevelt easement location in Douglas	(b)(6)
9. Recheck Douglas inventory	(b)(6)
10. Check w/ JTF-6 on deployments	HDR
11. Possibility of Cat. Ex. for Sonoita access road maintenance.	(b)(6)
12. Follow up on WWD 404 permit	GSRC
13. Check on MFR for Douglas work	HDR
14. Check Naco water source – Arizona Water Company	(b)(6)
15. RVS - Status of engineering contract for sites (Baker)	(b)(6)
16. RVS – check on construction schedule assuming Jan FONSI	(b)(6)

10:15 – 10:30 RVS

Nogales, Crawford Hill
Nogales, access roadways to RVS
Naco/Douglas RVS, Final EA

10:30 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard
JTF-6

11:00 – 11:30 ENGINEERING

Douglas, Whitewater Draw, Final Design
Naco, 4 Miles Roadway, Final Design
Nogales, Tunnels, Preliminary & Final Design
Nogales, 1/2 Miles Roadway Maintenance
Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design
Nogales, Ephraim Ridge Road Reclamation
Douglas, Picket Fence Extensions
Alternative Primary Fence Designs

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS

Lighting Design - Standard 1- Mile Rural Condition

11:30 – 12:00 ENVIRONMENTAL

- Biological Assessment
- Programmatic EIS
- Programmatic MOA
- Douglas, Whitewater Draw Permitting & Env. Baseline
- Naco, 4 Miles Roadway, EA & Permitting
- Nogales, Infrastructure Improvements, EA
 - Tunnels
 - 2 Miles Roadway
 - Portable Lights
- Nogales, Ephraim Ridge Road Reclamation
- Sonoita Station
- Distribution of Environmental Documents

12:00 – 1:00 LUNCH

1:00 – 1:15 REAL ESTATE

- Naco, ROE
- Nogales, ROE
- Douglas, Whitewater Draw ROE
- Douglas, US Fish and Wildlife Service Property
- Douglas, Kings Ranch Road

1:15 – 1:30 PROCUREMENT

- Douglas, Whitewater Draw

1:30 – 2:30 OTHER ITEMS

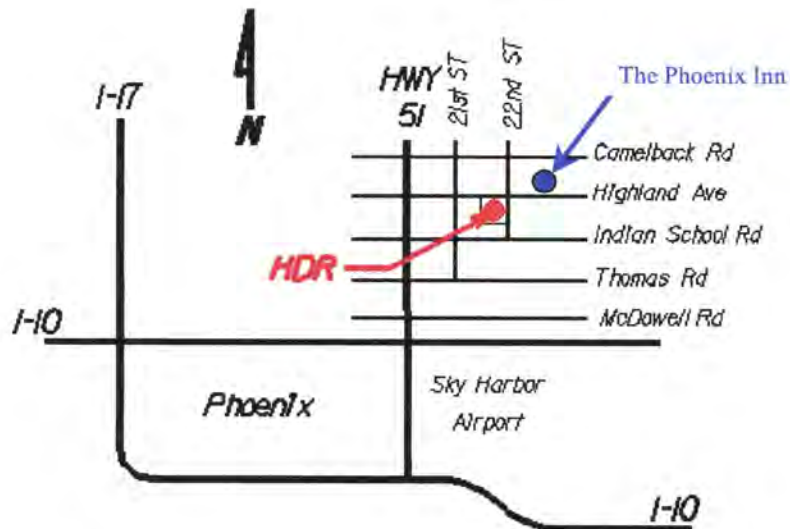
- Naco and Douglas Environmental Documents

NEXT MEETINGS

- January 14, HDR – Phoenix, 10:00 am**
- January 28, Tucson Station, 10:00 am**
- February 18, HDR – Phoenix, 10:00 am**

Note proposed additional meetings to accommodate design schedule. Proposed changes are in blue

The Phoenix Inn
2310 E. Highland
Phoenix, Arizona 85016



Directions:

From I-10, follow Highway 51 to the north.

Exit at Highland Avenue.

Turn right onto Highland Avenue from the ramp.

The second traffic signal is at 22nd Street. The Phoenix Inn is half a block further on the left.

Date: 3/11/2003 5:05 PM

Sender:

To:

(b)(6)(b)(7)(C)

cc:

Priority: Normal

Subject: Environmental Update #17

All--

Here are the environmental issues discussed during the PDT meeting Tuesday, March 11, 2003.

1. The Tucson/Yuma PEIS comment resolution log is being prepared and should be submitted by the end of this week. A schedule for delivery of the PFPEIS will be developed after this matrix is completed.
2. No word on the draft Yuma BO yet. GSRC is still waiting for information regarding species locations from the USFWS. The USFWS has also requested that additional species be added to the evaluation. These are in addition to the species that the USFWS recommended to be included. The AERC and USBP will need to decide how we will need to approach these issues, since the addition will delay the BA/BO and require a modification.
3. The pre-final Naco fence and roadway EA was submitted for internal review on 4 March. The PDT established a deadline for comments of 12 March. (b)(6) (b)(6) will have troops on the ground by 6 April and needs to have this document completed. (b)(6) agreed to push the FONSI through.
4. The pre-final Ephraim Ridge reclamation EA was sent out 5 March for internal review. The PDT established a deadline of 14 March for comments.
5. The pre-draft Nogales Infrastructure EA (roadways and portable lights) was submitted on 26 February for internal review. The PDT established a deadline of 14 March for comments. (b)(6) indicated that (b)(6) wanted to avoid the perception of possible segmentation and has requested that this EA be combined with the Nogales RVS. There might be a contractual problem with combining the two since there are different appropriations. (b)(6) will coordinate with (b)(6)
6. The WWD 404(b)(1) evaluation, brief EA and public notice was submitted to HDR for review. GSRC contacted (b)(6) (USACE Regulatory Functions Branch) regarding the status, but (b)(6) was out of the office this week.
7. The final CR survey reports for Naco and Douglas have been submitted to (b)(6) for coordination with the SHPO. The coordination on the Programmatic MOA can be re-established upon acceptance of this report.
8. (b)(6) stated that road maintenance at Sonoita can be CATExed provided

that the work stays within the original footprint and no new structures or designs are implemented. He suggested that biological and cultural resources

surveys be completed prior to the maintenance activities. HDR has developed

a SOW to proceed with these CR and bio surveys.

9. The pre-draft Naco and Douglas Station Supplemental Cumulative Effects EA

will be sent out tomorrow (12 March) as scheduled for internal review. The PDT established a deadline for comments of 25 March.

prepared and will be submitted NLT March 12.

10. Field surveys are scheduled next week for the following EAs:
Operation

Desert Grip II, 44 Emergency Beacons, Four Checkpoints (Ajo and Casa Grande Stations). A pre-draft of the Op Desert Grip is scheduled for early April.

11. The Nogales Station EBS/EA is underway. GSRC is conducting field visits this week.

12. During a sidebar conversation, (b)(6)(b)(7)(C)
identified

the new RVS sites that are proposed for Nogales. No new access roads or improvements to roads will be required. A modification request has been submitted to HQBOR through the AERC for the additional work needed for the Nogales RVS.

As usual, please do not hesitate to call me if you have any questions.
Thanks,

(b)(6)(b)(7)(C)

Date: 3/5/2003 4:37 PM

Sender:
To:

(b)(6)(b)(7)(C)

Priority: Normal

Subject: TCA PDT Meeting - Location In Phoenix

Attached is the meeting agenda for the 11 March 2003, Tucson Sector PDT Meeting. Due to the number of attendees we have relocated to a roomier facility. We will be meeting at the Phoenix Inn just 1/2 a block east of the HDR Phoenix office. This is the same meeting location where the meeting was conducted the 14 January 2003 meeting. A map is attached for your use.

<<phx_inn_map1.pdf>>
<<031103_Agenda.pdf>>

(b)(6)

Note: To assure proper delivery to all recipients, the following addresses have been moved from the header:

(b)(6)

(b)(6)



PHX_INN_.PDF



031103_A.PDF

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS

MEETING AGENDA

Meeting Date and Time: 11 March, 2003 at 10:00 am

Meeting Location: HDR Phoenix

MEETING PURPOSE

PDT Meeting

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. IMC to review site evaluation reports and will id where problem with access exist. Due by 25 February 2003	(b)(6)
2. Possibility of Cat. Ex. for Sonoita access road maintenance.	
3. Ephriam Ridge footprint to (b)(6) and follow up	
4. Check with Az ARNG for off loading capability in DGL and NCO	
5. Check on JTF-6 possibility to source units for Naco	
6. Inventory signs and posts in DGL	
7. Follow up with USFS and others on Sonoita Station roadway maintenance. (b)(6) to provide POC to HDR.	
8. Provide notification to BLM of Nogales work within 60' easement	
9. Provide (b)(6) with POC for (b)(6) (landowner on Kings ranch Road) in DGL.	
10. ROE and ownership information forwarded to DGL, NCO, and NGL Stations	
11. (b)(6) needs data for Cat. Ex. in DGL for cable on fence. Requires description of material and photograph	
12. Revised BOM for low water crossings in DGL deployments. Contact (b)(6) for locations, convey information to (b)(6)	

10:15 – 10:30 RVS

Nogales, Crawford Hill

Nogales, access

Douglas - Naco

10:30 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

15 March 2003 through 29 March 2003 DGL (WWD Roadway)

6 April 2003 through 19 April 2003 NCO (E. of POE)

24 May 2003 through 7 June 2003 NCO

14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)

ANG Safety Comments

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS

JTF-6

11:00 – 11:30 ENGINEERING

Naco, 4 Miles Roadway, Final Design
Nogales, Tunnels, Preliminary & Final Design
Nogales, 1/2 Miles Roadway Maintenance
Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design
Nogales, Ephraim Ridge Road Reclamation
Douglas, Picket Fence Extensions
Alternative Primary Fence Designs
Lighting Design - Standard 1- Mile Rural Condition

11:30 – 12:00 ENVIRONMENTAL

Biological Assessment
Programmatic EIS
Programmatic MOA
Douglas, Whitewater Draw Permitting & Env. Baseline
Naco, 4 Miles Roadway, EA & Permitting
Nogales, Infrastructure Improvements, EA
 Tunnels
 2 Miles Roadway
 Portable Lights
Nogales, Ephraim Ridge Road Reclamation
Sonoita Station

12:00 – 1:00 LUNCH

1:00 – 1:15 REAL ESTATE

Douglas, ROE
Naco, ROE
Douglas, US Fish and Wildlife Service Property
Douglas, Kings Ranch Road

1:15 – 1:30 PROCUREMENT

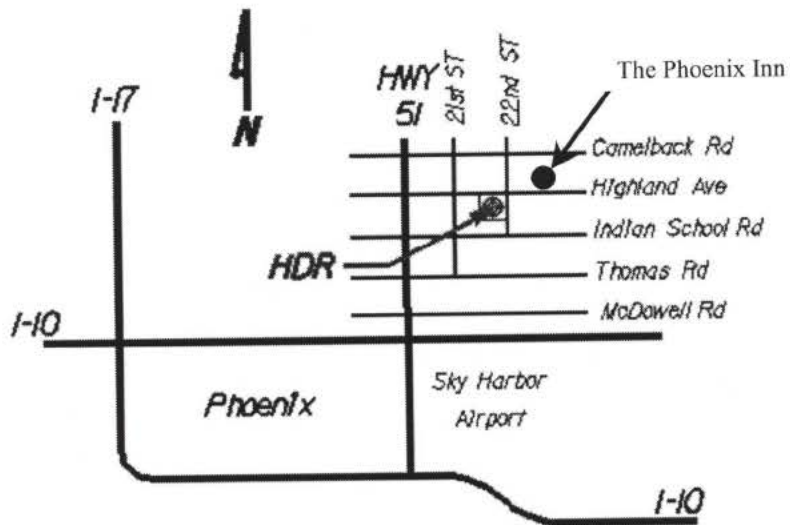
Douglas, Whitewater Draw Roadway
Naco, 4-Miles Roadway

1:30 – 2:30 OTHER ITEMS

NEXT MEETINGS

March 25, Tucson Station, 10:00 am
April 8, HDR Phoenix, 10:00 am

The Phoenix Inn
2310 E. Highland
Phoenix, Arizona 85016



Directions:

From I-10, follow Highway 51 to the north.

Exit at Highland Avenue.

Turn right onto Highland Avenue from the ramp.

The second traffic signal is at 22nd Street. The Phoenix Inn is half a block further on the left.

(b)(6)

Date: 2/19/2003 12:17 PM

Sender:

To:

(b)(6)

Priority: Normal

Subject: TCA PDT Meeting Minutes From 18 February 2003

Please find attached the Tucson Sector PDT Meeting Minutes. Should you have any corrections or comments please e-mail them back to me or (b)(6)

(b)(6)

<<021803.pdf>> <<021803_Sign_in.pdf>>

Note: To assure proper delivery to all recipients, the following addresses have been moved from the header:

(b)(6)

(b)(6)



021803_S.PDF



021803.PDF

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS

MEETING MINUTES

Meeting Date and Time: 18 February 2003 at 10:00 am

Meeting Location: Tucson Station

Distribution Date: 19 February 2003

Distributor: (b)(6)

Distribution:



MEETING PURPOSE

PDT Meeting.

ATTENDEES

See Attached.

PREVIOUS ACTION ITEMS STATUS

ACTION		RESPONSIBLE	STATUS
1.	RVS - Status of engineering contract for sites (Baker)	(b)(6)	Pending See attached e-mail
2.	RVS – check on construction schedule assuming Jan FONSI		Pending See attached e-mail
3.	Typical Lighting Design (Baker SOW & Contract)		Done
4.	Possibility of Cat. Ex. for Sonoita access road maintenance.		On-going
5.	Naco Drainage Report & 100% plan review by 28 January 2003	All	Done
6.	Status and copies of ROEs for Nogales	HDR	Done
7.	Ephriam Ridge footprint to (b)(6) and follow up	(b)(6)	Pending
8.	Copies of ROEs forwarded to Station		Done

RVS

Nogales, Crawford Hill

- Geotech work to begin for foundation of tower, looking at month out for design work to begin
- Lease issue pending

Nogales, access roadways & RVS TD #116

- IMC to review site evaluation reports and will id where problem with access exist. Due by 25 February 2003. Action item assigned to (b)(6)

Douglas - Naco

- Land issues and leases assigned to ACL Real Estate

MILITARY DEPLOYMENTS

AZ National Guard

Deployments

- Deployment scheduled
 - 15 March 2003 through 29 March 2003 DGL (WWD Roadway)
 - 6 April 2003 through 19 April 2003 NCO (E. of POE)
 - 24 May 2003 through 7 June 2003 NCO
 - 14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)
- deployments will have hauling capability for aggregate and Asphaltic concrete
- deployment to DGL will do 4 low water crossings, 2 on WWD roadway and 2 in the area from last year. Asphalt crew will come in June to place wearing surface.

JTF-6

- JTF-6 has canceled deployments for Naco, but is attempting to source another unit.

ENGINEERING

Douglas, Whitewater Draw, Preliminary & Final Design

- Plans complete and awaiting construction
- Requested comments from the National Guard safety office via (b)(6) for inclusion into the plan set.

Naco, 4 Miles Roadway, Preliminary & Final Design

- 100% plans provided
- 100% plans submitted. Geometry edited due to new monuments (resubmitted 2/14/2003)
- Drainage Report submitted to HDR for final comments.
- BOM submitted for comments.

Nogales, Tunnels, Preliminary & Final Design

- In-house 30% plans being prepared
- Contacted City Engineer (b)(6)

Nogales, 2 Miles Roadway, Preliminary & Final Design

- 60% Completed-Awaiting funding for geotechnical investigation.
- 100% plan set due 28 February 2003
- Nogales, ½ Miles Roadway Maintenance Plans – Completing 90% plans.

Nogales, Ephraim Ridge Road Reclamation

- Drainage Report submitted to HDR for final comments.
- 100 % plans submitted.

Douglas, Picket Fence Extensions

- On-going, Plans— 90% package submitted meeting 18 February 2003

Alternative Primary Fence Designs

- On-going, final Report under development.

Lighting Design

- 90% submittal provided 18 February 2003

ENVIRONMENTAL

Update: (b)(6) has provided environmental update number 16, which is attached to these minutes.

Douglas and Naco Station's Environmental Documents

- pending funding to proceed with modification

Biological Assessment

- Yuma pending B.O. from USF&WS
- Tucson comments from USF&WS received

Programmatic EIS

- PEIS Comment period was extended until 14 February 2003, GSRC will develop schedule once all comments are compiled

Programmatic MOA

- Revised CR report were received forwarded (b)(6) pending forward to SHPO

Douglas, Whitewater Draw Permitting

- 404 permit application submitted to COE Regulatory Branch. Individual permit estimated to take a minimum of 6 months (June 2003)
- JD to be provided by Baker based on 2 & 10 year events.

Douglas, Whitewater Draw Environmental Baseline Study on (b)(6)(b)(7)(C) Property

- Kleinfelder has responded to Draft Report comments. Final pending

Naco, 4 Miles Roadway, EA & Permitting

- DEA public comment closed, no public comments received.
- Recommendation of PDT to proceed with Final and FONSI as developed

Nogales, Infrastructure Improvements, EA

- Ephraim Ridge DEA public comment period expired

Nogales, Crawford Hill

- The Crawford Hill RVS installation preparation is scheduled to begin this week

Nogales RVS

- No environmental activity this period

Naco/Douglas RVS

- FONSI signed 7 January 2003, distributed to the PDT by (b)(6) no activity this period

Sonoita Station

- (b)(6) will have requested a determination on use of categorical exclusion for maintenance of the roadway facility from INS HQ. Environmental surveys may be required for a cat-ex. This project will be included in the list of future projects and prioritized
- (b)(6) provided a copy of the direction memorandum previously issued regarding roadway maintenance, (b)(6) expressed an opinion that the memorandum does not apply outside Naco-Douglas area and is specific to the EA that was under preparation in Naco-Douglas
- Scopes must be developed to proceed with biological and review work, and coordination with USFS.

Point of Contact

- INS Regional Environmental Officer will be the point of contact on environmental documents – (b)(6) (b)(6)(b)(7)(C) He will only process the questions and comments through to the appropriate person.

REAL ESTATE

Douglas, White Water Draw

- No activity this reporting period

Nogales, Naco, and Douglas except WWD

- Report per (b)(6) Sacramento COE,
 - Nogales, 0.5 mile Roadway (beginning east of POE) - construction easement to be defined - construction in March.
 - Douglas, Whitewater Draw Roadway - Required ROE's have been executed by the property owners (Union Ganadera Regional De Sonora (b)(6) and the (b)(6) Family Revocable Lifetime Trust.
 - Naco, 4 miles Roadway - ROEs west of POE have been obtained. ROEs east of POE are pending, (b)(6) will help coordinate with land owners. (b)(6) stated work can proceed, with difficulty with in the 60' easement.
 - Nogales, Ephraim Ridge - Waiting for construction easement to be defined by Baker.
 - Nogales, 0.5 mile Roadway - project footprint provided, BLM will be contacted

Rights of Entry

- Copies of all signed ROEs will be provided to the appropriate station representative

PROCUREMENT

Douglas, Whitewater Draw

- Contract with supplier has been executed.
- Water meter has been arranged

Naco 4-Miles Roadway

- Discussion of suppliers common to both Douglas and Naco, BOM presented in plans.
- Delivery dates of material required and will be prepared by HDR.

CONSTRUCTION

No on-going construction.

ACTION ITEMS

ACTION	RESPONSIBLE
1. IMC to review site evaluation reports and will id where problem with access exist. Due by 25 February 2003	(b)(6)
2. Possibility of Cat. Ex. for Sonoita access road maintenance.	
3. Ephraim Ridge footprint to (b)(6) and follow up	
4. Check with Az ARNG for off loading capability in DGL and NCO	
5. Check on JTF-6 possibility to source units for Naco	
6. Inventory signs and posts in DGL	
7. Follow up with USFS and others on Sonoita Station roadway maintenance. (b)(6) to provide POC to HDR.	
8. Provide notification to BLM of Nogales work within 60' easement	
9. Provide (b)(6) with POC for (b)(6) (landowner on Kings ranch Road) in DGL.	
10. ROE and ownership information forwarded to DGL, NCO, and NGL Stations	
11. (b)(6) needs data for Cat. Ex. in DGL for Cable on fence. Requires description of material and photo graph	
12. Revised BOM for low water crossings in DGL deployments. Contact (b)(6) for locations, convey information to (b)(6) (b)(6)	

NEXT MEETINGS

March 11, HDR Phoenix, 10:00 am

March 25, Tucson Station, 10:00 am

These minutes reflect the understanding of HDR Engineering, Inc. If revisions or additions are needed, contact (b)(6) (b)(6)

-----Original Message-----

From: (b)(6)
Sent: Tuesday, January 28, 2003 6:59 PM
To: (b)(6)
Cc: (b)(6)
Subject: FW: TCA PDT Meeting Minutes of 14 January 2003

(b)(6)

In response to the Action Item for the Engineering Contract for access to the RVS sites, IMC is only tasked with providing directions to the site and describing the general conditions of the access area.

IMC is not tasked with evaluating the amount of improvement needed for construction equipment to access a site or to give a construction solution.

As we discussed, this appears to be an item that is not in the IMC scope or the GSRC scope. The IMC-VA office has addressed this with the HQBOR RVS Project Management Office. (b)(6) the RVS Program Manager, will be better able to address any prior discussions with the government about the problem.

(b)(6)

TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS
BAKER STATUS REPORT - ENGINEERING

- A. Naco-4 Miles Roadway:
 - 100% plans submitted. Geometry edited due to new monuments (resubmitted 2/14/2003).
 - Drainage Report submitted to HDR for final comments.
 - BOM submitted to HDR for comments.
- B. Nogales, Tunnels:
 - Plans – Completed 30% package.
 - Contacted City Engineer (b)(6)
- C. Nogales, ½ Miles Roadway Maintenance:
 - Plans – Completing 90% Plans.
- D. & 1-1/2 Miles Roadway:
 - 60% Completed-Awaiting funding for geotechnical investigation.
- E. Nogales, Ephraim Ridge Road Reclamation:
 - 100 % plans submitted.
 - Drainage Report submitted to HDR for final comments.
- F. Douglas, Picket Fence Extensions:
 - Plans – Completing 80% package.
- G. Alternative Primary Fence Designs:
 - Plans – Researching various alternatives – Final report in progress.
- H. Lighting Design – Standard 1 – Mile Rural Condition:
 - Plans – Negotiations in progress with the Army Corps of Engineers.

-----Original Message-----

From: (b)(6)
Sent: Wednesday, February 19, 2003 7:39 AM

(b)(6)

Subject: Environmental Update #16

All--

Here are the environmental issues discussed during the PDT meeting Tuesday, February 18, 2003.

1. The Tucson/Yuma PEIS public comment period extended until 14 February. Approximately 1000 form letters were faxed over the weekend in opposition to the project, but provided no substantive comments. However, a lot of comment letters have been received. GSRC will develop a schedule once all the comments are received a comment resolution log is prepared.
2. The USFWS indicated to (b)(6) that the draft Yuma BO should be complete within a couple of weeks. Comments on the Tucson BA were received Friday. GSRC will revise the BA and submit it for review ASAP.
3. The draft Naco fence and roadway EA public comment period closed on 18 February. No comments have been received as of today. Assuming no public comments are received, the group agreed to beef up the water demand discussion and quantify the amount of water required for construction, but not to delay the release of the Final EA due to the pending hydrology study that GSRC currently has underway. (b)(6) will review historic records of water purchases to provide additional confirmation of the water demand estimates.
4. The draft Ephraim Ridge reclamation EA public comment period closed on February 18. As of Friday, February 14, three public comment letters were received.
5. The Nogales Infrastructure EA (roadways and portable lights) is under preparation and is scheduled to be submitted on February 26.
6. The WWD permit application was submitted in late November. GSRC has prepared a 404(b)(1) evaluation, and will submit a brief EA and public notice that the USACE Regulatory Functions Branch normally prepare for use by the USACE Los Angeles District. These efforts are intended to expedite the permit process.
7. The final CR survey reports for Naco and Douglas have been submitted to (b)(6) for coordination with the SHPO. The coordination on the Programmatic MOA can be re-established upon acceptance of this report.
8. (b)(6) has not received a response to his inquiry to HQ INS regarding the applicability of a CATEX for the road maintenance at Sonoita. HDR will develop a SOW to proceed with an EA, or at least, CR and bio surveys.
9. The PDT confirmed that the INS Regional Environmental Officer will be the POC identified on the title sheet.

10. The Naco and Douglas Station Supplemental Cumulative Effects EA is being prepared and will be submitted NLT March 12.
11. The Crawford Hill RVS installation preparation is scheduled to begin this week.
12. (b)(6) will provide a revised site evaluation report for the Nogales RVS sites by Tuesday, February 25. The two alternate sites will need to be surveyed. (b)(6) will attempt to get a decision/funds on developing access road designs.
13. Upcoming projects that will need to be expedited are as follows, in order of priority: Operation Desert Grip II, 44 Emergency Beacons, Four Checkpoints (Ajo and Casa Grande Stations), and Nogales Station EBS/EA.

As usual, please do not hesitate to call me if you have any questions.
Thanks,

(b)(6)

BOM Naco Arizona 6 April Deployment

ITEM DESCRIPTION	UNIT	Mile 1 West	Mile 2 West	Mile1 East	Mile2 East	Total Project	REQUIRED FOR 6 APRIL 2003 NACO ARIZONA DEPLOYMENT	NOTES
(b) (7)(E) AGGREGATE SURFACE COURSE	CY	1,169	1,266	869	688	3,992	1,558	3895 CY OF AGGREGATE
(b) (7)(E) AGGREGATE BASE COURSE	CY	2,088	2,351	1,304	1,033	6,776	2,337	
(b) (7)(E) ASPHALTIC CONCRETE SECTION	TONS	92	570	467	755	1,884	1,222	
PORTLAND CEMENT CONCRETE (b) (7)(E)	CY	643	523	508	3,264	4,939	3,772	
LONGITUDINAL BARS (b) (7)(E)								
(b) (7)(E)	EA	364	432	401	645	1,842	1,046	
STIRRUP BARS FOR CUT-OFF WALLS (b) (7)(E)								
(b) (7)(E)	EA	1,305	1,830	1,435	2,305	6,875	3,740	
SIGN PANELS	SF	54	90	18	27	189		
SIGN POST	LF	60	100	40	60	260		
SIGN FOUNDATIONS	EA	6	10	4	6	26		
(b) (7)(E) CORRUGATED PIPE (CMP)	LF	84	0	0	0	84	0	
(b) (7)(E) CORRUGATED PIPE (CMP)	LF	0	0	50	0	50	50	
(b) (7)(E) FLARED END SECTIONS	EA	0	4	0	0	4	0	
(b) (7)(E) FLARED END SECTIONS	EA	0	0	2	0	2	2	
BOLLARDS (b) (7)(E)								
(b) (7)(E)	EA	2,120	1,920	1,200	2,840	8,080		
PYRAMAT, http://www.fixsoil.com/products-fs.asp?ProductID=3 rolls are all 8.5' x 90' (21 rolls) dealer number provided 801 298 9696	SF	16,800	23,310	19,110	30,870	90,090	49,980	
RIPRAP, (b) (7)(E)	CY	673	925	675	1,090	3,363	1,765	
SILT FENCE	LF	4,400	4,000	3,300	3,300	15,000	6,600	

HAY BALES	EA	350	500	300	600	1,750
FENCE REMOVAL	LF	0	0	1,250	900	2,150
CATTLE GUARDS	EA	1	1	1	1	4

900

DATE: 2/18/03 TIME: 10:00

LOCATION: (b) (7)(E) Station

INS - US BORDER PATROL BORDER BARRIER PROJECTS
TUCSON SECTOR PROJECT DELIVERY TEAM
MEETING CHECK IN AND SIGN IN

TUCSON SECTOR

☐
☐
☒ (b)(6)

☒ NOGALES STATION
☒ (b)(6)

☐ DOUGLAS STATION
☐ (b)(6)
☐ TUCSON STATION
☐ (b)(6)

☒ NACO STATION
☐ (b)(6)
☐ CASA GRANDE STATION
☐ (b)(6)

CONSULTANT TEAM

☐ HDR
☐ (b)(6)
☒

☒ BAKER
☐ (b)(6)
☐

☒ GSRC
☐ (b)(6)
☐ Kleinfelder
☒ (b)(6)

☐ BPSCC
☐ (b)(6)
☐

☐ INS
☐ (b)(6)
☒

☒ CORPS OF ENGINEERS
☐ (b)(6)
☐

☐ IBWC
☐ (b)(6)

☐ JTF-6
☐ (b)(6)
☒

☒ AZ NATIONAL GUARD
☐ (b)(6)

OTHER

NAME: (b)(6)
ADDRESS: _____

AFFILIATION: USACOE Sacramento

E-MAIL: _____

PHONE: _____

(b)(6)

NAME: (b)(6)
ADDRESS: _____

AFFILIATION: Fort worth USACOE

E-MAIL: _____

PHONE: _____

(b)(6)

NAME: _____
ADDRESS: _____

AFFILIATION: _____

E-MAIL: _____

PHONE: _____

FAX: _____

Date: 2/19/2003 9:23 AM

Sender:
To:

(b)(6)(b)(7)(C)

CC:

Priority: Normal

Subject: Environmental Update #16

All--

Here are the environmental issues discussed during the PDT meeting Tuesday, February 18, 2003.

1. The Tucson/Yuma PEIS public comment period extended until 14 February. Approximately 1000 form letters were faxed over the weekend in opposition to the project, but provided no substantive comments. However, a lot of comment letters have been received. GSRC will develop a schedule once all the comments are received a comment resolution log is prepared.
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As usual, please do not hesitate to call me if you have any questions.
Thanks.

(b)(6)

Date: 6/30/2003 1:42 PM

Sender:

To:

(b)(6)(b)(7)(C)

bcc:

Priority: Normal

Subject: TCA PDT Env. Working Group meeting minutes from 24 June 2003

Please find attached the meeting minutes from the Tucson Sector PDT Environmental Working Group meeting held on 24 June 2003. Also attached is the QA/QC checklist discussed during the meeting. Should you have any questions, comments, or proposed corrections please reply directly back to this e-mail.

<<062403EWG.pdf>> <<062403EWGSignin.pdf>> <<QA QC Check List.doc>>

(b)(6)



062403EWGSignin.pdf



062403EWG.pdf



QA QC Check List.doc

INS
Facilities and Engineering Division
NEPA Quality Standard and Quality Assurance Checklist

Agency Managing Project _____ Identification Number _____ Project Title & Date _____

EA/EIS DOCUMENT QUALITY STANDARD

Subject Area	Area Considered and Fully Disclosed	Not Considered Relevant to Analysis (Explain in remarks)	Inadequately Disclosed	Not Disclosed	Not Required	Remarks
Cover Sheet Title of Proposed Action, Responsible Agency, Agency Point of Contact, (provide street and email address) and Preparing Organization.						
Signature Page. Include Preparer, Reviewer, and Official Approver. All EIS's shall include an Abstract and Executive Summary						
1.0 Purpose and Need The Purpose and Need statement defines the range of reasonable alternatives. Purpose. Briefly, answer the question, why is the action being purposed. Example: To provide urgent facilities to detain illegal aliens. Need: Briefly answer the question what is the underlying reason (need) for the action. Example: Need to support the enforcement program.						

INS
Facilities and Engineering Division
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Agency Managing Project _____ Identification Number _____ Project Title & Date _____

Subject Area	Area Considered, Fully Disclosed	Not Considered Relevant to Analysis (Explain in remarks)	Inadequately Disclosed	Not Disclosed	Not Required	Remarks
1.1 Scope of Project To orient the reader, describe the geographic area (state, county) that will be affected and the scope of the environmental analysis (e.g. cleanup, mission implementation, construction project, realignment etc.)						
1.2 Public Involvement Describe/Document public involvement opportunities and the process followed, such as public notices, NOIs, NOAs, scoping/efforts, Public meetings, news releases and public review of the document, others. Note: The purpose is to inform the public on participation opportunities and document the accomplishment of that fact.						
1.3 Framework for Analysis Identify, in bullet form, all relevant statutes, Executive Orders and applicable regulations. (this sets the stage for conducting the analysis)						
2.0 Description of the Proposed Action Describe the proposed action in sufficient detail for a meaningful analysis. Answer the questions who, what, when and where? Describe the specifics of the proposed action and associated activities. Include drawings, footprints, or other necessary graphics.						

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Agency Managing Project _____ Identification Number _____ Project Title & Date _____

Subject Area	Area Considered, Fully Disclosed	Not Considered Relevant to Analysis (Explain in remarks)	Inadequately Disclosed	Not Disclosed	Not Required	Remarks
3.0 Alternatives Considered The alternative determination analysis will be conducted to provide a rigorous, thorough and comprehensive identification of a <i>reasonable</i> range of alternatives. Provide a complete and accurate description of alternatives considered. The narrative must provide a clear choice among alternatives.						
3.1 The alternatives section discusses all alternatives considered including those eliminated from detailed study and providing the specific reasons for their elimination.						
Provide a decision matrix defining alternatives considered, components required to achieve the "purpose and need" and whether the required components were present in each alternative						
Have the alternatives considered been within the jurisdiction of the agency to implement.						
Does the Alternative Analysis include the "No Action" alternative?						
Does the alternative analysis lead to the identification of a preferred alternative that will meet the Purpose and Need						

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Agency Managing Project _____ Identification Number _____ Project Title & Date _____

Subject Area	Area Considered, Fully Disclosed	Not Considered Relevant to Analysis (Explain in remarks)	Inadequately Disclosed	Not Disclosed	Not Required	Remarks
4.0 Affected Environment and Consequences Succinctly, but completely, describe the environment of the area to be affected by resource category, clearly establishing baseline data against which the analysis is conducted. Present the consequences, adverse and beneficial, following each resource category for direct, indirect and cumulative effects as shown in the following guidance. Make concluding impact statements (analysis) which have supporting baseline data described in the resource category. The following list of resources is provided as a checklist to assist the preparer in identifying the relevant resources. Others to be identified by the preparer may also be relevant. The preparer must use professional judgment in determining which resources are relevant to the analysis.						
Organization Example (for each resource area) 4.X Resource 4.X.1 Describe conditions at the project site and in the Region of Influence (ROI). 4.X.2 Consequences Preferred Action Direct effects Indirect effects Cumulative effects Each Alternative Same No Action Same						

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Agency Managing Project _____ Identification Number _____ Project Title & Date _____

Subject Area	Area Considered, Fully Disclosed	Not Considered Relevant to Analysis (Explain in remarks)	Inadequately Disclosed	Not Disclosed	Not Required	Remarks
4.1. Land Use Describe project site and contiguous and surrounding land use within the Region of Influence. Community long range plans serve as the baseline for the cumulative effect analysis. This is the geographic setting, land, and air space use. Include recreation areas, parks, conservation areas, prime farmlands, timberlands, etc.						
4.2 Aesthetic and Visual Resources Answer question, how project impacts Street scene, seascape, skyline, or whatever pertinent conditions are. Provide digital photos of project site and adjacent areas.						
4.3 Geology/Soils/Topography Geologic structure, aquifers, seismicity. If discussed provide supporting maps and graphics.						
4.4 Hydrology Drainage, storm water, erosion. If discussed provide supporting maps and graphics.						
4.5 Water Resources Groundwater and Surface water Sources, quantities, quality, availability, uses and rights. If discussed provide supporting maps and graphics. (Note: potable water is treated in the infrastructure section)						

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Agency Managing Project _____ Identification Number _____ Project Title & Date _____

Subject Area	Area Considered, Fully Disclosed	Not Considered Relevant to Analysis (Explain in remarks)	Inadequately Disclosed	Not Disclosed	Not Required	Remarks
4.6 Biological Resources						
Vegetation Types of ecosystems (e.g. hardwood forest)						
Wildlife and aquatic resources Mammals, birds, reptiles, amphibians, fish management programs if present (hunting, fishing, trapping, etc.)						
Threatened and Endangered Species Federally listed or proposed for listing and critical habitat. If discussed provide supporting maps and graphics.						
Note: Endangered Species Act, Section 7. If the proposed action will potentially impact on critical habitat or threatened/endangered species, the preparer will officially coordinate the proposed action by letter with the US Fish and Wildlife Service, document their response and include the correspondence chain in the Appendix. The affected environment discussion will contain a separate section dealing with this issue, which discuss the results of this coordination. Document the fact if none are present as well.						

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Agency Managing Project _____ Identification Number _____ Project Title & Date _____

Subject Area	Area Considered, Fully Disclosed	Not Considered Relevant to Analysis (Explain in remarks)	Inadequately Disclosed	Not Disclosed	Not Required	Remarks
<p>Note: Wetlands, riparian areas, tidelands, navigable waters:</p> <p>If the proposed action will or could impact wetlands, the preparer will coordinate with the appropriate US Army Engineer District to determine if the proposed action affects a regulated wetland or navigable water. The response and chain of correspondence will be included in the Appendix. If these regulated areas are present, appropriate maps and descriptions will be included. The document must distinguish between "wetlands determination" and "wetlands delineation". Determination refers only to nature and type; Delineation refers to specific quantities. State in the "Permits Required" section if a permit is required. If discussed provide supporting maps and graphics.</p>						
<p>Note: Coastal Zone Management</p> <p>The preparer will coordinate with the appropriate state Coastal Zone Management authority to determine if the proposed action is consistent with the approved Coastal Zone development plan. Results of this coordination and chain of correspondence will be included in the Appendix and described the results and conditions in a separate section in the Affected Environment discussion. If discussed provide supporting maps and graphics.</p>						
<p>4.7 Floodplains</p> <p>Describe the floodplain (100 yr, 500 yr), include a map if needed, in the project area, and describe impacts created by the project in the consequences. If discussed provide supporting maps and graphics.</p>						

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Agency Managing Project _____ Identification Number _____ Project Title & Date _____

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4.8 Air Quality Include climate, rainfall, and wind if necessary to conduct air quality or other analysis. Keep climate discussion brief.						
Identify the Air Quality Control Region, and attainment status.						
Describe the ambient conditions, background emission sources, stationary and mobile.						
Note: Let the analysis determine compliance with the State Implementation Plan (SIP). Include a Record of Non-Applicability, if appropriate, in the appropriate Appendix.						
4.9 Noise Existing sources, stationary and mobile, identify applicable codes, ordinances, and management plan. Identify potential noise impacts and the anticipated noise threshold levels from project. If discussed identify noise sensitive receptors with supporting maps and graphics.						
4.10 Cultural Resources Identify historic building, sites and archaeological sites, Native American assets. Include state or tribal resources.						

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Note: In compliance with the NHPA Section 106, coordinate the proposed action and determinations with the appropriate State Historic Preservation Officer (SHPO). Document the results in the text and include the chain of correspondence in the Appendix. Any action, which adversely affects these resources, requires consultation with the Advisory Council on Historic Preservation (ACHP) as well. The results of Programmatic Agreements and Memoranda of Agreements will be described in the text and the documents included in the Appendix.						
Note: Determine if Native American (Tribal Preservation Officer) coordination is required. Include the chain of correspondence in the appendix and discuss the process in the text.						
4.11 Infrastructure available Potable water Wastewater Treatment Electric power supply Natural gas supply Fuel oil, coal Solid waste disposal Describe the distance to nearest source, supply capacity, average daily use, alternatives for supply and waste systems, and available capacity to accommodate the proposed action/alternatives.						

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4.13 Roadways/Traffic Describe the roadway network serving the project area. Include existing traffic conditions; discuss levels of operation in accepted units. Evaluate impacts of imposing the traffic increase of the project upon that baseline data.						
4.14 Hazardous Materials Describe storage, handling, use, disposal, contaminated sites and status of cleanup Special Hazards. Asbestos, Radon, Lead-base paints, PCBs, UST and AST, Unexploded Ordnance.						
Note: The requirements of CERCLA, CERFA, FFCA, RCRA, and EO 12088 will be addressed in an Environmental Due Diligence Study. Due diligence requires, at a minimum, preparation of an environmental assessment called a "Phase I Environmental Site Assessment" or simply a "Phase I". If the Phase I study indicates the likely presence of a "recognized environmental condition", a "Phase II" characterization study must also be conducted.						
4.15 Socioeconomic Identify economic Region of Influence (ROI) Demographics should include minority and low-income populations, employment, housing, schools, shops, whatever is relevant in the ROI. Evaluate economic impacts to the ROI generated by implementing the project.						

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Subject Area	Area Considered, Fully Disclosed	Not Considered Relevant to Analysis (Explain in remarks)	Inadequately Disclosed	Not Disclosed	Not Required	Remarks
4.16 Environmental Justice and Protection of Children EO 12898 Using minority and low-income populations data generated above identify and evaluate disproportionate impacts upon these resources. Evaluate impacts to children, if any.						
4.17 Health and Human Safety Identify and evaluate various stressors potentially affecting health and safety. Document relevant chemical, physical, behavioral, or psychological stressors. Document and evaluate safety and accident hazards.						
4.18 Permits/Regulatory Authorizations Include all permits and authorizations required for implementing, operating, and/or maintaining the proposed action.						
4.19 Sustainability and Greening In accordance with EO 12780, of October 1991, briefly discuss the ability to incorporate sustainability and greening in daily operations. Discussion should be focused on: Solid waste reduction and recycling Methods of energy conservation Source reduction and pollution prevention						

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4.20 Cumulative Impacts This section summarizes overall cumulative effects. Specific cumulative effects have been included with each resource category. Evaluate effects of proposed action/alternatives superimposed on past, present and reasonably foreseeable future actions. Develop data in the Land Use Section that describes past, present and future use of the contiguous areas. Identify land use trends (future) in the project ROI. These data become the baseline for conducting the cumulative impact analysis.						
4.21 Environmental Design Considerations/Mitigation This section shall be developed based on a hierarchy of: <ol style="list-style-type: none"> 1. Applying Best Management Practices (BMP), 2. Avoiding and minimizing, to the maximum extent practicable, impacts to endangered species, wetlands and historic/cultural resources 3. "In Kind" mitigation, (e.g., 9 acres of wetlands will be created to offset destruction of 3 acres by fill material. Note: All mitigation efforts shall be based on industry established BMP's, conservation measures in USFWS Recovery Plans, and recommendations/permit requirements from regulatory agencies.						

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4.22 Comparison/Decision Matrix of Potential Impacts Develop a matrix, setup on "X" and "Y" axis to identify impacts by alternatives, define if temporary or permanent impact, whether impact is insignificant, significant, or beneficial, and mitigation strategy proposed. Note: The matrix should present a clear one-page summary of all alternatives in relation to impact and mitigation. The matrix will combine the facts established in Section 4.20 and 4.21 and present the decision maker with the tools to evaluate the temporary/permanent impacts and all costs, direct and indirect, associated with the alternatives.						
5.0 References This section should provide a bibliographical information of sources cited in the document. Normally only references that can be reasonably obtained by the public are cited.						
6.0 List of Preparers The list of preparers should be diverse enough to ensure a multidiscipline approach to the environmental and socioeconomic analyses.						

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7.0 List of Individuals and Agencies Consulted List individual names, agencies, and organizations (if any) contacted for data and information in support of the analysis whether or not a response was received. Only contacts outside the preparing agency are listed.						
Appendix: Provide copies of all official correspondence sent or received from resource regulatory agencies for the project or operation.						
Finding of No Significant Impact The FONSI is a separate, brief document, usually no longer than two pages, presenting reasons why the proposed action would not significantly affect the human environment. It documents the decision that an EIS is not required. 1. Name the action 2. Brief description of the selected (preferred) action 3. Brief discussion of likely effects 4. Reasoning behind the determination of no significant effects. 5. Identify avoidance, minimization, and mitigation measures implemented for the project.						

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<p>Record of Decision (ROD)</p> <p>Final step in the EIS process. It is a concise public document that sets forth the decision, identifies the alternatives and factors considered, the preferred alternative and any mitigation measures to lessen impacts to the environment. It summarizes major issues and effects balanced by the agency in reaching a decision. The ROD shall be submitted to HQ INS for signature.</p>						
<p>Administrative Record</p> <p>The Administrative Record is the entirety of all written information, including emails and Fax transmittals, obtained, and relied upon during the NEPA process. At the completion of the process, The Administrative Record should be compiled in logical organization and provided to the proponent and/or INS Facilities and Engineering for retention.</p>						

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Agency Managing Project _____ Identification Number _____ Project Title & Date _____

Document Quality Assurance Checklist		YES	No	Additional Comments/Remarks
1.	Has the INS document format, organization and quality standard have been followed.			
2.	Is each section is specific to the topic and does not mix subjects.			
3.	Was the document prepared with an interdisciplinary team of subject matter experts, as shown in list of preparers.			
4.	Has the document has been edited for one voice, written in layman's language, error free.			
5.	Is subject baseline data sufficient to support analysis/findings statements and the purpose and need for the project.			
6.	Have all conclusions and /findings statements been supported by baseline data and correspondence .			
7.	Has all extraneous data or text been removed from the document.			
8.	Have tutorials been avoided, and only narrative necessary to support analysis has been included.			
9.	Does the document contains sufficient site plans, Geographic Information Systems (GIS) mapping, graphics and digital photos to accurately represent the project site/s and all biologically sensitive areas and wetlands in and immediately adjacent to the project footprint, access roads, and construction support areas.			
10.	Have GIS mapping data, digital photos and Global Positioning Systems (GPS) coordinates used to develop the supporting graphics. Have coordinates and mapping been provided in an electronic format that was previously coordinated with the Facilities and Engineering (F&E) Division GIS administrator.			

Agency Project Manager Signature _____ Date _____

Project Proponent Representative Signature _____ Date _____

DATE: 6/24/03 TIME: 8:30

LOCATION: HDR - Phoenix

INS - US BORDER PATROL BORDER BARRIER PROJECTS
TCA PDT ENVIRONMENTAL WORKING GROUP
MEETING CHECK IN AND SIGN IN

TUCSON SECTOR

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(b)(6)

NOGALES STATION

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DOUGLAS STATION

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SONOITA STATION

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NACO STATION

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CASA GRANDE STATION

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(b)(6)

CONSULTANT TEAM

HDR

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IMC

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AZ NATIONAL GUARD

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OTHER GOVERNMENT AGENCIES

USFS

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OTHER

NAME:

(b)(6)

AFFILIATION: _____

ADDRESS: _____

E-MAIL: _____

PHONE: _____

FAX: _____

(b)(6)

DATE: 6/24/03 TIME: 8:30

LOCATION: HDR - Phoenix

INS – US BORDER PATROL BORDER BARRIER PROJECTS
TCA PDT ENVIRONMENTAL WORKING GROUP
MEETING CHECK IN AND SIGN IN

NAME: _____

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**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

Due to lack of time, all of the projects listed were not reviewed. The status of these projects, prior to this meeting, in a format created by (b)(6) is attached to these minutes.

SUMMARY OF DHS ACTIVITIES (HQ)

Due to lack of time, all of the projects listed were not reviewed. The status of these projects, prior to this meeting, in a format created by (b)(6) is attached to these minutes.

SUMMARY OF ITEMS TO BE PRESENTED TO THE PDT

Due to lack of time a summary of items to present to the full PDT was not developed

ACTION	RESPONSIBLE
1. Update report names within the AERC data base and forward that information to the EWG	(b)(6)
2. Provide transitional statement within the data base for the Naco-Douglas Corridor Supplemental EA	
3. 8 July 2003 conference call	
4. Review Existing QA/QC Checklist	

NEXT MEETINGS

**8 July 2003 Conference Call – 8:00 mst (11:00 eastern, 10:00 Dallas)
22 July 2003 Prior to the Next PDT - Tucson Station, 8:30 am
19 August 2003 HDR - Phoenix, 8:30 am**

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

Attached: The following was contained in the meeting agenda as backup material.

ADMINISTRATIVE ITEMS

PURPOSE AND OBJECTIVE

The Department of Homeland Security and U.S. Border Patrol (USBP) have created and assembled Border Barrier Project Delivery Teams (PDT) for Tucson Sector. The PDT is tasked with identifying border infrastructure projects that are necessary to allow the USBP to gain and maintain control of the international borders; plan, design and schedule these projects; obtain and manage funding of such projects; and develop priority lists and budgets for future years. The PDT is comprised of representatives from Headquarters, Department of Homeland Security; USBP Stations, Sector and Headquarters; Architect-Engineer Resource Center (AERC); U.S. Army Corps of Engineers (USACE) and various contractors who specialize in program management and planning, engineering design and construction and environmental issues.

The primary mission of the PDT Environmental Working Group (EWG) is to advise the full PDT in order to ensure that projects are planned and constructed in compliance with all environmental regulations. Principal environmental statutes and regulations that will affect Department of Homeland Security and USBP projects include, but are not limited to:

- National Environmental Policy Act (NEPA) of 1969
- Clean Water Act (CWA) of 1970, as amended
- Clean Air Act (CAA) of 1990, as amended
- Endangered Species Act (ESA) of 1973, as amended
- National Historic Preservation Act (NHPA) of 1966

The guidance and technical advice that is expected from the EWG at both the planning and implementation stages of a project are presented in the following paragraphs.

The EWG will consider the Acts mentioned above and other pertinent regulations, as appropriate, when providing recommendation for project alternatives, estimated costs, and schedules. Engineering designs will be reviewed to identify potential environmental issues (e.g., wetlands, National Historic Districts, etc.) that will need to be considered during subsequent versions of the engineering designs.

MEMBERS & ROLES

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

MEMBERS		ROLE
(b)(6)	DHS Project manager	HQ Updates
	DHS Environmental Representative	Member – HQ Updates
	USBP Tucson Sector Designee	Member
	AERC Project Manager	Chairperson
	DHS Western Region Environmental Representative	Member - Regional Updates
	AERC Environmental Representative	Member - Administrative Record
	AERC Environmental Representative	Member
	JTF-6 Environmental Representative	Member
	GSRC – Environmental Contractor	Member – Summary of PDT & Non-PDT Activities
	HDR – Program Management Contractor	Member - agenda & minutes

The EWG will inform the PDT as early in the planning process as possible, of any major Federal regulations that will require compliance and, more importantly, any major impediments for the project to proceed relative to these regulations. Specific guidance that will be considered include, that is not limited to the following:

- **NEPA.** The EWG will advise the PDT whether a site- or project-specific Environmental Assessment (EA) or Environmental Impact Statement (EIS), or Programmatic and

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NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

Supplemental NEPA documents are appropriate for the project(s) or program(s) being considered by the PDT. The EWG will also assist in the developing the alternatives to be considered, identify potential mitigation requirements and evaluate potential public perception/controversy.

- **CWA.** The EWG will identify potential permitting requirements and schedule for Section 404/401 and National Pollutant Discharge Elimination System (NPDES) Storm Water Pollution Prevention Plan (SWPPP) permits for the proposed project(s). The EWG will also identify and recommend alternatives to avoid or minimize impacts to wetlands and identify potential compensation requirements for unavoidable impacts.
- **CAA.** The EWG will identify projects that occur within non-attainment areas, and, where such situations do occur, evaluate the potential requirement for conformity analysis. The EWG will also assist in the identification of potential emission sources and alternatives.
- **ESA.** The EWG will identify potentially affected species and critical habitat that occur within the project region. This should not be construed as site-specific identification; rather the EWG will use available databases to advise the PDT about the protected species that could be encountered. The EWG will also assist in the identification of potential alternatives to avoid adverse effects and advise the PDT about the possible costs, schedules delays, conservation and mitigation measures and anticipated outcome of required Section 7 consultation.
- **NHPA.** The EWG will consult with the PDT regarding the schedule, costs and potential impediments to compliance with Section 106 of the NHPA. The EWG will also assist in the identification of affected Native American Nations and, where appropriate, assist in Federal coordination requirements with the Nations and the State Historic Preservation Office.

EWG MEETING MINUTES

It is imperative that all PDT members remain informed. Sub-sets of the PDT, such as the EWG, meet as necessary to coordinate individual parts of the overall project. Within 3 working days of each meeting minutes are produced that document environmental discussions via e-mail. The e-mail will be distributed to all members of the PDT EWG and to appropriate HQ staff.

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BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

MEETING MINUTES

Meeting Date and Time: 24 June 2003 at 8:30 am

Meeting Location: HDR - Phoenix

Distribution Date: 30 June 2003

Distributor: (b)(6)

Distribution:

(b)(6)

MEETING PURPOSE

PDT EWG Meeting

ATTENDEES

See Attached.

PREVIOUS ACTION ITEMS STATUS

ACTION	RESPONSIBLE	STATUS
None		
(Please see NEW ACTION items)		

ADMINISTRATIVE ITEMS

This is the first meeting of the Environmental Working Group (EWG). Focus of this meeting was organization, tracking of documents, updating projects, and development of a forum for discussion and recommendations to the full Project Delivery Team (PDT). Attached to these minutes are the written discussion of the purpose, members, and member roles.

Discussions included the need to prepare comprehensive documents that include all projects associated with an area and the need for a systemic approach.

MEMBERS

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS**

ENVIRONMENTAL WORKING GROUP

The table below depicts the revised membership and their roles pursuant to the discussions within the EWG.

MEMBERS		ROLE
(b)(6)	DHS Project manager	HQ Updates
	DHS Environmental Representative	Member – HQ Updates
	USBP Tucson Sector Designee	Member
	USACE Project Manager	Chairperson
	DHS Western Region Environmental Representative	Member - Regional Updates
	AERC Environmental Representative	Member – Environmental Administrative Record – Point of Contact on Future Documents
	AERC Environmental Representative	Member
	JTF-6 Environmental Representative	Member
	GSRC – Environmental Contractor	Member – Summary of PDT & Non-PDT Activities
	HDR – Program Management Contractor	Member - agenda & minutes

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ENVIRONMENTAL WORKING GROUP

EWG MEETING MINUTES

EWG meeting minutes and the role of the current environmental updates from GSRC was discussed. Based on these discussions and the desire for a unified document from the EWG the present environmental update produced by GSRC subsequent to each PDT meeting will be forwarded to HDR for inclusion in the EWG meeting minutes.

FLOW PATH AND ENVIRONMENTAL DOCUMENTS

Per (b)(6) the QA/QC checklist must be filled out on documents transmitted to HQ from AERC or GSRC

Comments from the public have been going to (b)(6) and then forwarded to Fort Worth. POC will be the USACE as the clearinghouse. (b)(6) will serve as POC for TCA PDT documents.

The USACE (b)(6) will be the keeper of the Administrative Record for Environmental Projects.

Major issues that could be controversial should be discussed in a meeting or telephone conference call. E-mails and official comment correspondence should avoid using inflammatory or controversial language or phrases that could be used against the agency in the event litigation occurs.

The DHS HQ should be identified as the lead agency on title page; however, only the POC's phone number and address should be provided, not DHS HQ or RO.

The Project Manager/POC should handle inquiries about NEPA documents from the general public. Inquiries from journalists should be referred to (b)(6) or the HQ BOR PIO. (b)(6) and/or the PIO will coordinate the appropriate response with team members.

(b)(6) suggested that e-mails regarding documents have the title of the document in the subject to facilitate correct responses and increase efficiency.

SUMMARY OF NON-PDT ACTIVITIES (REGIONAL)

Due to lack of time, all of the projects listed were not reviewed. The status of these projects, prior to this meeting, in a format created by (b)(6) is attached to these minutes.

SUMMARY OF PDT ACTIVITIES (INFRASTRUCTURE)

(b)(6) suggested that a note be added, or transitional statement, for the incorporation of the proposed Naco & Douglas EAs in the Naco Douglas Corridor SEA. (b)(6) will update the projects and project titles.

***BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS***

ENVIRONMENTAL WORKING GROUP

SUMMARY OF NON-PDT ACTIVITIES (REGIONAL)

ACTION Number	3	AERC Project Number	225	STATE	AZ
ACTION Type	EIS	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	EIS and Associated Tasks - USBP Yuma and Tucson Sectors, AZ (DO 007)				
PROJECT DESCRIPTION	Programmatic Environmental Impact Statement for USBP Yuma and Tucson Sectors				
SUMMARY	Public comment period extended until February 7, 2003				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation				
NOI	01-Sep-00				
NOA	11/18/2002				
Scoping	Oct-Nov 2000				
Preliminary Draft	4 preliminary drafts				
Reviewed Date	extended to 14 feb				
DRAFT	<p>During a 22 April 2003 conference call it was decided to issue a revised draft PEIS that only address potential infrastructure in a cumulative manner. GSRC was tasked with preparing a comment resolution letter informing recipients of the USBP's decision. GSRC prepared and submitted a draft resolution letter on May 17, 2003 to (b)(6) for review. (b)(6) will submit the resolution letter the week of June 9, 2003. The revised draft PEIS will be submitted for internal review in mid-July.</p>				
FINAL	The revised draft PEIS should be available for public notice by the 3rd week of August.				
FONSI	N/A				
ROD					

ACTION Number	2	AERC Project Number	255	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	RVS for USBP Tucson Sector (DO 050)				
PROJECT DESCRIPTION	Environmental Assessments for RVS sites in Naco, Douglas and Nogales Stations				
SUMMARY	Naco and Douglas: Final EA and FONSI signed 01/07/03. Nogales: Additional biological and cultural resources surveys are required for the access roads to 3 Nogales sites. Waiting for CR clearance from SHPO for Crawford Hill site. Need to modify the contract for separate EA for Crawford Hill and for the 3 access roads.				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	Naco (Draft) 10/01/02; Naco (Final) 01/24/03; Crawford Hill (Draft) 10/22/02; Crawford Hill (Final) 11/15/02.				
Scoping	N/A				
Preliminary Draft	Naco-PDEA submitted 07/08/02; Nogales-PDEA submitted 08/13/02; Crawford Hill-PDEA submitted 09/18/02.				
Reviewed Date	Naco-DEA public review from 9/30/02 to 10/30/02; Crawford Hill public review from 10/22/02 to 11/06/02.				
DRAFT	Naco-DEA submitted 09/25/02; Crawford Hill DEA submitted 10/02/02.				
FINAL	Naco-PFEA submitted 11/05/02; Naco-Revised PFEA submitted 11/13/02; Naco-FEA submitted 01/03/03; Crawford Hill-PFEA submitted 10/30/02; Crawford Hill-FEA submitted 11/13/02.				
FONSI	Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02				
ROD	N/A				

ACTION Number	4	AERC Project Number	497	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	EA for Rescue Beacons - Tucson/Yuma Sectors				
PROJECT DESCRIPTION	EA for placement and operation of rescue beacons to aid in rescue of UDA's who face death or severe dehydration.				
SUMMARY	EA complete for 8 beacons off the Tohono O'odham Nation on BLM, Cabeza Prieta Nat'l Wildlife Refuge, Organ Pipe Cactus Nat'l Monument. 10 Beacons on T.O.N. are being handled under separate EA. The comment period was extended until June 10, 2003. Currently addressing comments and working with the US Fish and Wildlife Service to resolve the BO issue raised by the BLM.				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation TO0079				
NOI	N/A				
NOA	5/16/2003				
Scoping	N/A				
Preliminary Draft					
Reviewed Date	extended to June 16, 2003				
DRAFT	The review period ended on June 10, 2003.				
FINAL	The preliminary final EA will be submitted to the client no later than June 17, 2003. The final will be submitted to the client no later than June 23, 2003.				
FONSI	Anticipate the FONSI being signed no later than June 20, 2003.				
ROD	N/A				

ACTION Number 22

AERC Project Number 498/497

STATE AZ

ACTION Type EA

DOCUMENT ENV Number

**DOCUMENT
TITLE**

PROJECT

Eas are part of Operation Desert Grip II and Rescue Beacons for Tucson/Yuma Sectors

**PROJECT
DESCRIPTION**

Preliminary Draft EA for Ten Rescue Beacons and Four Temporary Camp Details on the Tohono O'odham Nation USBP Tucson Sector, AZ

SUMMARY

This document was separated from the original due to delays on the Nation. To accommodate the other portions of the project, these were separated out.

AERC POC

USACE POC

CONTRACTOR POC

CONTRACTOR

Gulf South Research Corporation

DHS REGIONAL POC

DHS FAE POC

USBP POC

(b)(6)

(b)(6)

NOI

N/A

NOA

Holding due to political problems on the Nation.

Scoping

NA

Preliminary Draft

30-May-03

Reviewed Date

6-Jun-03

DRAFT

Holding due to political problems on the Nation. This will go to the TON public for five days.

FINAL

FONSI

ROD

NA

ACTION Number	5	AERC Project Number	499	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	Temporary USBP Checkpoints on the (b) (7)(E) in the Tucson Sector and Ajo and Casa Grande AO's.				
PROJECT DESCRIPTION	EA for placement and operation of three temporary USBP checkpoints on the (b) (7)(E)				
SUMMARY	EA is being completed for four checkpoints (three on the (b) (7)(E) Checkpoints used to identify and apprehend any UDAs or drug traffickers. These checkpoints occur along (b) (7)(E) and County Roads (b) (7)(E) within the (b) (7)(E)				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation DACA63-00-D-0004 T.O. (082)				
NOI	N/A				
NOA	On hold until uses issues are resolved on the (b) (7)(E)				
Scoping	N/A				
Preliminary Draft	On hold				
Reviewed Date					
DRAFT	The preliminary draft EA for one temporary checkpoint off the (b) (7)(E) will be submitted for internal review no later than June 16, 2003				
FINAL	Anticipate submitting the draft EA for public review no later than June 30, 2003 for a 30-day public review period.				
FONSI					
ROD	N/A				

ACTION Number	6	AERC Project Number	503	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	EA/EBS				
PROJECT DESCRIPTION	Nogales BPS				
SUMMARY	Draft EA has been submitted for public review. The Phase I ESA is in the draft stage.				
AERC POC	N/A at this time	DHS REGIONAL POC	(b)(6)		
USACE POC	(b)(6)	DHS FAE POC	(b)(6)		
CONTRACTOR POC		USBP POC	(b)(6)		
CONTRACTOR	Gulf South Research Corporation TO0080				
NOI	N/A				
NOA					
Scoping	N/A				
Preliminary Draft	Due 12 May 03				
Reviewed Date					
DRAFT	Public comment period extended to June 30, 2003 by (b)(6) Letters sent by (b)(6) and USACE.				
FINAL					
FONSI					
ROD	N/A				

ACTION Number	I	AERC Project Number	51	STATE	AZ
ACTION Type	BA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors, AZ (DO 043)				
PROJECT DESCRIPTION	Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors				
SUMMARY	<p>Yuma Sector BA: Awaiting comments from the USFWS. Tucson Sector BA: Tentative meeting with USFWS set for 24 January 2003 in Phoenix, AZ. Meeting was conducted at the FWS office in Tucson and covered both Biological Assessments. According to (b) (6) we are at the top of the list once they complete the BOs for the military remanded BAs. FWS owes us a letter requesting an extension; (b) (6) will follow up on that letter.</p>				
AERC POC	(b) (6)	DHS REGIONAL POC	(b) (6)		
USACE POC		DHS FAE POC			
CONTRACTOR POC		USBP POC			
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	N/A				
Scoping					
Preliminary Draft					
Reviewed Date					
DRAFT	Yuma--9/27/02; Tucson 10/24/02				
FINAL	<p>The Revised Final BA will be submitted for internal review NLT 6/19/03. Pending Gov't comments, the Revised Final BA should be available for submittal to the USFWS by 3rd wee of July. (b) (6) has not completed the Draft BO for the Yuma Sector as of 6/12/03.</p>				
FONSI	N/A				
ROD	N/A				

ACTION Number	19	AERC Project Number	498	STATE	SW
ACTION Type	EA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	EA, Operation Desert Grip II				
PROJECT DESCRIPTION	Southwest US				
SUMMARY	Draft submitted for 30-day public review. The review period has been extended until June 16, 2003.				
AERC POC	N/A at this time	DHS REGIONAL POC	(b)(6)		
USACE POC	(b)(6)	DHS FAE POC			
CONTRACTOR POC		USBP POC			
CONTRACTOR		Gulf South Research Corporation T00078			
NOI	N/A				
NOA					
Scoping	N/A				
Preliminary Draft					
Reviewed Date					
DRAFT	Public comment extended to 6/16/2003				
FINAL	Anticipate submitting a preliminary final for internal review no later than June 30, 2003.				
FONSI					
ROD	N/A				

***BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS***

ENVIRONMENTAL WORKING GROUP

SUMMARY OF PDT ACTIVITIES (INFRASTRUCTURE)

ACTION Number	7	AERC Project Number	218	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	Environmental Assessment for 31-mile Enforcement Zone Infrastructure System, Naco, AZ (INS AERC--GSA Contract Order No. DACA63-02-F-0005)				
PROJECT DESCRIPTION	Environmental Assessment to address implementation of a 31-mile border enforcement system through a combination of infrastructure components (roads, fences and lights)				
SUMMARY	Technical review and coordination. Project being coordinated through the Tucson PDT. Comments to the Preliminary Draft have been provided. Public scoping meeting held 18 November 2002. PDT decided, based on guidance from HQ, to combine Naco and Douglas into a Supplemental EA for the Naco-Douglas Corridor. Draft SEA was distributed for public review on 7 Feb 03; comment period was extended from 7 May to 30 June. BA needs to be initiated.				
AERC POC	N/A at this time	DHS REGIONAL POC	(b) (6)		
USACE POC	(b) (6)	DHS FAE POC			
CONTRACTOR POC		USBP POC			
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	5/7/2003				
Scoping					
Preliminary Draft	Naco-Douglas EAs combined into one; Due 3-12-03				
Reviewed Date	PDEA 3/13/03 to 3/26/03; DSEA released 5/72003				
DRAFT	Public Review Extended to June 30, 2003 by (b) (6) Letter sent by (b) (6) and USACE				
FINAL	PFEA 7/10/03 FEA 8/04/03				
FONSI	Expected around 8/20/03				
ROD	N/A				

ACTION Number	20	AERC Project Number	255	STATE	AZ
ACTION Type	E	DOCUMENT ENV Number			
DOCUMENT TITLE					
PROJECT	Nogales Infrastructure Improvements (INS AERC--GSA Contract Order No. DACA63-02-F-0207)				
PROJECT DESCRIPTION	Environmental Assesment for RVS sites, 1 mile of pedestrian fence, 2 miles of patrol roads and the continued use of 60 portable lights				
SUMMARY	Draft EA submitted for public comment on May 9, comment period extended to 30 June,				
AERC POC	(b) (6)	DHS REGIONAL POC	(b) (6)		
USACE POC		DHS FAE POC			
CONTRACTOR POC		USBP POC			
CONTRACTOR	Gulf South Research Corporation				
(b) (7)(E)	N/A				
(b) (7)(E)	Nogales Draft 5/9/03				
Scoping	N/A				
Preliminary Draft	25-Apr-03				
Reviewed Date	2-May-03				
DRAFT	9-May-03				
FINAL	Awaiting comments from public review				
FONSI					
ROD	N/A				

***BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
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BUREAU OF CUSTOMS AND BORDER PROTECTION
NOGALES, SONOITA, DOUGLAS, AND NACO STATIONS***

ENVIRONMENTAL WORKING GROUP

SUMMARY OF DHS ACTIVITIES (HQ)

None were presented, as this was the first meeting of the EWG. Time constraints prevent a full discussion of these items.

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL

MEETING AGENDA

Meeting Date and Time:

9 December 2003 10:00

Meeting Location:

Phoenix – HDR Offices
 Suite #350 3200 E. Camelback Road
 Phoenix, AZ 85018-2311
 (602) 522-7700

MEETING PURPOSE

PDT Meeting

INTRODUCTIONS

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Report on Ephraim Ridge Real Estate	(b)(6)
2. MOU developed for Bureau of prisons to fabricate fence extension for DGL – need work statement from (b)(6)	
3. Follow up on contract for GSRC to prepare EA for RVS in Douglas AO – need survey and engineering support – need purpose statement developed by HDR – funding followed up by (b)(6) – access to sites reviewed by (b)(6) and HDR	
4. Final Plans Nogales first ½ mile of 2-Miles by 1 Dec.	
5. SWPPP responsibility for construction and ongoing reporting - Kleinfelder & Stations	
6. SWPPP training – need proposed dates and costs for training	
7. Fill material source located for February deployment to Douglas	
8. WWD foundation change to grouted rock – Baker to check on Geotech – AzANG to check with constructing unit	
9. (b)(6) needs digital copies of Douglas construction plans.	
10. Baker needs official comment resolution sign off on Nogales Tunnels from the PDT.	
11. Articulated concrete units specifications	
12. Inspector that will be at 10 Feb 2004 JTF-6 deployment must be at the 19 November meeting with the constructing units commander.	Baker
13. Construction practices and procedures to avoid defects conference call 21 November 2003	All
14. Organ Pipe NM Temp Vehicle Barrier EA, copy to GSRC	(b)(6)
15. Trade information on ROE formats	
16. Rent 6" forms for next JTF-6 deployment	

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

ACTION		RESPONSIBLE
Environmental Working Group		
1. Mitigation costs possible from BA to be provided to (b)(6)	(b)(6)	(b)(6)
2. The Naco-Douglas Corridor SEA internal review comments by 7 November. GSRC will revise the preliminary final and submit the final and FONSI to HQ CBP for staffing 24 November. Final EA and signed FONSI for 30 November.		All
3. Tucson checkpoint (b)(7)(E) - GSRC still needs some information from (b)(6) (Ajo) regarding strategic enforcement reasons the checkpoint needs to be relocated		(b)(6)
4. Letter drafted to USF&WS Phoenix Field Office for CBP signature regarding Yuma BO and Tucson/Yuma BA; the letter should also acknowledge the USFWS cooperation		
5. PEIS Matrix due 12 Dec. followed by 19 December 2003 conference call		
6. Naco Douglas Corridor SEA FONSI, track down and forward once signed		
7. Strategy Document for TCA NEPA Docs		GSRC

10:15 - 10:20 RVS
Monthly Report

10:20 - 10:45 MILITARY DEPLOYMENTS
Arizona National Guard

WWD - West of DGL POE

- Oregon National Guard - June 2004, 30 soldiers for two 2-week deployments
- Alaska National Guard - 15 soldiers May 2004
- Survey Crew from Idaho N.G.

Douglas Erosion Control

Tentative deployment of S. Carolina National Guard for June 2004.

Douglas Roadway West of POE

- Illinois N.G. 10 July 2004

JTF-6

LOCATION	PLANNER	START	END
NACO, AZ USBP (Patrol Roads)	(b)(6)	10-Feb	30-Mar
DOUGLAS, AZ USBP (Patrol Roads)		10-Feb	30-Mar
ORGAN PIPE, AZ, NPS (Vehicle Barriers)		15-Mar	15-Apr
NOGALES, AZ USBP (Patrol Roads)		Jul	Aug

10:45 - 11:15 ENGINEERING

Baker Eng. - updates and discussion

Douglas, Lighting (5 Miles) Split East and West of the POE, Preliminary and Final Design.

Douglas, Construction Oversight and Staking.

Douglas, 13-Miles Roadway, Preliminary and Final Design - *Actual*

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
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BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

*not
done
not tracked*

Douglas, International Ditch, Preliminary and Final Design
Naco, Lighting (5 Miles) Split East and West of the POE, Preliminary and Final Design
Naco, Primary Fencing, Preliminary and Final Design
Naco, Construction Oversight and Staking
Nogales, Construction Oversight and Staking
Nogales, Aerial West of Nogales
Nogales, Schematic Design — *intended*
Sonoita, Preliminary Design — *intended*
Permanent Survey Markers
Temporary Vehicle Barriers
Naco, 10-miles Roadway, Preliminary and Final Design *60% intended 13 Jan 2004*
Nogales, 1-1/2 Miles Roadway, Final Design *completed but for intended review 13 Jan 2004*

11:15 – 12:00 ENVIRONMENTAL
GSRC - updates and discussion

PEIS Tucson & Yuma (AERC 225)
Checkpoints (b)(7)(E) AERC 499
Checkpoint - [REDACTED] (AERC 227)
Nogales BPS (AERC 503)
BA – Operations – Tucson & Yuma (AERC 51)
Naco-Douglas SEA (AERC 218)
FONSI signed 17 November
Nogales Infrastructure EA (AERC #255 & 218 ENV #225)
The FONSI for the Nogales Various Infrastructure Improvements final EA
was signed on 17 October.
Douglas Whitewater Draw
Sonoita
Nogales Schematic Design
Temporary Vehicle Barriers (Nogales & Sonoita Stations)
Naco BA
Douglas Dip 5 (report complete)

12:00 – 1:00 LUNCH

1:00 – 1:30 REAL ESTATE
USACE – (b)(6)(b)(7)(C)

Douglas Lighting (5 Miles) Split East and West of the POE
Douglas, 13-Miles Roadway (8 miles west & 5 miles east)
Douglas, International Ditch
Naco, Lighting (5 Miles) Split East and West of the POE
Nogales, 2-Miles Roadway
First ½ mile – ROEs 9work within 60'
1-½ miles - Construction & ROW Acquisition
Nogales, Schematic Design
Sonoita, Preliminary Design and Coordination
Permanent Survey Markers
Temporary Vehicle Barriers

Western Region – (b)(6)

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

Report on costs and viability of acquiring additional real estate near Ephraim Ridge
Ephraim Ridge ROEs for surveys and construction access

finding requested Basant

1:30 – 1:45 PROCUREMENT
BOM for JTF-6 Deployment 10 February 2004

1:45 – 2:00 OTHER ITEMS

NEXT MEETINGS

13 January 2004 – Tucson Station, 10:00 am
17 February 2004 – HDR Phoenix, 10:00 am
23 March 2004 – Tucson Station, 10:00 am
27 April 2004 – HDR Phoenix, 10:00 am
25 May 2004 – Tucson Station, 10:00 am
22 June 2004 – HDR Phoenix, 10:00 am
27 July 2004 – Tucson Station, 10:00 am
24 August 2004 – HDR Phoenix, 10:00 am
14 September 2004 – Tucson Station, 10:00 am

*day after
pres. day -
do we need
to move it?*

FY04 TUCSON SECTOR DEPLOYMENTS

Task Name	Duration	3rd Quarter			4th Quarter			
		Feb	Mar	Apr	May	Jun	Jul	Aug
Naco and East of POE Douglas Large Deployment Split	35 days							
JTF-6 NACO, AZ USBP (Patrol Roads W. of POE)	35 days							
JTF-6 DOUGLAS,AZ USBP (Patrol Roads E. of POE)	35 days							
ORGAN PIPE - National Park Service	22 days							
JTF-6 ORGAN PIPE, AZ, NPS (Vehicle Barriers)	22 days							
Nogales First 1/2 Mile Roadway	20 days							
JTF-6 (Patrol Roads)	20 days							
Douglas White Water Draw - West of POE	38 days							
Oregon National Guard 2 - 2 week deployments	20 days							
Alaska National Guard	10 days							
Idaho National Guard - Survey Crew	10 days							
Douglas Erosion Control West of POE	10 days							
S. Carolina National Guard	10 days							
Douglas Roadway West of POE	10 days							
Illinois National Guard	10 days							

Task	Task Split	Task Progress	Milestone	Summary	Project Summary	External Tasks		
						External Milestone		
						Deadline		



①

Tucson PPT-mtg 12/9/03

Action Items

- 1) Graham Edge - report done - would not transport - needs to return
- 2) MOC - BOP - ~~season~~ SOW done yesterday
- 3) GSA - SA RIS, Security, etc - draft ~~last~~ SOW done - action null
- 4) Nogales Field plans 1/2 mile or 2 miles
- 5) SWPPP - station coordination w/ Kliffelder - need engineering group 8:00 ^{labor} Call
Henderson Friday @ 8:00 am
- 6) SWPPP training - Calif. Content - getting costs
- 1st part of February - Friday
- 7) Fill material source in Nogales in Fort Defiant 48 yds ^{area}
- 8) WWP Foundation - Baker
- Oklahoma cancelled
- 9) (b)(6) - got plans
- 10) Baker comments still pending
- 11) Anticipated comments
- 12) 2/10/04 JTF-6 was at 11/19/03 - reporter take at meeting
~~needs~~ needs to be at January meeting 1/22/04 @ 8:00 am
- 13) Copy call 11/21/03 on procedure, cost, etc. practices
- 14) Organ pipe
- 15) Unit 6" pass need to check on # of feet of - Calvin has 200 ft. in AT.
- 15) DOE permits started OFAT - concerns at Water Region

Meeting EWG

- 1) Mitigation costs being worked on
- 2) Naco (Douglas SEA - FANSE
- 3) VIMS -
- 4) 31 Dec letter out
- 5) Nix copy call
- 7) Study DOE for work

ROS

no monthly report

Stop work order because GSA control in dispute
Control ~~has~~ doesn't meet contractor





(2)

Military Requirements

Cal Hoge now ANS POC right to 8/06

- Requirements

Alaska in 1st 2 week in May

Idaho - Governors

ILINW - 10-24 July

Dec 26-30 on site meeting w/NG in Douglas

WWD, excise project, Ballads, low water avn

JTF-6 - Naco roads

- Douglas - roads

Organic

Hogley - possible ANS could assist

Engineering

Duke -

Douglas slightly not clarity

- Constitution " "

13 miles - Fendley

1.5 miles @ 100% JTF6

4 miles w/NG @ 93% ANS

100% due 13 Jan 08

Environmental study

N

(b) (6) drawings

Enumerated

BEES return

✓ ports TDA current 12/21

✓ port 85 send out this or next week

Hogley Done

GA next week

Naco Douglas SEA & structures PO

Douglas WWD mitigation

Sonoma - needs POEs

Hogley return " "

White basis - needs locations

50 miles split between

Aio, Naco, Sonoma, etc

BW1 FOIA CBP 007578

13 Jan 03





3

Naco btt - meeting today
Douglas trip 5 report done but meeting
Action ~~Item~~ ^{Item} PEIS meeting
- ROES Sonoma & Napa

Real Estate

Napa's lights - nothing done
" Pauls ROE's ~~not done~~ ^{not done} can come back in
Napa's schedule
Sonoma meeting in Feb w/ Forest Service
Contact property this week
Napa's 3 1/2 miles construction now - ED owners
1 1/2 miles Roadway get info stated.

Procurement

not spoken w/ (b)(6)

Date: 12/4/2003 11:06 AM

Sender:

To:

(b)(6)

bcc:

Priority: Normal

Subject: TCA PDT EWG Meeting Agenda for 9 December

<<120903EWGad.pdf>> <<MAP.pdf>>

(b)(6)

Senior Project Manager

(b)(6)



MAP.PDF



120903EW.PDF

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR U.S. BORDER PATROL**

MEETING AGENDA

Meeting Date and Time: 9 December 2003 – 8:30

Meeting Location: HDR Phoenix

MEETING PURPOSE

TCA PDT Environmental Working Group Meeting

INTRODUCTIONS

1. REVIEW OF ACTION ITEMS

ACTION		RESPONSIBLE
Environmental Working Group		
1. Mitigation costs possible from BA to be provided to (b)(6)	(b)(6)	(b)(6)
2. Tucson checkpoint (b)(7)(E) - GSRC still needs some information from (b)(6) (Ajo) regarding strategic enforcement reasons the checkpoint needs to be relocated		
3. Letter drafted to USF&WS Phoenix Field Office for CBP signature regarding Yuma BO and Tucson/Yuma BA; the letter should also acknowledge the USFWS cooperation		
4. PEIS Matrix due 12 Dec. followed by 19 Dec conference call.		GSRC
5. Strategy Document for TCA NEPA Docs		GSRC

2. SUMMARY OF NON-PDT ACTIVITIES (REGIONAL)

- a. PEIS Tucson & Yuma (AERC 225)
- b. RVS for TCA (AERC 255) *done*
- c. Rescue Beacons (AERC 497)
- d. Checkpoints (b)(7)(E) (AERC 499)
- e. Nogales BPS (AERC 503) - FONSI Signed
- f. BA – Operations – Tucson & Yuma (AERC 51)

3. SUMMARY OF PDT ACTIVITIES (INFRASTRUCTURE)

- a. Naco-Douglas SEA (AERC 218) – FONSI Signed
- b. Sonoita Station Roadways
- c. New Items

5. NEXT MEETING

13 January 2004 – Tucson Station, 8:30 am





(1)

Tocam PDT - EWE Meeting 12/9/03

Mitigation - in progress

- a lot of secondary cats
- the land -

- need EA + Real Estate Gato

USPL - probably good idea

Can waste work

Xeroxage

land purchase

Education

Hot water pipes & water ~~stop~~ on demand

Check points needed purpose & need to stay

PEES Meeting - Dec 12/12/03

Tucson PEES

ROS Tucson - included in Nogales chapter

Leave reasons - on TOW ~~there~~ is pending

Checkpoints on (b) (7)(E) extended to 12/21 for public comment

Nogales - ROS

BA questions being raised

transfer ROS activities to ROS - liability issues

A/O ROS need ROE's

Cabana Smith - annual report per report

Naco Nogales - signed - BA to be discussed w/ F&WS

Prognosis of SHPO - has been recommended to continue 106 process

SWIP for Naco Nogales - BAFEX to develop

Concrete Station Roadways - need ROE's may still be needed





(2)

~~Page - 449~~ 12/9/03

Action Item

(b)(6) e-mail on mitigation efforts

USF&WS letter on 12/21/03

Comps call 12/16/03 @ 7:00

HERC call w/ H

SLAPP at PDT meeting

December 2003 Arizona Environmental Actions Report

Aerc Number: 218

DOCUMENT ENV Number new action

Action Type: Survey

**Document
Title:**

Cabeza Prieta National Wildlife Refuge (NWR) Road Improvements

**Project
Actions:**

5 miles of post action surveys and 18 miles of new road construction and improvements on NWR

**Project
Details:**

USBP graded about 5 miles of road without prior surveys. Post action report to document no activities outside existing road (a maintenance operation CATEX). Area within home range of Sonoran pronghorn antelope(USFWS).

**Current
Status
Summary:**

Field reconnaissance to occur week of 22 September; field surveys 2 weeks after; document circulated for review.

Draft:

Aerc Number: 218

DOCUMENT ENV Number new action

Action Type: Survey

Final:

FONSI:

ROD:

NOI:

NOA:

Scoping:

Preliminary
Draft:

AERC / USACE
Review Dates:

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 218

DOCUMENT ENV Number new action

Action Type: EA

Document Title: EA for Temporary Vehicle Barriers in Tucson, Nogales and Sonoita Stations

Project Actions: Installation of Temporary Vehicle Barriers, Tucson Sector

Project Details: Installation of barriers at high traffic areas anywhere within the Tucson Sector at various locations along a 50-mile corridor - no cultural surveys or biological resources surveys are expected.

Current Status Summary: NTP issued, reconnaissance to identify sensitive areas and markings to identify off-limits areas based on sensitive resources to occur in beginning of November 2003.

Draft:

Final:



Aerc Number: 218

DOCUMENT ENV Number new action

Action Type: EA

FONSI:

ROD:

NOI:

NOA:

Scoping:

**Preliminary
Draft:**

**AERC / USACE
Review Dates:**

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 218

DOCUMENT ENV Number new action

Action Type: EA

Document Title: EA for 10 miles of road construction in Nogales Station, Santa Cruz County, AZ

Project Actions: 10 miles of roads in Nogales Station AO.

Project Details: 5 miles of major road construction and improvements on either side of Nogales POE and up to 500 ft. north of the international border.

Current Status Summary: NTP issued, work needs ROE's prior to beginning surveys.

Draft:

Final:



Aerc Number: 218

DOCUMENT ENV Number new action

Action Type: EA

FONSI:

ROD:

NOI:

NOA:

Scoping:

Preliminary
Draft:

AERC / USACE
Review Dates:

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 218

DOCUMENT ENV Number new action

Action Type: EA

Document Title: EA for 27 miles of Road Improvements Sonoita Station, Santa Cruz County, AZ

Project Actions: 27-miles Road improvements EA, Sonoita Station

Project Details: Road grading with some repair and installation of drainage structures. Most of the work is on National Forest Service land.

Current Status Summary: NTP issued, work needs ROE's prior to beginning surveys.

Draft:

Final:



Aerc Number: 218

DOCUMENT ENV Number new action

Action Type: EA

FONSI:

ROD:

NOI:

NOA:

Scoping:

**Preliminary
Draft:**

**AERC / USACE
Review Dates:**

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 218

DOCUMENT ENV Number new action

Action Type: BA

**Document
Title:**

Biological Assessment for Infrastructure within the Naco- Douglas Corridor, Cochise County, Arizona

**Project
Actions:**

Biological Assessment for proposed Infrastructure in Naco Corridor. To address impacts from construction across approx. 49 miles within USBP Naco and Douglas USBP AO's.

**Project
Details:**

Satisfys the Section 7 requirements brought up in the Supplemental EA for Infrastructure within USBP Naco-Douglas Corridor, Cochise County, AZ

**Current
Status
Summary:**

The issue of water withdrawal from San Pedro Basin might affect critical habitat for 2 fish and 1 plant species. BA is being prepared to address concerns per USFWS and BLM. Water withdrawal from San Pedro Basin will be the primary issue. Ft. Huachuca and Sierra Vista have recently implemented measures to reduce water demands. USBP might have to implement similar conservation measures, which could include trucking water in from outside sources, acquiring agricultural lands for preservation, using other wetting materials for dust control, etc. (USFWS).

Draft:

Final:



Aerc Number: 218

DOCUMENT ENV Number new action

Action Type: BA

FONSI:

ROD:

NOI:

NOA:

Scoping:

Preliminary
Draft:

AERC / USACE
Review Dates:

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 218

DOCUMENT ENV Number 139 (changed from 148)

Action Type: EA

**Document
Title:**

Supplemental Environmental Assessment For Infrastructure Within U.S. Border Patrol Naco-Douglas Corridor, Cochise County, Arizona

**Project
Actions:**

Environmental Assessment for 31-mile Enforcement Zone Infrastructure System, Naco, AZ and 26 miles in Douglas, AZ. A combination of infrastructure components

**Project
Details:**

Environmental Assessment to address implementation of a 56-mile border enforcement system through a combination of infrastructure components (roads, fences and lights) in Naco and Douglas POE's. Formerly ENV 148 and one other.

**Current
Status
Summary:**

Project being coordinated through the Tucson PDT. Comments to the Preliminary Draft have been provided. Public scoping meeting held 18 November 2002. PDT decided, based on guidance from HQ, to combine Naco and Douglas into a Supplemental EA for the Naco-Douglas Corridor. Draft SEA was distributed for public review on 7 Feb 03; comment period was extended from 7 May to 30 June. PDT reviewed response matrix 23 Sept. 2003.

Pre-final sent to PDT; comments due 7 Nov 03. Final EA expected 24 Nov 03.

Draft:

Public Review Extended to June 30, 2003 by (b)(6) Letter sent by (b)(6) and USACE. PDT reviewed response matrix on 23 Sept 2003.

Final:

PFEA 7/10/03 FEA pending comment resolution
PFSEA expected mid Oct 2003
Final expected 24 Nov 03

Aerc Number: 218

DOCUMENT ENV Number 139 (changed from 148)

Action Type: EA

FONSI:

ROD: N/A

NOI: N/A

NOA: 5/7/2003

Scoping:

Preliminary Draft: Naco-Douglas EAs combined into one; Due 3-12-03

AERC / USACE Review Dates: PDEA 3/13/03 to 3/26/03; DSEA released 5/7/2003

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 498/497

DOCUMENT ENV Number not assigned yet

Action Type: EA

Document Title: EA For Installation and Maintenance of 10 Rescue Beacons on the Tohono O'odham Nation

Project Actions: Formerly part of Desert Grip II (ENV 145), Desert Grip (an operations related action) separated into 6 separate EA's including ENV 226, 227, 228 and others TBA. Beacons (AERC #497) off the TON (ENV 227) FONSI signed 19 June 2003

Project Details: EA for Ten Rescue Beacons on the Tohono O'odham Nation, USBP Tucson Sector, AZ

Current Status Summary: Preliminary draft complete. Tohono O'odham council has objected to the beacons so the draft has not been released yet.
On Hold

Draft: Holding due to pending discussions with the Nation.

Final:

Aerc Number: 498/497

DOCUMENT ENV Number not assigned yet

Action Type: EA

FONSI: See Summary

ROD: NA

NOI: N/A

NOA: pending

Scoping: NA

**Preliminary
Draft:** 30-May-03

**AERC / USACE
Review Dates:** 6-Jun-03

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 499

DOCUMENT ENV Number TBA

Action Type: EA

**Document
Title:**

EA for the Operation of Three Temporary Checkpoints on the (b) (7)(E) USBP Casa Grande Station, Arizona

**Project
Actions:**

Temporary USBP Checkpoints on the (b) (7)(E) in the Tucson Sector and Ajo and Casa Grande AO's.

**Project
Details:**

1 of 2 EA's began as 4 checkpoints in Tucson Sector and part of Desert grip II. These checkpoints occur along (b) (7)(E) and County Roads (b) (7)(E) within the (b) (7)(E)

**Current
Status
Summary:**

The Draft Temporary Checkpoint EA off the (b) (7)(E) went out 7 July to the public. (b) (7)(E) checkpoint comments due 7 August 2003. The preliminary Draft EA for the checkpoints on the (b) (7)(E) has been completed, but we are waiting for approval from the (b) (7)(E) to release it to the (b) (7)(E). Both of these EAs were conducted under AERC # 499.

Draft submitted for review on (b) (7)(E) 5 Sept 2003. Pending approval by (b) (7)(E) Council.

Pending (b) (7)(E) Council decision; Public review on (b) (7)(E) extended 30 days; Comment period to close 17 Nov 03.
The council is still reviewing the issue. Their fear is that additional roads might be constructed to circumvent the checkpoints.

Draft:

pending

Final:

Aerc Number: 499

DOCUMENT ENV Number TBA

Action Type: EA

FONSI:

ROD: N/A

NOI: N/A

NOA: On hold until uses issues are resolved on the (b) (7)(E)

Scoping: N/A

Preliminary Draft: The preliminary draft EA for one temporary checkpoint off the (b) (7)(E) submitted for internal review; Submitted to (b) (7)(E) 15 Sept 2003.

AERC / USACE Review Dates: Went out with comments due 14 August 2003.

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 225

DOCUMENT ENV Number 90

Action Type: PEIS

Document Title:

Programmatic Environmental Impact Statement for USBorder Patrol Activities within the Border Areas of the Tucson and Yuma Sectors, Arizona

Project Actions:

Programmatic EIS and Associated Tasks - USBP Yuma and Tucson Sectors, AZ (DO 007)

Project Details:

Programmatic Environmental Impact Statement for USBP Yuma and Tucson Sectors - focus is on expansion of operations. Initial draft was sent out with defined infrastructure construction projects included and confused everyone. Document restructured.

Current Status Summary:

Realigned document to focus on operations and the types of infrastructure needed for them. Initial public impression was that the USBP planned to have the border completely fenced and leveled. Programmatic evaluation of daily operations for both sectors, includes air reconnaissance, SAR, checkpoints, dragging roads, patrols (particularly off-road).

Public comments resulted in revision of document to remove specific references to actual infrastructure projects, to go back to what was stated in the public scoping announcement. Revised Preliminary Draft PEIS reviewed by PDT EWG 20-21 August 2003; Revised document distributed for review and comments due 29 October 2003.

Internal comments on final revision extended to 29 Oct 03. Comment matrix for review by participants to be prepared in 2-3 weeks; conference call to be held to discuss the matrix, date for the call to be set at the December 9, 2003 PDT meeting, matrix due 12 December.

Draft:

During a 22 April 2003 conference call it was decided to issue a revised draft PEIS that only address potential infrastructure in a cumulative manner. GSRC was tasked with preparing a comment resolution letter informing recipients of the USBP's decision. GSRC prepared and submitted a draft resolution letter on May 17, 2003 to (b)(6) for review. See comments on Final. The Tucson-Yuma PEIS revised draft went out 15 July. Comments due 7 August. The EWG conference in August in Phoenix to discuss any unresolved issues. Dates for the meeting are 20 & 21 August (the next PDT meeting is 19 August in Phoenix). HDR was assigned conference set-up duties.

Comments from the 20-21 August review session are now incorporated into a new draft distributed for review; comments to be returned by 29 Oct 2003. All data previously requested must be received by that date. A copy has been given to (b)(6) USBP, for CBP review.

No CBP comments been received; CBP will provide review before document is released to the public.

Aerc Number: 225

DOCUMENT ENV Number 90

Action Type: PEIS

Final: Should be released early next year?

FONSI: N/A

ROD:

NOI: 01-Sep-00

NOA: 11/18/2002

Scoping: Oct-Nov 2000

**Preliminary
Draft:** 4 preliminary drafts to date

**AERC / USACE
Review Dates:**

extended to 14 Feb; Current version internal review period ends 29 Oct 2003

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 51

DOCUMENT ENV Number Yuma: 40, 141, 186 Tucson: 38

Action Type: BA

**Document
Title:**

Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors, AZ

**Project
Actions:**

Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors, AZ (DO 043) ENV. # Yuma= 40, 141, 186 / Tucson= 38; AKA Tucson Sector BA

**Project
Details:**

Two Biological Assessments for USBP Daily Operations; one in Tucson(ENV 38) and one in Yuma(ENV 186) Sectors; consultation shifted from Phoenix to Tucson USFWS office and additional species requested by FWS Tucson office.

**Current
Status
Summary:**

FWS pushing for critical habitat designation for jaguar in Nogales/Sonoita areas - will have an impact on USBP projects if successful (USWFS).

According to (b)(6) at USFWS, we are at the top of the list once they complete the BO's for the military remanded BA's. FWS owes us a letter requesting an extension. Tucson BA being revised for changes in PEIS. Final QA/QC by USACE expected by 17 Nov 03.

Draft:

Yuma--9/27/02; Tucson 10/24/02. (b)(6) has not completed the Draft BO for the Yuma Sector as of 6/12/03. Internal review 3 July 03. Internal comments due 25 July 03. Conference call scheduled 14 August. Pending BO from USF&WS in Yuma and Tucson.

Document submitted to FWS week of 1 Dec 2003; conservation measures were identified and costs estimates were provided by USACE (b)(6) to PDT for review.

Final:

Revised Final BA expected by the end of October for Tucson Sector
Need Draft BO from Phoenix office FWS to complete Yuma Sector; final BA was accepted in January 2003.

Aerc Number: 51

DOCUMENT ENV Number Yuma: 40, 141, 186 Tucson: 38

Action Type: BA

FONSI: N/A

ROD: N/A

NOI: N/A

NOA: N/A

Scoping:

**Preliminary
Draft:**

**AERC / USACE
Review Dates:**

19 Nov 2003 by USACE (b)(6)

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

**Recommendations to the Tucson Sector Project Development Team
Regarding the NEPA Approach to Identified Projects**

Project	Recommendation	Start Date	Reason
Site Specific Projects			
Douglas Station			
<ul style="list-style-type: none"> • 14 miles of primary fence • 9 miles of secondary fence • 24 miles of all-weather patrol road • 14 miles of primary fence maintenance road • 7.8 miles of drag roads • 28 low water crossings • 6 miles of permanent lighting 	Site specific Environmental Assessment (EA)	FY-04	These projects have been addressed in the Naco-Douglas 2003 Supplemental EA. The following items need to be obtained in order to proceed: SHPO concurrence, SWPPP, 404 NWP permit notification
Naco Station			
<ul style="list-style-type: none"> • 8.4 miles of primary fence • 9 miles of secondary fence • 8.2 miles of vehicle barrier • 19.7 miles of all-weather patrol road • 7 miles of all-weather maintenance road • 8.4 miles of primary fence maintenance road • 5 miles of drag roads • 32 low water crossings • 7 miles of permanent lighting 	Site specific EA	FY-04	See above. Also, a BA and Section 7 consultation might be required for activities in the San Pedro watershed or if water is withdrawn from the basin.
Sonoita Station			
<ul style="list-style-type: none"> • 27 to 32 miles of border and access road improvements • installation of temporary vehicle barriers 	Site Specific EA combining both projects	FY 04	This project can be addressed by a single site specific EA because there are no other actions planned in the same general area with in the next 2-3 years. The temporary vehicle barriers will be addressed as a separate EA, since they will encompass areas within several stations' AO, but they will also need to be addressed in the road improvements project.
<ul style="list-style-type: none"> • 10 miles of major patrol road construction and primary fence 	Site specific EA	FY 05	This project consists of new road construction along the border for 4 miles west of the POE and 6 miles east of the POE, beginning 2 miles east of the POE. This project requires a site specific EA because construction would be major and involve up to 500-ft wide corridor.

**Recommendations to the Tucson Sector Project Development Team
Regarding the NEPA Approach to Identified Projects**

Project	Recommendation	Start Date	Reason
Ajo Station			
• Proposed expansion of Ajo Station	Site specific EA	To Be Determined	This project is in the initial planning stage. An EA should be prepared for this project since it will encompass at least 5 acres. There is also a possibility of impacts to CFPO critical habitat.
• Installation of 10 RVS sites (TD 135)	Site specific EA	FY-04	This project will require a site-specific EA tiered to the Western Region RVS PEA; some access road improvements might be required
Tucson Station			
• Installation of 13 RVS sites (TD 129 & 136)	Site specific EA	FY-04	This project will require a site-specific EA tiered to the Western Region RVS PEA; some access road improvements might be required

Updated 12/08/03

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 19 August 2003 8:30
Meeting Location: Phoenix – Mountain Shadows Resort (Marriott)
<http://www.mountainshadows.net/index.html>

MEETING PURPOSE

TCA PDT Environmental Working Group Meeting

INTRODUCTIONS

1. REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Under NOI on data base add where available	HDR
2. Nogales BPS (AERC #503 ENV #220) due out 25 July – Comments due back 15 August 2003	All
3. Tucson BA comments due by 25 July	All
4. Tucson-Yuma PEIS revised draft internal review comments due 1 August – conference in phoenix scheduled 20 & 21 August 2003	All
5. Conference call on comments for Naco-Douglas DSEA	(b) (6)
6. SOW for GSRC to look at Cabeza Prieta NWR	HDR

Changes 8/29/03
(b)(6) AEC
Nogales

9/15/03

2. SUMMARY OF NON-PDT ACTIVITIES (REGIONAL)

- a. PEIS Tucson & Yuma (AERC 225)
- b. RVS for TCA (AERC 255)
- c. Rescue Beacons (AERC 497)
- d. Operation Desert Grip (AERC 497/498)
- e. Checkpoints (b)(7)(E) (AERC 499)
- f. Nogales BPS (AERC 503)
- g. BA – Operations – Tucson & Yuma (AERC 51)

3. SUMMARY OF PDT ACTIVITIES (INFRASTRUCTURE)

Review all actions pending on chart - add/delete/change –

- a. Naco-Douglas SEA (AERC 218)
- b. Nogales Infrastructure EA (AERC #255 & 218 ENV #225)

4. SUMMARY OF DHS ACTIVITIES (HQ)

5. SUMMARY OF ITEMS TO BE PRESENTED TO THE PDT

6. NEXT MEETING

23 September 2003 – Tucson Station – USBP, 8:30 am

ACTION Type **EIS**

DOCUMENT ENV Number 90

90

**DOCUMENT
TITLE**

Programmatic Environmental Impact Statement for USBP Yuma and Tucson Sectors

PROJECT

EIS and Associated Tasks - USBP Yuma and Tucson Sectors, AZ (DO 007)

PROJECT DESCRIPTION

(b)(6) Programmatic Environmental Impact Statement for USBP Yuma and Tucson Sectors

SUMMARY

Public comments resulted in revision of document to remove infrastructure. Revised Preliminary Draft PEIS distributed for internal review 18 July 03 comments due 8 Aug 03.

AERC POC

(b)(6)

DHS REGIONAL POC

USACE POC

DHS FAE POC

CONTRACTOR POC

USBP POC

CONTRACTOR

Gulf South Research Corporation

NO1

01-Sep-00

NOA

11/18/2002

Scoping

Oct-Nov 2000

Preliminary Draft

4 preliminary drafts

Reviewed Date

extended to 14 feb

27 August

DRAFT

During a 22 April 2003 conference call it was decided to issue a revised draft PEIS that only address potential infrastructure in a cumulative manner. GSRC was tasked with preparing a comment resolution letter informing recipients of the USBP's decision. GSRC prepared and submitted a draft resolution letter on May 17, 2003 to (b)(6) for review. See comments on Final

FINAL

The Tucson-Yuma PEIS revised draft went out 15 July. Comments due 7 August. The EWG conference in August in Phoenix to discuss any unresolved issues. Dates for the meeting are 20 & 21 August (the next PDT meeting is 19 August in Phoenix). HDR was assigned conference set-up duties.

FONSI

(b)(6)

	N/A
--	-----

ROD

ACTION Number 20AERC Project Number 255STATE AZACTION Type EADOCUMENT ENV Number 225

(b)(6)(b)(7)(C)

DOCUMENT
TITLE*EA for
Nogales infrastructure improvements, Tucson Sector
Nogales Station, Satalung, AZ*

PROJECT

Nogales Infrastructure Improvements (INS AERC--GSA Contract Order No. DACA63-02-F-0207)

PROJECT
DESCRIPTION

Combination of Nogales infrastructure and RVS projects. 18 RVS, 60 Portable lights. 1 mi. fence and 2mi road east of Nogales POE.

SUMMARY

Draft EA submitted for public comment on May 9, comment period extended to 30 June, See AERC # 218 RVS for TCA (AERC #255 ENV #225)
One EA was prepared for Naco and Douglas, FONSI issued. One EA was prepared for the Crawford Hill relay tower in Nogales, FONSI issued. The remaining Nogales RVS sites were rolled into the Nogales Various Infrastructure EA, after both the RVS and the Various Infrastructure EAs had been developed.

AERC POC

(b)(6)

DHS REGIONAL POC

(b)(6)

USACE POC

DHS FAE POC

CONTRACTOR POC

USBP POC

CONTRACTOR

Gulf South Research Corporation

NOI

N/A

NOA

Nogales Draft 5/9/03

Scoping

N/A

Preliminary Draft

25-Apr-03

Reviewed Date

2-May-03

DRAFT

Draft EA submitted for public comment on May 9, comment period extended to 30 June,

Cultural resources report in

(b)(6)

FINAL

pending comment resolution. comment resolution matrix and/or preliminary Final EA are expected by 1 August 2003.

FONSI

see summary

ROD

N/A

*Due 8/20/03
Due in early September, 2003*

ACTION Number	2	AERC Project Number	255	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number	94 102		
DOCUMENT TITLE					
PROJECT	RVS for USBP Tucson Sector (DO 050) AERC # 255				
PROJECT DESCRIPTION	Environmental Assessments for RVS sites in Naco, Douglas and Nogales Stations				
SUMMARY	Naco and Douglas: Final EA and FONSI signed 01/07/03. (ENV 94) Crawford Hill EA FONSI signed 11/08/02 (ENV 102) Nogales:RVS combined with Nogales infrastructure EA. See ENV 225 Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC			DHS FAE POC		
CONTRACTOR POC			USBP POC		
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	Naco (Draft) 10/01/02; Naco (Final) 01/24/03; Crawford Hill (Draft) 10/22/02; Crawford Hill (Final) 11/15/02.				
Scoping	N/A				
Preliminary Draft	Naco-PDEA submitted 07/08/02; Nogales-PDEA submitted 08/13/02; Crawford Hill-PDEA submitted 09/18/02.				
Reviewed Date	Naco-DEA public review from 9/30/02 to 10/30/02; Crawford Hill public review from 10/22/02 to 11/06/02.				
DRAFT	Naco-DEA submitted 09/25/02; Crawford Hill DEA submitted 10/02/02.				
FINAL	Naco-PFEA submitted 11/05/02; Naco-Revised PFEA submitted 11/13/02; Naco-FEA submitted 01/03/03; Crawford Hill-PFEA submitted 10/30/02; Crawford Hill-FEA submitted 11/13/02.				
FONSI	Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02				
ROD	N/A				

ACTION Number

4

AERC Project Number 497

STATE

AZ

ACTION Type EA

DOCUMENT ENV Number 226 T

*Corrected*DOCUMENT
TITLE

PROJECT

EA for Rescue Beacons - Tucson/Yuma Sectors

PROJECT
DESCRIPTION

EA for placement and operation of rescue beacons to aid in rescue of UDA's who face death or severe dehydration.

SUMMARY

Divided into two EA; one EA complete for 8 beacons off the Tohono O'odham Nation on BLM, Cabeza Prieta Nat'l Wildlife Refuge, Organ Pipe Cactus Nat'l Monument (ENV 226). The other EA for 10 Beacons on T.O.N. is held up in negotiations with TON (see ENV TBA)

AERC POC

(b)(6)

DHS REGIONAL POC

(b)(6)

USACE POC

DHS FAE POC

CONTRACTOR POC

USBP POC

CONTRACTOR

Gulf South Research Corporation TO0079

NOI

N/A

NOA

5/16/2003

Scoping

N/A

Preliminary Draft

Reviewed Date

extended to June 16, 2003

DRAFT

The review period ended on June 10, 2003.

FINAL

See ENV # 226

FONSI

Anticipate the FONSI being signed no later than June 20, 2003.

ROD

N/A

ACTION Number

22

AERC Project Number

498/497

STATE

AZ

ACTION Type

EA

DOCUMENT ENV Number

227 T

DOCUMENT
TITLE

PROJECT

EAs are part of Operation Desert Grip II and Rescue Beacons for Tucson/Yuma Sectors. See ENV # 228 & 145

PROJECT
DESCRIPTION

Preliminary Draft EA for Ten Rescue Beacons and Four Temporary Camp Details on the Tohono O'odham Nation USBP Tucson Sector, AZ

SUMMARY

This document was separated from the original due to delays on the Nation. To accommodate the other portions of the project, these were separated out. EA for four temporary camp details on Tohono O'odham nation, Tucson sector. Operation Desert Grip (AERC #497 & #498 ENV #145 & #228) The USACE is responsible for producing and mailing CDs of the Final document to the large number of individuals who submitted form letters for Operation Desert Grip, Naco-Douglas Corridor and Nogales Infrastructure EAs. Desert Grip II out as FEA with, FONSI 18 July 2003

AERC POC

N/A at this time

DHS REGIONAL POC

USACE POC

(b)(6)

DHS FAE POC

CONTRACTOR POC

USBP POC

(b)(6)

CONTRACTOR

Gulf South Research Corporation

NOI

N/A

NOA

pending

Scoping

NA

Preliminary Draft

30-May-03

Reviewed Date

6-Jun-03

DRAFT

Holding due to pending discussions with the Nation. This will go to the TON public for five days.

FINAL

Rescue Beacons (AERC #497) The Emergency Rescue Beacons off the TON (ENV #227) has been completed, FONSI issued 19 June 2003. GSRC prepared a separate EA for the beacons on the TON, and is awaiting approval from the TON (ENV #TBA). Both of these EAs are under AERC # 497

FONSI

See Summary

ROD

NA

ACTION Number

5

AERC Project Number

499

STATE

AZ

ACTION Type

EA

DOCUMENT ENV Number

227 T

DOCUMENT
TITLE

PROJECT

Temporary USBP Checkpoints on the (b) (7)(E) in the Tucson Sector and Ajo and Casa Grande AO's.

PROJECT
DESCRIPTION

EA for placement and operation of three temporary USBP checkpoints on the (b) (7)(E)

SUMMARY

EA is being completed for four checkpoints (three on the (b) (7)(E)). Checkpoints used to identify and apprehend any UDAs or drug traffickers. These checkpoints occur along (b) (7)(E) and County Roads (b) (7)(E) within the (b) (7)(E). The Draft Temporary Checkpoint EA off the (b) (7)(E) went out 7 July to the public. (b) (7)(E) checkpoint comments due 7 August 2003. The preliminary Draft EA for the checkpoints on the (b) (7)(E) has been completed, but we are waiting for approval from the (b) (7)(E) to release it to the (b) (7)(E). Both of these EAs were conducted under AERC # 499.

AERC POC

(b)(6)

DHS REGIONAL POC

(b)(6)

USACE POC

DHS FAE POC

CONTRACTOR POC

USBP POC

CONTRACTOR

Gulf South Research Corporation DACA63-00-D-0004 T.O. (082)

NOI

N/A

NOA

On hold until uses issues are resolved on the (b) (7)(E)

Scoping

N/A

Preliminary Draft

On hold

Reviewed Date

DRAFT

The preliminary draft EA for one temporary checkpoint off the (b) (7)(E) will be submitted for internal review

FINAL

on hold pending action by (b) (7)(E)

FONSI

ROD

N/A

ACTION Number

6

AERC Project Number

503

STATE

AZ

ACTION Type

EA

DOCUMENT ENV Number

220

DOCUMENT
TITLE

EA/Phase I Environmental Site Assessment for the Purchase of 30 Acres of Property

PROJECT

EA/EBS

PROJECT
DESCRIPTION

Nogales BPS. Purchase of 30 Acres of Property

SUMMARY

EA/Phase I Environmental Site Assessment for the Purchase of 30 Acres of Property ENV # 503 & 220 Purchase of warehouse and land currently under lease in Nogales. The Phase I ESA is in the final stages.

AERC POC

N/A at this time

DHS REGIONAL POC

USACE POC

(b)(6)

DHS FAE POC

CONTRACTOR POC

USBP POC

(b)(6)

CONTRACTOR

Gulf South Research Corporation TO0080

NOI

N/A

NOA

Scoping

N/A

Preliminary Draft

Due 12 May 03

Reviewed Date

DRAFT

Nogales Station Draft EA came off the public comment period on 30 June.

FINAL

GSRC expects to have a preliminary final within the next two weeks. There were issues on the ESA with WRO REO, but these have been resolved. GSRC will submit the revised SEA for the Nogales Station NLT August 1. The expanded record search did not reveal any additional sites beyond the original record search.

FONSI

ROD

N/A

County doc
29 August 2003

ACTION Number	1	AERC Project Number	51	STATE	AZ
ACTION Type	BA	DOCUMENT ENV Number	40, 14		
DOCUMENT TITLE					
PROJECT	Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors, AZ (DO 043) ENV. # Yuma= 40, 141, 186 / Tucson= 38				
PROJECT DESCRIPTION	Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors				
SUMMARY	(Yuma ENV #40, #141, & #186 Tucson #38) The Tucson BA was shipped out 3 July. The EWG agreed to have the comments back by 25 July. The USFWS is still working on the Yuma draft BO. These 2 BA/Bos are covered under the AERC # 51.				
AERC POC	(b)(6)		DHS REGIONAL POC	(b)(6)	
USACE POC	(b)(6)		DHS FAE POC	(b)(6)	
CONTRACTOR POC	(b)(6)		USBP POC	(b)(6)	
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	N/A				
Scoping					
Preliminary Draft					
Reviewed Date					
DRAFT	Yuma--9/27/02; Tucson 10/24/02				
FINAL	(b)(6) has not completed the Draft BO for the Yuma Sector as of 6/12/03. internal review 3 july 03. Internal comments due 25 July 03. Conference call scheduled 14 August				
FONSI	N/A				
ROD	N/A				

6-17-03 Environmental Actions Report - AZ CA

ACTION Number	7	AERC Project Number	218	STATE	AZ
ACTION Type	EA	DOCUMENT ENV Number	148		
DOCUMENT TITLE	Supplemental Environmental Assessment For Infrastructure Within U.S. Border Patrol Naco-Douglas Corridor Cochise County, Arizona				
PROJECT	Environmental Assessment for 31-mile Enforcement Zone Infrastructure System, Naco, AZ (INS AERC--GSA Contract Order No. DACA63-02-F-0005)				
PROJECT DESCRIPTION	Environmental Assessment to address implementation of a 31-mile border enforcement system through a combination of infrastructure components (roads, fences and lights)				
SUMMARY	Project being coordinated through the Tucson PDT. Comments to the Preliminary Draft have been provided. Public scoping meeting held 18 November 2002. PDT decided, based on guidance from HQ, to combine Naco and Douglas into a Supplemental EA for the Naco-Douglas Corridor. Draft SEA was distributed for public review on 7 Feb 03; comment period was extended from 7 May to 30 June. BA needs to be initiated. Naco-Douglas SEA (AERC #218 ENV #139, #148 & #225) The Draft EA came off public review. A comment resolution matrix and/or preliminary Final EA are expected by 1 August 2003. See ENV. # 139				
AERC POC	N/A at this time	DHS REGIONAL POC	(b)(6)		
USACE POC	(b)(6)	DHS FAE POC	(b)(6)		
CONTRACTOR POC	(b)(6)	USBP POC	(b)(6)		
CONTRACTOR	Gulf South Research Corporation				
NOI	N/A				
NOA	5/7/2003				
Scoping					
Preliminary Draft	Naco-Douglas EAs combined into one; Due 3-12-03				
Reviewed Date	PDEA 3/13/03 to 3/26/03; DSEA released 5/7/2003				
DRAFT	Public Review Extended to June 30, 2003 by (b)(6) Letter sent by (b)(6) (b)(6) and USACE				
FINAL	PFEA 7/10/03 FEA pending comment resolution				
FONSI	Expected around 9/20/03				
ROD	N/A				

Extended to 29/August 03

ACTION Number

19

AERC Project Number

498

STATE

SW

ACTION Type

EA

DOCUMENT ENV Number

145

DOCUMENT
TITLE

PROJECT

EA, Operation Desert Grip II

PROJECT
DESCRIPTION

EA, for expansion of Operation Desert Grip (Desert Grip II)

SUMMARY

Draft submitted for 30-day public review. The review period has been extended until June 16, 2003. Divided into supplemental EA for expansion of Desert Grip (ENV 228) and Ea for temp. camp details on TON (ENV TBA)

AERC POC

N/A at this time

DHS REGIONAL POC

(b)(6)

USACE POC

(b)(6)

DHS FAE POC

(b)(6)

CONTRACTOR POC

USBP POC

CONTRACTOR

Gulf South Research Corporation TO0078

NOI

N/A

NOA

Scoping

N/A

Preliminary Draft

Reviewed Date

DRAFT

Public comment extended to 6/16/2003

FINAL

Anticipate submitting a preliminary final for internal review no later than June 30, 2003.

FONSI

ROD

N/A

Final

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 19 August 2003 10:00

Meeting Location: Phoenix – Mountain Shadows Resort (Marriott)

<http://www.mountainshadows.net/index.html>

MEETING PURPOSE

PDT Meeting

INTRODUCTIONS

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. RVS - Crawford Hill needing lease processed by Western Region	(b)(6)
2. RVS - Crawford Hill funding and RVS funds for project construction and leases	(b)(6)
3. Schedules for National Guard Deployments	Az ANG
4. Constructability Review of WWD – set for 13 August 2003 (will also discuss WWD wetland mitigation requirements)	Baker, HDR, Az ANG, & USACE
5. Union Pacific Railroad requested an updated maintenance agreement for the new gates in Nogales	(b)(6)
6. Clarification of BOM for August deployment to Naco – conference call to be arranged between (b)(6) (b)(6)	(b)(6)
7. Alternative Fence Design – comments solicited from the Stations – deadline extended until 29 July 2003	All
8. Comments and copy of the PowerPoint presentation to the PDT on 24 June 2003	(b)(6)
9. Extend the ROE with Phelps Dodge for WWD	(b)(6)

*has been processed
sent to (b)(6)*

Done

10:15 – 10:20 RVS

10:20 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

Whitewater Draw Constructability Review 13 August 2003

Deployments

- Capabilities
- Schedules
- Resources Required

Unit METL requirements

JTF-6

August Deployment to Naco

10:45 – 11:15 ENGINEERING

Nogales, Tunnels, Preliminary & Final Design

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS**

Nogales, 1/2 Miles Roadway Maintenance *complete*
Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design *quote scheduled*
Douglas, Picket Fence Extensions *completes needed*
Alternative Primary Fence Designs *no comments which would require review*
Lighting Design - Standard 1- Mile Rural Condition
FY'03 Contracts *scheduled to complete on Friday*

11:15 – 12:00 ENVIRONMENTAL

GSRC - updates and discussion
Douglas-Naco Corridor Draft SEA - *response due by 8/29, resolution 9/18*
Tucson & Yuma Biological Assessment *next 2 days - Tucson & Yuma to arrive*
Programmatic EIS *worked on next 2 days*
Programmatic MOA *on hold*
Douglas, Whitewater Draw 404 Permitting *plan revised & submitted*
Nogales, Infrastructure Improvements, DEA *— attend entitled to 8/29*
Tunnels
2-Miles Roadway
Portable Lights
Sonoita Station *— FY03 contract*
FY'03 Contracts *notice to proceed Thursday*

12:00 – 1:00 LUNCH

1:00 – 1:30 REAL ESTATE

USACE – (b)(6)
Douglas Lighting (5 Miles) Split East and West of the POE
Douglas, 4-Miles Roadway West of POE
Douglas, International Ditch
Naco, Lighting (5 Miles) Split East and West of the POE
Nogales, 2-Miles Roadway
Nogales, Construction & ROW Acquisition (Pending Alignments)
Nogales, Schematic Design
Sonoita, Preliminary Design and Coordination
Permanent Survey Markers
Temporary Vehicle Barriers
Western Region – (b)(6)
Report on costs and viability of acquiring additional real estate near Ephraim Ridge

1:30 – 1:45 PROCUREMENT

Naco Deployment

11:45 – 2:00 OTHER ITEMS

NEXT MEETINGS

23 September 2003 – Tucson Station - USBP

Tucson POT

8/19/03

AZ National Guard Schedule

Doing prep for 1 low water crossing

Meeting w/ units next week for next year

May 15th prep for WWD working on dock layout May 8

Deployments maybe coming in 04

AC unit in 05

WWD consistently revenue

Alternative force design received from 1 station

(b)(6) did not send comments or power point

10E - Phelps Dodge entered to 1 1/2 yrs

Military mission -

FORNITE - JTF-6

2 deployments in May - July 04 3rd quarter

Patrol boat in Douglas

Ephean Ridge

Low water crossing #5

NACO 2nd quarter

Engineering

Turns comments by 7/30 - no comments

Real Estate - WWD

(b)(6) - Real Estate

(b)(6) lease or purchase lands - He is receptive

62.1 acres we are leasing 75 acres

Funding for 1st quarter via 14 Q

Market surveys w/ week from GSA

Mount - water meter taken care of

Other items - Plans given to prison officials
- Loading out face exposures for boulders



communications

IMC Corporation

2011 Crystal Drive Suite 301 ♦ Arlington, Virginia 22202
phone: 703.746.0014 ♦ fax: 703.746.0260

**Remote Video Surveillance
Tucson Sector
Monthly Status Report
July 2003**

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1.1 TD 106 (b) (7)(E) Retrofit, AZ

The following table lists the tasks which are complete, in progress, or planned for the next reporting period for TD 106, (b) (7)(E) Retrofit. The overall status of this technical directive is summarized at the top of the table.

Table 1: TD 106 Summary & Task Status

106 (b) (7)(E) Retrofit				
ACT #: 14307061				
TD Award Date: 11/15/01 (Phase I, II & III); MOD 6/20/02 (Site Change)				
Number of Structures: 10 Total (b) (7)(E)				
Summary: Phase I Active: The (b) (7)(E) lease was signed by ACD on 07/28/03. IMC needs full funding to proceed with this TD.				
WBS Task	Status	Actions Accomplished	Planned Activities	Comments/Issues
Project Management				
106.1.1 Planning, Administration and Documentation				
106.1.2 Training Development				
106.1.3 Logistics Planning and Administration				
Phase I 106.2.1 Real Estate	Slipped			
Site Verification			Awaiting approval of CRF # 70, submitted 4/8/03, to install the (b) (7)(E) on (b) (7)(E) (b) (7)(E)	
Obtain ROEs				
Site Validation				
Utility Evaluation				
Plot Survey				
GeoTech Survey				

Obtain Leases or MOUs	06/09/03	(b) (7)(E) lease was signed by the Contracting Officer on 7/28/03, effective 08/01/03, per ACL.		
Obtain Zoning Approvals	07/14/03			
Obtain City/County Permits	06/16/03		Obtain City Permit for (b) (7)(E)	
Phase I 106.2.2 EAs Provide Required EA Information				
Phase I 106.2.3 Design				
Site Evaluation Report				
Project Design Plan				
Frequency Authorization				
Design Foundations				
Final Design Plan				
Phase II 106.2.1 Equipment	Slipped			
Order Equipment	08/14/02		Await approval of CRF # 69, submitted on 4/8/03, for new platforms to replace the existing platforms.	TD is not fully funded. Cannot proceed on Station or platform upgrades until funding is in place.
Deliver Equipment				
Integrate Equipment				
Test Equipment				
Ship Equipment to Site				
TD Overall Status/Revised Completion Date				Slipped - 12/15/03*

** Dates were change to update the initial start date of the schedule as 6/20/02 when (b) (7)(E) was added to this TD, ultimately postponing the original installation date by close to seven months. This TD was delayed an additional two months due to the difficulties in obtaining and funding the (b) (7)(E) lease. IMC needs to obtain full funding for this TD, including the approval of the outstanding CRFs, immediately in order to avoid further slips in the current schedule.*

1.2 TD 107 (b) (7)(E) A, AZ

The following table lists the tasks which are complete, in progress, or planned for the next reporting period for TD 107, (b) (7)(E) A. The overall status of this technical directive is summarized at the top of the table.

Table 2: TD 107 Summary & Task Status

107 (b) (7)(E) A				
ACT #: 10523454 TD Award Date: 06/29/01 (Phase I, II & III); MOD 2/13/02 (Site Change); MOD 3/01/02 (Site Change). Number of Structures: (b) (7)(E) Summary: Phase I Active: IMC is working with (b) (7)(E) SBPA (b)(6) to obtain leases for all sites. IMC is currently working on the Final Design Plan.				
WBS Task	Status	Actions Accomplished	Planned Activities	Comments/Issues
Project Management				
107.1.1 Planning, Administration and Documentation			IMC will submit CRF removing Limestone Hill site.	
107.1.2 Training Development				
107.1.3 Logistics Planning and Administration				
Phase I 107.2.1 Real Estate	Slipped			
Site Verification				
Obtain ROEs				
Site Validation				
Utility Evaluation				
Plot Survey				
GeoTech Survey				

Obtain Leases or MOUs	6/18/02	Continued working with AZ Land Development and ACL for access across State Land. Continued discussions with the (b)(6)(b)(7)(C) and ACL in regards to (b)(7)(E) and State Windmill sites.	Assist ACL in obtaining lease from (b)(6)(b)(7)(C) for (b)(7)(E) site and obtain tentative agreement from (b)(6)(b)(7)(C) for easement through their land to the (b)(7)(E) and State Windmill sites.	Correction to 07/10/03: (b)(6)(b)(7)(C) Ranch has a signed lease and is not a (b)(6)(b)(7)(C) property as previously stated in the June Monthly Report.
Obtain Zoning Approvals	7/23/02			
Obtain City/County Permits	6/25/02	SBPA (b)(6) sent a height waiver request to (b)(7)(E) County for (b)(7)(E) site.		
Phase I 107.2.2 EAs Provide Required EA Information				
Phase I 107.2.3 Design	Slipped			
Site Evaluation Report				
Project Design Plan				
Frequency Authorization				
Design Foundations				
Final Design Plan	7/2/02	Work started on FDP.	Continue to work on FDP. Integrate modular control room into FDP, if approved.	
Phase II 107.3.1 Equipment	On Hold			
Order Equipment	07/27/01		Purchase modular control room upon receipt of written directive by HQBOR.	On Hold awaiting HQBOR decision on purchase of modular control room. IMC has provided HQBOR with GSA quote for modular. Delivery interval is 60-days or more.
Deliver Equipment				

Integrate Equipment				
Test Equipment				
Ship Equipment to Site	01/24/02			
TD Overall Status/Revised Completion Date				Slipped - 01/16/04*

* TD 107 continues to slip due to the delays in obtaining leases to the (b)(5)(D)(7)(C) property and MOUs with state of AZ, BLM, and NPS. Discussions with the (b)(5)(D)(7)(C) are slow but are progressing. The delays in the leases have pushed out this TD by over 12 months and will continue to delay this project until all the leases are signed and IMC can proceed with installation.

1.3 TD 108 (b) (7)(E) AZ

The following table lists the tasks which are complete, in progress, or planned for the next reporting period for TD 108, (b) (7)(E). The overall status of this technical directive is summarized at the top of the table.

Table 3: TD 108 Summary & Task Status

108 (b) (7)(E)				
ACT #: 10526202				
TD Award Date: 07/26/01 (Phase I, II & III)				
Number of Structures: (b) (7)(E)				
Summary: Phase I Active: IMC is working with the Station to obtain leases for both sites. Work on the Final Design Plan continues.				
WBS Task	Status	Actions Accomplished	Planned Activities	Comments/Issues
Project Management				
108.1.1 Planning, Administration and Documentation			Submit CRF for antenna re-alignment of the SE of (b)(6) Ranch site. Submit CRF to switch monitoring of the TD 108 (b) (7)(E) sites to the (b) (7)(E) control room.	CRF submissions for monitoring and antenna realignment were delayed awaiting completion of current CLIN action.
108.1.2 Training Development				
108.1.3 Logistics Planning and Administration				
Phase I 108.2.1 Real Estate	Slipped			
Site Verification				
Obtain ROEs				
Site Validation				
Utility Evaluation				
Plot Survey				
GeoTech Survey				

<i>Obtain Leases or MOUs</i>	08/31/03	Continued to work with ACL and Rail America on a lease agreement.	IMC will assist ACL to file leases with the State of AZ. Continue to work with ACL to complete lease discussions with Rail America.	
<i>Obtain Zoning Approvals</i>	10/3/03			
<i>Obtain City/County Permits</i>	9/5/03			
Phase I 108.2.2 EAs <i>Provide Required EA Information</i>				
Phase I 108.2.3 Design	Slipped			
<i>Site Evaluation Report</i>				
<i>Project Design Plan</i>				
<i>Frequency Authorization</i>				
<i>Design Foundations</i>				
<i>Final Design Plan</i>	8/5/02	Work continued on FDP.	Complete and present FDP to HQBOR for approval as soon as all site and antenna changes have been approved.	IMC must obtain approval from HQBOR for the CRF changes prior to the completion and delivery of the FDP.
Phase II 108.3.1 Equipment	Slipped			
<i>Order Equipment</i>	9/19/01			
<i>Deliver Equipment</i>				
<i>Integrate Equipment</i>				
<i>Test Equipment</i>				
<i>Ship Equipment to Site</i>	2/14/02			
TD Overall Status/Revised Completion Date				Slipped – 01/16/04*

* Date based on estimated completion of lease agreements by 8/31/03.

1.4 TD 116 (b) (7)(E) Expansion, AZ

The following table lists the tasks which are complete, in progress, or planned for the next reporting period for TD 116, (b) (7)(E) Expansion. The overall status of this technical directive is summarized at the top of the table.

Table 4: TD 116 Summary & Task Status

116 (b) (7)(E) Expansion				
ACT #: 10523360				
TD Award Date: 06/25/01 (Phase I); 05/22/02 (Phase II & III)				
Number of Structures: (b) (7)(E)				
Summary: Phase I Active: TD 116 continues to slip pending approval of the revised site list submitted in CRF #74.				
WBS Task	Status	Actions Accomplished	Planned Activities	Comments/Issues
Project Management				
116.1.1 Planning, Administration and Documentation			Continue to await approval of CRF #74.	
116.1.2 Training Development				
116.1.3 Logistics Planning and Administration				
Phase I				
116.2.1 Real Estate	Slipped			
Site Verification	06/29/01			Awaiting approval of CRF #74 for Site List changes and Solar Power units submitted 5/20/03.
Obtain ROEs	10/05/01	Tracked status of ROEs.	Continue work on obtaining ROEs upon approval of CRF #74.	
Site Validation				
Utility Evaluation				
Plot Survey				
GeoTech Survey				
Obtain Leases or MOUs				

Obtain Zoning Approvals				
Obtain City/County Permits				
Phase I 116.2.2 EAs Provide Required EA Information	Slipped		Await approval of GSRC's Draft EA Report.	Draft report pending completion.
Phase I 116.2.3 Design	Slipped			
Site Evaluation Report				
Project Design Plan	5/15/02		Begin work on PDP upon approval of CRF #74.	
Frequency Authorization				
Design Foundations				
Final Design Plan				
TD Overall Status/Revised Completion Date				Slipped - TBD *

*This TD has continued to slip due to delays in the ability to verify a valid site list. This TD can not be completed prior to the installation of (b) (7)(E) Relay tower on TD 106, and the delays in obtaining the lease for that site have also created delays for TD 116. IMC cannot estimate a delivery date for the approval of the site changes on CRF #74; therefore the TD continues to slip until a valid site list can be established.

1.5 TD 129 (b) (7)(E) Station A, AZ

The following table lists the tasks which are complete, in progress, or planned for the next reporting period for TD 129, (b) (7)(E) Station A. The overall status of this technical directive is summarized at the top of the table.

Table 5: TD 129 Summary & Task Status

129 (b) (7)(E) Station A				
ACT #: 14313084				
TD Award Date: 05/20/02 (Phase I, II & III) MOD 11/26/02				
Number of Structures: (b) (7)(E)				
Summary: Phase I Active: TD 129 continues to slip pending identification of relay and monitoring locations by Tucson Sector and (b) (7)(E) Station.				
WBS Task	Status	Actions Accomplished	Planned Activities	Comments/Issues
Project Management				
129.1.1 Planning, Administration and Documentation				
129.1.2 Training Development				
129.1.3 Logistics Planning and Administration				
Phase I 129.2.1 Real Estate	Slipped			
Site Verification	5/24/02	IMC's (b)(6) continued to work with (b) (7)(E) Station and Sector to make progress on identifying a monitoring location and relay sites.	Continue to work with (b) (7)(E) Station and Sector to finalize sites.	On hold until monitoring locations and relay sites have been determined by Tucson Sector and (b) (7)(E) Station.
Obtain ROEs	8/30/02			
Site Validation				
Utility Evaluation				

Plot Survey				
GeoTech Survey				
Obtain Leases or MOUs				
Obtain Zoning Approvals				
Obtain City/County Permits				
TD Overall Status/Revised Completion Date				Slipped - 12/29/04*

*Assume 8/30/03 for Site Verification

1.6 TD 135 (b) (7)(E) Station, AZ

The following table lists the tasks which are complete, in progress, or planned for the next reporting period for TD 135, (b) (7)(E) Station. The overall status of this technical directive is summarized at the top of the table.

Table 6: TD 135 Summary & Task Status

135 (b) (7)(E) Station				
ACT #: 14313440 TD Award Date: 05/15/02 (Phase I) MOD 7/11/03 Number of Structures: 10 Total Summary: Phase I Active.				
WBS Task	Status	Actions Accomplished	Planned Activities	Comments/Issues
Project Management				
135.1.1 Planning, Administration and Documentation		CRF #62 was funded on 7/11/03.		
135.1.2 Training Development				
135.1.3 Logistics Planning and Administration				
Phase I	Slipped			
135.2.1 Real Estate				
Site Verification	5/21/02			
Obtain ROEs	8/27/02		Obtain ROEs.	
Site Validation				
Utility Evaluation				
Plot Survey	9/24/02			
GeoTech Survey				
Obtain Leases or MOUs	5/2/03			
Obtain Zoning Approvals				
Obtain City/County Permits				

Phase I 135.2.2 EAs <i>Provide Required EA Information</i>				
Phase I 135.2.3 Design				
<i>Site Evaluation Report</i>			Complete SER.	
<i>Project Design Plan</i>				
<i>Frequency Authorization</i>				
<i>Design Foundations</i>				
<i>Final Design Plan</i>				
TD Overall Status/Revised Completion Date				Slipped -11/16/04*

* TD 135 has been delayed 14 months pending approval of a valid site list (i.e., 7/11/03).

1.7 TD 136 (b) (7)(E) Station B, AZ

The following table lists the tasks which are complete, in progress, or planned for the next reporting period for TD 136, (b) (7)(E) Station B. The overall status of this technical directive is summarized at the top of the table.

Table 7: TD 136 Summary & Task Status

136 (b) (7)(E) Station B				
ACT #: 14313437				
TD Award Date: 05/15/02 (Phase I)				
Number of Structures: 5 Total				
Summary: Phase I Active: TD 136 continues to slip pending site list changes by Sector.				
WBS Task	Status	Actions Accomplished	Planned Activities	Comments/Issues
Project Management				
136.1.1 Planning, Administration and Documentation				
136.1.2 Training Development				
136.1.3 Logistics Planning and Administration				
Phase I	Slipped			
136.2.1 Real Estate				
Site Verification	5/21/02	Worked with Sector on site selection.	Submit CRF for site changes once Station selects new sites.	IMC is unable to submit a CRF for site changes until Station selection of Monitoring station and new site list is documented by Sector. The site list issued in the TD is not feasible due to Fish and Wildlife opposition to BP use of certain sites.
Obtain ROEs	8/27/02			
Site Validation				
Utility Evaluation				
Plot Survey	09/24/02			

<i>GeoTech Survey</i>				
<i>Obtain Leases or MOUs</i>				
<i>Obtain Zoning Approvals</i>				
<i>Obtain City/County Permits</i>				
TD Overall Status/Revised Completion Date				Slipped – 12/29/04*

**Assume 8/30/03 for Site Verification*

1.8 TD 137 (b) (7)(E) Station, AZ

The following table lists the tasks which are complete, in progress, or planned for the next reporting period for TD 137, (b) (7)(E). The overall status of this technical directive is summarized at the top of the table.

Table 8: TD 137 Summary & Task Status

137 (b) (7)(E) Station				
ACT #: 14313466 TD Award Date: 05/15/02 (Phase I); MOD 7/11/03 (Site List Change) Number of Structures: 10 Total Summary: Phase I Active.				
WBS Task	Status	Actions Accomplished	Planned Activities	Comments/Issues
Project Management				
137.1.1 Planning, Administration and Documentation			Submit CPM Schedule and WBS	
137.1.2 Training Development				
137.1.3 Logistics Planning and Administration				
Phase I	Slipped			
137.2.1 Real Estate				
Site Verification	7/11/03	CRF # 72 was funded on 7/11/03.		
Obtain ROEs	8/27/02		Work with Station to obtain ROEs.	
Site Validation				
Utility Evaluation				
Plot Survey	9/24/02			
GeoTech Survey				
Obtain Leases or MOUs	5/2/03			

Obtain Zoning Approvals				
Obtain City/County Permits				
TD Overall Status/Revised Completion Date				Slipped -11/8/04 *

* TD 137 has been delayed 14 months pending approval of a valid site list (i.e., 7/11/03).

1.32 TD 147 (b) (7)(E) AZ

The following table lists the tasks which are complete, in progress, or planned for the next reporting period for TD 145, (b) (7)(E) Station. The overall status of this technical directive is summarized at the top of the table.

Table 31: TD 147 Summary & Task Status

147 (b) (7)(E)				
ACT #: 22105433				
TD Award Date: 7/21/03				
Number of Structures: NA (This TD is for repositioning the (b) (7)(E) control room, no camera site installation is involved)				
Summary: Phase I Active: HQBOR and (b) (7)(E) Station are currently in the process of evaluation for the submission of a valid design plan.				
WBS Task	Status	Actions Accomplished	Planned Activities	Comments/Issues
Project Management				
147.1.1 Planning, Administration and Documentation				
147.1.2 Training Development				
147.1.3 Logistics Planning and Administration				
Phase I 145.2.3 Design	On Track	Evaluated Control Room and System on 7/31/03.	Submit Preliminary Design Plan.	IMC needs HQBOR direction on how to handle non-functioning or malfunctioning equipment identified in report.
TD Overall Status/Revised Completion Date				On Track

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS

MEETING AGENDA

Meeting Date and Time: 18 February, 2003 at 10:00 am

Meeting Location: Tucson Station

MEETING PURPOSE

PDT Meeting

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. RVS - Status of engineering contract for sites (Baker)	(b)(6)
2. RVS – check on construction schedule assuming Jan FONSI	
3. Typical Lighting Design (Baker SOW & Contract)	
4. Possibility of Cat. Ex. for Sonoita access road maintenance.	
5. Naco Drainage Report & 100% plan review by 28 January 2003	All
6. Status and copies of ROEs for Nogales	HDR
7. Ephraim Ridge footprint to (b)(6) and follow up	(b)(6)
8. Copies of ROEs forwarded to Station	

10:15 – 10:30 RVS

Nogales, Crawford Hill

Nogales, access roadways & RVS TD #116

Douglas - Naco

10:30 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

15 March 2003 through 29 March 2003 DGL (WWD Roadway)

6 April 2003 through 19 April 2003 NCO (E. of POE)

24 May 2003 through 7 June 2003 NCO

14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)

ANG Safety Comments

JTF-6

4 low water crossing

11:00 – 11:30 ENGINEERING

Naco, 4 Miles Roadway, Final Design

Nogales, Tunnels, Preliminary & Final Design

Nogales, 1/2 Miles Roadway Maintenance

Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design

Nogales, Ephraim Ridge Road Reclamation

Douglas, Picket Fence Extensions

Alternative Primary Fence Designs

Lighting Design - Standard 1-Mile Rural Condition

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS

11:30 – 12:00 ENVIRONMENTAL

Biological Assessment
Programmatic EIS
Programmatic MOA
Douglas, Whitewater Draw Permitting & Env. Baseline
Naco, 4 Miles Roadway, EA & Permitting
Nogales, Infrastructure Improvements, EA
Tunnels
2 Miles Roadway
Portable Lights
Nogales, Ephraim Ridge Road Reclamation
Sonoita Station
Distribution of Environmental Documents

12:00 – 1:00 LUNCH

1:00 – 1:15 REAL ESTATE

Douglas, ROE
Naco, ROE
Nogales, ROE
Douglas, US Fish and Wildlife Service Property
Douglas, Kings Ranch Road

1:15 – 1:30 PROCUREMENT

Douglas, Whitewater Draw Roadway
Naco, 4-Miles Roadway

1:30 – 2:30 OTHER ITEMS

NEXT MEETINGS

March 11, HDR Phoenix, 10:00 am
March 25, Tucson Station, 10:00 am
April 8, HDR Phoenix, 10:00 am

(b)(6)

From: (b)(6)
Sent: Tuesday, January 28, 2003 6:59 PM
To: (b)(6)
Cc:
Subject: FW: TCA PDT Meeting Minutes of 14 January 2003



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(b)(6)

In response to the Action Item for the Engineering Contract for access to the RVS sites, IMC is only tasked with providing directions to the site and describing the general conditions of the access area.

IMC is not tasked with evaluating the amount of improvement needed for construction equipment to access a site or to give a construction solution.

As we discussed, this appears to be an item that is not in the IMC scope or the GSRC scope. The IMC-VA office has addressed this with the HQBOR RVS Project Management Office. (b)(6) the RVS Program Manager, will be better able to address any prior discussions with the government about the problem.

(b)(6)

-----Original Message-----

From: (b)(6)
Sent: Friday, January 17, 2003 10:37 AM

(b)(6)

Subject: TCA PDT Meeting Minutes of 14 January 2003

TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS
BAKER STATUS REPORT - ENGINEERING

A. Naco-4 Miles Roadway:

- 100% plans submitted. Geometry edited due to new monuments (resubmitted 2/14/2003).
- Drainage Report submitted to HDR for final comments.
- BOM submitted to HDR for comments.

B. Nogales, Tunnels:

- Plans – Completed 30% package.
- Contacted City Engineer (b)(6)

C. Nogales, ½ Miles Roadway Maintenance:

- Plans – Completing 90% Plans.

D. & 1-1/2 Miles Roadway:

- 60% Completed-Awaiting funding for geotechnical investigation.

E. Nogales, Ephraim Ridge Road Reclamation:

- 100 % plans submitted.
- Drainage Report submitted to HDR for final comments.

F. Douglas, Picket Fence Extensions:

- Plans – Completing 80% package.

G. Alternative Primary Fence Designs:

- Plans – Researching various alternatives – Final report in progress.

H. Lighting Design – Standard 1 – Mile Rural Condition:

- Plans – Negotiations in progress with the Army Corps of Engineers.

Date	Title	Project Description	Project and Compliance Status
TUCSON SECTOR			
Apr 1991	Draft EA For JTF-6 Operation 91024, Douglas, Cochise County, AZ; Prepared by USACE Los Angeles District	3 Miles of Drag Road located approx. 20 Miles east of Douglas.	Assume completed.
Feb 1993	Final EA for the Border Road Maintenance and Repair, Naco, Cochise County, AZ; Prepared by USACE Los Angeles District	22 miles of road repair and maintenance. 6.5 Miles east of POE; 15.4 Miles West of POE. Culverts and Gabions where appropriate. Grading to existing width of road, some widening at culverts. Three washes on east road and four on west. One wash to be repaired near the San Pedro River. Agreement with BLM will be on File?	Assume completed.
Feb 1993	Final EA for JTF-6 Operation JT089-93, JT094-93, and JT265-93, Douglas, Cochise County, AZ; Prepared by USACE Los Angeles District	12.5 Miles of Road Repair starting at WWD and going west. Road to the east starts 2 miles east of Douglas at the "Airport Gate" and proceeds for 6.5 Miles (Where Mountain Road Begins). Approximately 1 mile of "mountain road". Continue after Mountain Road for 5 miles. (Total 12.5 Miles of Road repair to the East). Fencing located at the Douglas BP Station. Various locations for staging areas (Pg 7). Includes culverts, minor filling, etc...	Assume completed.
Apr 1994	Final EA for Border Fence Construction and Road Repair, Naco, Cochise County, AZ; Prepared by USACE Los Angeles District	3 Miles of steel landing mat fence 1.5 miles east and 1.5 miles west of Naco POE. Improvement of Road .5 miles east and west of POE to include culverts.	Completed.

Date	Title	Project Description	Project and Compliance Status
Jul 1996	Draft EA JTF-6 Road Maintenance and Construction, Naco-Douglas, Cochise County, AZ; Prepared by USACE Fort Worth District	Road maintenance activities on 52 miles of road maintenance. Starting at Silver Creek east of Douglas and going to Forest Service boundary west of Naco (52 Miles). 2.5 miles of rail barrier fence starting approx. 2 miles west of Naco POE and going west for 2.5 miles. 2 Miles of new road starting at Hwy 80 and going south to border through the Wilbourne Ranch. (Near Cochise County College). The EA states that over 40 culverts and gabions will be installed during the road maintenance activities. Includes surveyed bivouac site (pg 8)	Road maintenance completed. Some rail barrier installed, but not sure if completed 2.5 miles. Assume the new 2-mile road was completed.
Aug 1994	Final PEIS for JTF-6 Activities Along the US/Mexico Border	Addressed JTF-6 support actions for INS/USBP. First accounting of all past actions (1989 to 1994) conducted along SW border. Identify types and approximate number of projects expected to be completed in the next 5 years.	PEIS was supplemented beginning in 1999 and completed in 2001.
Jul 1997	Supplemental Environmental Assessment JTF-6 Fence and Road Construction, Douglas, Cochise County, AZ; Prepared by USACE Fort Worth District	1 Mile of decorative fence starting at the POE and going east and 0.3 miles going west of the POE. 3.6 Miles of Landing Mat Fence starting at the end of the decorative fence (4.6 miles total east from POE) and 1.3 miles of landing mat fence starting at the end of the decorative fence to the west (1.6 miles total west of POE). 0.5 Miles of road maintenance starting 0.3 miles west of POE. Four 36-inch culverts may be used.	Eastern side is complete except for LWC; western side is being completed by National Guard under 2002 INS EA (Kings Ranch Road); still some LWCs to be installed and/or repaired on west side.
Mar 1998	Final Supplemental EA Proposed JTF-6 Light Pole Installation Mission, Douglas, Cochise County, AZ; Prepared by USACE Fort Worth District	Approx. 2 miles of lights spaced 400 feet apart starting at Ave A and ending at Airport Road. 3 Miles of lights starting at POE and going west. 8-ft wide maintenance road along next to light poles.	Lights have been installed—need USBP Douglas to confirm

Date	Title	Project Description	Project and Compliance Status
Mar 1998	Final EA Proposed U.S. Border Patrol Facility at the Davis-Monthan Air Force Base, Tucson, Arizona		
Sep 1998	Final EA, Joint Task Force Six, Proposed Lighting and Camera Installation Project, Nogales, Arizona		
Apr 1999	Final EA JTF-6 Proposed Lighting Project, Naco, Cochise County, AZ; Prepared by USASE Fort Worth District	2 miles of lights; one mile east and one mile west of truck POE. Approx 40 poles, 300 to 400 ft apart. Minor road maintenance to pole locations, if needed.	Lights completed in 2002—shields are being installed
June 2000	Final EA for Seven Remote Video Surveillance Sites Near Naco, Arizona	Seven RVS sites on both sides of the POE, mostly along the RR ROW	Cameras installed.
Aug 2000	Final EA for Infrastructure Projects within the Naco-Douglas Corridor, Arizona	aka the Cumulative Impact EA—described past, on going and potential future infrastructure projects along 60-mile border	No specific projects were identified for construction; this document was more like a programmatic document, with intentions of satisfying the needs of the AZ Governor and US White House demands
Aug 2000	Final EA JTF-6 Proposed Fence and Road Improvement Project, Naco, Cochise County, AZ; Prepared by Fort Worth District	Extend fence one mile further to the east. Replace existing vehicle barrier east of POE starting at the end of the new fence and going 3.0 miles (total approved fence will be 2 miles of landing mat and 3 miles of vehicle barrier). Improve border road for four miles east and six miles west of POE. Two low water crossings (no culverts just paving) west of POE.	Project has not been initiated; some components will be similar to and/or the same as the October 2002 EA being prepared by INS
Jan 2001	Final EA for Immigration & Naturalization Service Expansion of Parking/Storage Facilities and New Traffic Checkpoint at Sonoita, Arizona	Move the temporary checkpoint at the Sonoita Station to (b) (7)(E)	Project completed.

Date	Title	Project Description	Project and Compliance Status
Jan 2001	Final EA for Immigration & Naturalization Service New (b) (7)(E) Temporary Traffic Checkpoint, Nogales, Arizona	Move the temporary station near the Nogales Elementary School to the (b) (7)(E) exit off of (b) (7)(E)	Project completed.
Feb 2001	Final EA JTF-6 Proposed Fence, Lighting, Road Repair and Improvement Project, Douglas, Cochise County, AZ; Prepared by Fort Worth District	Extend landing mat fence an additional 2 miles east of POE (Total approved fence will be 6 miles from POE going east). Permanent lights; 1.0 mile west of POE and 0.8 miles east of POE (0.3 miles from POE and 0.5 Miles starting at the end of the existing lights going to south of airport, Figure 1.0). 4.0 Miles of road upgrade east of POE and 4.0 miles west of WWD. Minor road repair for an additional 8 miles past the 4.0 miles west of WWD. (Total road work is 12 miles past WWD, 4 major and 8 minor work)	Project completed on east side; west side (except WWD) is being completed by National Guard using Kings Ranch Road EA. Additional work (new and repair) on LWCs needed. Minor road repair for the 8 miles has not been initiated
April 2001	Supplemental EA for JTF-6, Whitewater Draw (WWD) Crossing, Douglas, AZ; Prepared by Fort Worth District	Construction of drainage structure/road platform across Whitewater Draw	Section 404/401 applications have been submitted and currently being coordinated.
May 2001	Final EA for Proposed Expansion of the Ajo U.S. Border Patrol Station, Why, Arizona	To provide necessary parking, locker rooms, office buildings and support facilities.	Project completed.
June 2001	Supplemental Final PEIS for INS and JTF-6 Activities	Updated the 1994 PEIS. Identified impacts from JTF-6 support activities from 1989 through 1999. Provided estimates of the types, numbers and magnitude (e.g., miles, acres, etc) of projects expected, by state, over the next 5 years	Numerous EAs tiered from the SPEIS since its completion.
Dec 2001	Final EA for Portable Lights Within the Naco Corridor, Cochise County, Arizona	Deployment of 30-50 portable lights over a 10 mile corridor on an as-needed basis.	Portable lights have been deployed.
Feb 2002	Final EA for Road Improvements along Kings Ranch Road and Border Road, Douglas, AZ	Construction/improvements of 1 mile of road from Douglas Station to the border (Kings Ranch Road) and 2 miles of border road originally proposed by JTF-6	Construction completed, but some rework is needed, especially for the LWCs
Oct 2002	Final EA for Conversion of Vehicle Barriers to Landing Mat Fence, Naco, AZ	Conversion of 1.2 miles of vehicle barriers (with 10-12 foot vertical supports) to landing mat fence. Project starts about 1 mile east of Naco	EA completed, but construction has not started as of January 2003

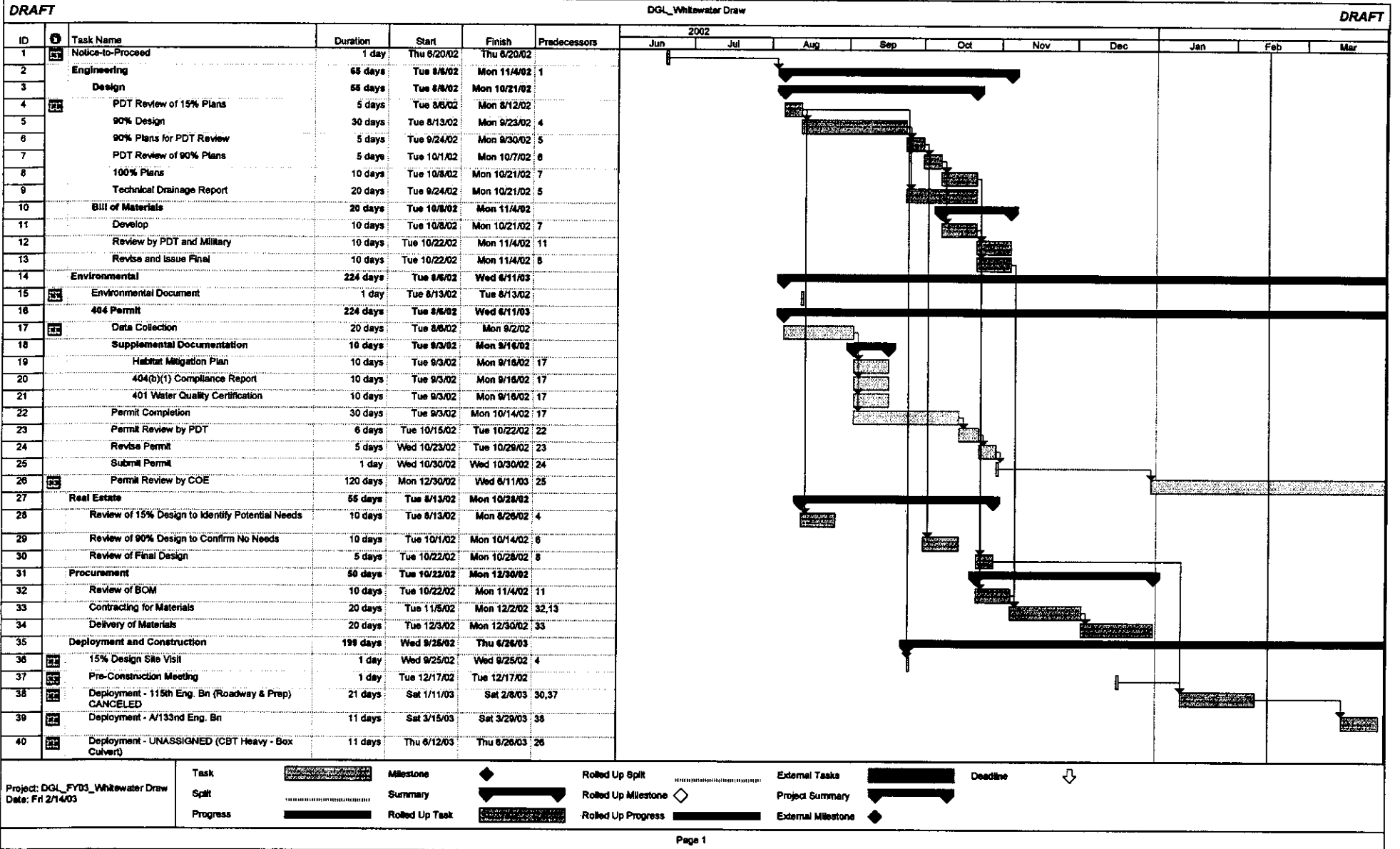
Date	Title	Project Description	Project and Compliance Status
Sept 2002	Final EA U.S. Border Patrol Station, Willcox, Arizona		
Oct 2002	Draft PEIS, Tucson/Yuma Daily Operations, AZ	Programmatic evaluation of USBP daily operations for all line stations. Operations addressed include aerial reconnaissance, checkpoints, on and off-road patrols, SAR, etc.	Draft PEIS is on public review, which is expected to be closed in mid-February
Nov 2002	Final EA for the Installation of Temporary Vehicle Barriers along US/Mexico border in Douglas and Naco Stations	Construct vehicle barriers at Stations and place the barriers, as needed, at locations along a 25-mile reach of the border	EA complete, some barriers have been constructed and emplaced
Jan 2003	Draft EA for 4 miles of Roadway Improvements, Fences and LWCs, Naco, AZ	Construction/major improvements of 2 miles of roadway on either side of the Naco POE, installation of 1 mile of landing mat fence on east side of POE beginning about 1 mile east of POE (vehicle barriers to be removed), installation of up to 4 LWCs	Draft distributed 17 January 03 for 30-day comment period
	Draft EA for 2 miles of Roadway Improvements and Fences, Placement of 60 Portable Lights, Nogales, AZ	Construction/major improvements of 2 miles of roads on west side of POE, installation of portable lights at about 60 locations on either side of the POE, reclaim and support hill that is sloughing toward Mexico—will require rerouting of road	Baker to provide designs; EA is being prepared (Feb 2003) and a preliminary draft should be ready for review by end of February
Jan 2003	Draft EA for Reclamation of Ephraim Ridge, Nogales, AZ	Reclaim and restore hill (about 1.25 acre) to ensure that it does not slip into Mexico	Draft EA released 17 January 03 for 30-day comment period
EL PASO SECTOR			
Jan 1999	Final EA for JTF-6 Road Improvements and Vehicle Barriers, Columbus, NM	Construction/improvements of 75 miles of roadways and installation of 50 miles of rail vehicle barriers; road work on either side of POE	Road construction and some vehicle barriers were installed on east side of POE; road work completed on west side to (b)(6) Ranch; MFR completed in Sept 2002 to allow NG to complete road work on west side
Jan 1999	Final EA for JTF-6 Road Improvements near Van Horn, TX	Construction/improvements of 110 miles of patrol roads and construction/major improvements of 20 miles of access road to Indian Repeater site	Not sure of the status of this project—need USBP and/or JTF-6 to confirm
May 2000	Final EA for JTF-6 Road and Drainage Improvements near Eagle Pass, TX	Construction/improvements of 16 miles of roads, 5 LWCs, 1 box culvert crossing, and 2 timber trestle bridges; an additional 2.8 miles of alternate road was identified on Cinco Ranch as possible future project	Some work has been completed, but not sure of the complete status—need USBP or JTF-6 to confirm. Neither of the bridges were constructed and I do not think the large box culvert was installed either

Date	Title	Project Description	Project and Compliance Status
May 2000	Final EA for JTF-6 Rail Barriers, Santa Teresa, NM	Construction and installation of rail barriers along 2 different reaches of the border; about 0.8 miles to be installed in the stock yards, east of the POE and about 2 miles of barrier along the border starting approximately 5 miles west of the POE. Minor road improvements were necessary to access the site, but would remain within the extant road ROW	Some work was completed, but need USBP or JTF-6 to confirm status
Jan 2003	Final EA for Fence Upgrade and Extension, Anapra, NM	Conversion of portion (0.2 miles) of the extant chain link fence to landing mat fence and extending the extant fence for 0.17 miles to the east and 0.41 miles to the west	EA completed; JTF-6 unit was scheduled for February but mission was canceled.
EL CENTRO SECTOR			
Oct 2002	Final Supplemental EA for 24 RVS sites, El Centro Sector, CA	24 RVS sites on either side of the Calexico POE. Eastern side along All American Canal; western side included several in BLM Yuha Basin; western most was at "Boulder Park" off I-8	RVS towers still being installed as of Feb 03. Sites within Critical Habitat for Peninsular Bighorn Sheep must be installed outside of lambing season
Jan 2003	Final EA for Placement of Temporary Vehicle Barriers, El Centro, CA	Construction of temporary vehicle barriers at Calexico and El Centro BP Stations and then placement of the barriers at various locations on an as needed basis—anywhere along a 21-mile section of the border	Temporary vehicle barriers being constructed; unaware of the status of their placement
YUMA SECTOR			
May 2002	Biological Monitoring for Installation of Emergency Beacons, Yuma Sector	Monitoring the installation of 6 emergency beacons; CATEX was prepared by MCAS	Beacons installed with no loss to flat-tailed horned lizards
June 2002	EA for Operation Desert Grip, Wellton Station, AZ	Placement of temporary trailers and associated infrastructure in Cabeza Prieta NWR/Los Vidrios area for 24-hour patrol support	No construction required; trailers emplaced

NACO STATION
NACO 4 MILE ROADWAY
PROJECT

BILL OF MATERIALS

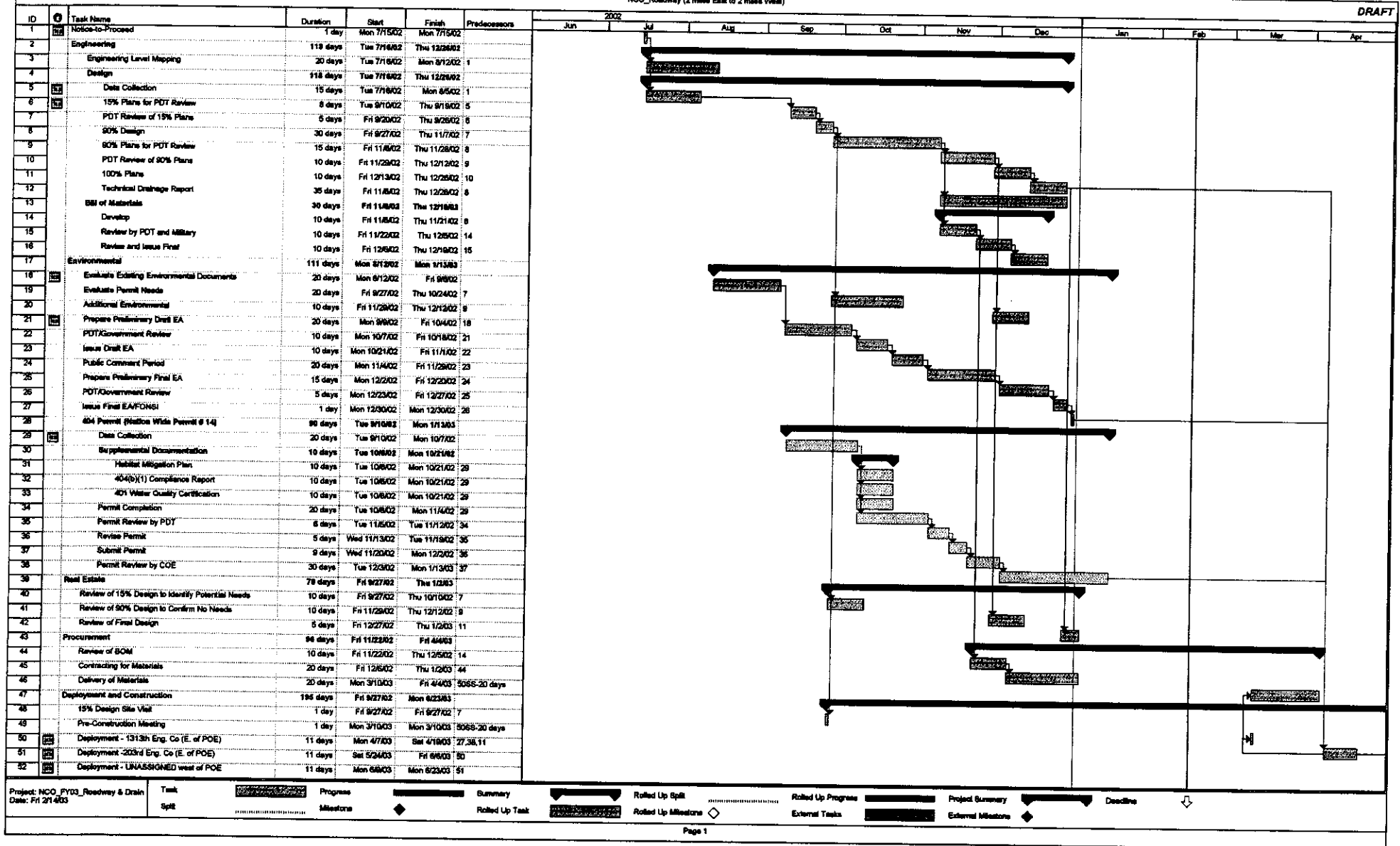
				REQUIRED FOR 6 APRIL 2003 NACO ARIZONA DEPLOYMENT	NOTES
(b) (7)(E) AGGREGATE SURFACE COURSE	CY	869	688	1,558	3895 CY OF AGGREGATE
		1,304	1,033	2,337	
(b) (7)(E) ASPHALTIC CONCRETE SECTION	TONS	467	755	1,222	
		508	3,264	3,772	
LONGITUDINAL BARS (b) (7)(E) Grade 60, meeting ASTM A615 Spec (b) (7)(E) Longitudinal)	EA	401	645	1,046	
		1,435	2,305	3,740	
SIGN PANELS	SF				
SIGN FOUNDATIONS	EA				
		0	0	0	
(b) (7)(E) CORRUGATED PIPE (CMP)	LF	50	0	50	
		0	0	0	
(b) (7)(E) FLARED END SECTIONS	EA	2	0	2	
		1,200	2,840	4,040	
PYRAMAT, http://www.fixsoil.com/products-fs.asp?ProductID=3 rolls are all 8.5' x 90' (21 rolls) dealer number provided 801 298 9696	SF	19,110	30,870	49,980	
		(b) (7)(E)		(b) (7)(E)	
SILT FENCE	LF				
FENCE REMOVAL	LF				

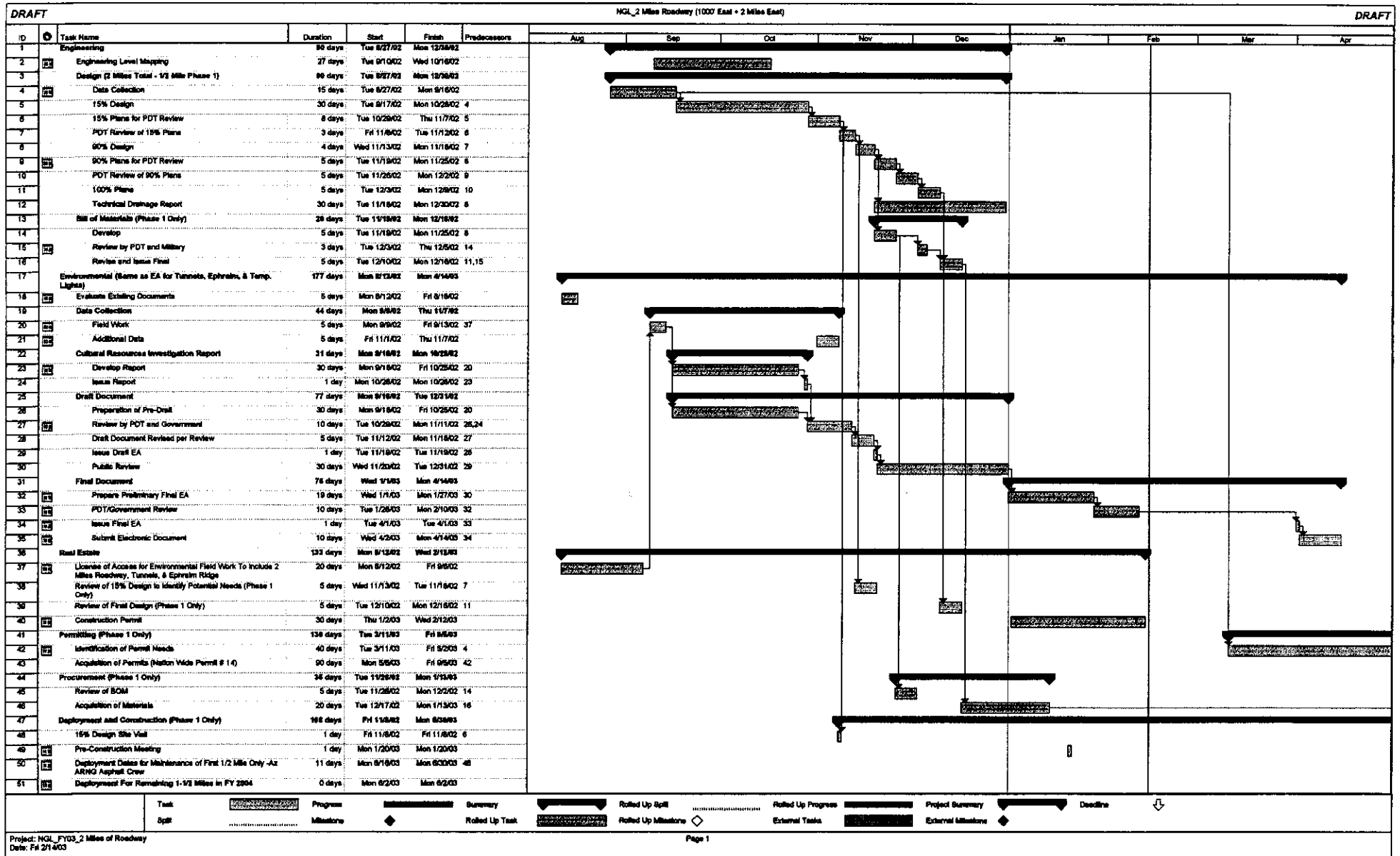


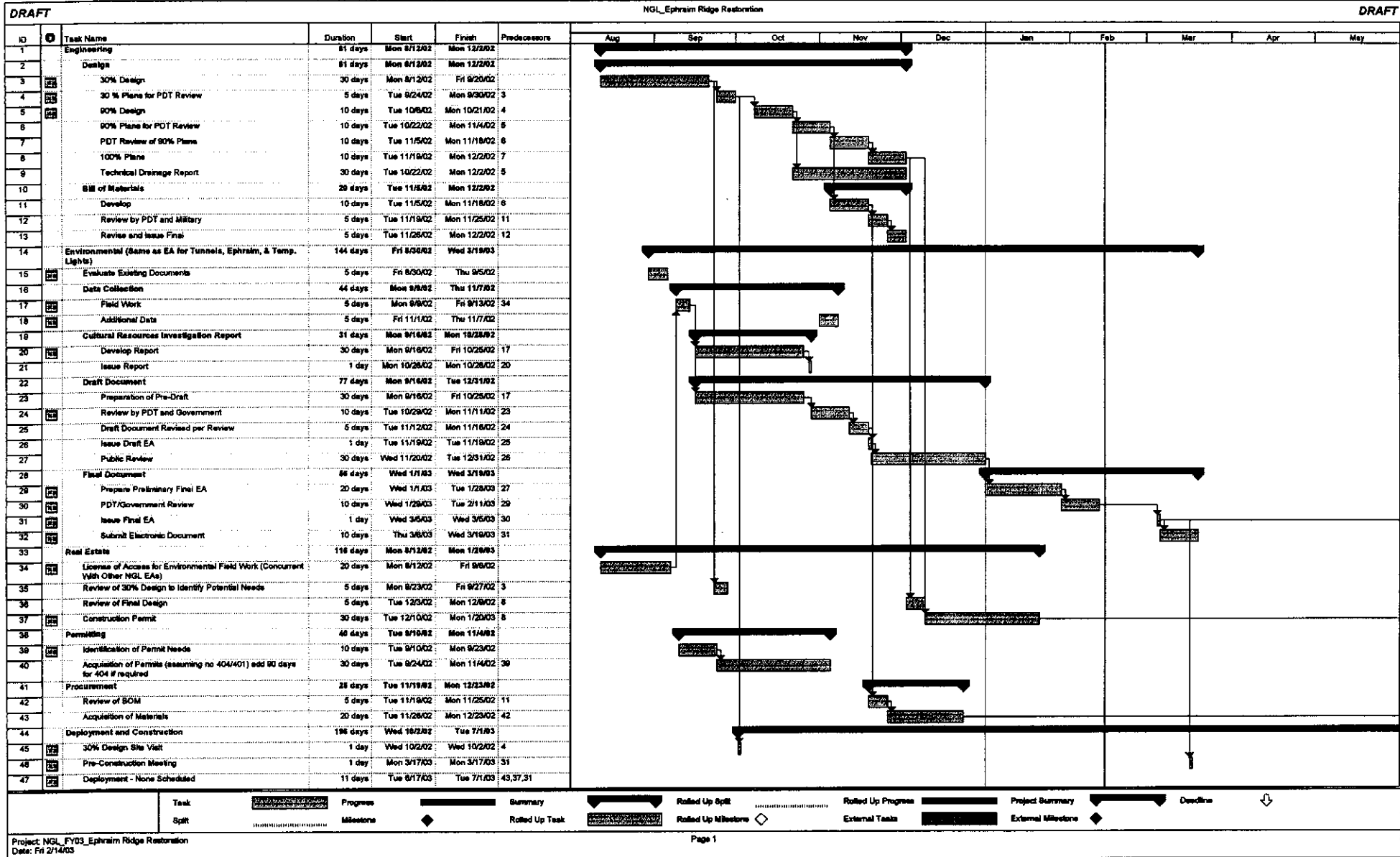
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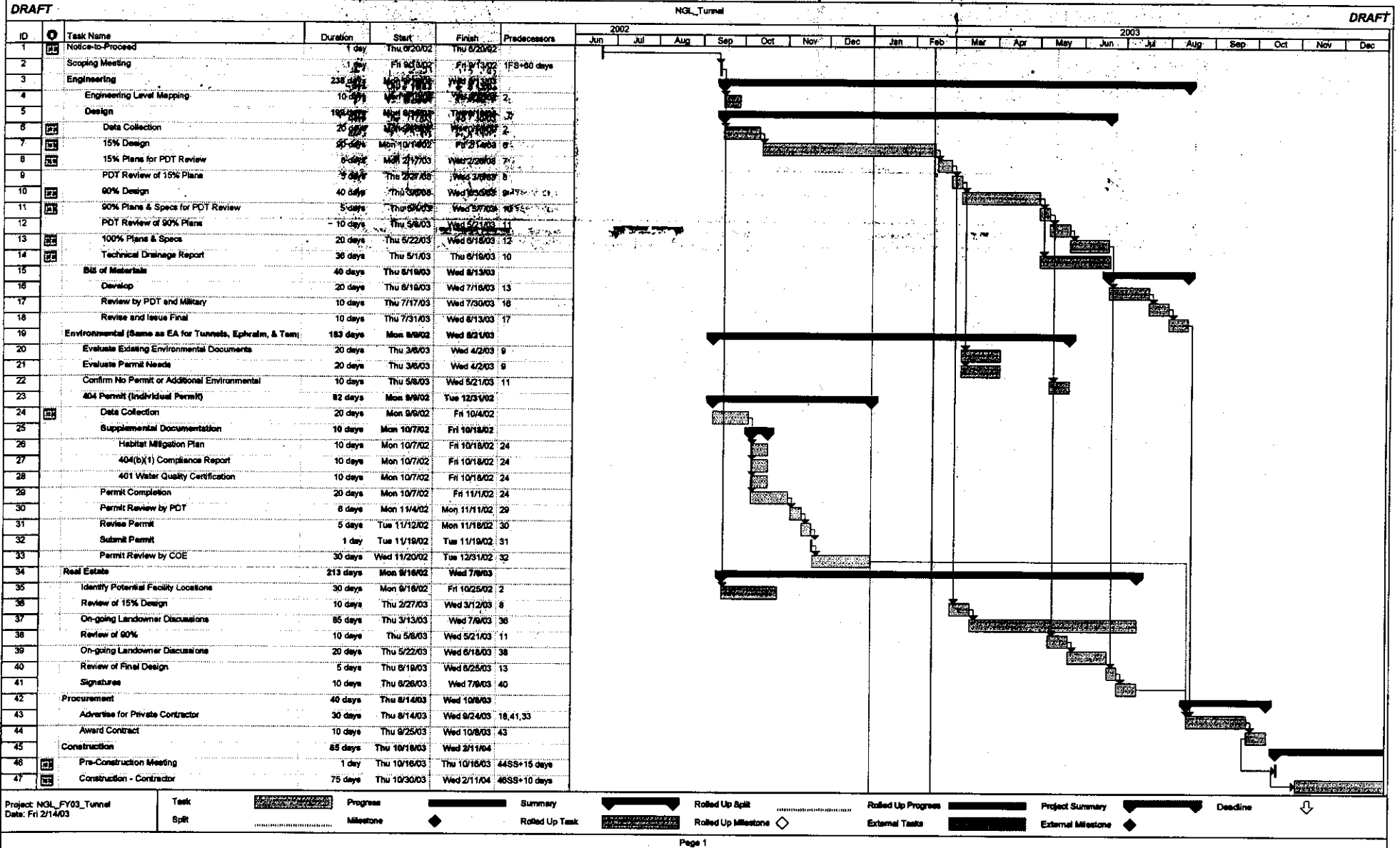
NCO_Roadway (2 miles East to 2 miles West)

DRAFT









**TUCSON SECTOR
PROJECT COST SUMMARY**
02/15/03 HOR

STATION		PROJECT NAME & DESCRIPTION	COSTS FY 2002				COSTS FY 2003				COSTS FY 2004				GRAND TOTAL	
			Engineering, Environmental & Oversight	Real Estate	Construction	TOTAL	Engineering, Environmental & Oversight	Real Estate	Construction	TOTAL	COW-36-6002	UNASSIGNED COW-	Engineering, Environmental & Oversight	Real Estate		Construction
Douglas	1	Environmental Assessment and 15% Schematic Design for Complete Buildout														
	2	Kings Ranch Road														
	3	2 Mile Border Road Extension														
	4	15' C&P & Erosion Control Repair														
	5	Whittewater Draw 1.5 Miles Roadway														
	6A	WWD Bolard Fencing														
	6B	WWD Box Culvert														
	7	Temporary Vehicle Barrier (5 miles)														
	8	Vertical Fence Extensions (6.5 miles)														
	9	Mossoon Repair														
	10	Complete 8 Low Water Crossings														
	11	Kings Ranch Road Fencing (2 miles)														
	12	Lighting Conversion (1 mile)														
	13	Dip 1														
	14	Dip 7														
	15	Lighting (5 miles) split E. & W. of POE														
	16	Primary Fencing (Cattlemen's West 4 miles)														
	17	Construction Oversight & Staking														
	18	Construction As-Built														
	19	5 Miles All Weather Roadway East of POE														
	20	International Ditch (1.3 miles)														
	21	Dip 5														
	22	4 Miles Roadway West POE														
	23	Acquire USFWS Property														
	24	Identify Future Real Estate Needs for Station														
	25	Acquire Portion of Future Real Estate Needs for Station														
	26	Permanent Survey Monuments (17 miles)														
TOTAL																

**TUCSON SECTOR
PROJECT COST SUMMARY**
02/15/03 HDR

		COSTS FY 2002				COSTS FY 2003				COSTS FY 2004								
STATION	PROJECT NAME & DESCRIPTION	Engineering, Environmental & Oversight	Real Estate	Construction	TOTAL	Engineering, Environmental & Oversight	Real Estate	Construction	1	TOTAL	COW-36-002	UNASSIGNED COW-	Engineering, Environmental & Oversight	Real Estate	Construction ***	TOTAL	GRAND TOTAL	
Neco	26 Environmental Assessment and 15% Schematic Design for Complete Buildout	(b) (5)																
	27 Lighting, Phase 1 West																	
	28 Vertical Fence Extensions																	
	29 4 Miles Roadway (2 miles east to 2 miles west of POE)																	
	30 Temporary Vehicle Barrier																	
	31 Vehicle Barrier to Landing Mat Fence																	
	32 Lighting (5 mile) SPIR E. & W. POE																	
	33 Primary Fencing (7 miles)																	
	34 Construction Oversight & Staking																	
	35 Construction As-Built																	
36 4 Miles Roadway E. & W. POE																		
37 Identify Future Real Estate Needs for Station																		
38 Acquire Portion of Future Real Estate Needs for Station																		
39 Permanent Survey Monuments (20 miles)																		
TOTAL																		
Nogales	41 Tunnel																	
	42 2 Miles Roadway (East of POE)																	
	43 Ephraim Ridge																	
	44 Environmental Assessment and 15% Schematic Design for Complete Buildout																	
	45 4 Miles Roadway																	
	46 Identify Future Real Estate Needs for Station																	
	47 Acquire Portion of Future Real Estate Needs for Station																	
48 Permanent Survey Monuments (20 miles)																		
TOTAL																		

**TUCSON SECTOR
PROJECT COST SUMMARY**
02/15/03 HDR

		COSTS FY 2002				COSTS FY 2003					COSTS FY 2004							
STATION	PROJECT NAME & DESCRIPTION	Engineering, Environmental & Oversight	Real Estate	Construction	TOTAL	Engineering, Environmental & Oversight	Real Estate	Construction	1	TOTAL	COW-36-0002	UNASSIGNED COW-	Engineering, Environmental & Oversight	Real Estate	Construction**	TOTAL	GRAND TOTAL	
All	49 POT Meetings	(b) (5)																
50	Alternative Primary Fence																	
51	Aerial Mapping West of Nogales																	
52	Permanent Survey Monuments for Sonora & Wilcox Stations (20 miles)																	
53	Lighting for Other Stations (5 miles)																	
54	Temporary Vehicle Barriers for Ajo, Casa Grande, Tucson, Nogales, Sonora & Wilcox Stations (10 miles)																	
55	Roadway Maintenance for Sonora and Other Station (50 miles)																	
TOTAL																		
GRAND TOTAL																		

Notes

- 1 Construction costs estimated for 2003 assume military contractor. However, private contractors may be required. If private contract is used, multiply construction costs by 2.6 (includes additional engineering required). If all work not currently commit
- 2 Modification needed for revised DGL-NCO Corridor Supplemental EA to GSRG, HDR, Baker
- 3 DGL & NCO Survey, Construction Staking, Material Testing & Inspection Combined

POT Mtg 2/18/03

(1)

NACO station
and camp.

General

- military - A-246 not here - dates are a go as of today
- Phonetic - no changes in deployment
- WWD road in March - no fences
- NACO ~~after~~ April & May - fine
- Supplies ordered except for AC
- * - will set up water for construction in Naco & Douglas
Tanner list
- Nogales AC ~~SAW~~ ^{SAW} tenture in March
- Safety officers at ANG - not gotten back yet
- Starts w/ road work this FY

Environmental

- DA - Yuma ^{have not} received draft 60 - close to deadline
- possibly 2 weeks
- Tucson BA received comments on Friday for USFWS

- PETS - extractors on Friday
- Four little boxes about 1000 copies

PUOA / Chet's Review - Sent to (b)(6)

- Not to SHPO?

- WWD Realty - Quick EA for LA District USACE
- to go to POT this week part of 401B process
- telephone permit FY03 construction FY04

- NACO Haul Road - no comments as of Friday 2/14/03
- FOAR needed by 4/6/03
- water analysis probably by mid March
- out PDQ

Nogales - chupariter improvements 2/24/03

Explosion bridge - (b)(6) 3 comment letters

Sonoite Road Repair - (b)(6) reportedly said Road repair is
out until March and road.

Date: 2/12/2003 4:12 PM

Sender:

To:

(b)(6)

Priority: Normal

Subject: TCA PDT Meeting Agenda for 18 February 2003

Please find attached the Tucson Sector PDT Agenda for next weeks meeting.

<<021803_Agenda.pdf>>

(b)(6)

Note: To assure proper delivery to all recipients, the following addresses have been moved from the header:

(b)(6)

(2)

Contracted Out

cl will be point of contact for all EAs,
Crawford Hill & legislation.

AVS

IMC

(b)(6)

Crawford Hill - Real Estate Today/tomorrow - best
Nogales Expansion 30 days to submit report - 120 towns

- Design plans

Douglas/Naco - Sites proposed covered under EA & FONSII
- Possibly add 1 site covered by previous EA
- Land issues BCM, NP, etc.
- Access roads - No treaty / child acts at IMC
- USDP needs to find money to do engineering work

Contracted - Start 3 EAs

- 1) Emergency beacons
- 2) Op. Cent Trip II - 4 months
- 3) Check Point Stations
- 4) Nogales Stations 0

Engineering

NACO - 4 miles plan - 100% design plan

Nogales - 1/2 miles

Ephraim Ridge - submitted

Perimeter Fence - submitted 80-90%

Primary Fence - draft figures

Lighting design

Tunnels - Geography w/ cities 30% internally

(b)(6)



021803_A.PDF

③ Real Estate

Douglas^{ROE} - have everything the real

NAEO LOE - takes care of w/1/2

- have nothing on Eastern

- Got several \$1000's

- people have expanded on East side unfavorably

Douglas USF&WS -

Douglas Kingston Road > lending

Real Estate trading ~~Canada~~

ACTION ITEM

HDR - off roading item

JTF-G - available

(b)(6)

charters 1st & 2nd street to Ben
Squires

ELT Committee

Forest Service roads

JMC - Report on locations

(b)(6)

1/2 miles BCR

Ephraim Ridge Footprint

Next meeting in Phoenix

BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS

MEETING AGENDA

Meeting Date and Time: 18 February, 2003 at 10:00 am

Meeting Location: Tucson Station

MEETING PURPOSE

PDT Meeting

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. RVS - Status of engineering contract for sites (Baker)	(b)(6)
2. RVS – check on construction schedule assuming Jan FONSI	
3. Typical Lighting Design (Baker SOW & Contract)	
4. Possibility of Cat. Ex. for Sonoita access road maintenance.	
5. Naco Drainage Report & 100% plan review by 28 January 2003	All
6. Status and copies of ROEs for Nogales	HDR
7. Ephraim Ridge footprint to (b)(6) and follow up	(b)(6)
8. Copies of ROEs forwarded to Station	

10:15 – 10:30 RVS

Nogales, Crawford Hill

Nogales, access roadways & RVS TD #116

Douglas - Naco

10:30 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

15 March 2003 through 29 March 2003 DGL (WWD Roadway)

6 April 2003 through 19 April 2003 NCO (E. of POE)

24 May 2003 through 7 June 2003 NCO

14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)

ANG Safety Comments

JTF-6

11:00 – 11:30 ENGINEERING

Naco, 4 Miles Roadway, Final Design

Nogales, Tunnels, Preliminary & Final Design

Nogales, 1/2 Miles Roadway Maintenance

Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design

Nogales, Ephraim Ridge Road Reclamation

Douglas, Picket Fence Extensions

Alternative Primary Fence Designs

Lighting Design - Standard 1- Mile Rural Condition

Date: 1/27/2003 6:08 PM

Sender:
To:

(b)(6)(b)(7)(C)

Priority: Normal

Subject: Note: Next TCA PDT meeting is scheduled for 18 Feb 2003
<<011403.pdf>>

(b)(6)

Note: To assure proper delivery to all recipients, the following addresses have been moved from the header:

(b)(6)



011403.PDF

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING MINUTES

Meeting Date and Time: 14 January 2003 at 10:00 am
Meeting Location: HDR – Phoenix (at the Phoenix Inn)
Distribution Date: 16 January 2003
Distributor: (b)(6)
Distribution:



MEETING PURPOSE

PDT Meeting.

ATTENDEES

See Attached.

PREVIOUS ACTION ITEMS STATUS

ACTION		RESPONSIBLE	STATUS
1.	Naco 90% plan review by 19 December 2002	All	done
2.	Ephriam Ridge 90% plan review by 19 December 2002	All	done
3.	Typical Lighting Design (Baker SOW & Contract)	(b)(6)	Ongoing – Baker to Follow up
4.	Kleinfelder to provide (b)(6) with WWD Env. Baseline Doc.		done
5.	Naco 4-miles Roadway EA comments by 19 December 2002	All	done
6.	Ephriam Ridge EA comments by 19 December 2002	All	done
7.	Update schedules and Web Page	HDR	ongoing
8.	Check on Roosevelt easement location in Douglas	(b)(6)	done
9.	Recheck Douglas inventory		done

ACTION	RESPONSIBLE	STATUS
10. Check w/ JTF-6 on deployments	HDR	Done report by (b) (6) (b) (6) BPSCC
11. Possibility of Cat. Ex. for Sonoita access road maintenance.	(b)(6)	Ongoing (b) (6) to help follow up
12. Follow up on WWD 404 permit	GSRC	done
13. Check on MFR for Douglas work	HDR	Done, copy provided to PDT
14. Check Naco water source – Arizona Water Company	(b)(6)	done
15. RVS - Status of engineering contract for sites (Baker)		No report
16. RVS – check on construction schedule assuming Jan FONSI		No report

MILITARY DEPLOYMENTS

AZ National Guard

Deployments

- Deployment scheduled
 - 15 March 2003 through 29 March 2003 DGL (WWD Roadway)
 - 6 April 2003 through 19 April 2003 NCO (E. of POE)
 - 24 May 2003 through 7 June 2003 NCO
 - 14 June 2003 through 28 June 2003 NGL (tentative: asphalt ½ mile)
- 11 January Deployment was canceled
- (b)(6) expressed considerable concern relayed from the NG safety office regarding the WWD plans. Comments were requested for inclusion in the plan sets.

JTF-6

- (b)(6) made a report for (b)(6) and presented letter from (b)(6) CPA, BPSCC.
- JTF-6 has canceled deployments for Naco

ENGINEERING

Douglas, Whitewater Draw, Preliminary & Final Design

- Plans complete and awaiting construction
- Requested comments from the National Guard safety office via (b)(6) for inclusion into the plan set.

Naco, 4 Miles Roadway, Preliminary & Final Design

- 100% plans provided
- Naco water source via Az. Water Company has been arranged by (b)(6) pending ROE to place meter.
- Drainage Report due 21 January 2003

Nogales, Tunnels, Preliminary & Final Design

- In-house 30% plans being prepared
- When 30% plans are ready a copy will be sent to the City of Nogales

Nogales, 2 Miles Roadway, Preliminary & Final Design

- 90% plan set due 30 January 2003, because no PDT is schedule near that date plans will be sent out for review. Comments will be requested by 13 February 2003.
- 100% plan set due 28 February 2003

Nogales, Ephraim Ridge Road Reclamation

- 100% plans submitted
- Drainage report due 21 January 2003

Douglas, Picket Fence Extensions

- On-going, 30% design package expected at the next PDT meeting 18 February 2003

Alternative Primary Fence Designs

- On-going, final Report under development.

Lighting Design

- Need contract modification for Baker. (b)(6) to follow up on contract modification.

ENVIRONMENTAL

Douglas and Naco Station's Environmental Documents

- Presentation by (b)(6) followed by discussion with (b)(6) (b)(6) (see attached notes from (b)(6))
- Recommendation from the PDT to prepare a Supplemental EA to the Existing 2000 EA for Infrastructure USBP Naco-Douglas Corridor.
- The supplemental will include the full build out alternative, the prioritized approach alternative and the no build alternative. The prioritized approach alternative would be similar to that proposed in the previous draft documents, however it will not be defined as an "enforcement zone". Instead, it will be defined by the individual components. No improvements will be suggested for those areas covered in previous environmental documents. This will allow us to continue to construct the previously approved projects while awaiting the outcome of the supplemental EA. Given this approach, a draft document could be available for review within 2 months and a FONSI in approximately 5 months.
- (b)(6) indicated: that a supplemental EA could succeed (FONSI) as noted in the recommendation slide prepared for the presentation, with 5 months for the supplemental EA, all projects would be on hold should the process go to an EIS

Biological Assessment

- Yuma acceptable to USF&WS and consultation has begun
- Tucson, meeting with USF&WS scheduled for 24 January 2003 to discuss additional information that may be required.

Programmatic EIS

- PEIS Comment period extended until 7 February 2003

Programmatic MOA

- Revised CR report were received, will be forwarded to SHPO and (b)(6)

Douglas, Whitewater Draw Permitting

- 404 permit application submitted to COE Regulatory Branch. Individual permit estimated to take a minimum of 6 months. (b)(6) to follow up with the USACE on permit status.
- JD to be provided by Baker based on 2 & 10 year events.

Douglas, Whitewater Draw Environmental Baseline Study on Phelps Dodge Property

- Kleinfelder has prepared a Draft report.

Naco, 4 Miles Roadway, EA & Permitting

- DEA ready for public release by Wednesday

Nogales, Infrastructure Improvements, EA

- Awaiting design information and notice to landowners before proceeding with environmental survey. ROEs should be in place soon. (b)(6) will follow up on this.
- Ephraim Ridge DEA ready for release, most likely Wednesday

Nogales, Crawford Hill

- No update

Nogales RVS

- From the previous minutes "The Nogales RVS EA is on hold pending directions regarding the access roads. (b)(6) agreed to find out about the status of this decision."
- No update from IMC

Naco/Douglas RVS

- FONSI signed 7 January 2003, distributed to the PDT by (b)(6)

Sonoita Station

- (b)(6) will have requested a determination on use of categorical exclusion for maintenance of the roadway facility from INS HQ. Environmental surveys may be required for a cat-ex. This project will be included in the list of future projects and prioritized
- (b)(6) will assist in tracking down the INS HQ determination and provide a copy of the direction memorandum previously issued regarding roadway maintenance

Point of Contact

- INS Regional Environmental Officer will be the point of contact on environmental documents – (b)(6) (b)(6) He will only process the questions and comments through to the appropriate person.

Document Tracking

- Return receipt or equivalent will be used when documents are issued for review to stakeholders

REAL ESTATE

Douglas, White Water Draw

- Report per (b)(6) (b)(6) has signed and faxed all the appropriate documents, i.e. Temporary Work Area Easement Decd, Right of Entry for Survey and Exploration instrument, Certificate of Authority, Payment and Closing Sheet, and Taxpayer Identification Certification

Nogales, Naco, and Douglas except WWD

- Report per (b)(6) Sacramento COE,
 - Nogales, 0.5 mile Roadway (beginning east of POE) - construction easement to be defined - construction in March.
 - Douglas, Whitewater Draw Roadway - Required ROE's have been executed by the property owners (b)(6) (b)(6) Copies of these agreements were sent to (b)(6) Agreements are good until July 5, 2003.
 - Naco, 4 miles Roadway - Owners have been identified. In addition, (b)(6) of (b)(6) (b)(6) has been contacted. Once deployment date is set, ROE's will be mailed within 2 days.
 - Nogales, Ephraim Ridge - Waiting for construction easement to be defined.
 - Nogales, 0.5 mile Roadway - Waiting for project footprint.

Rights of Entry

- Copies of all signed ROEs will be provided to the appropriate station representative

PROCUREMENT

Funding received for January construction of \$583,363.93.

Douglas, Whitewater Draw

- Contract with supplier is pending, will be issued closer to deployment. May incorporate Naco construction materials

Naco 4-Miles Roadway

- Discussion of suppliers common to both Douglas and Naco. BOM presented in plans.
- (b)(6)(b)(7)(C) asked to prepare BOM in spreadsheet format with additional data. Delivery dates of material required and will be prepared by HDR.

CONSTRUCTION

No on-going construction.

ACTION ITEMS

ACTION	RESPONSIBLE
1. RVS - Status of engineering contract for sites (Baker)	(b)(6)
2. RVS - check on construction schedule assuming Jan FONSI	
3. Typical Lighting Design (Baker SOW & Contract)	
4. Possibility of Cat. Ex. for Sonoita access road maintenance.	
5. Naco Drainage Report & 100% plan review by 28 January 2003	All
6. Status and copies of ROEs for Nogales	HDR
7. Ephraim Ridge footprint to (b)(6) and follow up	(b)(6)
8. Copies of ROEs forwarded to Station	

NEXT MEETINGS

February 18, Tucson Station, 10:00 am

March 11, HDR Phoenix, 10:00 am

March 25, Tucson Station, 10:00 am

Note proposed additional meetings/conference call to accommodate design schedule.

Proposed changes are in blue

These minutes reflect the understanding of HDR Engineering, Inc. If revisions or additions are needed, contact (b)(6)
(b)(6)

TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS
BAKER STATUS REPORT - ENGINEERING

- A. Douglas-Whitewater Draw:
 - 100% plans-Submitted.
 - Quantities and Cost for phases one and two submitted.
- B. Naco-4 Miles Roadway:
 - 100 % plans to be submitted at PDT meeting, January 14, 2003.
 - Drainage Report to be submitted on January 21, 2003.
- C. Nogales, Tunnels:
 - Plans – Completing 30% package.
 - Preparing to meet with various local government and utilities agencies.
- D. Nogales, ½ Miles Roadway Maintenance & 1-1/2 Miles Roadway:
 - Plans – 90 % to be submitted on January 30th, 2003.
 - Plans – 100 % to be submitted on February 27th, 2003.
- E. Nogales, Ephraim Ridge Road Reclamation:
 - 100 % plans to be submitted at PDT meeting, January 14, 2003.
 - Drainage Report to be submitted on January 21, 2003.
- F. Douglas, Picket Fence Extensions:
 - Plans – Completing 30% package.
- G. Alternative Primary Fence Designs:
 - Plans – Researching various alternatives – Final report in progress.
- H. Lighting Design – Standard 1 – Mile Rural Condition:
 - Plans – Negotiations in progress with the Army Corps of Engineers.

-----Original Message-----

From: (b)(6)

Sent: Tuesday, January 14, 2003 11:58 PM

(b)(6)

Subject: Environmental Update #15

All--

I trust that everyone had a wonderful and safe holiday season. Here are the environmental issues discussed during the PDT meeting Tuesday, January 14, 2003.

1. The Tucson/Yuma PEIS public comment period has been extended until 7 February 2003. It appears from some of the newspaper articles and some of the verbal comments we have received that the original intent and focus of the PEIS (i.e., daily operations) might have been lost.
2. The USF&WS has acknowledged that the Yuma BA is adequate and consultation has begun. A meeting is scheduled with the USF&WS for 24 January in Tucson to discuss some additional information needs on the Tucson BA.
3. The draft EA for the Naco fence and roadway was submitted for approval to release last Friday (10 January). HDR will complete another review and provide comments, if any, today. The NG intends to have a unit ready for this project in April, so the draft needs to be released ASAP.
4. The draft Ephraim Ridge reclamation EA was submitted for approval on 10 January. HDR will complete another review and provide comments, if any, today.
5. The Nogales Infrastructure EA (roadways, tunnel modifications, and portable lights) has been initiated but designs and ROEs still need to be resolved. (b)(6) felt that the ROEs have been completed and will confirm.
6. The WWD draft permit application was submitted in late November. GSRC will follow up with (b)(6) USACE Los Angeles District, to determine if there are any additional data needs and to attempt to move the application to the forefront. GSRC will draft a 404(b)(1) evaluation for the LA District to assist in the preparation of the permit. This 404 process can take 6-9 months to complete; The NG has planned to reschedule this project for June 03.
7. The revised CR survey reports for Naco and Douglas were received and are being reviewed by GSRC. Once our review is complete, they will be forwarded to (b)(6) for submittal to the SHPO. The coordination on the Programmatic MOA can be re-established upon acceptance of this report.
8. (b)(6) has not received a response to his inquiry to HQ INS Legal Counsel regarding the applicability of a CATEX for the road maintenance at Sonoita. (b)(6) agreed to follow up on this request and to send (b)(6) a copy of a memo from (b)(6) (dated about 2-3 years ago) acknowledging that road

maintenance (not improvements) fell within CATEX threshold.

9. The PDT agreed that the INS Regional Environmental Officer will be the POC identified on the title sheet; GSRC will notify the PDT when documents have been distributed to the public and keep records of the distribution. For "special" recipients, GSRC will send the documents via FedEx or Return Receipt Requested. If the costs of sending these items become onerous, a modification to GSRC's contract will be required.

10. The Naco and Douglas Station Level NEPA documents were discussed during a special afternoon session. The PDT discussed the 6 different approaches that had been formulated and finally agreed on a modified approach. We will continue with a supplement to the 2000 Naco-Douglas Corridor EA (aka Cumulative Impact EA) using the following alternatives: (1) No Action, (2) Prioritized Approach Alternative (preferred alternative) and (3) Full Build Out Alternative. The Prioritized Approach will be essentially the same that was presented in the September 2001 preliminary draft EAs, except that all projects identified in the Corridor EA will be removed from the Prioritized Approach project description since they have already been assessed. The Full Build Out Alternative will also be modified to exclude sensitive areas such as the Coronado National Memorial and to reduce the footprint to 60-foot in areas such as the developed areas around the Naco POE. The USBP will be able to continue their other site-specific projects, as identified in the Corridor EA, while this supplement is being prepared. The Full Build Out Alternative will be carried forward as a viable alternative, but not selected as the preferred at this time due to the potential environmental impacts. However, this will also provide an opportunity for USBP to revisit this alternative at some point in the future in the event that the full build out design is deemed necessary.

The RVS projects were not discussed since IMC representatives were not available. However, (b)(6) and GSRC did report that the FONSI for the Naco/Douglas RVS EA had been signed last week. As usual, if you have any questions, please do not hesitate to call me.

(b)(6)

Date: 1/15/2003 1:43 AM

Sender:

To:

(b)(6)

cc:

Priority: Normal

Subject: Environmental Update #15

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(b)(6)

Date: 1/31/2003 12:55 PM

Sender: (b)(6)

To:

Priority: Normal

Subject: Crawford Hill

Here are the updates--FYI.

----- Forwarded

(b)(6)

All--

Here are the environmental issues discussed during the PDT meeting Tuesday, November 5, 2002.

1. The final EA and FONSI for the Naco vehicle barriers to fence EA was released to the public on 18 October
2. The Tucson/Yuma PEIS was sent to HQ INS for submittal to the EPA on 21 October. NOA is expected to be published in the Federal Register on 8 November. Distribution to the public has been made for 45-day comment period.
3. The USFWS received the Yuma BA on 17 October.
4. The Tucson BA was submitted to HQ INS on 25 October. Expected to be submitted to USFWS this week.
5. The signed FONSI for the Naco/Douglas temp vehicle barriers EA was received on 31 October and distributed to the public on 4 November. The NOA was published on 5 November.
6. Preparation for the Naco fence and roadway EA continues. GSRC needs locations for the bollard fences. Still shooting for completion by the end of this year.
7. The Ephraim Ridge reclamation project will be separated from the other

Nogales infrastructure projects and has become a priority. (b)(6)
agreed that this project can be separated due to the nature
(repair/replace)

of the project and the independence from other infrastructure projects. It was also agreed that this EA can be released to the public for a 15-day comment period, provided there were no major comments received on JTF-6's original EA. GSRC will attempt to complete this project in early January.

8. The ROE notifications for the Nogales projects have been filed by USBP/HDR. Upon receipt of the revised designs for the 2 miles of roadway from Baker, the field surveys can be initiated. Preparations have begun on the EA.

9. The WWD draft permit application will be submitted to the PDT for review this week. The wetlands/waters of the US impacts exceed the thresholds for NWP 3 or 14 and thus will require an Individual Permit. This process can take 6-9 months to complete.

10. The CR survey reports have been received and forwarded to (b)(6) for

submittal to the SHPO. The coordination on the Programmatic MOA can be re-established upon acceptance of this report.

11. The Tucson (Naco/Douglas) RVS EA public review period ended on 30 October. Thus far, no comments were received [since the meeting, I've learned that one comment letter was received and has been forwarded to GSRC]. The preliminary final will be submitted for review and approval by the end of next week (15 November).

12. The Crawford Hill relay tower/RVS site FEA and FONSI was submitted to HQ INS for staffing on 6 November. As soon as the signed FONSI is received, the final distribution will be made.

13. The Nogales RVS EA is on hold pending directions regarding the access roads.

14. (b)(6) has submitted an inquiry to HQ INS Legal Counsel regarding the

applicability of a CATEX for the road maintenance at Sonoita, but has not received a response to date. HDR feels that at the very least CR and possibly some bio surveys might be required.

15. The Naco and Douglas Station Level EAs have been distributed for internal review. Naco comments were due on 1 November. Comments on the Douglas EA are due on 8 November. GSRC has coordinated two public scoping meetings at Naco and Douglas on 18 and 19 November, respectively. The format will be a formal presentation, followed by an open floor to provide comments. No Q&A sessions will be provided. ACPA (b)(6) will open the meeting and present the USBP information; GSRC will present the NEPA portions of the presentations and describe the alternatives, as they currently exist. (b)(6) will serve as the facilitator/moderator during the comment session.

16. Klienfelder has completed the file review and site reconnaissance for the Phelps Dodge slag piles. Expect to have the draft report submitted by the end of next week (15 November).

As usual, if you have any questions, please do not hesitate to call me.

(b)(6)

----- Forwarded

From
To:
To:
To:

(b)(6)

(b)(6)

.....

Here are the environmental issues discussed during the PDT meeting Tuesday, September 10, 2002.

2. Comments on the Tucson/Yuma PEIS were received. The draft is expected to be sent to (b)(6) for approval to release late next week, but NLT 15 October. [One thing not discussed, but needs to be considered--will USACE or HQ INS send the draft to EPA for publication in the Federal Register?]

(b)(6) indicated that (b)(6) had concerns about the commitment to coordinate with BMGR, CPNWR and MCAS before implementing construction/operation activities on their lands. (b)(6) will contact

4. Comments have been received on the Tucson BA and will be the revisions are being incorporated. The BA will be sent to the USACE/INS for submittal NLT 11 October.

6. The 15% designs for the Naco roadway/fencing project were received during the PDT meeting. Briefly, the PDT agreed that all lands within the 60-ft easement would be permanently impacted and that a 60-ft temporary construction easement should also be included in the impact analysis. JTF-

6

has stated that the unit they identified for this work will not be able to deploy in January, so they will look for other units. (b)(6) indicated he would contact a NG unit Colorado to see if they were interested in doing this work. So, GSRC will still shoot for the final EA by the end of this year.

7. Nogales road/lights and Ephraim Ridge reclamation project is dependent upon receipt of the ROEs and engineering designs. Data collection has been initiated.

8. WWD 90% design was received during the PDT meeting. GSRC has contacted

(b)(6) (USACE Los Angeles, Phoenix Field Office) and will begin development of the permit application. Baker will need to provide Qs for 10 and 100-year events, a dewatering plan, bollard fence details, and if possible, dredge/fill volumes.

9. (b)(6) had sent an earlier e-mail indicating that the SHPO will wait for the results of the current surveys before proceeding with coordination on the Programmatic MOA. Surveys were delayed on the west side of the Naco AO due to fire hazards this summer, but have now been completed. The report is

expected within the next few weeks. GSRC's subconsultant was asked to revisit some sites because of conflicting determinations of potential eligibility between the current investigation and previous surveys.

10. The footprint of the site at the Arnie's Trestle has been resolved and

the draft EA was released for public review on 25 September. The 30-day comment period closes on 30 October.

11. The Crawford Hill relay tower/RVS site EA has been revised and will be sent out for 15-day public review this week.

12. Comments were received on the Nogales RVS EA. However, GSRC will still need direction regarding the access roads.

13. HDR has requested CR and bio survey data from the USFS, but nothing has been received to date. HDR will establish a conference call later this week to decide which approach to take.

14. GSRC believed that a public scoping meeting regarding the Naco and Douglas Stations EAs in October would not provide adequate preparation or public notice time. The PDT agreed to look at the weeks of 11 or 17 November (the latter is better for (b)(6)). GSRC will contact the Cochise College to determine availability. (b)(6) wants to have a formal presentation and comment period--no Q&A session. GSRC will prepare a draft PowerPoint presentation by 18 October for internal review. A dry run will be performed at the PDT meeting on 5 November to make sure all players know what their responsibility/roles will be. The EAs were scheduled to be delivered by 4 October, but have been delayed until 11 October, due to a variety of electrical and weather-related problems.

As usual, if you have any questions, please do not hesitate to call me.

(b)(6)

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Subject: Tucson Environmental Update (035)11

All--

Here are the environmental issues discussed during the PDT meeting Tuesday, September 10, 2002.

1. The preliminary final EA for the Naco vehicle barriers to fence EA was submitted for internal review and approval. (b)(6) has submitted comments and (b)(6) is expected to send some by 13 September, which is the deadline for comments. Barring any significant comments, the final EA will be released NLT next week. GSRC will send a draft FONSI to (b)(6) for staffing this week.
2. The Tucson/Yuma PEIS is expected to go out this week for another review. Comments will be due 27 September.
3. The Yuma BA was sent out for internal review on 16 August. Comments are due 13 September.
4. The Tucson BA was sent out for internal review on 23 August. Comments are due 13 September.
5. The Naco/Douglas temp vehicle barriers EA was sent out for 30-day public review; review period will close 2 Oct.
6. Naco roadway project now includes 4 miles of fencing as well. A preliminary draft will be sent out for internal review by the end of next week, provided roadway designs are received. PDT is shooting for a final EA by the end of the CY so that JTF-6 and NG units can get started in January/February if funding is available.
7. Nogales road/lights and Ephraim Ridge reclamation will be rolled into one EA--expect to get ROEs within 6 weeks; field surveys are dependent upon receipt of the ROEs and designs.
8. WWD 90% design is expected by 23 September; (b)(6) has coordinated with

(b)(6)

(USACE Los Angeles); GSRC will follow-up and begin permit application as soon as design is submitted.

9. (b)(6) is still coordinating with the SHPO regarding the Programmatic

MOA. The Mine Ridge site report has been completed and the site has been cleared for construction.

10. The new alignment/design for access road to the North of Monument 90 RVS

has been resolved; however, the footprint of the site at the Arnie's Trestle

has changed and GSRC will need revised footprint in order to complete the EA.

11. The Crawford Hill RVS site in Nogales can not be CATEXed. (b)(6) will attempt to get approval to prepare a separate EA for this site and for a 15-day public review period. GSRC will develop a cost estimate and internal

draft ASAP, provided this approach is accepted by HQ INS.

12. The Nogales RVS EA has been sent out for internal review; comments are

due on 13 September. GSRC will still need direction regarding the access roads.

13. HDR has requested CR and bio survey data from the USFS. If there are no

sensitive resources recorded, the Sonoita road maintenance project (18-23 miles) will be CATEXed.

14. PDT agreed to conduct a public scoping meeting regarding the Naco and

Douglas Stations EAs. The meetings will be solicit input regarding alternative designs, mitigation and to see if there is enough controversy to

warrant consideration of an EIS. GSRC will begin preparations of the scoping meeting. In the meantime, GSRC will continue with the preparation of the Station level EAs and expect delivery NLT 4 October. GSRC is also still accepting comments on the draft Section 2.

As usual, if you have any questions, please do not hesitate to call me.

(b)(6)

Date	Title	Project Description	Project and Compliance Sta
TUCSON SECTOR			
Aug 1994	Final PEIS for JTF-6 Activities Along the US./Mexico Border		
Jul 1997	Supplemental Environmental Assessment JTF-6 Fence and Road Construction, Douglas, Cochise County, AZ; Prepared by USACE Fort Worth District	1 Mile of decorative fence starting at the POE and going east and 0.3 miles going west of the POE. 3.6 Miles of Landing Mat Fence starting at the end of the decorative fence (4.6 miles total east from POE) and 1.3 miles of landing mat fence starting at the end of the decorative fence to the west (1.6 miles total west of POE). 0.5 Miles of road maintenance starting 0.3 miles west of POE. Four 36-inch culverts may be used.	Eastern side is complete except for LWC; western completed by National Guard under 2002 INS EA still some LWCs to be installed and/or repaired o
Mar 1998	Final Supplemental EA Proposed JTF-6 Light Pole Installation Mission, Douglas, Cochise County, AZ; Prepared by USACE Fort Worth District	Approx. 2 miles of lights spaced 400 feet apart starting at Ave A and ending at Airport Road. 3 Miles of lights starting at POE and going west. 8-ft wide maintenance road along next to light poles.	Lights have been installed—need USBP Douglas
Mar 1998	Final EA Proposed U.S. Border Patrol Facility at the Davis-Monthan Air Force Base, Tucson, Arizona		
Sep 1998	Final EA, Joint Task Force Six, Proposed Lighting and Camera Installation Project, Nogales, Arizona		

Apr 1999	Final EA JTF-6 Proposed Lighting Project, Naco, Cochise County, AZ; Prepared by USASE Fort Worth District	2 miles of lights; one mile east and one mile west of truck POE. Approx 40 poles, 300 to 400 ft apart. Minor road maintenance to pole locations, if needed.	Lights completed in 2002—shields are being installed
June 2000	Final EA for Seven Remote Video Surveillance Sites Near Naco, Arizona		
Aug 2000	Final EA for Infrastructure Projects within the Naco-Douglas Corridor, Arizona	aka the Cumulative Impact EA—described past, on going and potential future infrastructure projects along 60-mile border	No specific projects were identified for construction more like a programmatic document, with intention needs of the AZ Governor and US White House d
Aug 2000	Final EA JTF-6 Proposed Fence and Road Improvement Project, Naco, Cochise County, AZ; Prepared by Fort Worth District	Extend fence one mile further to the east. Replace existing vehicle barrier east of POE starting at the end of the new fence and going 3.0 miles (total approved fence will be 2 miles of landing mat and 3 miles of vehicle barrier). Improve border road for four miles east and six miles west of POE. Two low water crossings (no culverts just paving) west of POE.	Project has not been initiated; some components and/or the same as the October 2002 EA being p
Jan 2001	Final EA for Immigration & Naturalization Service Expansion of Parking/Storage Facilities and New Traffic Checkpoint at Sonoita, Arizona		
Jan 2001	Final EA for Immigration & Naturalization Service New (b) (7)(E) Temporary Traffic Checkpoint, Nogales, Arizona		
Feb 2001	Final EA JTF-6 Proposed Fence, Lighting, Road Repair and Improvement Project, Douglas, Cochise County, AZ; Prepared by Fort Worth District	Extend landing mat fence an additional 2 miles east of POE (Total approved fence will be 6 miles from POE going east). Permanent lights; 1.0 mile west of POE and 0.8 miles east of POE (0.3 miles from POE and 0.5 Miles starting at the end of the existing lights going to south of airport, Figure 1.0). 4.0 Miles of road upgrade east of POE and 4.0 miles west of WWD. Minor road repair for an	Project completed on east side; west side (except completed by National Guard using Kings Ranch work (new and repair) on LWCs needed. Minor r miles has not been initiated

		additional 8 miles past the 4.0 miles west of WWD. (Total road work is 12 miles past WWD, 4 major and 8 minor work)	
April 2001	Supplemental EA for JTF-6, Whitewater Draw (WWD) Crossing, Douglas, AZ; Prepared by Fort Worth District	Construction of drainage structure/road platform across Whitewater Draw	Baker is preparing the 90% design; GSRC will prepare applications with the intent of having the permits ready in early 2003
May 2001	Final EA for Proposed Expansion of the Ajo U.S. Border Patrol Station, Why, Arizona	To provide necessary parking, locker rooms, office buildings and support facilities.	
June 2001	Supplemental Final PEIS for INS and JTF-6 Activities		
Dec 2001	Final EA for Portable Lights Within the Naco Corridor, Cochise County, Arizona		
Feb 2002	Final EA for Road Improvements along Kings Ranch Road and Border Road, Douglas, AZ	Construction/improvements of 1 mile of road from Douglas Station to the border (Kings Ranch Road) and 2 miles of border road originally proposed by JTF-6	Construction completed, but some rework is needed LWCs
Oct 2002	Final EA for Conversion of Vehicle Barriers to Landing Mat Fence, Naco, AZ	Conversion of 1.2 miles of vehicle barriers (with 10-12 foot vertical supports) to landing mat fence. Project starts about 1 mile east of Naco	EA completed, but construction has not started
Sept 2002	Final EA U.S. Border Patrol Station, Willcox, Arizona		
Nov 2002	Final EA for the Installation of Temporary Vehicle Barriers along US/Mexico border in Douglas and Naco Stations	Construct vehicle barriers at Stations and place the barriers, as needed, at locations along a 25-mile reach of the border	EA complete, some barriers have been constructed
Jan 2003	Draft EA for 4 miles of Roadway Improvements, Fences and LWCs, Naco, AZ	Construction/major improvements of 2 miles of roadway on either side of the Naco POE, installation of 1 mile of landing mat fence on east side of POE beginning about 1 mile east of POE (vehicle barriers to be removed), installation of up to 4 LWCs	Preliminary Draft EA has undergone internal review. Draft by mid-January 03 for 30-day comment period
	Draft EA for 2 miles of Roadway Improvements and Fences, Placement of 60 Portable Lights, and Reclamation of Ephraim Ridge, Nogales, AZ	Construction/major improvements of 2 miles of roads on west side of POE, installation of portable lights at about 60 locations on either side of the POE, reclaim and support hill that is sloughing toward Mexico—will require rerouting of road	Baker to provide designs; EA is being prepared (preliminary draft should be ready for review by mid-February depending upon receipt of the designs)

Jan 2003	Draft EA for Reclamation of Ephraim Ridge, Nogales, AZ	Reclaim and restore hill (about 1.25 acre) to ensure that it does not slip into Mexico	Preliminary Draft EA has undergone internal review Draft by mid-January 03 for 30-day comment period
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EL PASO SECTOR

Jan 1999	Final EA for JTF-6 Road Improvements and Vehicle Barriers, Columbus, NM	Construction/improvements of 75 miles of roadways and installation of 50 miles of rail vehicle barriers; road work on either side of POE	Road construction and some vehicle barriers were completed on west side to John completed in Sept 2002 to allow NG to complete road work
Jan 1999	Final EA for JTF-6 Road Improvements near Van Horn, TX	Construction/improvements of 110 miles of patrol roads and construction/major improvements of 20 miles of access road to Indian Repeater site	Not sure of the status of this project—need USBP to confirm
May 2000	Final EA for JTF-6 Road and Drainage Improvements near Eagle Pass, TX	Construction/improvements of 16 miles of roads, 5 LWCs, 1 box culvert crossing, and 2 timber trestle bridges; an additional 2.8 miles of alternate road was identified on Cinco Ranch as possible future project	Some work has been completed, but not sure of the status need USBP or JTF-6 to confirm. Neither of the bridges constructed and I do not think the large box culvert
May 2000	Final EA for JTF-6 Rail Barriers, Santa Teresa, NM	Construction and installation of rail barriers along 2 different reaches of the border; about 0.8 miles to be installed in the stock yards, east of the POE and about 2 miles of barrier along the border starting approximately 5 miles west of the POE. Minor road improvements were necessary to access the site, but would remain within the extant road ROW	Some work was completed, but need USBP or JTF-6 to confirm
Oct 2002	Draft EA for Fence Upgrade and Extension, Anapra, NM	Conversion of portion (0.2 miles) of the extant chain link fence to landing mat fence and extending the extant fence for 0.17 miles to the east and 0.41 miles to the west	EA is in review now; expect to have the Draft EA completed in October; Final EA and FONSI should be available

EL CENTRO SECTOR

Oct 2002	Draft EA for Placement of Temporary Vehicle Barriers, El Centro, CA	Construction of temporary vehicle barriers at Calexico and El Centro BP Stations and then placement of the barriers at various locations on an as needed basis—anywhere along a 21-mile section of the border	Draft EA will be released to the public soon
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YUMA SECTOR

May 2002	Biological Monitoring for Installation of Emergency Beacons, Yuma Sector	Monitoring the installation of 6 emergency beacons; CATEX was prepared by MCAS	Beacons installed with no loss to flat-tailed horned
June 2002	EA for Operation Desert Grip, Wellton Station, AZ	Placement of temporary trailers and associated infrastructure in Cabeza Prieta NWR/Los Vidrios area for 24-hour patrol support	No construction required; trailers emplaced

Date: 7/12/02 11:28 AM

Sender:

To:

(b)(6)(b)(7)(C)

Priority: Normal

Subject: TCA PDT Meeting Minutes - July 9, 2002

Attached are the meeting minutes and sign in sheet for the July 9, 2002 Tucson Sector PDT meeting.

<<070902.doc>> <<070902_Sign_in.doc>>

If possible, please forward these minutes to the following individuals and provide me with their e-mail addresses for future use.

- * (b)(6) - Nogales Station
- * (b)(6) - JTF6

If you have any questions about the material contained above, please do not hesitate to contact me.

Thank you,

(b)(6)

Note: To assure proper delivery to all recipients, the following addresses have been moved from the header:

(b)(6)

070902.DOC

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**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR, US BORDER PATROL
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING MINUTES

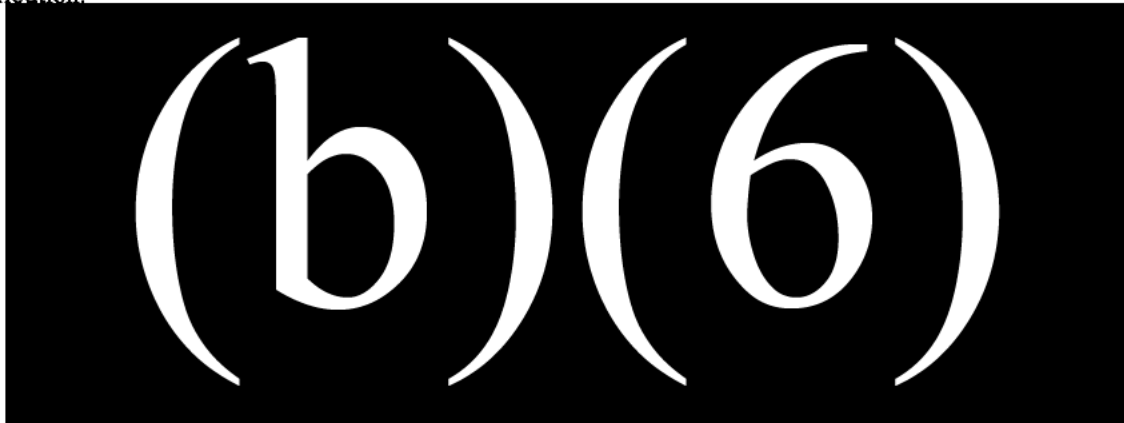
Meeting Date and Time: July 9, 2002 at 10:00 am

Meeting Location: HDR-Phoenix

Distribution Date: July 12, 2002

Distributor: (b)(6)

Distribution:



MEETING PURPOSE

PDT Meeting.

ATTENDEES

See Attached.

PREVIOUS ACTION ITEMS STATUS

ACTION	RESPONSIBLE	STATUS
Determine who the wooden box deposit was paid to for the lighting supplies.	Naco BP	No deposit was made.
Review Programmatic EIS and provide GSRC with comments.	Team	Done
Site visit Sonoita and develop SOW for grading if necessary.	HDR	Done-see below.
USF&WS Property in Douglas – Develop specific use statement.	(b)(6)	No update available.
USF&WS Property in Douglas – ALTA Policy, Schedule B.	(b)(6)	No update available.
USF&WS Property in Douglas – Develop scope of work.	HDR	On-going.
Coordinate filing of Kings Ranch Road easements.	(b)(6)	No update available.
Coordinate communication with Kings Ranch Road southernmost landowner.	(b)(6)	No update available.

MILITARY DEPLOYMENTS

AZ National Guard

Deployments

- Nothing scheduled for the remainder of the year.
- Additional funding requested for troops at the end of the fiscal year, but not optimistic to receive.

Other Issues

- (b)(6) visited California and indicated similar staffing can be anticipated for Tucson Sector.

JTF-6

Future Deployments

- Reviewing support requests for Douglas and Naco roadway work.
- Hesitant to commit to Whitewater Draw until additional pieces are in place.
- Nogales work looks intensive. Hesitant to commit at this time.
- Funding available to begin work as early as October.

ENGINEERING

Douglas Schematic Design

- Discussion surrounding what should be shown in design sheets ... interim build out or ultimate build out. Concern centered around trying to get clearance for the full 300 feet, particularly in areas where houses would be taken. Decision made to show full build out.

Naco Schematic Design

- Discussion surrounding what should be shown in design sheets ... interim build out or ultimate build out. Concern centered around trying to get clearance for the full 300 feet, particularly in areas where houses would be taken. Decision made to show full build out.

Douglas, Whitewater Draw, Preliminary & Final Design

- Determined to be the first priority for completion.
- Design drainages first to accommodate 401/404 permit schedule.
- Consider packaging low water crossing and roadway work as separate projects.

Naco, 4 Miles Roadway, Preliminary & Final Design

- Determined to be the third priority for completion.
- Design drainages first to accommodate 401/404 permit schedule..

Nogales, Tunnels, Preliminary & Final Design

- Determined to be the second priority for completion.
- Design drainages first to accommodate 401/404 permit schedule.

Nogales, 2 Miles Roadway, Preliminary & Final Design

- Determined to be the fourth priority for completion.
- Design drainages first to accommodate 401/404 permit schedule.

Nogales, Ephraim Ridge Road Reclamation

- Complete concurrent with other projects.

Douglas, Picket Fence Extensions

- Complete concurrent with other projects.

Alternative Primary Fence Designs

- Complete concurrent with other projects.

ENVIRONMENTAL

Naco, Vehicle Barrier to Landing Mat Fence

- Received no comments to date. If no comments appear in next few days, conceivable to have final document and FONSI to INS HQ for signature this week.

Douglas EA

- Awaiting schematic designs.
- Finalizing field work.

Naco EA

- Awaiting schematic designs.
- Finalizing field work..

Agency Scoping for Station Level EAs

- Excellent attendance by agencies.
- Agencies indicated a willingness to work with Border Patrol.
- Work will continue with the stations. Meet August 1 at Tucson Station.

Biological Assessment

- Draft issued and comments requested by July 30.

Programmatic EIS

- A number of comments were received. A matrix of comments and responses will be developed and distributed. A resolution conference call is scheduled for Friday, July 19, 8:00 am (Phx).

Mine Ridge Cultural Site

- Document reviewed by SHPO. Including one additional photo and report will be complete. Final report to be sent to ACHP and all efforts will be finalized. Construction will then be able to go forward.

Programmatic MOA

- Effort on-going with continued coordination with SHPO.

Nogales Tunnels – Cat Ex

- Document signed.

Douglas Vertical Fence Extensions – Cat Ex

- Document signed.

Douglas, Whitewater Draw Permitting

- Awaiting NTP to proceed.
- Require a level of engineering effort to proceed.

Naco, 4 Miles Roadway, EA & Permitting

- Awaiting NTP to proceed.

Douglas, Naco Temporary Vehicle Barrier

- Effort to commence with NTP on task order. Anticipate if all goes well, construction can occur in September.

Nogales, Infrastructure Improvements, EA

- Included projects are Tunnels, 2 Miles Roadway, Ephraim Ridge Road Reclamation and Portable Lights.
- Awaiting NTP to proceed.
- Require a level of engineering effort to proceed.

Sonoita Station

- HDR visited site.
- Recommendation is to clearly define level of maintenance effort, clearly define locational limits of maintenance, acquire biological and cultural data from Forest Service and pursue categorical exclusion.

REAL ESTATE

Douglas, West, Kings Ranch Road

- No update available.

Douglas, USFWS Land West of Kings Ranch Road

- No update available.

PROCUREMENT

Douglas, Roadway Extension and Kings Ranch Road

- Douglas Station personnel to provide inventory of materials remaining. All materials to be protected from the elements.

Naco Lighting

- Working with Border States Electric to return items.
- Working with GTR on light infiltration solutions that may require procurement.

CONSTRUCTION

All construction completed for scheduled deployments.

OTHER ISSUES

Whitewater Draw

- Conference call with Douglas Station personnel, INS legal counsel, INS HQ personnel and COE real estate personnel. Results of meeting are to move forward with an issues paper detailing the liability assumed with various levels of real estate acquisition, begin condemnation for environmental baseline

study and construction of interim facility, begin acquisition of ultimate real estate based on recommendation from issues paper and begin Phase 1 and Phase 2 environmental baseline study.

Naco Lighting

- Lights were turned on and complaints received. Letter issued to address complaints. Complaints came from local, amateur astronomers regarding light escaping to the north and west. Efforts will be made with GTR to determine if screening options exist.
- Also test light infiltration into Mexico.

Lessons Learned

- A lessons learned meeting was held to document what worked well and what could work better in future efforts. A summary document will be distributed.

ACTION ITEMS

ACTION	RESPONSIBLE	DATE
Provide JTF-6 copy of low water crossing design.	HDR	
Provide Nogales Shower Facility Cat-Ex to (b)(6)	HDR	
Provide Douglas Vertical Fence Extension Cat-Ex to (b)(6)	HDR	
Follow up on NTP for environmental task order.	HDR	
Develop estimate to upgrade Douglas lighting with wedges and fixtures.	HDR	
Provide HDR with inventory of remaining construction materials in Douglas.	USBP	

NEXT MEETINGS

July 23, Tucson Station, 10:00 am

August 6, HDR-Phoenix, 10:00 am

August 20, Tucson Station, 10:00 am

These minutes reflect the understanding of HDR Engineering, Inc. If revisions or additions are needed, contact (b)(6)

LOCATION: HDR - Phoenix

**INS – US BORDER PATROL BORDER BARRIER PROJECTS
TUCSON SECTOR PROJECT DELIVERY TEAM
MEETING CHECK IN AND SIGN IN**

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NAME: (b)(6)

ADDRESS: (b)(6)

AFFILIATION: Border Patrol Special Coordination Center

E-MAIL:

PHONE:

(b)(6)

NAME: (b)(6)

ADDRESS: (b)(6)

AFFILIATION: Kleinfelder

E-MAIL:

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NAME: (b)(6)
ADDRESS: _____

AFFILIATION: BPSCC

E-MAIL:

PHONE:

(b)(6)

FAX:

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 21 October 2003 8:30 AM

Meeting Location: Camelback Golf Club - 7847 N. Mockingbird Lane

MEETING PURPOSE

TCA PDT Environmental Working Group Meeting

INTRODUCTIONS

1. REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Mitigation costs possible from BA to be provided to (b)(6)	(b)(6)
2. (b)(6) to provide contacts to develop cumulative impacts to GSRC	
3. Nogales BPS EA out by 26 September	
4. Check on FEA and Draft FONSI for Nogales Infrastructure	
5. Updates by 29 Sept. to (b)(6) for environmental projects	

2. SUMMARY OF NON-PDT ACTIVITIES (REGIONAL)

- a. PEIS Tucson & Yuma (AERC 225)
- b. RVS for TCA (AERC 255)
- c. Rescue Beacons (AERC 497)
- d. Checkpoints (b)(7)(E) (AERC 499)
- e. Nogales BPS (AERC 503)
- f. BA – Operations – Tucson & Yuma (AERC 51)

3. SUMMARY OF PDT ACTIVITIES (INFRASTRUCTURE)

- a. Nogales Infrastructure EA (AERC #255 & 218 ENV #225)
- b. Naco-Douglas SEA (AERC 218)

5. NEXT MEETING

18 November 2003 – Tucson USBP Station

Draft – Must be Cross Checked BY GSRC

PROJECT	SPENDING PLAN FISCAL YEAR	NEPA DOCUMENT	FONSI	COMMENTS
DGL, Whitewater Draw Box Culvert	03	Supplemental EA for JTF-6, Whitewater Draw (WWD) Crossing, Douglas, AZ	4/2001	Pending 404 permit – Floodplain Use Permit issued by Cochise County – WILL MOVE TO FY'04 DUE TO 404 PERMIT AND SCHEDULED JUNE DEPLOYMENT OF OKLAHOMA NATIONAL GUARD
DGL, 10' CMP & Erosion Control Repair	03	Final EA JTF-6 Proposed Fence, Lighting, Road Repair and Improvement Project, Douglas, Cochise County, AZ	2/2001	Also items yet to be completed under Final EA for Road Improvements along Kings Ranch Road and Border Road, Douglas (2/2002) - WILL MOVE TO FY'04 PENDING DEPLOYMENT OF NATIONAL GUARD
DGL, Temporary Vehicle Barrier (5 miles)	03	Final EA for the Installation of Temporary Vehicle Barriers along US/Mexico border in Douglas and Naco Stations	11/2002	Construct vehicle barriers at Stations and place the barriers, as needed, at locations along a 25-mile reach of the border - WILL MOVE TO FY'04 PENDING DEPLOYMENTS
DGL, Vertical Fence Extensions	03			Cat. Ex.
DGL, Monsoon Repair	03	Final EA for Road Improvements along Kings Ranch Road and Border Road, Douglas, AZ	2/2002	Construction of erosion control and repair of facilities of 1 mile of road from Douglas Station to the border (Kings Ranch Road) and 2 miles of border road - WILL MOVE TO FY'04 PENDING DEPLOYMENTS

PROJECT	SPENDING PLAN FISCAL YEAR	NEPA DOCUMENT	FONSI	COMMENTS
NCO, 4 Miles Roadway	03	Final EA for 4 miles of Roadway Improvements, Fences and LWCs, Naco, AZ	4/2003	Construction/major improvements of 2 miles of roadway on either side of the Naco POE, installation of 1 mile of landing mat fence on east side of POE beginning about 1 mile east of POE (vehicle barriers to be removed), installation of up to 4 LWCs – TWO MILES EAST OF POE CONSTRUCTED FY'03 – FEB. 2004 DEPLOYMENT TO CONSTRUCT TWO MILES WEST OF POE
NCO, Temporary Vehicle Barrier	03	Final EA for the Installation of Temporary Vehicle Barriers along US/Mexico border in Douglas and Naco Stations	11/2002	Construct vehicle barriers at Stations and place the barriers, as needed, at locations along a 25-mile reach of the border - WILL MOVE TO FY'04 PENDING DEPLOYMENTS
NCO, Vehicle Barrier to Landing Mat Fence	03	Final EA for Conversion of Vehicle Barriers to Landing Mat Fence, Naco, AZ	10/2002	Conversion of 1.2 miles of vehicle barriers (with 10-12 foot vertical supports) to landing mat fence. Project starts about 1 mile east of Naco. Project began construction with JTF-6 deployment 25 August 2003

PROJECT	SPENDING PLAN FISCAL YEAR	NEPA DOCUMENT	FONSI	COMMENTS
NCO, Primary Fencing (7 miles)	03	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	Final EA & FONSI pending - Construction of primary and secondary fence in Douglas (9 miles) and Naco (6 miles), installation of primary fence for remainder of Douglas border, installation of vehicle barrier eastward to Coronado NM in Naco AO, and road improvements along entire area - WILL MOVE TO FY'04 PENDING DEPLOYMENTS
NGL, Tunnels	03	Nogales Various Infrastructure EA	pending	RVS added to EA. Final EA & Draft FONSI at HQ - Project includes 2 miles of major roadway improvements on east side of POE, primary fencing on east side to parallel new road, installation of 15 RVS sites and continuation of current use of 69 portable light generators. WILL MOVE TO FY'04 PENDING DEPLOYMENTS
NGL, 2 Miles E. of POE (Const. First ½ mile)	03	Nogales Various Infrastructure EA	pending	WILL MOVE TO FY'04 PENDING DEPLOYMENTS
NGL, Ephraim Ridge	03	Final EA for Reclamation of Ephraim Ridge, Nogales, AZ		Reclaim and restore hill to ensure that it does not slip into Mexico. Need 7 acres of easement/lease
Temporary Vehicle Barriers for other stations	03			GSRC developing NEPA Document

PROJECT	SPENDING PLAN FISCAL YEAR	NEPA DOCUMENT	FONSI	COMMENTS
DGL, Whitewater Draw Bollard Fencing	04	Final EA JTF-6 Proposed Fence, Lighting, Road Repair and Improvement Project, Douglas, Cochise County, AZ	2/2001	being completed using Kings Ranch Road EA (2/2002). Additional work (new and repair) on LWCs needed. Minor road repair for the 8 miles has not been initiated.
DGL, Complete 8 Low Water Crossings	04	Final EA for Road Improvements along Kings Ranch Road and Border Road, Douglas, AZ	2/2002	
DGL, Kings Ranch Road Fencing	04	Final EA for Road Improvements along Kings Ranch Road and Border Road, Douglas, AZ	2/2002	
DGL, Lighting Conversion (1 Mile) (Engr)	04	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
DGL, International Ditch for Private Contractor	04	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
DGL, Dip 1 (Low Water Crossing)	04	Final EA JTF-6 Proposed Fence, Lighting, Road Repair and Improvement Project, Douglas, Cochise County, AZ	pending	
DGL, Dip 7	04	Final EA JTF-6 Proposed Fence, Lighting, Road Repair and Improvement Project, Douglas, Cochise County, AZ	2/2001	

PROJECT	SPENDING PLAN FISCAL YEAR	NEPA DOCUMENT	FONSI	COMMENTS
DGL, Lighting (5 Miles) Split E. & W. of POE	04	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
DGL, Primary Fencing (Cattleman's West 4 miles) (Engr. & Env)	04	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
DGL, 5 Miles Roadway (E. of POE)	04	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
DGL, 5 Miles Roadway & Drainage (W. of POE)	04	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
DGL, Dip 5	04	Final EA JTF-6 Proposed Fence, Lighting, Road Repair and Improvement Project, Douglas, Cochise County, AZ	2/2001	
NCO, Lighting (5 Miles) Split E. & W. of POE	04	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
NCO, 4 Miles Roadway & Drainage (E. & W. of POE)	04	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
NGL, 4 Miles Roadway & Drainage (W. of POE)	04			GSRC developing NEPA Document - WILL MOVE TO FY'05 PENDING DEPLOYMENTS

PROJECT	SPENDING PLAN FISCAL YEAR	NEPA DOCUMENT	FONSI	COMMENTS
NGL, 2 Miles Roadway & Drainage (E. of POE)	04			GSRC developing NEPA Document - WILL MOVE TO FY'05 PENDING DEPLOYMENTS
NGL/DGL/NCO Additional Lighting (5 Miles)	04	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	Nogales pending Environmental Document
Temporary Vehicle Barriers (other Stations)	04			GSRC developing NEPA Document
Roadway for Sonoita and Other Stations	04			GSRC developing NEPA Document - 27-mile Road Improvements EA, Sonoita Station
DGL, 10-Miles Roadway (5 Miles Split E. & W. of POE)	05	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
DGL, 5-Miles Lighting (2.5 miles E. & W. split on POE)	05	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
NCO, 4-Miles Roadway & Drainage (E. & W. of POE)	05	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
NCO, 5-Miles Lighting (2.5 miles E. & W. split on POE)	05	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
NGL, 5-Miles Lighting (2.5 miles E. & W. split on POE)	05			Need NEPA Document - GSRC developing NEPA Document
TUS, Vehicle Barrier (2 Miles W. & 8 Miles East of Sasabe)	05			Need NEPA Document

PROJECT	SPENDING PLAN FISCAL YEAR	NEPA DOCUMENT	FONSI	COMMENTS
DGL, 5-Miles Primary Fence (2.5 miles E. & W. split on POE)	06	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
DGL, 5-Miles Roadway (W. of POE)	06	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
NCO, 5-Miles Roadway (2.5 Miles Split on POE)	06	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
NCO, 5-Miles Primary Fence (2.5 miles E. & W. split on POE)	06	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	
NGL, 5-Miles Primary Fence (2.5 miles E. & W. split on POE)	06			Need NEPA Document
TUS, 10-Miles Roadway (2 Miles W. & 8 Miles East of Sasabe)	06			Need NEPA Document
SON, 4-Miles Roadway	06			GSRC developing NEPA Document - 27-mile Road Improvements EA, Sonoita Station
SON, 2-Miles Vehicle Barrier	06			GSRC developing NEPA Document - 27-mile Road Improvements EA, Sonoita Station
NGL, 4 Miles Roadway & Drainage	06		pending	Need NEPA Document
DGL, 5-Miles Primary Fence (2.5 miles E. & W. split on POE)	07	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ	pending	

PROJECT	SPENDING PLAN FISCAL YEAR	NEPA DOCUMENT	FONSI	COMMENTS
DGL, 5-Miles Roadway (W. of POE)	07	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ		
NCO, 5-Miles Roadway (2.5 Miles Split on POE)	07	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ		
NCO, 5-Miles Primary Fence (2.5 miles E. & W. split on POE)	07	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ		
NGL, 5-Miles Primary Fence (2.5 miles E. & W. split on POE)	07			GSRC developing NEPA Document
CAG, 10 Miles Vehicle Barrier	07			Installation of temporary vehicles at high traffic areas anywhere within the Tucson Sector—no ground disturbance - GSRC developing NEPA Document
SON, 2-Miles Vehicle Barrier	07			Installation of temporary vehicles at high traffic areas anywhere within the Tucson Sector—no ground disturbance - GSRC developing NEPA Document
DGL, 5-Miles Roadway (W. of POE)	08	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ		
NCO, 5-Miles Roadway (2.5 Miles Split on POE)	08	Supplemental EA for Various Infrastructure along the Naco-Douglas Corridor, AZ		

PROJECT	SPENDING PLAN FISCAL YEAR	NEPA DOCUMENT	FONSI	COMMENTS
NGL, 5-Miles Lighting	08			GSRC developing NEPA Document
CAG, 10 Miles Vehicle Barrier	08			Installation of temporary vehicles at high traffic areas anywhere within the Tucson Sector—no ground disturbance - GSRC developing NEPA Document
SON, 2-Miles Vehicle Barrier	08			GSRC developing NEPA Document - 27-mile Road Improvements EA, Sonoita Station
TUC, 2-Miles Vehicle Barrier	08			Installation of temporary vehicles at high traffic areas anywhere within the Tucson Sector—no ground disturbance - GSRC developing NEPA Document

①

DDT mety 10/21/03

Review Actors

DRUS report considered today by C-Panel

2) Low Water Crossing design & saw ~~the~~ - still being modified

3) MOA AUG 8 BP done 10/3/07

4) Customs / Nogales BP - turn design - no problems

5) Fence design comments - jridgely

6) USACE and recovery to work out database glitch

7) BPSCC - force extension spectra sent to (b)(6)
- need a M.O.A. w/ BP & Bureau of Prisons

FVS update shipped out

No contact for Douglas Station - EA on Hold due to ROE
red ^{with} surveys & roads locations

Military Deployments - 42 NG schoolhouse conference in Arkansas

- Forces command has not finalized for next year

- copied ~~ask~~ bhama ni may > wupwe
alaska is day

(S Carolina is fine 6-19 - 4 was on 3 other road

04 FY } Survey crew in fire from Idaho

7 Oregon - 2-40 person cities live

1354 engine (still in use) for 10/24 July

65 { wenig rot schielte in rot mit
Colado 9474

06 { 3 antz

JTF6 - { Feb - rank 2 mission NTCO w/ & Douglas East
 & { 3rd quarter 1-2 deputies in Organ pipe ^{plant} ~~Final~~ ^{valley} & lower
 { 4th quarter leave A. Ezrin July & August for loads

Baker Engineers

2 miles East & 3 West of Douglas
5 miles East & 4 miles West of Douglas
95% done 3 Nov 03

Tunnels on hold - getting paid over it
Nogales 1/2 mile working on it - delivered 90% ^{Final} done 1 Dec 03
Begin ROW acquisition & Temp construction easements
Partial fence extensions finalized
FY 03 contract getting done

Environmental

Douglas - Naco Sup IFEA dead line 11/7/03 cannot do
Tucson BIA out to Naco on Friday
Letter to F&WS

PEIS out on 29 Oct 03
P MOA in discussion w/ SHPO & the author up meeting. will include the
Douglas WWD. (b)(6) ^{re}called. She has reviewed the files.
(b)(6)(b)(7)(C) need to call her back.

Nogales signature - Fowss signed
Station 9A up in stuffy. Needs soil sampling

Sonora - sidebar w/ Wayne
- coordinate with Forestry

Chidofaitz - (b)(7)(E) warty on Aio reports
extended 30 days

Angry bacon on hold
White banners 50 miles corridor

Nogales 10 mile upgrade - need post print
Up 5 Douglas East - not wetlands but is W of US

Need SWPPP prepared

3

Training opportunities * SWPPP

Real Estate

Douglas lightly - warty on hinton

~~Nogles~~ 4 miles done

Nogles 2 miles - LOES out - acquire vats

Cost of LOES acquisition

Nogles lightly relocation - ~~at~~ taken off

Douglas 8 miles

Nogles 2 miles

Douglas POE 6 1/2 miles

Puruit Swamp

Temp Vehicle bases } on hold

(b)(6)

- have him call Tom on Sphinx Ridge

APC only once 300'

Document

Naco Force extension materials should be delivered this week

Douglas testing

Actions Items - MOC w/ DOP

- Scores on EAs in Douglas

- Cost of Military labor

- Douglas West plans

- Nogles

- PEIS status review

- Naco Douglas PEIS 27th

- SWPPP Team

- natural resources

- ~~tail~~ to Douglas

(b)(6)

report

10/21/03 PDT meeting

Mitigation costs to (b)(6) - not done

- Naco water use
- Mark needs additional 2 weeks

Hogden objection Oct 17, 2003 to NPS signed
Even done consultation

Nogles just signed

Naco/Nogles SRA Corridor being sent to as PF EA
Final Comments by 11/7/03

New SAs - Nogles sketched roads

Temp vehicle barriers along 50-mile corridor

DA for Naco Nogles Corridor

No direct FVS oversight - try to facilitate via POT

Got ~~the~~ request for cost estimates for FVS - ajo, naco, wilcox, ^{hwy}

Date: 10/13/2003 11:26 AM

Sender:

To:

(b)(6)

cc:

bcc:

Priority: Normal

Subject: FW: TCA PDT Meeting 21 October at the Camelback Golf Club -

> -----Original Message-----

> From: (b)(6)

> Sent: Monday, October 13, 2003 8:22 AM

(b)(6)

> Subject: TCA PDT Meeting 21 October at the Camelback Golf Club -
Scottsdale

>

> <<102103EWGad.pdf>> > <<camelgolf.pdf>>

>

(b)(6)

>



102103EW.PDF



CAMELGOL.PDF

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
TUCSON SECTOR
BUREAU OF CUSTOMS AND BORDER PROTECTION
NACO, NOGALES AND DOUGLAS STATIONS**

MEETING AGENDA

Meeting Date and Time: 21 October 2003 8:30 AM

Meeting Location: Camelback Golf Club - 7847 N. Mockingbird Lane

MEETING PURPOSE

TCA PDT Environmental Working Group Meeting

INTRODUCTIONS

1. REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. Mitigation costs possible from BA to be provided to (b)(6)	(b)(6)
2. (b)(6) to provide contacts to develop cumulative impacts to GSRC	
3. Nogales BPS EA out by 26 September	
4. Check on FEA and Draft FONSI for Nogales Infrastructure	
5. Updates by 29 Sept. to (b)(6) for environmental projects	

*needs links
for
Kor
low*

2. SUMMARY OF NON-PDT ACTIVITIES (REGIONAL)

- a. PEIS Tucson & Yuma (AERC 225)
- b. RVS for TCA (AERC 255)
- c. Rescue Beacons (AERC 497) - *Nogales deployment Done*
- d. Checkpoints (b)(7)(E) (AERC 499) - *operations 2 EAs 1 done 70% not done
1 on station until 30 days to 11/12*
- e. Nogales BPS (AERC 503) *F2WAC*
- f. BA - Operations - Tucson & Yuma (AERC 51) *due back
within to F&WS over 135 days*

3. SUMMARY OF PDT ACTIVITIES (INFRASTRUCTURE)

- a. Nogales Infrastructure EA (AERC #255 & 218 ENV #225)
- b. Naco-Douglas SEA (AERC 218)

5. NEXT MEETING

18 November 2003 - Tucson USBP Station

October 2003 Arizona Environmental Actions Report

Aerc Number: 498/497

DOCUMENT ENV Number TBA

Action Type: EA

**Document
Title:**

EA For Installation and Maintenance of 10 Rescue Beacons on the T. O. N.

**Project
Actions:**

EAs are part of Operation Desert Grip II and Rescue Beacons for Tucson/Yuma Sectors. Formerly part of Desert Grip II (ENV 145), Desert Grip (an operations related action) split into 6 separate EA's including ENV 226, 227, 228 and others.

**Project
Details:**

EA for Ten Rescue Beacons on the Tohono O'odham Nation, USBP Tucson Sector, AZ

**Current
Status
Summary:**

Preliminary draft complete. Tohono O'odham council has objected to the beacons so the draft has not been released yet. Rescue Beacons (AERC #497)The Emergency Rescue Beacons off the TON (ENV #227) has been completed, FONSI issued 19 June 2003.

Draft:

Holding due to pending discussions with the Nation.

Aerc Number: 498/497

DOCUMENT ENV Number TBA

Action Type: EA

Final:

FONSI: See Summary

ROD: NA

NOI: N/A

NOA: pending

Scoping: NA

**Preliminary
Draft:** 30-May-03

**AERC / USACE
Review Dates:** 6-Jun-03

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 255

DOCUMENT ENV Number 225

Action Type: EA

Document Title: Nogales Infrastructure Improvements, Nogales Station

Project Actions: EA for Nogales Various Infrastructure.

Project Details: Combination of Nogales infrastructure and RVS projects. 18 RVS, 60 Portable lights. 1 mi. fence and 2mi road east of Nogales POE.

Current Status Summary: Draft EA submitted for public comment on May 9, comment period extended to 30 June, See AERC # 218 RVS for TCA (AERC #255 ENV #225) One EA was prepared for Naco and Douglas, FONSI issued. One EA was prepared for the Crawford Hill relay tower in Nogales, FONSI issued. The remaining Nogales RVS sites were rolled into the Nogales Various Infrastructure EA, after both the RVS and the Various Infrastructure EAs had been developed. FONSI and Pre-Final staffed to HQ DHS.

Draft: Draft EA submitted for public comment on May 9, comment period extended to 30 June, pending comment resolution. Comment resolution matrix and/or preliminary Final EA is expected by 5 September 2003.

Final:



Aerc Number: 255

DOCUMENT ENV Number 225

Action Type: EA

FONSI: see summary

ROD: N/A

NOI: N/A

NOA: Nogales Draft 5/9/03

Scoping: N/A

**Preliminary
Draft:** 25-Apr-03

**AERC / USACE
Review Dates:** 2-May-03

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 498

DOCUMENT ENV Number 145

Action Type: EA

**Document
Title:**

This document description is included as an historical reference back to a SOW. The actions have been incorporated into other documents. Superseded

**Project
Actions:**

EA, Operation Desert Grip II

**Project
Details:**

EA, for expansion of Operation Desert Grip (Desert Grip II)

**Current
Status
Summary:**

Historical information:
Draft submitted for 30-day public review. The review period has been extended until June 16, 2003. Divided into supplemental EA for expansion of Desert Grip (ENV 228) and Ea for temp. camp details on TON (ENV TBA)

Draft:

Public comment extended to 6/16/2003

Final:

Anticipate submitting a preliminary final for internal review no later than June 30, 2003.

Aerc Number: 498

DOCUMENT ENV Number 145

Action Type: EA

FONSI:

ROD: N/A

NOI: N/A

NOA:

Scoping: N/A

**Preliminary
Draft:**

**AERC / USACE
Review Dates:**

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

SW

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 218

DOCUMENT ENV Number 139 (changed from 148)

Action Type: EA

**Document
Title:**

Supplemental Environmental Assessment For Infrastructure Within U.S. Border Patrol Naco-Douglas Corridor Cochise County, Arizona

**Project
Actions:**

Environmental Assessment for 31-mile Enforcement Zone Infrastructure System, Naco, AZ and 26 miles in Douglas, AZ.

**Project
Details:**

Environmental Assessment to address implementation of a 56-mile border enforcement system through a combination of infrastructure components (roads, fences and lights) in Naco and Douglas POE's. Formerly ENV 148 and one other.

**Current
Status
Summary:**

Project being coordinated through the Tucson PDT. Comments to the Preliminary Draft have been provided. Public scoping meeting held 18 November 2002. PDT decided, based on guidance from HQ, to combine Naco and Douglas into a Supplemental EA for the Naco-Douglas Corridor. Draft SEA was distributed for public review on 7 Feb 03; comment period was extended from 7 May to 30 June. PDT reviewed response matrix 23 Sept. 2003. Final document due mid October 2003.

Draft:

Public Review Extended to June 30, 2003 by (b)(6) Letter sent by (b)(6) and USACE. PDT reviewed response matrix on 23 Sept 2003.

Final:

PFEA 7/10/03 FEA pending comment resolution
PFSEA expected mid Oct 2003

Aerc Number: 218

DOCUMENT ENV Number 139 (changed from 148)

Action Type: EA

FONSI:

ROD: N/A

NOI: N/A

NOA: 5/7/2003

Scoping:

Preliminary Draft: Naco-Douglas EAs combined into one, Due 3-12-03

AERC / USACE Review Dates: PDEA 3/13/03 to 3/26/03; DSEA released 5/7/2003

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 503

DOCUMENT ENV Number 220

Action Type: EA

Document Title: EA/Phase I Environmental Site Assessment for the Purchase of 30 Acres of Property

Project Actions: EA/EBS

Project Details: Nogales BPS. Purchase of 30 Acres of Property. EA/Phase I Environmental Site Assessment for the Purchase of 30 Acres of Property ENV # 503 & 220 Purchase of warehouse and land currently under lease in Nogales.

Current Status Summary: Final EA and FONSI sent to HQ for signature. FONSI was signed 17 October 2003. Phase One revealed a minor fuel contamination site. GSRC and USACE recommend Phase Two testing to determine extent of contamination and clean-up strategy. Phase Two awaiting funding.

Draft: Nogales Station Draft EA came off the public comment period on 30 June. GSRC expects to have a preliminary final within the next two weeks. There were issues on the ESA with WRO REO, but these have been resolved. GSRC will submit the revised SEA for the Nogales Station NLT August 1. The expanded record search did not reveal any additional sites beyond the original record search. Comment period extended to 29 August 2003.

Final:



Aerc Number: 503

DOCUMENT ENV Number 220

Action Type: EA

FONSI: Signed 17 October 2003

ROD: N/A

NOI: N/A

NOA:

Scoping: N/A

**Preliminary
Draft:** Due 12 May 03

**AERC / USACE
Review Dates:**

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 499

DOCUMENT ENV Number 227 TBA

Action Type: EA

**Document
Title:**

EA for placement and operation of three temporary USBP checkpoints on the (b) (7)(E)

**Project
Actions:**

Temporary USBP Checkpoints on the (b) (7)(E) in the Tucson Sector and Ajo and Casa Grande AO's.

**Project
Details:**

EA is being completed for four checkpoints (three on the (b) (7)(E) Checkpoints used to identify and apprehend any UDAs or drug traffickers. These checkpoints occur along (b) (7)(E) and County Roads (b) (7)(E) within the (b) (7)(E)

**Current
Status
Summary:**

The Draft Temporary Checkpoint EA off the (b) (7)(E) went out 7 July to the public (b) (7)(E) checkpoint comments due 7 August 2003. The preliminary Draft EA for the checkpoints on the (b) (7)(E) has been completed, but we are waiting for approval from the (b) (7)(E) to release it to the (b) (7)(E). Both of these EAs were conducted under AERC # 499.

Draft submitted for review on (b) (7)(E) 15 Sept 2003. Pending approval by (b) (7)(E) Council.

Draft:

pending

Final:

Aerc Number: 499

DOCUMENT ENV Number 227 TBA

Action Type: EA

FONSI:

ROD: N/A

NOI: N/A

NOA: On hold until uses issues are resolved on the (b) (7)(E)

Scoping: N/A

Preliminary Draft: The preliminary draft EA for one temporary checkpoint off the (b) (7)(E) submitted for internal review; Submitted to (b) (7)(E) 15 Sept 2003.

AERC / USACE Review Dates: Went out with comments due 14 August 2003.

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 497

DOCUMENT ENV Number 226 TBA

Action Type: EA

**Document
Title:**

This document description is included as an historical reference back to a SOW. The actions have been incorporated into other documents. Superseded

**Project
Actions:**

EA for Rescue Beacons - Tucson/Yuma Sectors

**Project
Details:**

EA for placement and operation of rescue beacons to aid in rescue of UDA's who face death or severe dehydration.

**Current
Status
Summary:**

For historical reference only. This is now two other actions:
Divided into two EA; one EA complete for 8 beacons off the Tohono O'odham Nation on BLM, Cabeza Prieta Nat'l Wildlife Refuge, Organ Pipe Cactus Nat'l Monument (ENV 226). The other EA for 10 Beacons on T.O.N. is held up in negotiations with TON (see ENV TBA)

Draft:

The review period ended on June 10, 2003.

Final:

See ENV # 226

Aerc Number: 497

DOCUMENT ENV Number 226 TBA

Action Type: EA

FONSI: 20 June 2003.

ROD: N/A

NOI: N/A

NOA: 5/16/2003

Scoping: N/A

**Preliminary
Draft:**

**AERC / USACE
Review Dates:** extended to June 16, 2003

USBP POC:

AERC POC:

USACE POC:

States:

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

Aerc Number: 225

DOCUMENT ENV Number 90

Action Type: EIS

Document Title: Programmatic Environmental Impact Statement for USBP Yuma and Tucson Sectors

Project Actions: EIS and Associated Tasks - USBP Yuma and Tucson Sectors, AZ (DO 007)

Project Details: Programmatic Environmental Impact Statement for USBP Yuma and Tucson Sectors

Current Status Summary: Public comments resulted in revision of document to remove infrastructure. Revised Preliminary Draft PEIS reviewed by PDT EWG 20-21 August 2003; Revised document distributed for review and comments due 29 October 2003.

Draft:

During a 22 April 2003 conference call it was decided to issue a revised draft PEIS that only address potential infrastructure in a cumulative manner. GSRC was tasked with preparing a comment resolution letter informing recipients of the USBP's decision. GSRC prepared and submitted a draft resolution letter on May 17, 2003 to (b)(6)(b)(7)(C) for review. See comments on Final. The Tucson-Yuma PEIS revised draft went out 15 July. Comments due 7 August. The EWG conference in August in Phoenix to discuss any unresolved issues. Dates for the meeting are 20 & 21 August (the next PDT meeting is 19 August in Phoenix). HDR was assigned conference set-up duties.

Comments from the 20-21 August review session are now incorporated into a new draft distributed for review; comments to be returned by 29 Oct 2003. All data previously requested must be received by that date. A copy has been given to (b)(6) USBP, for CBP review.

Final:

Aerc Number: 225

DOCUMENT ENV Number 90

Action Type: EIS

FONSI: N/A

ROD:

NOI: 01-Sep-00

NOA: 11/18/2002

Scoping: Oct-Nov 2000

**Preliminary
Draft:** 4 preliminary drafts to date

**AERC / USACE
Review Dates:** extended to 14 Feb; Current version internal review period ends 29 Oct 2003

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 255

DOCUMENT ENV Number 94 & 102

Action Type: EA

**Document
Title:**

This document description is included as an historical reference back to a SOW. The actions have been completed and are no longer currently active. Superseded

**Project
Actions:**

RVS for USBP Tucson Sector (DO 050) AERC # 255

**Project
Details:**

Environmental Assessments for RVS sites in Naco, Douglas and Nogales Stations

**Current
Status
Summary:**

This is historical data for reference:
Naco and Douglas: Final EA and FONSI signed 01/07/03. (ENV 94) Crawford Hill EA FONSI signed 11/08/02 (ENV 102) Nogales:RVS combined with Nogales infrastructure EA. See ENV 225 Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02

Draft:

Naco-DEA submitted 09/25/02; Crawford Hill DEA submitted 10/02/02.

Final:

Naco-PFEA submitted 11/05/02; Naco-Revised PFEA submitted 11/13/02; Naco-FEA submitted 01/03/03; Crawford Hill-PFEA submitted 10/30/02; Crawford Hill-FEA submitted 11/13/02.

Aerc Number: 255

DOCUMENT ENV Number 94 & 102

Action Type: EA

FONSI: Naco-FONSI signed 01/07/03; Crawford Hill-FONSI signed 11/08/02

ROD: N/A

NOI: N/A

NOA: Naco (Draft) 10/01/02; Naco (Final) 01/24/03; Crawford Hill (Draft) 10/22/02; Crawford Hill (Final) 11/15/02.

Scoping: N/A

Preliminary Draft: Naco-PDEA submitted 07/08/02; Nogaies-PDEA submitted 08/13/02; Crawford Hill-PDEA submitted 09/18/02.

AERC / USACE Review Dates: Naco-DEA public review from 9/30/02 to 10/30/02; Crawford Hill public review from 10/22/02 to 11/06/02.

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Aerc Number: 51

DOCUMENT ENV Number 40, 141, 186 & 38

Action Type: BA

**Document
Title:**

Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors, AZ

**Project
Actions:**

Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors, AZ (DO 043) ENV. # Yuma= 40, 141, 186 / Tucson= 38

**Project
Details:**

Biological Assessments for USBP Daily Operations Tucson and Yuma Sectors

**Current
Status
Summary:**

(Yuma ENV #40, #141, & #186 Tucson #38) The USFWS is still working on the Yuma draft BO which was due May 2003.

BA for Yuma Sectors sent to USFWS January 2003. POC for USFWS is _____.

BA for Tucson Sector underwent revisions to make the language consistent with the revisions to the PEIS and due to USWF changes in office of responsibility from _____ to _____.

Draft:

Yuma--9/27/02; Tucson 10/24/02. (b)(6) has not completed the Draft BO for the Yuma Sector as of 6/12/03. Internal review 3 July 03. Internal comments due 25 July 03. Conference call scheduled 14 August. Pending BO from USF&WS in Yuma and Tucson.

Final:

Aerc Number: 51

DOCUMENT ENV Number 40, 141, 186 & 38

Action Type: BA

FONSI: N/A

ROD: N/A

NOI: N/A

NOA: N/A

Scoping:

**Preliminary
Draft:**

**AERC / USACE
Review Dates:**

USBP POC:

AERC POC:

USACE POC:

States:

(b)(6)

AZ

Contractor POC:

Contractor:

DHS Regional POC:

DHS FAE POC:

(b)(6)

Date: 10/13/2003 12:13 PM

Sender:

To:

(b)(6)

cc:

bcc:

Priority: Normal

Subject: FW: TCA PDT Meeting 21 October at the Camelback Golf Club -

> Please find attached the Tucson Sector Project Delivery Team meeting agenda. A

map is attached depicting the meeting location, Camelback Inn Golf Club (across

the street and to the east of where we met in August). Should you have any additions to this agenda reply directly to this e-mail.

>

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> > <<102103Ad.pdf>>

> > <<camelgolf.pdf>>

>

(b)(6)

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102103AD.PDF



CAMELGOL.PDF

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
BUREAU OF CUSTOMS AND BORDER PROTECTION
TUCSON SECTOR - U.S. BORDER PATROL**

MEETING AGENDA

Meeting Date and Time: 21 October 2003 10:00

Meeting Location: Camelback Golf Club - 7847 N. Mockingbird Lane, Scottsdale AZ

MEETING PURPOSE

PDT Meeting

INTRODUCTIONS

10:00 – 10:15 REVIEW OF ACTION ITEMS

ACTION	RESPONSIBLE
1. RVS report forwarded to all PDT members	HDR
2. LWC designs and SOW developed	HDR & Baker
3. Memorandum of Agreement between Arizona National Guard and USBP will be coordinated by 3 October	(b)(6)
4. Follow up on comments from Customs on Nogales tunnel designs	
5. Fence Extension Design comments due COB 26 September 2003	All
6. Recover funds from Sacramento USACE for web access that has not worked for the USBP	(b)(6)
7. BPSCC update on projects including fabrication of fence extensions	

10:15 – 10:20 RVS

10:20 – 10:45 MILITARY DEPLOYMENTS

Arizona National Guard

WWD May 2004

- Oregon National Guard
- Oklahoma National Guard

Tentative deployment of S. Carolina National Guard for June fence construction and erosion control in

JTF-6

2 Miles West of POE Naco – February 2004 (roadway and fencing)

10:45 – 11:15 ENGINEERING

Baker Eng. - updates and discussion

Douglas, New Roadway Designs

Nogales, Tunnels, Preliminary & Final Design

Nogales, 1-1/2 Miles Roadway, Preliminary & Final Design

Douglas, Picket Fence Extensions

FY'03 Contracts

11:15 – 12:00 ENVIRONMENTAL

GSRC - updates and discussion

Douglas-Naco Corridor Draft SEA

Tucson & Yuma Biological Assessment

Programmatic EIS

**BORDER BARRIER SYSTEM PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
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TUCSON SECTOR - U.S. BORDER PATROL**

Programmatic MOA
Douglas, Whitewater Draw 404 Permitting
Nogales, Infrastructure Improvements, DEA
 Tunnels
 2-Miles Roadway
 Portable Lights
Sonoita Station

12:00 – 1:00 LUNCH

1:00 – 1:30 REAL ESTATE

USACE – (b)(6)
 Douglas Lighting (5 Miles) Split East and West of the POE
 Douglas, 4-Miles Roadway West of POE
 Douglas, International Ditch
 Naco, Lighting (5 Miles) Split East and West of the POE
 Nogales, 2-Miles Roadway
 Nogales, Construction & ROW Acquisition (Pending Alignments)
 Nogales, Schematic Design
 Sonoita, Preliminary Design and Coordination
 Permanent Survey Markers
 Temporary Vehicle Barriers
Western Region – (b)(6)
 Report on costs and viability of acquiring additional real estate near Ephraim
 Ridge

1:30 – 1:45 PROCUREMENT
Naco Deployment

1:45 – 2:00 OTHER ITEMS
Scoping Issues for Engineering Contracts FY'03 and FY'04

NEXT MEETINGS

21 October 2003 – HDR Phoenix
18 November 2003 – Tucson USBP Station

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

MEETING AGENDA

Meeting Date and Time: 19 July 2005 @ 10:00
Meeting Location: Tucson Station
Meeting Purpose: TCA PDT Meeting

DISTRIBUTION

See attached Distribution list.

ACTION ITEMS

1.	GSA coordination on drainage tunnel access work. Follow-up with local contact at the POE. To be discussed in July 29 Nogales meeting	(b)(6) staff & Baker
2.	Follow-up on paving the Nogales ½ mile with a private contractor once funding is available. Pending with PM (b)(6)(b)(7)(C)	(b)(6)
3.	Finalize SOW and prepare fee proposal for FY'05 engineering services by Baker Eng. (Sonoita in , need others) Reviewing cost estimates, etc.	
4.	Rental Equipment extended for Naco and Douglas fence crews, pending new vendor.	
5.	Douglas, 13-Mile Roadway 2.5 miles on the west into the Naco AO 100% plans expected by 28 June 2005. Baker is doing quality review of plan sets	
6.	Douglas, International Ditch drainage report expected 3 June 2005. Submitted to PM Montgomery for review.	
Environmental Working Group		
1.	Set aside \$35,000 for mitigation on Whitewater Draw 404 permit	
2.	Ephraim Ridge Reclamation SOW and request for fee proposal for Phase I ESA to GSRC. GSRC & AERC to re-negotiate fees.	
3.	Tucson BA needs funding for GSRC contract modification and up-dated maps from stations. Maps completed & at GSRC.	
4.	Provide (b) (6) with a copy of the Preliminary Draft EA for the Sonoita Border Roads to obtain feed-back on deployment operation and staging sites.	
5.	Comments needed on PEIS by 15 July	All

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
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MILITARY DEPLOYMENTS

Arizona Army National Guard

Scheduled Deployments FY'05

101st Engineer Company from Massachusetts. 70 personnel into Whitewater Draw to complete approaches to box culvert. Unit did outstanding job on project.

(b)(6)

JTF-N

No Further Scheduled Deployments FY'05

Report on Potential FY'06 Deployments

(b)(6)

ENGINEERING

Baker Eng.

Douglas, Lighting (5 Miles)

Douglas, 13-Mile Roadway

Douglas, International Ditch

Naco, Lighting (5 Miles)

Nogales, Schematic Design on hold pending resolution of real estate issues and funding to proceed. To be discussed in 29 July meeting in Nogales

*8 MISSENGER REQUESTED - NO CONFIRMATION
1 - 2nd Quarter scheduled Douglas/NACO
1 - 3rd quarter " " FORCE BMBR-IA
6 - 4th quarter " " STOLE BAR
- GIVE CALL
- NOT WORK FOR
- RECENTLY*

(b)(6)

FY'05 Engineering Projects

2 additional miles of roadway in Douglas

relocation of lights in Nogales

2 additional miles of roadway in Nogales

4 miles in Sonoita (fee proposal received and in process, effort will not proceed until environmental documents are in place)

(b)(6)

ENVIRONMENTAL

GSRC

(b)(6)

PEIS Tucson & Yuma (AERC 225

Tucson BA

Whitewater Draw 404 Permit

San Pedro River LWC

Vehicle Barriers - Tohono O'Odham Nation (TON)

Tactical Infrastructure for Western Arizona

Public meetings are scheduled for Tucson, Gila Bend and Yuma from July 19th through July 21st. Tactical Infrastructure for Western Arizona (TIWAZ) Public Meeting will be held after the PDT at the Tucson Convention Center, from 4 to 8 PM. The Cabeza Prieta material can now be accessed via the link below:

(b) (7)(E)

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

Let (b)(6) GSRC) know if you are having trouble accessing the ftp site. His contact information is below, after hours please use the cell number. GSRC Phone (b)(6)
Fax: (b)(6) Cell (b)(6)

USPP

Nogales Schematic Design -to be discussed on July 29 meeting in Nogales.

Ephraim Ridge Phase I -GSRC submitted estimate for Ephraim Ridge ESA/EA.

REAL ESTATE

USACE - Sacramento

No Report

NLC - Laguna Nigel

Ephraim Ridge Report

(document is into CBP legal review)

*ASK ABOUT NOGALES
RIDGE ESTATE.*

(b)(6)

out of funds

PROCUREMENT

AERC

Discussion of Hertz Rentals in Naco and Douglas

(b)(6)

CONSTRUCTION

Kleinfelder

Updates (see web page below)

To access a website that has updates, go to:

www.kleinfelder.com

-Click on the **Client Link** link at the left of the page.

-Select **Border Patrol Construction Oversight** from the drop-down menu.

-For a User Name enter: (b)(7)(E)

-For a Password enter: (b)(6)

(The User Name and Password are case-sensitive, so make sure you don't capitalize.)

-Select the deployment you wish to view

*last deployment on week
project completion pending
30 day break last/this week*

ACTION ITEMS

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TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
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5.	Douglas, 13-Mile Roadway 2.5 miles on the west into the Naco AO 100% plans expected by 28 June 2005. Baker is doing quality review of plan sets	
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1.	Set aside \$35,000 for mitigation on Whitewater Draw 404 permit	
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3.	Tucson BA needs funding for GSRC contract modification and up-dated maps from stations. Maps completed & at GSRC.	
4.	Provide (b)(6) with a copy of the Preliminary Draft EA for the Sonoita Border Roads to obtain feed-back on deployment operation and staging sites.	
5.	Comments needed on PEIS by 15 July	

NEXT MEETINGS

23 August 2005 @ 10:00 – Tucson Station

13 September 2005 @ 10:00 – Tucson Station

TACTICAL INFRASTRUCTURE PROGRAM MANAGEMENT
DEPARTMENT OF HOMELAND SECURITY
CUSTOMS AND BORDER PROTECTION
OFFICE OF BORDER PATROL - TUCSON SECTOR

DISTRIBUTION

(b)(6)