October 2002

FINAL ENVIRONMENTAL ASSESSMENT FOR CONVERSION OF VEHICLE BARRIERS TO LANDING MAT FENCE NACO, ARIZONA

IMMIGRATION AND NATURALIZATION SERVICE
WASHINGTON, D.C.

FINDING OF NO SIGNIFICANT IMPACT

CONVERSION OF VEHICLE BARRIERS TO LANDING MAT FENCE
NACO, COCHISE COUNTY, ARIZONA

PURPOSE AND NEED: Vehicle barriers along the Naco corridor, constructed under a previous Environmental Assessment (EA), have proven to be effective in stopping illegal vehicle traffic in this area. However, the barriers have done nothing to impede the continuing influx of illegal foot traffic, including migrants and smugglers. Also, the nearby road network enables undocumented aliens to easily enter the United States. As a result, there is a need to convert 1.2 miles of vehicle barriers east of the Naco Port-of-Entry to landing mat fence. This structure will substantially hinder illegal foot traffic.

PROPOSED ACTION: Convert 1.2-miles of vehicle barriers east of Naco, Arizona into landing mat fence.

ALTERNATIVES: Alternatives addressed in the EA include the "No Action" and the Preferred Alternative described above. The No Action Alternative leaves the vehicle barriers in place and no landing mat fence. The Preferred Alternative converts 1.2 miles of vehicle barriers with 10-foot support poles into landing mat fence. Under this alternative, there would be little or no additional ground disturbance. Other alternatives considered but eliminated from further discussion included using various types of fence materials, such as chain link, metal mesh, and Bollard style fences.

This EA is tiered from two documents: the 2000 Final Environmental Assessment for Infrastructure within U.S. Border Patrol Naco-Douglas Corridor, Cochise County, Arizona and the 2000 Final Environmental Assessment for Joint Task Force Six Proposed Fence and Road Improvement Project, Naco, Cochise County, Arizona.

ENVIRONMENTAL CONSEQUENCES: No significant adverse effects to the natural or human environment are expected upon implementation of the proposed action. The vehicle barriers are adjacent to an existing road; thus, no new road construction or road improvements would be required. The only anticipated ground disturbance would be from the installation of some fencing support poles. However, the project site has been disturbed by prior construction activities.

MITIGATION MEASURES: Environmental design measures to be implemented for the proposed action include proper maintenance of all vehicles, generators, and other equipment needed to complete the project to ensure air emissions are within the design standards of the equipment. Best Management Practices such as watering roads to keep fugitive dust in check, would be used to prevent dusting.

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Based upon the analysis provided and the conclusions reached on the potential for environmental impact as outlined in the Environmental Analysis and the environmental design measures including Best Management Practices incorporated as part of the proposed action, it is concluded that the proposed action will not have a significant impact on the human or natural environment. Because of this finding of no significant impact, no further environmental analysis of this effort is necessary.

Kenneth R. Ehinger, Director
Headquarters Facilities and Engineering Division

10/9/02
Date

FINAL ENVIRONMENTAL ASSESSMENT
for
Conversion of Vehicle Barriers to Landing Mat Fence
Naco, Cochise County, Arizona

October 2002

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EXECUTIVE SUMMARY

PROPOSED ACTION:	The proposed action is to convert 1.2 miles of vehicle barriers east of Naco, Arizona into landing mat fence.
PURPOSE AND NEED:	Vehicle barriers along the Naco corridor, which were constructed under a previous EA, have proven to be effective in stopping illegal vehicle traffic in this area. However, the barriers have done nothing to impede the continuing influx of illegal foot traffic, including migrants and smugglers. Because of the nearby road network, undocumented aliens can easily escape into the United States once they have successfully breached this portion of the boundary. Thus, there is a need to convert the 1.2 miles of existing vehicle barriers east of the Naco port-of-entry into landing mat fence. The purpose is to create a structure that would halt or substantially hinder illegal foot traffic in areas that provide easy escape routes for illegal entrants.
ALTERNATIVES ADDRESSED:	The No Action Alternative would not allow the construction of the 1.2 miles of landing mat fence. The Preferred Alternative would allow the conversion of 1.2 miles of existing vehicle barriers with 10-foot support poles into landing mat fence with little or no additional ground disturbance. Other alternatives considered but eliminated from further discussion include using various types of materials to construct the 1.2 miles of fence.
ENVIRONMENTAL IMPACTS OF THE PROPOSED ACTION:	The Preferred Alternative would involve minimal construction activities within an area that has been previously disturbed. No significant adverse effects to air quality, water quality, cultural resources, unique areas, soils, protected species, or land use are expected. Site-specific surveys for sensitive resources and coordination with the appropriate Federal and state agencies by Joint Task Force Six have provided assurances that the proposed action would not have a significant adverse impact on the human or natural environment.
CONCLUSION:	Based on the findings of this analysis and assuming that all mitigation measures recommended herein are implemented, no significant adverse impacts would occur from the Preferred Alternative.

TABLE OF CONTENTS

LIST OF EXHIBITS

LIST OF FIGURES

LIST OF PHOTOGRAPHS

LIST OF TABLES

SECTION 1.0
INTRODUCTION AND PURPOSE AND NEED

1.0 INTRODUCTION AND PURPOSE AND NEED

This Final Environmental Assessment (EA) addresses the potential for effects, beneficial and adverse, of the Immigration and Naturalization Service (INS) and U.S. Border Patrol (USBP) proposed fence construction activities within the USBP Naco Station area of operation (AO). This EA evaluates the conversion of 1.2 miles of existing vehicle barriers to landing mat fence as part of the INS and USBP infrastructure projects within the Naco AO. This EA is tiered from two documents: the Final Environmental Assessment for Infrastructure within U.S. Border Patrol Naco-Douglas Corridor, Cochise County, Arizona (INS 2000) and the Final Environmental Assessment for Joint Task Force Six (JTF-6) Proposed Fence and Road Improvement Project, Naco, Cochise County, Arizona (USACE 2000).

This EA was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969, the President's Council on Environmental Quality (CEQ) Regulations for the Implementation of the NEPA, as well as the INS's Procedures for Implementing NEPA (28 CFR 61).

1.1 Background

1.1.1 INS Organization

The INS has the responsibility to regulate and control immigration into the United States. In 1924, the U.S. Congress created the USBP to be the law enforcement arm of the INS. The USBP's primary function is to detect and deter the unlawful entry of undocumented aliens (UDAs) and smuggling along the United States' land borders and between the ports-of-entry (POE). With the increase in illegal drug trafficking, the USBP also has become the leader for drug interdiction between land POEs. Since 1980, an average of 150,000 immigrants have been naturalized every year. At the same time, however, illegal aliens have become a significant issue. Apprehension rates for INS are currently averaging more than 1.5 million illegal aliens throughout the country. At present, the INS estimates that there are seven to nine million illegal aliens in the United States. Other studies have indicated higher numbers, closer to 10 million.

The INS has reported that the U.S.-Mexico border is breached more than any other international border in the world. It is a large, diverse, and difficult boundary to effectively enforce without the use of dedicated tactical infrastructure (fences, lights, roads, cameras, etc.).

Prior to the early 1990s, there was less awareness of southwest border issues and less national attention was given to illegal trans-boundary activity than is currently attributable. As a result, the USBP's growth was nominal, funding for enforcement efforts fell short, and the USBP functioned under severe constraints. Events over the last decade, however, related to illegal immigration and narcotics smuggling have increased the nation's awareness and generated substantial interest in controlling the U.S.-Mexico border. This has resulted in increased funding and staffing, and has also created new opportunities in the development of proactive border control strategies as demonstrated in patrol and enforcement operations throughout the southwest border area (e.g., Operations Gatekeeper, Hold-the-Line, Safeguard, and Rio Grande).

The anti-terrorism role of the INS has always been an important function to the agency; however, since the September 11, 2001 terrorist attack on the United States, this role has been increased and is now more important than ever. This increased function to fight terrorism requires more vigilance at the POEs and all areas along the borders. All enforcement activities and subsequent infrastructure and technological improvements, such as roads, fencing, remote video surveillance (RVS) systems, and lighting, are necessary elements in securing our borders from illegal entry.

Past enforcement strategies were reactive, and because little emphasis was placed on deterring illegal crossing, it diminished the importance of infrastructure (e.g., lights and fences) along the U.S.-Mexico border. Instead, the USBP's efforts focused primarily on making apprehensions *after* the international boundary was breached. This strategy utilized the "element of surprise" by deploying their limited resources away from the border in concealed positions. However, as illicit trafficking continued to increase, the area that the USBP was required to patrol also increased. The USBP's inability to deter or contain illegal migration at the border resulted in an increase in the geographic footprint, and subsequent environmental impacts, of illegal migration patterns.

During recent years, the USBP has significantly increased its emphasis on deterrence. Deterrence is achieved only when the USBP has the ability to *create and convey the immediate, credible, and absolute certainty of detection and apprehension*. As such, tactical infrastructure components, such as fences, are a critical element in the current enforcement strategy. Developing trends such as the continued urbanization and industrialization of the immediate border, the recognition of environmental preservation concerns, and the increase of criminal trans-boundary activities (including trafficking in people and drugs and terrorist acts) continue to pose a border enforcement challenge and compound the need for tactical infrastructure.

1.1.2 Naco Station

The Naco Station AO is located within Cochise County and covers approximately 1,600 square miles. The station AO includes 30 miles of the international border and the towns of Naco, Bisbee, Tombstone, Sierra Vista, Warren, Hereford, Palominas, and Huachuca. There are currently 224 USBP agents assigned to the station. The geographical terrain of the area is desert with rolling hills covered with brush thickets and numerous north-south trending washes. The approximate elevation of the station is 4,800 feet above mean sea level (msl).

1.1.3 Regulatory Authority

The primary sources of authority granted to officers of the INS are the Immigration and Nationality Act (INA), found in Title 8 of the United States Code (USC), and other statutes relating to the immigration and naturalization of aliens. Secondary sources of authority are administrative regulations implementing those statutes, primarily those found in Title 8 of the Code of Federal Regulations (8 CFR Section 287), judicial decisions, and administrative decisions of the Board of Immigration Appeals. In addition, the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) mandates INS to acquire and/or improve equipment and technology along the border, hire and train new agents for the border region, and develop effective border enforcement strategies.

Subject to constitutional limitations, INS officers may exercise the authority granted to them in the INA. The statutory provisions related to enforcement authority are found in Sections 287(a), 287(b), 287(c), and 287(e) [8 USC § 1357(a,b,c,e)]; Section 235(a) [8 USC § 1225]; Sections 274(b) and 274(c) [8 USC § 1324(b,c)]; Section 274(a) [8 USC §

1324(a)]; and Section 274(c) [8 USC § 1324(c)] of the INA. Other statutory sources of authority are Title 18 of the United States Code (18 USC), which has several provisions that specifically relate to enforcement of the immigration and nationality laws; Title 19 [19 USC § 1401(i)], relating to U.S. Customs Service cross-designation of INS officers; and Title 21 [21 USC § 878], relating to Drug Enforcement Agency cross-designation of INS officers.

1.2 Purpose and Need

The combination of sound infrastructure (e.g., roads, fences, barriers, and technological components) and adequate resources (e.g., vehicles, field agents, support personnel, etc.) is essential for the effective enforcement of the border strategy and integral to the success of the USBP to gain, maintain, and extend control of the border.

Border fences have proven to be an effective deterrent in numerous areas (e.g., San Diego, Naco, Nogales, and Tecate), even though a single fence can be breached, since USBP agents cannot protect the south side of the fence. In fact, UDA apprehensions in the Naco AO have fallen from 113,287 in fiscal year 2000 to 36,900 by May 2002. Fences are typically constructed in urban or developed areas, particularly around legal POEs. Military surplus steel landing mat fences have been the type of fence most commonly constructed along the border. However, numerous other styles, including bollard, Sandia, and steel picket fences, have also been used. These fences are generally 10-14 feet high and usually constructed within six feet of the U.S.-Mexico border. Fence designs can vary depending upon the presence of other natural or man-made physical barriers, local terrain, and the USBP's enforcement strategy.

Vehicle barriers typically consist of 4- to 5-inch diameter metal pipe approximately three feet high to prevent vehicles from crossing the border at selected areas. They are usually constructed along the southern edge of existing roads, particularly roads that are adjacent to the U.S.-Mexico border. As the name implies, vehicle barriers are designed to impede illegal vehicle entry; however, they do not preclude pedestrian or wildlife movement.

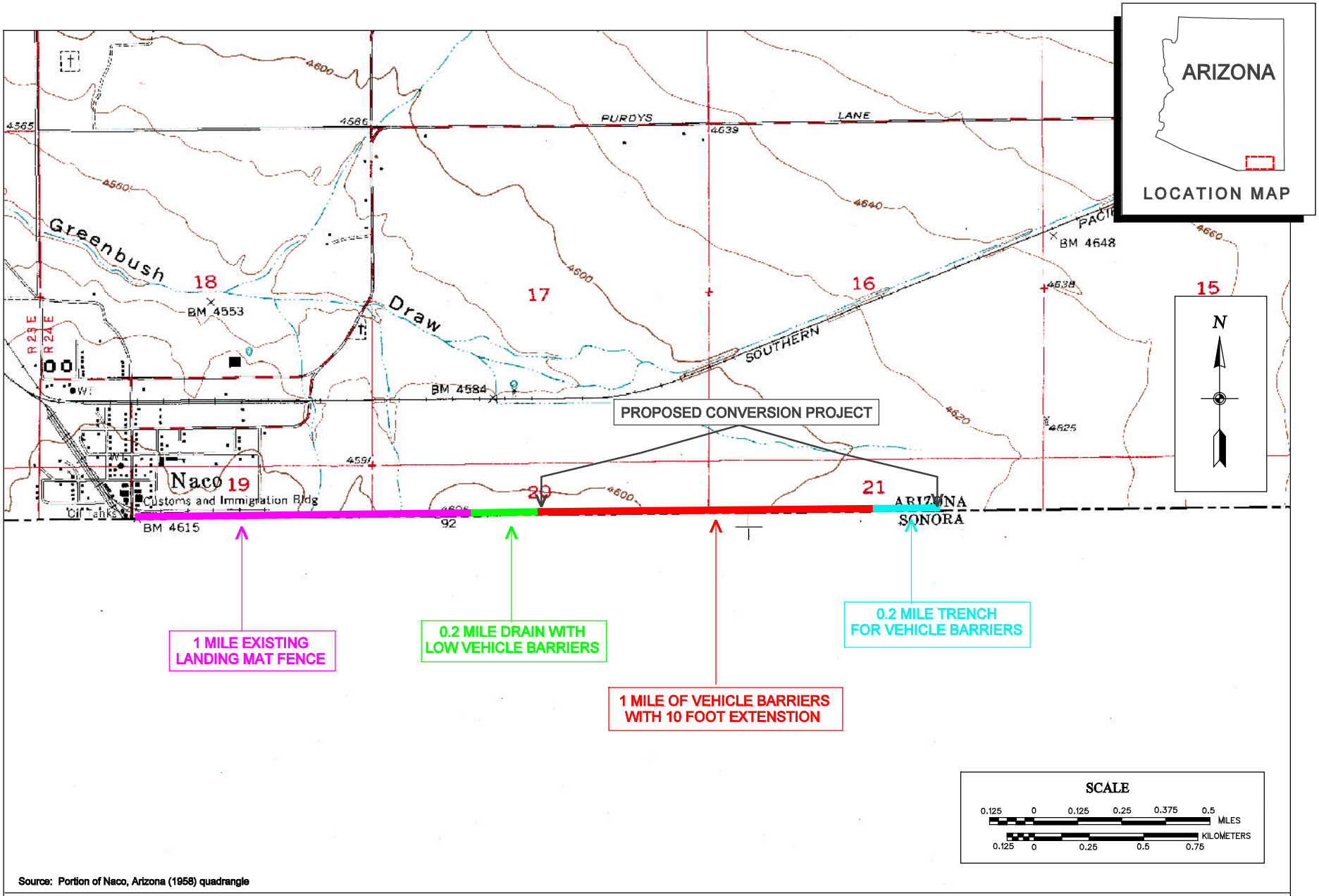
The vehicle barriers, which were addressed under a previous EA (USACE 2000), have proven to be effective in stopping illegal vehicle traffic along the 1.2-mile corridor. However, the barriers have done nothing to impede the continuing influx of illegal foot traffic, including migrants and smugglers. Because of the nearby road network, UDAs can easily escape into the United States once they have successfully breached this portion of the border. Thus, there is a need to convert 1.2 miles of existing vehicle barriers east of the Naco POE into landing mat fence. The purpose is to create a structure that would halt or substantially hinder illegal foot traffic in areas that provide easy escape routes for illegal entrants.

1.3 Location of the Proposed Action

The proposed action is located in Cochise County near the town of Naco, Arizona approximately 100 miles southeast of Tucson. Naco is located on the U.S.-Mexico border across from Naco, Sonora, Mexico, and is a legal POE. Currently, about 2.3 miles of various infrastructure have been built along the border east of the Naco POE (Figure 1-1). The proposed action would take place along the eastern-most 1.2-mile section shown in Figure 1-1.

1.4 Report Organization

This report is organized into nine major sections including this introduction with the description of the purpose, need, and location of the proposed project. Section 2.0 describes all alternatives considered for the project. Section 3.0 discusses the environmental features potentially affected by the project, while Section 4.0 discusses the environmental consequences for each of the viable alternatives. Mitigation measures are discussed in Section 5.0 and public involvement is addressed in Section 6.0. Sections 7.0, 8.0, and 9.0 present a list of the references cited in the document, a list of acronyms and abbreviations, and a list of the persons involved in the preparation of this document, respectively. Appendix A includes supporting documents of the public involvement program, such as the notice of availability and public comment letters. Other supporting documents can be found in the Environmental Assessment completed for U.S. Border Patrol's Infrastructure along the Naco-Douglas Corridor in Cochise County, Arizona (INS 2000) and the Environmental Assessment for JTF-6 Proposed Fence and Road Improvement Project, Naco, Cochise County, Arizona (USACE 2000).



Source: Portion of Naco, Arizona (1958) quadrangle

Figure 1-1: Existing Infrastructure East of Naco POE

gsrc / GULF SOUTH RESEARCH CORPORATION

SCALE: on map

DATE: October 2002

SECTION 2.0
ALTERNATIVES

2.0 ALTERNATIVES

The purpose of this section is to describe the alternatives that were considered during the preparation of the EA, relative to their ability to satisfy the purpose and need. Cost and maintenance requirements were also considered in the selection of alternatives. Four alternatives will be addressed: (1) No Action Alternative; (2) Preferred Alternative; (3) Conventional Fence Alternative; and (4) Specialty Fence Alternative. Each of these alternatives is discussed below.

2.1 No Action Alternative

The No Action Alternative would require leaving the vehicle barriers in place and not continuing the landing mat fence for 1.2 miles. While border vehicle barriers have proven to be an effective deterrent in illegal vehicular drive-throughs, they do not deter illegal immigrants from climbing over or under them. The No Action Alternative would not provide an increased deterrence of illegal foot entry nor expand the window of opportunity for USBP agents to detect illegal entry attempts.

2.2 The Preferred Alternative – Landing Mat Fence

The Preferred Alternative is to construct approximately 1.2 miles of steel landing mat panel fencing (Photograph 1) along the existing vehicle barriers east of Naco, Arizona. The proposed fence would start where the vehicle barriers with tall vertical supports begin (approximately 0.2 mile east of the existing landing mat fence) and continue east 1.2 miles. An existing border road is adjacent to and parallel with the vehicle barrier and would be used during the construction for the landing mat fence. Thus, no new roads or road upgrades would be required for the proposed action. The 0.2-mile section located between the end of the existing landing mat fence and beginning of the proposed

Photograph 1. Landing mat fence

landing mat fence is a small drainage area (see Figure 1-1). This area currently has low vehicle barriers (Photograph 2). If fencing were to be erected in this area, it would most likely be a bollard style fence to allow water to flow and would require a separate NEPA document.

Currently, of the 1.2 miles of proposed landing mat fence, 1.0 mile has the vertical supports in place while the remaining 0.2 mile of supports have not yet been constructed. Trenches (Photograph 3) for placement of the support barriers are in place and the work is expected to be completed in the near future. The trenching and installation of the vertical support barriers was covered under a previous NEPA document (USACE 2000).

The proposed steel landing mat fence would be constructed with surplus military supplies similar to the existing fence adjacent to the POE at a cost of approximately $5,000 per mile. The fence would be erected to approximately 10 feet of height during the initial construction phase. It is also the USBP's intent to add an approximate 5-foot vertical, expanded wire mesh panel extension to the top of the fence in the future. Each landing mat panel would be welded to the next to form a solid fence. The landing mat panels would be joined directly to the vehicle barriers; thus, very little, if any, additional ground disturbance would be required. Vertical support poles (Photograph 4) at a height of 10 feet are currently in place to provide additional support for the landing mat fence; however, additional support poles, if needed, would be installed using an auger and the holes would be grouted with concrete. This alternative would substantially impede illegal foot and vehicle traffic within the area with minimal cost and environmental impacts.

2.3 Alternatives Considered but Eliminated from Further Evaluation

Other types of fencing materials/fence designs were considered during the preparation of this EA. However, since they did not satisfy the purpose and need to provide a substantial barrier to illegal foot traffic or were too costly or time consuming to install or maintain, these alternative designs were eliminated from further consideration. Two major categories of fences (i.e., conventional and specialty) were considered, as described below.

Photograph 2
0.2 mile of low vehicle barrier

Photograph 3
Trenching for vehicle barriers
with vertical support poles

Photograph 4
Existing vehicle barriers with
10’ vertical support poles

2.3.1 Conventional Fence Alternative

Conventional fence building materials, such as barbed wire and chain link, have been considered by the USBP. These materials are not excessively expensive when compared to the specialty fences described below, but still cost a great deal more than the landing mat option. In addition, these materials are not considered to be as effective as landing mat panels in satisfying the purpose and need. Chain link fencing costs approximately $130,000 per mile and requires a high level of maintenance, and is not resistant to cutting or vandalism. Barbed wire fencing would be the least effective and is easily traversed without the necessity of cutting the fence, although the cost is approximately $40,000 per mile. Although fences built from these materials may offer some level of deterrence to illegal entrance, they would require constant maintenance due to the effects of vandalism and exposure to the elements. Furthermore, the environmental impacts from the construction of these types of fences would be similar to those produced by construction of a landing mat panel fence. Additionally, landing mat panel fences would require less maintenance and as a result, less maintenance impacts and costs. Thus, these designs were eliminated from further consideration.

2.3.2 Specialty Fence Alternative

The bollard fence (Photograph 5) consists of a double row of 10- to 15-foot high steel pipe poles, approximately six inches in diameter, placed on 8.5-inch centers. The pipes would be filled with concrete for added strength and security. The two rows are offset, such that the gaps between the poles would be filled by the poles of the other row. A concrete footer is required to anchor the poles – approximately 20 inches wide and three feet deep. This type of fence is normally only used in areas with flowing water that would damage other types of fences. It is the most expensive to construct, costing approximately $1,000,000 per mile. Therefore, this type of fence was eliminated from further consideration for this 1.2-mile project area.

Photograph 5 Bollard style fence

Sandia fences (Photograph 6) have been used in other areas along the border. The current standard design consists of vertical secura metal mesh panels attached to 16- foot steel poles. Additional 6-foot panels are secured to the top panels at an angle of 45 degrees toward the south. The poles would be anchored to a 12-inch wide by 4-foot deep concrete footing that runs the length of the proposed fence. Generally, this type of fence has been used as a secondary fence behind the landing mat panel fence or in maximum-security situations because of the high construction costs (approximately $200,000/mile) and high maintenance costs if subjected to vandalism. The environmental impacts from construction of this type of fence are greater than the preferred landing mat panel fence due to the required ground disturbance; therefore this design was eliminated from further consideration.

Photograph 6 Sandia style fence

Photograph 7 Picket style fence

Decorative picket style fences (Photograph 7) have been used (e.g., near the Douglas POE). The intended use of picket fences is for aesthetic reasons rather than structural or cost effectiveness. This fence has only been used in an urban setting due to the high cost of construction (approximately $200,000/mile) and the relative low durability of this design. Environmental impacts resulting from construction of this type of fence would be greater than the Preferred Alternative since the picket fence could not be

applied directly to the vehicle barrier and additional ground disturbance would be required.

2.4 Summary

Two alternatives were carried forward for analysis: No Action Alternative and Preferred Alternative. Other fence designs were considered but eliminated due to operational or cost constraints. A summary of the alternatives, in comparison to the purpose and need for the action, is presented in Table 2-1.

Table 2-1: Alternative Matrix

Purpose and Need Requirements	No Action	Fence			
		Landing Mat Fence	Chain Link	Barbed wire	Specialty
Effective in deterring foot traffic from illegal migrants and drug smugglers	No	Yes	Maybe	No	Yes
Reduce number of easy escape routes for illegal entrants	No	Yes	No	No	Yes
Prevent vehicular drive-throughs	Yes	Yes	Maybe	No	Yes
Cost per mile	NA	$5,000	$130,000	$40,000	$200,000+

Due to the disturbed nature of the project corridor and the fact that the vehicle barrier is already in place, negligible impacts to the human and natural environment would occur as a result of the Preferred Alternative (Table 2-2). Conversion of the vehicle barrier to landing mat fence would have an effect on migration patterns of larger mammals; however, these effects are also considered to be insignificant since the surrounding area does not support expansive populations of large mammals that would be susceptible to slight, long-term shifts in genetic variability.

Table 2-2: Summary Matrix of Potential Impacts

Affected Environment	No Action Alternative	Preferred Alternative – Landing Mat Fence
Land Use	No impacts	Land use would remain the same as it is now
Soils and Prime Farmlands	No impacts	No additional soil disturbance would be required
Vegetation	UDA foot traffic would continue to disturb vegetation in the project region	The project site has been previously disturbed and essentially void of vegetation
Wildlife Communities	UDA foot traffic would continue to disturb wildlife species and their habitats in the project region	Proposed project could interfere with wildlife migration patterns; however, the project area is highly disturbed and not suitable for wildlife species that would be most affected by fence
Unique and Sensitive Areas	No impacts	No impacts
Protected Species and Critical Habitat	UDA foot traffic would continue to disturb protected species and designated critical habitats in the project region	No protected species were observed within the project site; there are no designated critical habitats within the project site
Cultural Resources	No impacts	No additional ground disturbance would be required; therefore, no impacts to cultural resources
Air Quality	No impacts	Short-term increase in emissions from equipment required for proposed project; any increase is expected to be temporary
Water Resources	No Impacts	No impacts
Socioeconomics	Continued UDA and drug smuggling foot traffic in urban/developed areas near the POE	Improved socioeconomics in surrounding communities due to less UDA and drug smuggling activities
Noise	No additional impacts	Short-term increase in noise from equipment required for proposed project; any increase is expected to be temporary

SECTION 3.0
AFFECTED ENVIRONMENT

3.0 AFFECTED ENVIRONMENT

3.1 Land Use

The total area of Cochise County is 6,170 square miles. The 2000 census estimated the population at 117,755, with a population density of 19.1 persons per square mile (U.S. Census Bureau 2001). The largest land use category for the county is in the private and corporate ownership (42%). The principal land use outside the urban areas is rangeland and agriculture (cotton, alfalfa, barley, corn, and vegetables). The Federal government controls approximately 841,000 acres (21%), with the U.S. Forest Service (USFS) managing approximately 490,000 acres (12%) of the land in the county. The majority of the USFS land is the multiple-use Coronado National Forest. The U.S. Fish and Wildlife Service (USFWS) manages the San Bernardino National Wildlife Refuge within Cochise County. The Bureau of Land Management (BLM) manages approximately 350,000 acres (9%). The BLM land includes the Chiricahua National Monument, the San Pedro Riparian National Conservation Area, and numerous multiple use areas used primarily for grazing. The State of Arizona manages approximately 1,368,000 acres (34%), which is primarily maintained for recreation, historical, and natural uses.

The project region has three small to medium sized urban areas. According to the U.S. Census Bureau (2001), the primary urban areas and their 2000 populations are: Douglas (14,312), Bisbee (6,090), and Naco (833). More detailed information regarding land use in the project region can be found in the EA completed for USBP's infrastructure along the Naco-Douglas corridor in Cochise County, Arizona (INS 2000) and the EA for JTF-6 Proposed Fence and Road Improvement Project, Naco, Cochise County, Arizona (USACE 2000), and is incorporated herein by reference.

3.1.1 Mining Operations

Copper mining is an important industry in Arizona. In 1999, activities of the Arizona copper industry occurred on 187,900 acres of the state's 72,960,000 acres (Arizona Mining Association 2000). No mines are presently being operated in Cochise County. However, Bisbee operates several tourist industries based on past mining in the area, such as Bisbee Mining and Historical Museum and Queen Mine Tours.

3.2 Soils And Prime Farmland

3.2.1 Soils

Arizona has a diverse assortment of soil types throughout the state with variations in depth, texture, chemical properties, and appropriate land uses. This diversity is directly related to regional differences in climate, parent material, topography, and erosion actions. The predominant soil association found within the project area is the Nickel-Latene-Pinaleno Association (Hendricks 1985).

The Nickel-Latene-Pinaleno Association is found in the central portion of the Naco Station and covers much of the area surrounding the POE. It consists of very deep and shallow, well-drained soils that formed in alluvium. It is found on floodplains and fan terraces at slopes of zero to 20 percent at elevations from 2,000 to 5,500 feet msl. More detailed information regarding the soils in the project area is contained in previous EAs (INS 2000; USACE 2000), and is incorporated herein by reference.

3.2.1.1 Hydric Soils

There are no hydric soils located within the project area (Wilson 2000; Bemis 2000).

3.2.2 Prime Farmland

There are no prime or unique farmlands located within the project area. Prime farmlands are classified as Category 1 soils that occur mainly within the San Pedro Valley. Soils within the project area are not considered unique because they require irrigation to be arable (Bemis 2000).

3.3 Vegetation

Biological resources include native plants in the region around the proposed project area. The proposed project region supports a plant community defined as semi-desert grassland, a perennial grass-scrub community that is usually located between desert scrub and higher elevation plant communities (Brown 1994). This habitat type is found in southeastern Arizona, southwestern New Mexico, and northern Mexico between elevations of 4,000 and 8,000 feet msl and receives an annual rainfall between 11 and 17 inches per year.

Semi-desert grassland is found in the valley areas of Cochise and eastern Pima counties. This vegetation type is dominated by grama grasses (*Bouteloua* spp.), velvet mesquite (*Prosopis velutina*), Lehmann lovegrass (*Eragrostis lehmanniana*), and Arizona cottontop (*Digitaria californica*). Other species in this community observed during the November 1999 site visit include squawbush (*Rhus trilobata*), desert broom (*Baccharis sarothroides*), broom snakeweed (*Gutierrezia sarothrae*), Parry's agave (*Agave parryi*), and some oak species (*Quercus* sp.) (USACE 2000). More detailed information on vegetation in the project area can be found in previous EAs (INS 2000; USACE 2000) and is incorporated herein by reference.

A field reconnaissance survey was performed along the 1.2-mile corridor in March 2002 and a pedestrian survey of the entire Naco Station was performed in April 2002. These biological surveys were conducted in an effort to inventory biological resources in the proposed project area and evaluate the potential effects of the alternatives on these resources.

Based on these recent field surveys, the semi-desert grassland designation is consistent throughout the project region. Dominant vegetation observed adjacent to the existing road and fence during the surveys was white thorn acacia (*Acacia constricta*), mesquite, Lehmann lovegrass, and Plains lovegrass (*Eragrostis intermedia*). Less common plants observed in the area were mormon tea (*Ephedra aspera*), soaptree yucca (*Yucca elata*), Christmas cholla (*Opuntia leptocaulis*), desert holly (*Acourtia nana*), and desert sumac (*Rhus microphylla*). The corridor where the proposed action would occur is in a disturbed state due to recent fence and road work along the border, which was addressed in the JTF-6 Fence EA (USACE 2000).

3.4 Wildlife Communities

The native fauna of southeastern Arizona, which encompass Cochise County, include approximately 370 bird species, 109 mammals, 23 amphibians, and 72 reptiles. The bird population is dominated by sparrows and towhees (35 species); wood warblers (32 species); swans, geese, and ducks (31 species); tyrant flycatchers (30 species); and sandpipers and phalaropes (26 species). Bird species diversity is highest in the spring

and fall when neotropical migrants (i.e., flycatchers and warblers) pass through on their way to summer breeding or wintering grounds, and in the winter when summer resident birds (i.e., robins, kinglets, and sparrows) from the northern U.S. and Canada arrive to winter in the area. The majority of the mammal species found in the area are bats and rodents (i.e., mice, rats, and squirrels). Rodents, such as pocket mice and kangaroo rats, are the most commonly encountered. Of the 23 amphibian species that inhabit southeastern Arizona, spadefoot toads and true toads are dominant and the most widespread. Iguanid lizards, colubrid snakes, and whiptails are the most common reptiles in the area. The types of wildlife commonly occurring in Cochise County are listed in Appendix A of the EA for Infrastructure within USBP Naco-Douglas Corridor, Cochise County, Arizona (INS 2000). More information on fauna within the project region can be found in the EA for JTF-6 Proposed Fence and Road Improvement Project Douglas, Cochise County, Arizona (USACE 2000).

A field reconnaissance survey was performed along the 1.2-mile corridor in March 2002 and pedestrian surveys were performed in April 2002 for the entire Naco Station. Common fauna species observed during the April 2002 surveys of the station were black-tailed jackrabbit, black-throated sparrow, white-winged dove, western kingbird, roadrunner, scaled quail, Gambel's quail, and verdin. No species were observed at the project site in March 2002.

3.5 Unique or Sensitive Areas

Several unique or sensitive areas are found in or near Cochise County, Arizona. The closest one to the project area is the San Pedro Riparian National Conservation Area. This conservation area begins approximately 17 miles west of the project area.

3.6 Protected Species and Critical Habitats

The Endangered Species Act (ESA) [16 U.S.C. 1531 et. seq.] of 1973, as amended, was enacted to provide a program for the preservation of endangered and threatened species and to provide protection for the ecosystems upon which these species depend for their survival. All Federal agencies are required to implement protection programs for designated species and to use their authorities to further the purposes of the act.

Responsibility for the identification of a threatened or endangered species and development of any potential recovery plan lies with the Secretary of the Interior and the Secretary of Commerce.

The USFWS is the primary agency responsible for implementing the ESA, and is responsible for bird, terrestrial, and freshwater species. The USFWS responsibilities under the ESA include: (1) the identification of threatened and endangered species; (2) the identification of critical habitats for listed species; (3) implementation of research on, and recovery efforts for, these species; and (4) consultation with other Federal agencies concerning measures to avoid harm to listed species.

An endangered species is a species in danger of extinction throughout all or a significant portion of its range. A threatened species is a species likely to become endangered within the foreseeable future throughout all or a significant portion of its range. Proposed species are those that have been formally submitted to Congress for official listing as threatened or endangered. Species may be considered endangered or threatened when any of the five following criteria occurs: (1) current/imminent destruction, modification, or curtailment of their habitat or range; (2) overuse of the species for commercial, recreational, scientific, or educational purposes; (3) disease or predation; (4) inadequacy of existing regulatory mechanisms; and (5) other natural or human-induced factors affect continued existence.

In addition, the USFWS has identified species that are candidates for listing as a result of identified threats to their continued existence. The candidate designation includes those species for which the USFWS has sufficient information to support proposals to list as endangered or threatened under ESA. However, proposed rules have not yet been issued because such actions are precluded at present by other listing activity.

The ESA also calls for the conservation of what is termed Critical Habitat - the areas of land, water, and air space that an endangered species needs for survival. Critical habitat also includes such things as food and water, breeding sites, cover or shelter, and sufficient habitat area to provide for normal population growth and behavior. One of the primary threats to many species is the destruction or modification of essential habitat by uncontrolled land and water development.

3.6.1 Federal

A total of 31 Federally endangered, threatened, proposed threatened, and candidate species occur within Cochise County, Arizona (USFWS 2001). A total of 16 species are listed as endangered, eight as threatened, two as proposed threatened, and five as candidate (Table 3-1). This information was taken from a recently published document for a project near Douglas, Arizona (approximately 20 miles to the east of Naco, AZ) and the coordination letter can be found in Appendix B of that document (INS 2002). USFWS coordination for the original barrier project was made under the EA for JTF-6 Proposed Fence and Road Improvement Project, Naco, Cochise County, Arizona from which this EA is tiered from (USACE 2000).

Protected species in the Naco-Douglas Corridor are generally concentrated near the San Pedro River and the Huachuca Mountains. No known locations of threatened or endangered species occur within the project area.

No evidence of Federally listed threatened or endangered species were found within the project site during the site visit in March and April 2002, or during past surveys in the project region (INS 2001; USACE 1993, 1994, 1996, 2000).

Protected feline species potentially occurring in the area have been a common concern in the project area. One ocelot (*Leopardus pardalis*) sighting was reported in the last two years in Mexico near Douglas, Arizona (approximately 20 miles east of the project area). The Arizona Game and Fish Department (AGFD) recently photographed the endangered jaguar (*Panthera onca*) west of Nogales, Arizona (approximately 50 miles west of the project area); this jaguar is the first photographed in six years in North America (Dye 2002). Until the December 2001 photograph, the last confirmed sighting of the jaguar was in 1996 near the Baboquivari Mountains, approximately 100 miles to the west of the project area in Pima County, Arizona. According to the AGFD there are no recorded sightings of jaguarundi (*Herpailurus yagouaroundi cacomitli*) in or near the project area in recent years (2001). There are no confirmed sightings of the jaguarundi in the region (AGFD 2001; Tewes 2001). The historic range of these three cats is in the southwestern part of the United States (Texas, Arizona, and New Mexico) and Mexico.

Table 3-1

Federally Listed, Proposed, and Candidate Species Potentially Occurring within Cochise County, Arizona

Common/Scientific Name	Federal Status	Date Listed	Designated Critical Habitat	Habitat Requirements
AMPHIBIANS				
Chiricahua leopard frog *Rana chiricahuensis*	T	6/13/02 67 FR 40789	NA	Streams, rivers, backwaters, ponds, and stock tanks
Sonora tiger salamander *Ambystoma tigrinum stebbinsi*	E	1/6/97 62 FR 665	NA	Stock tanks and impounded cienegas in San Rafael Valley, Huachuca Mountains
BIRDS				
American peregrine falcon *Falco peregrinus anatum*	E	10/13/70 35 FR 16047	NA	Cliffs and steep terrain usually near water or woodlands with abundant prey
Bald eagle *Haliaeetus leucocephalus*	T	7/12/95 60 FR 35999	NA	Large trees or cliffs near water (reservoirs, rivers, and streams) with abundant prey
Brown pelican *Pelecanus occidentalis californicus*	E	10/16/70 35 FR 16047	NA	Coastal land and islands; Arizona lakes and rivers
Cactus ferruginous pygmy-owl *Glaucidium brasilianum cactorum*	E	3/10/97 62 FR 10730	NA	Mature cottonwood/willow, mesquite bosques, and sonoran desert scrub
Mexican spotted owl *Strix occidentalis lucida*	T	4/11/91 56 FR 14678	2/1/01 66 FR 8530	Old growth forest associated with steep canyons
Mountain plover *Charadrius montanus*	PT	2/16/99 64 FR 7587	NA	Open arid plains, short-grass prairies, and cultivated forms
Northern aplomado falcon *Falco femoralis septentrionalis*	E	1/25/86 51 FR 6686	NA	Desert grasslands
Southwestern willow flycatcher *Empidonax traillii extimus*	E	2/27/95 60 FR 10694	NA	Dense riparian vegetation
Whooping crane *Grus americana*	E	3/11/67 32 FR 4001	5/15/78 43 FR 20938	Marshes, prairies, river bottoms
Yellow-billed cuckoo *Coccyzus americanus*	C	NA	NA	Large blocks of riparian woodlands
FISHES				
Beautiful shiner *Cyprinella formosa*	T	8/31/84 49 FR 34490	8/13/84 49 FR 34490	Deep pools in creeks, scoured areas of cienegas, and other stream-associated quiet waters
Gila chub *Gila intermedia*	PE	8/9/02 67 FR 51947	NA	Pools, springs, cienegas, and streams

Common/Scientific Name	Federal Status	Date Listed	Designated Critical Habitat	Habitat Requirements
Loach minnow *Tiaroga cobitis*	T	10/28/86 51 FR 39468	3/8/94 59 FR 10898	Lower San Pedro River has been designated as critical habitat by USFWS
Spikedace *Meda fulgida*	T	7/1/86 51 FR 23769	2/25/00 65 FR 24327	Lower San Pedro River has been designated as critical habitat by USFWS
Yaqui catfish *Ictalurus pricei*	T	8/31/84 49 FR 34490	8/13/84 49 FR 34490	Moderate to large streams with slow current over sand and rock bottoms
Yaqui chub *Gila purpurea*	E	8/31/84 49 FR 34490	8/13/84 49 FR 34490	Deep pools of small streams, pools, or ponds near undercut banks
Yaqui topminnow *Poeciliopsis occidentalis sonoriensis*	E	3/11/67 32 FR 4001	NA	Streams, springs, and cienegas between 4,000 - 5,000 feet elevation, primarily in shallow areas
INVERTEBRATES				
Huachuca springsnail *Pyrgulopsis thompsoni*	C	NA	NA	Aquatic areas, small springs with vegetation slow to moderate flow
MAMMALS				
Black-tailed prairie dog *Cynomys ludovicianus*	C	NA	NA	Burrows in plains and grassland habitats
Jaguar *Panthera onca*	E	7/22/97 62 FR 39147	NA	Variety of habitats including lowland wet habitats and typically swampy savannas
Jaguarundi *Herpailurus yagouaroundi cacomitli*	E	6/14/76 41 FR 24064	NA	Dense thorny thickets of mesquite and acacia
Lesser long-nosed bat *Leptonycteris curasoae yerbabuenae*	E	9/30/88 53 FR 38456	NA	Desert scrub habitat with columnar cacti and agave present as food plants
Mexican gray wolf *Canis lupus baileyi*	E	3/11/67 32 FR 4001	NA	Chapparal, woodland, and forested areas. May cross desert areas
Ocelot *Leopardus pardalis*	E	7/21/82 47 FR 31670	NA	Humid tropical and sub-tropical forests, savannas, and semi-arid thornscrub
PLANTS				
Canelo Hills ladies' tresses *Spiranthes delitescens*	E	1/6/97 62 FR 665	NA	Finely grained, highly organic, saturated soils of cienegas
Cochise pincushion cactus *Coryphantha robbinsorum*	T	1/9/86 51 FR 952	NA	Semidesert grassland with small shrubs, agave, other cacti, and grama grass

Common/Scientific Name	Federal Status	Date Listed	Designated Critical Habitat	Habitat Requirements
Huachuca water umbel *Lilaeopsis schaffneriana* ssp. *Recurva*	E	1/6/97 62 FR 665	7/12/99 64 FR 37441	Cienegas, perennial low gradient streams, wetlands
Lemmon fleabane *Erigeron lemmonii*	C	NA	NA	Crevices, ledges, and boulders in canyon bottoms in pine-oak woodlands
REPTILES				
New Mexico ridge-nosed rattlesnake *Crotalus willardi obscurus*	T	4/4/78 43 FR 34479	8/4/78 43 FR 34476	Presumably canyon bottoms in pine-oak and pin-fir communities

Legend: E = Endangered
T = Threatened
PT = Proposed Threatened
C = Candidate

Sources: USFWS 2001; AGFD 2000

The range of the lesser long-nosed bat (*Leptonycteris curasoae yerbabuenae*) is from "southern Arizona and extreme southwestern New Mexico, through western Mexico, and south to El Salvador" (Bat Conservation International 2001, University of Arizona 2001). The occurrences in southern Arizona range from "the Picacho Mountains southwest to the Agu Dulce Mountains, southeast to the Chiricahua Mountains" (University of Arizona 2001). Although the project area is outside of the lesser long-nosed bat's range, their habitats, roosting areas, and feeding requirements were evaluated. Assessments were conducted during a field survey performed in 2001 (INS 2001) and were based on the presence of the columnar cacti and agaves, which are preferred food sources, and appropriate roosting and breeding sites, such as caves and mines (Bat Conservation International 2001, University of Arizona 2001). No such cacti or roosting and breeding sites were observed in or near the project area during previous surveys (INS 2001; USACE 1993, 1994, 1996, 2000). Agaves are common in the project region, but none were observed in the project site during the site visit in March and April 2002.

3.6.2 Critical Habitat

Critical habitat has been designated for seven species identified as potentially occurring in Cochise County, Arizona (USFWS 2000). None of their designated critical habitats are present within the project area.

3.6.3 State

The AGFD maintains lists of Wildlife of Special Concern. This list includes flora and fauna whose occurrence in Arizona is or may be in jeopardy, or with known or perceived threats or population declines (AGFD 2000). These species are not necessarily the same as those protected by the Federal government under the ESA. Recent letters from AGFD can be found in the appendix of the EA for JTF-6 Proposed Fence and Road Improvement Project, Naco, Cochise County, Arizona (USACE 2000).

The Arizona Department of Agriculture maintains a list of protected plant species within Arizona. The 1993 Arizona Native Plant Law defined five categories of protection within the state. These include: Highly Safeguarded, no collection allowed; Salvage Restricted, collection only with permit; Export Restricted, transport out of state prohibited; Salvage Assessed, permit required to remove live trees; and Harvest Restricted, permit required to remove plant by-products (AGFD 2000).

There was no evidence of or observations of any state-listed flora or fauna within the project site during the March and April 2002 site visits.

3.7 Cultural Resources

The cultural resources within the project area are extensive and diverse. Numerous terrestrial investigations have been performed north of the U.S.-Mexico border in the project area. These investigations and their results are discussed in detail in the EA completed for USBP's infrastructure along the Naco-Douglas corridor in Cochise County, Arizona (INS 2000) and in the EA for JTF-6 Proposed Fence and Road Improvement Project, Naco, Cochise County, Arizona (USACE 2000).

Surveys within the current project area were performed as a part of the JTF-6 EA, from which this EA is tiered. Section 106 coordination was conducted for all ground disturbing activities during the JTF-6 NEPA process. Furthermore, recent surveys were conducted along the entire Naco-Douglas corridor to locate and re-evaluate sites that were previously identified. No sites that are considered potentially eligible for inclusion to the National Register of Historic Places (NRHP) are found within the project area (USACE 2001).

No ground disturbing activities are associated with the Preferred Alternative; therefore, in accordance with 36 CFR Part 800.3 (a)(1), there is no potential to cause effects.

3.8 Air Quality

The State of Arizona has adopted the National Ambient Air Quality Standards (NAAQS) (40 CFR Part 50) as the state's air quality criteria (Table 3-2). Primary standards are established to protect public health while secondary standards provide protection for the public's welfare including wildlife, climate, recreation, transportation, and economic values. States are required to adopt ambient air quality standards that are at least as stringent as the Federal NAAQS; however, the state standards may be more stringent. Based on measured ambient criteria pollutant data, areas are designated as having air quality better than the standard (attainment) or worse than the standard (nonattainment).

Table 3-2: National Ambient Air Quality Standards

POLLUTANT	STANDARD VALUE	STANDARD TYPE
Carbon Monoxide (CO)		
8-hour average	9ppm (10mg/m^3)**	Primary
1-hour average	35ppm (40mg/m^3)**	Primary
Nitrogen Dioxide (NO_2)		
Annual arithmetic mean	0.053ppm (100μ/m^3)**	Primary and Secondary
Ozone (O_3)		
1-hour average*	0.12ppm (235μg/m^3)**	Primary and Secondary
8-hour average*	0.08ppm (157μg/m^3)**	Primary and Secondary
Lead (Pb)		
Quarterly average	1.5μg/m^3	Primary and Secondary
Particulate<10 micrometers (PM_{10})		
Annual arithmetic mean	50μg/m^3	Primary and Secondary
24-hour average	150μg/m^3	Primary and Secondary
Particulate<2.5 micrometers ($PM_{2.5}$)		
Annual arithmetic mean	15μg/m^3	Primary and Secondary
24-hour Average	65μg/m^3	Primary and Secondary
Sulfur Dioxide (SO_2)		
Annual arithmetic mean	0.03ppm (80μg/m^3)**	Primary
24-hour average	0.14ppm (365μg/m^3)**	Primary
3-hour average	0.50ppm (1300μg/m^3)**	Secondary

Source: USEPA 1995.
Legend: ppm = parts per million
mg/m^3 = milligrams per cubic meter of air
μg/m^3 = micrograms per cubic meter of air
*The ozone 1-hour standard applies only to areas that were designated non-attainment when the ozone 8-hour standard was adopted in July 1997.
**Parenthetical value is an approximate equivalent concentration.

Cochise County is in attainment for all Federal NAAQS except for Douglas and Paul Spur. The Clean Air Act requires that for areas designated “non-attainment”, plans must be prepared and implemented to bring the area into attainment within a specified time. More detailed information on air quality in the project area can be found in the EA completed for USBP’s infrastructure along the Naco-Douglas corridor in Cochise County, Arizona (INS 2000) and the EA for JTF-6 Proposed Fence and Road Improvement Project, Naco, Cochise County, Arizona (USACE 2000). The information contained in these two documents is incorporated herein by reference.

3.9 Water Resources

The project area receives water from surface runoff and groundwater via precipitation and snowmelt in the local mountains. Geologic forces have created a regional terrain that includes arroyos or washes (deep gullies), steep canyons, and somewhat flat basins. Due to the arid climate of the area, most of the drainage channels are dry much of the year. Rivers and streams that flow periodically due to fluctuations in precipitation are referred to as being ephemeral. Intermittent waterways (rivers, streams, etc.) are those that flow as a result of seasonal precipitation. Due to the flash flood tendency of the washes, sediment loads are high when water is present. Natural and human-induced factors determine the quality of these resources. Numerous small ephemeral drainages transect the project area.

The major surface water drainage near the project area is the Greenbush Draw, which flows just north of Naco and is a tributary of the San Pedro River. Numerous smaller streams, which are intermittent or ephemeral in nature, flow to or from the draw depending on topography.

Groundwater resources in the surrounding areas are available from both unconfined (water table) and confined (artesian aquifer) conditions. Water depths to unconfined water are between 50 and 570 feet, while confined water can be found from 500 to 1,000 feet below the ground (USACE 2000).

More information on surface and groundwater resources within the Naco area is described in detail in the EA for Infrastructure within USBP Naco-Douglas Corridor, Cochise County, Arizona (INS 2000) and the EA for JTF-6 Proposed Fence and Road Improvement Project, Naco, Cochise County, Arizona (USACE 2000). The information contained in these two EAs is incorporated herein by reference (USACE 2000; INS 2000).

3.9.1 Waters of the U.S. and Wetlands

There are no jurisdictional waters of the United States, including wetlands, within the project site (USACE 2000).

3.10 Socioeconomics

The 2000 census estimated the population of Cochise County to be 117,755 with Naco's population accounting for approximately 833 of the total (U.S. Census Bureau 2001). The four major towns closest to the project area are Huachuca, Bisbee, Douglas, and Sierra Vista. More information, incorporated herein by reference, can be found in the EA for Infrastructure within USBP Naco-Douglas Corridor, Cochise County, Arizona (INS 2000) and the EA for JTF-6 Proposed Fence and Road Improvement Project, Naco, Cochise County, Arizona (USACE 2000).

3.11 Noise

The three common classifications of noise are: (1) general audible noise that is heard by humans; (2) special noise, such as sonic booms and artillery blasts that can have a sound pressure or shock component; and (3) noise-induced vibration also typically caused by sonic booms and artillery blasts involving noise levels that can cause physical movement (i.e., vibration) and even possible damage to natural and man-made structures such as buildings and cultural resource structures. Most noise sources will fall within the audible noise classification because of the rural nature of the majority of the project area.

Audible noise typically is measured in A-weighted sound pressure levels expressed in decibels (dBA). The A-scale de-emphasizes the low and high frequency portions of the sound spectrum and provides a good approximation of the response of the average human ear. On the A-scale, zero dBA represents the average least perceptible sound, such as gentle breathing, and 140 dBA represents the intensity at which the eardrum may rupture, such as a jet engine at open throttle (National Research Council 1977).

Since the proposed activities are not capable of attaining the speed of sound and thus are incapable of causing special noises, all noise levels discussed herein are measured on the A-scale dBA. Normal rural noise levels in the project area would range from a low of 35 dBA over the majority of the corridor to a high 60 dBA near any rural community. More detailed information on noise in the project area can be found in previous EAs (INS 2000; USACE 2000) and is incorporated herein by reference.

SECTION 4.0
ENVIRONMENTAL CONSEQUENCES

4.0 ENVIRONMENTAL CONSEQUENCES

This section of the EA addresses potential impacts to the affected environment within the Naco area for the No Action and Preferred Alternatives outlined in Section 2.0.

4.1 Land Use

4.1.1 No Action Alternative

Implementation of the No Action Alternative would not affect current land use within the Naco area.

4.1.2 Preferred Alternative

No changes to land use in this area would occur from implementing this alternative. The project area is currently used as a border enforcement zone and would continue to be used as such. Fencing would be installed along the existing border roadway.

4.2 Soils And Prime Farmland

4.2.1 No Action Alternative

Implementation of the No Action Alternative would eliminate potential direct disturbances to soils from further construction activities. Regardless of the alternative selected, existing erosion problems would continue, since the USBP would continue to use the roads for patrol activities. Soils found in the Naco area have medium to high erosion hazards, depending on the slope. Maintenance activities would occur along the existing road adjacent to the border, but soil erosion would continue to be a problem.

Implementation of the No Action Alternative would have no effect on prime farmland in the project area because there are no prime farmlands.

4.2.2 Preferred Alternative

Construction activities addressed under this alternative would occur in proximity to the border road, where soils are already considered disturbed. The only ground disturbance expected would be during the occasional installation of support poles. The holes would

be about eight inches in diameter and backfilled with concrete. Best management practices (BMPs) would be incorporated into the construction plan to control erosion.

Prime and unique farmlands are not found within the Naco-Douglas Corridor (Wilson 2000; Bemis 2000).

4.3 Vegetation

4.3.1 No Action Alternative

Implementation of the No Action Alternative would eliminate the potential for direct disturbances to vegetation from further construction activities. However, the existing road right-of-way where all fence construction would occur is already devoid of vegetation due to previous construction and maintenance activities.

Impacts to vegetation outside the maintained road corridor from illegal entrants would continue to occur. Indirect effects have occurred to vegetation by illegal entrants diverting around fences or away from areas that are heavily patrolled. Improvements in the infrastructure and increases in patrol activities have resulted in some illegal entrants redirecting their efforts into more remote areas. Increases in illegal foot and vehicle traffic would continue to result in damage to vegetation.

4.3.2 Preferred Alternative

This alternative would include the conversion of 1.2 miles of vehicle barrier to landing mat fence. The corridor along which the action would take place has been previously disturbed and no additional impacts to vegetation are expected. The conversion to landing mat fence should substantially reduce secondary impacts to vegetation from illegal entry within the project area.

However, indirect effects could occur to the vegetation beyond the project area by UDAs attempting to avoid the fenced corridor. The magnitude of these effects cannot be determined at the present, since the routes selected by UDAs and smugglers are at their discretion and out of the control of the USBP.

4.4 Wildlife

4.4.1 No Action Alternative

The No Action Alternative would not allow the conversion of the vehicle barrier to a fence. Larger mammals and herpetiles would benefit from the No Action Alternative since solid fences can impede movement by such species. Fences have also afforded protection to some wildlife species and other sensitive resources by reducing habitat disturbances caused by UDA activities. Fences do significantly reduce illegal entries and, indirectly, reduce the amount of foot traffic within wildlife communities in the U.S.

4.4.2 Preferred Alternative

No additional direct impacts to wildlife resources are expected from the conversion of the vehicle barrier to landing mat fence since no additional wildlife habitat would be altered. However, the landing mat fence would create a barrier to wildlife movement, especially for larger mammals and herpetiles. The magnitude of this impact cannot be quantified at the present. However, there are no wildlife populations in the project area that are sensitive to potentially slight reductions in genetic variability. Therefore, impeding some local wildlife movement in this area is not considered significant.

4.5 Unique or Sensitive Areas

There are no areas classified as unique or sensitive natural areas found within the proposed project area.

4.6 Protected Species and Critical Habitats

4.6.1 No Action Alternative

The No Action Alternative would have no effect on protected species or designated critical habitats. However, increased and continued illegal traffic and the consequent enforcement activities could be adverse to protected species and critical habitats.

4.6.2 Preferred Alternative

No listed threatened or endangered species or their designated critical habitats are known to occur within the project area. Thus, the proposed activities within the project area

would not be expected to adversely affect protected species or critical habitats. No Federally listed species were found in the project area during the surveys conducted in March and April 2002.

No agaves or columnar cacti, a preferred food source for the lesser long-nosed bat, were located in the project site during surveys performed in March and April 2002. Agaves are present in the surrounding communities, but would not be disturbed by the proposed action.

There have been no confirmed sightings of the ocelot, jaguar, and jaguarundi in the project area. The conversion of 1.2 miles of vehicle barriers to landing mat fence is not expected to have a negative effect on the migration patterns of these three species, since they are not known to occur in the project area. The proposed fence is located approximately one mile from the Naco POE; this area receives heavy traffic and is urbanized. The presence of these feline species in this type of environment would be unlikely. The closest feline sighting to the project area was one ocelot reported in the last two years on the Mexico side of the border near Douglas, Arizona, approximately 20 miles east of the project area.

4.7 Cultural Resources

4.7.1 No Action Alternative

The No Action Alternative would not result in any direct effects to cultural resources. However, as illegal traffic, and the consequent enforcement actions continue, indirect effects to known and undiscovered sites would continue to occur.

4.7.2 Preferred Alternative

Conversion to landing mat fence would not directly affect any cultural resource sites, since no additional ground disturbance would be required. Indirect beneficial effects would occur, however, by reducing illegal foot traffic in the area.

4.8 Air Quality

4.8.1 No Action Alternative

The No Action Alternative would eliminate all potential emission sources associated with the proposed vehicle barrier conversion. No further impacts, beneficial or adverse, are expected to occur under the No Action Alternative.

4.8.2 Preferred Alternative

Air quality impacts from construction and maintenance activities of fences include emissions due to fuel combustion from heavy equipment, and fugitive dust due to travel through the construction area. Particulate concentrations would be expected to be below *de minimis* thresholds due to the short duration of the construction activities and negligible ground disturbances. Thus, the proposed action would not violate national standards. All impacts would be temporary in nature.

4.9 Water Resources

4.9.1 No Action Alternative

No impacts to water resources would be expected under this alternative.

4.9.2 Preferred Alternative

Conversion to landing mat fence would not affect any water resources since none occur within the project corridor (USACE 2000).

4.10 Socioeconomics

4.10.1 No-Action Alternative

The No Action Alternative would provide no direct effects to socioeconomic resources. Indirect effects due to the lack of deterrence to illegal aliens and smugglers and the reduced capability of the USBP agents to apprehend illegal entrants would include increased crime, loss of property, and costs of social programs.

4.10.2 Preferred Alternative

Materials and other project expenditures would predominantly be obtained through merchants in the local community, providing minor increases to the local economy. Landing mat panels, as discussed previously, are wartime surplus items and thus would not be purchased. Labor would be obtained through the National Guard, active/reserve military units primarily through JTF-6, USBP maintenance staff, or commercial contractors.

4.10.3 Environmental Justice

Executive Order 12898 of February 11, 1994, "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" require each Federal agency to identify and address, as appropriate, disproportionate adverse effects of its proposed actions on minority populations and low-income communities.

The racial mix of Cochise County is about 90 percent Caucasians, and less than half (34 percent) of the entire county population claim to be of Hispanic origin. The proposed projects would not displace residences or commercial structures in or around the project area. Therefore, disproportionate effects to minority populations would not be expected.

Cochise County has about 21 percent of its total population living at or below poverty levels. The 1997 per capita personal income was estimated to be about $17,000, which indicated a 28 percent increase since 1990. However, the proposed action's location is east of Naco and remote to any low-income neighborhoods. Consequently, no disproportionate adverse effects to low-income populations would be expected from the implementation of any of the alternatives.

On the other hand, implementation of the Preferred Alternative would enhance the probability of success for the INS/USBP. This increased success in controlling illegal drug activity and the increasing flow of UDAs into the Naco area would benefit all populations, regardless of income, nationality, or ethnicity. In addition, construction activities would have short term, but positive impacts on local economies from sales of construction materials, other project expenditures, and temporary employment. Long term positive impacts would occur on local, regional, and national levels by the reduction of illegal immigrants and drug trafficking and the associated social costs.

In addition, the Proposed Action alternative is not expected to generate disproportionately high environmental health and safety risks to children as specified by Executive Order 13045, “Protection of Children from Environmental Health Risks.” This Executive Order 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.

4.11 Noise Effects

4.11.1 No Action Alternative

Implementation of the No Action Alternative would result in no additional INS or USBP-related construction activities, and, thus, no increases in ambient noise levels.

4.11.2 Preferred Alternative

If this alternative was selected, equipment, such as welding machines, cranes, and trucks, would cause temporary increases in noise levels. The magnitude of these effects would depend upon the time of year, proximity to sensitive receptors (e.g. schools, hospitals, churches, and residences), climatic conditions, type and number equipment pieces, and terrain. Based on past similar activities, the construction would occur only during daylight, thus reducing the day-night average sound level and the chances of causing annoyances. No blasting would be expected.

Animals, particularly domesticated species, would be expected to quickly habituate to construction noise. Wildlife may at first be startled and flee the construction area; however, wildlife species, too, have demonstrated rapid habituation, even to loud and sudden noises which cause panic responses. Bowles (1997) reported that habituation could occur with fewer than five exposures. Several other recent studies (Workman et al. 1992; Krausman et al. 1993, 1998; Weisenberger et al. 1996) have indicated that wildlife habituate through repeated exposure without long-term discernible negative effects.

Ambient noise levels would return upon completion of the proposed projects with no long-term, significant adverse impacts. The project area is rural and is not in the vicinity of sensitive receptors. No significant adverse effects would be expected.

4.12 Cumulative Effects

This section of the EA addresses the cumulative impacts associated with the proposed conversion activities and other projects/programs that are planned for the region.

4.12.1 No Action Alternative

Approximately 126 acres of wildlife habitat near Naco have been impacted by fence construction, new road construction, road improvements, and the installation of stadium lighting and RVS sites in the past five years. Of these 126 acres, 62 acres are located in Chihuahuan desert scrub, 48 acres are located in semi-desert grassland, 11 acres are located in Madrean Evergreen Woodland, and five acres are located in plains grassland.

However, there is no documented evidence that wildlife populations in the area were significantly impacted by this habitat loss. The linear nature of the clearing for road construction, upgrade, and fence and stadium lighting right-of-ways, and, more importantly, the highly degraded and disturbed nature of the majority of the project locations have contributed to the determination of negligible effects to wildlife populations. In general, these impacts did not result in a significant reduction in the number of animals whose home range is within or adjacent to the project area, and no change in the overall species composition of the area is believed to have occurred due to these projects.

Wildlife movement in the project area might have been impacted by the infrastructure construction and maintenance over the past five years; however, there is no documentation of this effect. The greatest effect to movement of small animals generally happens when a disturbance such as road grading, dozing, or fence construction occurs. Mobile animals escaped to areas of similar habitat, while other slow or sedentary animals such as reptiles, amphibians, and small mammals were potentially lost. This displacement and/or reduction in the number of animals did not significantly impact animal communities due to the presence of similar habitat adjacent to the project area. Larger terrestrial wildlife movements in the construction and maintenance areas were not affected due to the short duration of construction activities at each site. Additionally, construction activities were only conducted during daylight hours. No construction

activities were conducted during the early morning hours or nighttime hours when wildlife species are most active.

Roads and fences resulted in other indirect impacts. Improved roads increased the speed at which vehicles travel and increased traffic as well. Higher vehicular speeds decreased the response time for wildlife to avoid the vehicles, and thus, potentially increased the number of accidental wildlife deaths. Fences serve as a barrier to wildlife species; the magnitude of this effect depends upon the fence design and location. Fences that would act as a physical barrier to wildlife are generally constructed at or near POEs, which are located within very developed areas. Consequently, such fences do not have a significant effect on wildlife movement. Vehicle barriers do not impede wildlife movement or remove/alter significant amounts of wildlife habitat.

The No Action Alternative would result in no additional direct effects to the area's resources. No threatened or endangered species or critical habitat would be affected, nor would there be any adverse effects on cultural resources sites or historic structures that are listed or potentially eligible for listing on the NRHP. Likewise, no additional direct impacts to air quality, water resources, soils, and socioeconomic conditions would occur under this alternative.

Long term indirect cumulative effects have occurred and would continue to occur to the area’s natural habitats from a variety of sources such as urban development, mining operations, off-road recreational vehicles, ranching, UDA traffic, and USBP and INS activities; however, these effects, both beneficial and adverse, are difficult, if not impossible, to quantify. Reductions in habitat have undoubtedly created inter- and intra-species competition for available food and shelter and, eventually, slight reductions in some wildlife populations. Given the rural nature of Cochise County, 126 acres of altered habitat would be a negligible loss.

The increase in lights along the border also could have produced some long-term cumulative effects, although the magnitude of these effects in some areas is not presently known. Some species, such as insectivorous bats, may benefit from the concentration of insects that would be attracted to the lights. Circadian rhythms of other diurnal species, however, may be disturbed enough that breeding or feeding patterns

are skewed, causing synergistic physiological changes. Increased patrol activities would increase the potential for some wildlife specimens to be accidentally hit and killed. Such losses would not be expected to result in significant reductions to the populations.

The USBP Naco Station currently maintains about 21 miles of drag roads throughout its 2,000 square mile AO. Drag roads are existing, unimproved roads that are highly traveled or regularly crossed by UDAs or smugglers. The surface of these roads is prepared using a method known as dragging. Dragging is accomplished by the use of a 4-wheel drive vehicle towing several tires bolted together and pulled on sections of the road at speeds between five and seven miles per hour. This method erases old tracks and smoothes the road surface so any new tracks crossing the road can be easily located. These roads are located within known UDA and smuggler travel corridors and are instrumental in detecting evidence of vehicle and/or pedestrian crossings. Many of these roads are open to the public and used as general transportation routes. The Naco Station will drag these roads at least daily and occasionally up to three times per day.

Since dragging occurs on existing roads, no direct effects to vegetation or wildlife occurs. However, the dragging activities do produce fugitive dust, which settles on adjacent vegetation and can result in reduced photosynthesis.

Helicopter flights are conducted within the Naco Stations AO on a daily basis, with no set flight pattern. However, the reconnaissance flights are typically flown along the international border of State Highway 92, at altitudes of about 200 to 300 feet above ground level. The purpose of these flights is multifold: (1) identify signs of illegal entry, (2) assist in the apprehension of UDAs and smugglers, (3) serve as a deterrent to illegal entry, (4) serve as force multiplier, (5) enhance the efficiency and effectiveness of ground patrols and, (6) provide search and rescue missions for UDAs and smugglers. While these flights can cause temporary disturbances to wildlife and recreationists, they are considered to be negligible due to the short duration and infrequency of the disturbance.

Positive cumulative benefits have resulted from INS activities as well. Additional knowledge regarding threatened or endangered species' locations, distribution, and life requisites has been obtained through surveys and monitoring efforts associated with INS

construction projects. Erosion has been alleviated along some roads, and fences have precluded illegal foot and vehicular traffic through environmentally sensitive areas.

The INS/USBP is currently in the early stages of planning road improvements along a 4-mile reach east and west of the Naco POE. These improvements would include grading and resurfacing the existing roadway and installing up to four low water crossings to provide an all-weather patrol road. The INS/USBP is also in the preliminary planning phase of identifying/designing infrastructure projects along the entire international border within the Naco and Douglas Stations AO. This infrastructure could include primary and secondary fences, lights, RVS, and patrol/drag roads within a 300-foot corridor. These activities are being planned and would require additional NEPA documentation to analyze and present the impacts and mitigation, if required.

Plans by other agencies in the region which would also affect the region's natural and human environment include the road improvements by Arizona Department of Transportation (ADOT), the commercial truck U.S. Highway 80 bypass and border crossings near Douglas, the Bisbee-Douglas International Airport expansion, and the reactivation of the abandoned Southern Pacific rail line by SWKR, Inc to the west of Naco. With the exception of the proposed new bypass and border crossing near Douglas, the remaining projects would be along existing corridors and/or within previously disturbed sites (e.g., airport). Land use would change along the bypass, and additional wildlife habitat would be lost. The magnitude of these effects would depend upon the length and width of the bypass right-of-way (ROW) and the extant conditions within and adjacent to the ROW.

Reactivation of the rail line and crossing near Naco would result in additional habitat losses, even though the rail would probably be constructed along the existing, but abandoned, line. The tracks were removed in 1975 and the line has begun to revegetate. Reactivation of the line would also increase noise in the immediate vicinity and increase potential health and safety risks due to transportation of hazardous cargo.

4.12.2 Preferred Alternative

Implementation of this alternative would have similar cumulative effects as the No Action Alternative, since very little, if any, ground disturbances would occur. Furthermore, any

of the disturbances would occur within areas that are already heavily disturbed by on-going or past activities. The primary cumulative effect that would occur under the Preferred Alternative, as opposed to the No Action Alternative, would be the barrier to wildlife movement, especially for larger mammals and herpetiles; no provisions have been made for small mammal passageways through the fence. The magnitude of this impact cannot be quantified at the present, but there are no wildlife populations in the project area that are anticipated to be sensitive to potentially slight reductions in genetic variability. Also, the fence would be constructed in an area that has already been developed and wildlife species would most likely not be utilizing the project area for habitat or for migration purposes. Therefore, the potential to impede wildlife movement in this area is not considered significant.

Construction activities would result in temporary emissions, but they are short term and would not be expected to add significantly to the cumulative effects.

Indirect effects could occur to the vegetation beyond the project area by UDAs attempting to avoid the fenced corridor. USBP would patrol areas beyond the landing mat fence to apprehend UDAs, which would lessen any indirect effects to vegetation from illegal traffic trying to skirt around the barrier. The magnitude of these effects cannot be determined at the present, since the routes selected by UDAs and smugglers are at their discretion and out of the control of the USBP. Since there are no plans for ground disturbing activities, no provisions have been made to prevent UDAs or smugglers from tunneling under the fence.

Future plans to construct bollard style fencing between where the existing landing mat fence ends and where the proposed landing mat fence would begin have been designed (see Figure 1-1). This is a section along the border where a minor drainage crosses into Mexico, and the bollard style fence would allow for seasonal water events to flow unimpeded. Also, bollard fence, as described in Section 2.3.2, leaves small gaps in between the poles, allowing for small mammals and herpetiles to cross though. This section of bollard style fence is approximately 0.2 mile and would be addressed under a separate NEPA document.

SECTION 5.0
ENVIRONMENTAL DESIGN MEASURES

5.0 ENVIRONMENTAL DESIGN MEASURES

This chapter describes those measures that could be implemented to reduce or eliminate potential adverse impacts to the human and natural environment. Many of these measures have been incorporated as standard operating procedures by INS and USBP on past projects. Environmental design measures are presented for the resource category that could be potentially affected. The proposed mitigation measures would be coordinated through the appropriate agencies and land managers/administrators.

5.1 Air Quality

Proper and routine maintenance of all vehicles, generators, and other equipment would be implemented to ensure that air emissions are within the design standards of the equipment. If bivouac sites were required (in the event the National Guard or other military units are used for construction services), generators and other similar field equipment would be kept to the minimum required. Where practicable, drop lines from local electrical systems would be used as a substitute for generators.

Project-related emissions would be minimized by the implementation of BMPs in the form of a truck watering program for roads and construction zones within the project area, construction curtailed in winds exceeding 25 miles per hour, efficient utilization of equipment to minimize the amount of time engines are left idling, and upkeep and maintenance of construction equipment to ensure that engines and emission systems are properly tuned. Any necessary air quality operating permits are the responsibility of the contractor.

SECTION 6.0
PUBLIC INVOLVEMENT

6.0 PUBLIC INVOLVEMENT

6.1 Agency Coordination

This chapter discusses consultation and coordination that would occur during preparation of the draft and final versions of this document. This would include contacts that are made during the development of the proposed action and writing of the EA. Formal and informal coordination will be conducted with the following agencies:

- U.S. Fish and Wildlife Service (USFWS)
- U.S. Environmental Protection Agency (USEPA)
- Natural Resource Conservation Service (NRCS)
- Bureau of Land Management (BLM)
- Arizona State Historic Preservation Office (SHPO)
- Arizona Department of Transportation (ADOT)
- Arizona Game and Fish Department (AGFD)
- Arizona Department of Environmental Quality (ADEQ)
- Arizona Department of Agriculture

6.2 Public Review

The draft EA was made available for public review for a period of 30 days, and the Notice of Availability (NOA) was published in the local newspaper. Proof of publication is included in Appendix A of this document. A request was received from the public to extend the comment period an additional 24 days and the request was granted. Three public comment letters were submitted on the draft document and are included in Appendix A. Summaries of the comments received and the responses to these comments are presented in the following section.

The final EA will be released to the public and a NOA will be published in the local newspaper. Exhibit 6-1 is a copy of the NOA that will be published for the final EA.

Exhibit 6-1

NOTICE OF AVAILABILITY

FINAL ENVIRONMENTAL ASSESSMENT
for
Conversion of Vehicle Barriers to Landing Mat Fence
Naco, Cochise County, Arizona

The public is hereby notified of the availability of the final Environmental Assessment (EA) for fence construction along the U.S.-Mexico Border near Naco, Cochise County, Arizona. This EA addresses the conversion of 1.2 miles of existing vehicle barriers to landing mat fence along the International Border by welding landing mat panels to the vehicle barriers. The final EA will be available for review at the Douglas Library, 560 E. 10th Street, Douglas, Arizona 85607 or can be viewed and/or downloaded the U.S. Army Corps of Engineers, Fort Worth District's webpage at http://www.swf.usace.army.mil/ins/Pages/Publicreview.cfm.

6.3 Comments and Responses

The following sections address the three comment letters received during the public review of the draft EA.

6.3.1 SouthWest Alliance to Resist Militarization (SWARM)

Comment 1: The commenter claims that the EA is inadequate because of supposedly erroneous statements regarding the lack of vegetation and wildlife at the project site.

Response 1: Since the proposed project is to weld landing mat fence to existing vehicle barriers along the road, there would be no need to disturb any additional vegetation. The road right-of-way is already devoid of vegetation due to vehicle traffic along the roadway, and previous construction and maintenance activities, which were addressed under previous NEPA documents (USACE 2000).

Nowhere in the document does it state, “no wildlife species were observed, so thus there will be no impact on wildlife.” This EA addresses the potential impact to wildlife migration patterns by converting vehicle barriers to landing mat fence. Section 3 discusses wildlife species known to occur in the project area; none of these species were observed at the project site during the survey conducted specifically for this project. No threatened or endangered species are known to exist in the area. The project area is approximately one mile from the POE and the border road along which the fence would be constructed receives heavy vehicle traffic.

As stated in several places in the EA, no Federally listed flora or fauna threatened or endangered species were located in the project area during the surveys conducted in March and April 2002 or during previous surveys conducted in the region (INS 2001; USACE 1993, 1994, 1996, 2000).

Comment 2: The commenter felt the EA did not adequately address the potential to the ocelot, jaguar, and jaguarundi.

Response 2: Section 4.6 has been updated to specifically include the ocelot, jaguar, and jaguarundi. Section 3.6 discusses all three species and the date and location of their last

sightings. These species are not expected to inhabit the project area, or use this area as a migration corridor due to the proximity to the Naco POE and residential areas.

Comment 3: The commenter expressed a concern that there were potential cumulative impacts to vegetation and wildlife or uncertainties about effects to the species that were not sufficiently addressed or supported documentation.

Response 3: The cumulative effects section of the document thoroughly addresses past and present effects in the area, such as road construction, lighting, fence, and actions by other agencies. One paragraph in Section 4.12.1 discusses some long-term, indirect cumulative effects as being unquantifiable. These effects have been defined further as effects by UDAs, mining, ranching, recreation, urban development, and USBP and INS activities, and are not only related to INS/USBP projects. Activities of this nature continuously occur in the areas along the border, especially near POEs. Cumulative effects expected from the implementation of the Proposed Action alternative have been addressed in Section 4.12.2 and are concluded to not result in "significant" adverse effects on vegetation or wildlife, as defined by 40 CFR Section 1508.27.

Comment 4: The commenter would like to see USBP "off-roading, helicopter flights, and tire-dragging" included in the cumulative effects section, as well as all other USBP and JTF-6 activities.

Response 4: The use of vehicles off designated roads (by the USBP and civilians), helicopter flights, and tire-dragging have been added to the cumulative effects section of the document. USBP and JTF-6 activities in and near the project area are addressed in the cumulative effects section.

Comment 5: The commenter claims that the EA does adequately address the effects the fence would allegedly have on human health and safety, particularly since the fence would force migrants "into desolate and dangerous areas where there is no water or shelter from the elements."

Response 5: Migrants attempting to illegally cross the U.S-Mexico border are violating Federal law. It is not the USBP or INS's responsibility to "mitigate" for individuals who are

committing a crime. While it is true that immigrants have been known to attempt to illegally cross the border in desolate areas, this is their choice. The USBP does not force illegal immigrants into remote areas.

Comment 6: The commenter requested that Executive Order 13045, "Protection of Children from Environmental Health Risks," be addressed.

Response 6: EO 13045 has been addressed in Section 4.10.3 Environmental Justice of this document. As for the health and safety of illegal immigrants trying to cross the border in remote areas, please refer to the response to the above Comment 5.

6.3.2 Ernest M. Rogers

Comment 1: The commenter stated that USBP and INS "should make every effort to ensure that the community's input is included in construction projects."

Response 1: This comment has been noted. The EA was made available to the public for a period of 30 days, with an additional 24-day extension. A NOA was published in the local newspaper (see Appendix A).

Comment 2: The commenter expressed concern that materials for the proposed project had already been purchased and placed at the proposed site before the public comment period had closed.

Response 2: The USBP and INS have other on-going projects in the Naco area. The materials that the commenter referred to had been purchased and will be used for these projects. Materials for the proposed project have not been purchased.

Comment 3: The commenter stated that they are in favor of the proposed project.

Response 3: This comment has been noted.

6.3.3 Alejandro Jimenez S.

Comment 1: The commenter stated that USBP and INS "should make every effort to ensure that the community's input is included in construction projects."

Response 1: This comment has been noted. The EA was made available to the public for a period of 30 days, with an additional 24-day extension. A NOA was published in the local newspaper (see Appendix A).

Comment 2: The commenter expressed concern that materials for the proposed project had already been purchased and placed at the proposed site before the public comment period had closed.

Response 2: The USBP and INS have other on-going projects in the Naco area. The materials that the commenter referred to had been purchased and will be used for these projects. Materials for the proposed project have not been purchased.

Comment 3: The commenter stated that they are in favor of the proposed project.

Response 3: This comment has been noted.

6.3.4. U.S. Fish and Wildlife Service

On September 13, 2002, Mr. Chris Ingram of Gulf South Research Corporation spoke with Ms. Thetas Gamberg from the USFWS via telephone.

Comment 1: Ms. Gamberg stated that two listed species' statuses have changed. The Chiricahua leopard frog is now listed as threatened and the Gila chub has been changed from a candidate species to proposed endangered.

Response 1: The new designations have been updated in Table 3-1.

SECTION 7.0
REFERENCES

7.0 REFERENCES

Arizona Department of Commerce. 2000. Internet website: http://www.commerce.state.az.us/

Arizona Fish and Game Department (AGFD). 2000. List of Special Status Species for Cochise County, Arizona. Maintained by the AGFD-Heritage Data Management System. Compiled 19 June 2000.

AGFD. 2001. Last confirmed sightings of the ocelot, jaguar, and jagarundi in southwest Arizona. Personal communications between Ms. Lori Averill-Murray, AGFD, and Ms. Kate Koske, GSRC, 1 October 2001.

Arizona Mining Association. 2000. Internet website: http://www.azcu.org/

Bat Conservation International. Bat Species: U.S. Bats: Leptonycteris curasoae. http://www.batcon.org. Accessed 2 October 2001.

Bemis, R. Personal Communication. Soil Scientists for the United States Department of Agriculture, Natural Resources Conservation Service. June 23, 2000. www.epa.gov/surf3/hucs/15050202/

Bowles, A.E. 1997. Effects of Recreational Noise on Wildlife: An Update. Hubbs-Sea World Research Institute, San Diego, CA.

Brown, D.E. (ed.). 1994. Biotic Communities of the American Southwest-United States and Mexico. University of Arizona.

Brown, D.E. and C.H. Lowe. 1983. Biotic Communities of the Southwest. U.S. Department of Agriculture Forest Service General Technical Report RM-78. Rocky Mountain Forest and Range Experiment Station, Fort Collins, Colorado.

Dice, L.R. 1943. The Biotic Provinces of North America. University of Michigan Press, Ann Arbor, Michigan. 78 p.

Dye, Lee. 2002. Where the Jaguars Roam…Wild Jaguars Become a Frequent Sight in Arizona. ABCNEWS.com, 21 February 2002. Accessed 21 February 2002.

Hendricks, D.M. 1985. Arizona Soils. College of Agriculture, University of Arizona Press. Tucson, Arizona. 244 p.

Immigration and Naturalization Service (INS). 2000. Final Environmental Assessment For Infrastructure Within U.S. Border Patrol Naco-Douglas Corridor, Cochise County, Arizona. U.S. Immigration and Naturalization Service, Washington, D.C.

INS. 2001. Final Environmental Assessment for Portable Lights within the Naco Corridor, Cochise County, Arizona. U.S. Immigration and Naturalization Service, Washington D.C.

INS. 2002. Final Environmental Assessment for Road Improvements along King's Ranch Road and the U.S.-Mexico Border near Douglas, Cochise County, Arizona. U.S. Immigration and Naturalization Service, Washington D.C.

Krausman, P.R., M.C. Wallace, D.W. DeYoung, M.E. Weisenberger, and C.L. Hayes. 1993. The Effects of Low-altitude Jet Aircraft on Desert Ungulates. International Congress: Noise as a Public Health Problem 6:471-478.

Krausman, P.R., M.C. Wallace, D.W. DeYoung, M.E. Weisenberger, and C.L. Hayes. 1998. Effects of Jet Aircraft on Mountain Sheep. Journal of Wildlife Management 62:1246-1254.

National Research Council. 1977. Guidelines for Preparing Environmental Impact Statements on Noise. Prepared by the Committee on Hearing, Bioacoustics, and Biomechanics, Assembly of Behavior and Social Sciences. Office of Naval Research, Contract No. N00014. Washington D.C.

Tewes, Dr. Michael. 2001. Last confirmed sightings of the ocelot, jaguar, and jagarundi in southwest Arizona. Personal communications between Dr. Tewes, Texas A&M-Kingsville, and Ms. Kate Koske, GSRC, October 1, 2001.

University of Arizona. Lesser Long-nosed Bat. http://ag.arizoan.edu/~shelleyd/LN%20Bats.html. Accessed 29 October 2001.

U.S. Army Corps of Engineers (USACE). 1993. Final Environmental Assessment for the JTF-6, Border Road Maintenance and Repair, Naco, Cochise County, Arizona. USACE, Los Angeles District, Los Angeles, California.

USACE. 1994. Final Environmental Assessment for the JTF-6, Border Fence and Road Repair, Naco, Cochise County, Arizona (JT044-94). USACE, Los Angeles District, Los Angeles, California.

USACE. 1996. Final Environmental Assessment for the JTF-6 Road Maintenance and Construction Naco-Douglas, Cochise County, Arizona (JT315-96). U.S. Army Corps of Engineers, Fort Worth District, Fort Worth, Texas.

USACE. 2000. Final Environmental Assessment Joint Task Force Six Proposed Fence and Road Improvement Project, Naco, Cochise County, Arizona. U.S. Army Corps of Engineers, Fort Worth District, Fort Worth, Texas.

USACE. 2001. Relocation and Assessment of Thirty-One Sites along the U.S.-Mexico International Border between Douglas and Naco, Cochise County, Arizona.

U.S. Census Bureau. 2001. 2001 Census of Population. American FactFinder. http://factfinder.census.gov/servlet/BasicFactsServlet. Accessed 2 January 2002 and 28 March 2002.

U.S. Environmental Protection Agency (USEPA). 1995. AP-42: Compilation of Air Pollutant Emission Factors. Volume I: Stationary Point and Area Sources. 5th Edition.

U.S. Fish and Wildlife Service (USFWS). 2000. Southwest Region Ecological Services. Endangered Species List for Cochise County, Arizona. 26 June 2000. http://ifw2es.fws.gov/EndangeredSpecies/lists/ListSpecies.cfm.

USFWS. 2001. Listed, Proposed, and Candidate Species List for Cochise County, Arizona. 11 October 2001.

Weisenberger, M.E., P.R. Krausman, M.C. Wallace, D.W. DeYoung, and E.E. Maughan. 1996. Effects of Simulated Jet Aircraft Noise on Heart Rate and Behavior of Desert Ungulates. Journal of Wildlife Management 60:52-61.

Wilson, R. Personal Communication. Soil Scientists for the U.S. Department of Agriculture, Natural Resources Conservation Service. 23 June 2000. www.epa.gov/surf3/hucs/15050202/.

Workman, G.W., T.D. Bunch, J.W. Call, R.C. Evans, L.S. Neilson, and E.M. Rawlings. 1992. Sonic Boom/Animal Disturbance Studies on Pronghorn Antelope, Rocky Mountain Elk, and Bighorn Sheep. Utah State University Foundation, Logan. Prepared for U.S. Air Force, Hill AFB, Contract F42650-87-C-0349.

SECTION 8.0
LIST OF ACRONYMS/ABBREVIATIONS

8.0 ACRYONYMS

ADEQ	Arizona Department of Environmental Quality
ADOT	Arizona Department of Transportation
AGFD	Arizona Game and Fish Department
AO	Area of operation
BLM	Bureau of Land Management
BMP	Best Management Practice
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	Carbon monoxide
dBA	decibel
EA	Environmental Assessment
ESA	Endangered Species Act
IBWC	International Boundary and Water Commission
IIRIRA	Illegal Immigration Reform and Immigrant Responsibility Act
INA	Immigration and Nationality Act
INS	Immigration and Naturalization Service
JTF-6	Joint Task Force Six
$\mu g/m^3$	Micrograms per cubic meter
mg/m^3	Milligrams per cubic meter
msl	mean sea level
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act of 1969
NRHP	National Register of Historic Places
NRCS	Natural Resource Conservation Service
NOA	Notice of Availability
NO_2	Nitrogen Dioxide
O_3	Ozone
PM_{10}	Particulate matter measuring less than 10 micrometers
$PM_{2.5}$	Particulate matter measuring less than 2.5 micrometers
Pb	Lead
POE	Port of Entry
ppm	Parts per million
ROW	Right-of-way
RVS	Remote Video Surveillance
SHPO	State Historic Preservation Office
SO_2	Sulfur dioxide
UDA	Undocumented Alien
USACE	U.S. Army Corps of Engineers
USBP	U.S. Border Patrol
USC	U.S. Code
USEPA	U.S. Environmental Protection Agency
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service

SECTION 9.0
LIST OF PREPARERS

9.0 LIST OF PREPARERS

The following people were primarily responsible for preparing this Environmental Assessment.

NAME	AGENCY/ORGANIZATION	DISCIPLINE/EXPERTISE	EXPERIENCE	ROLE IN PREPARING EA
Eric Verwers	INS A-E Resource Center	Biology	14 years in NEPA and related studies	Program manager and EA review and coordination
Charles Parsons	INS Western Region, Environmental Officer	Geology	23 years in geotechnical and environmental studies	EA review and coordination
Gilbert Estrada	U.S. Border Patrol-Tucson Sector	U.S. Border Patrol	22 years experience of USBP operations	EA review and coordination
Patience Patterson	U.S. Army Corps of Engineers, Fort Worth District	Archaeology	29 years Professional Archaeologist/Cultural Resource Manager	EA review and coordination
Amelia Edwards	HDR Engineering, Inc.	Program Manager / Transportation Engineer	11 years Engineering and Program Management	EA review and coordination
Jim Malusa	Private Contractor	Botany	10+ years botanical surveys	Field survey
Chris Ingram	Gulf South Research Corporation	Biology/Ecology	22 years EA/EIS studies	Impact analysis and EA review; Field survey
Suna Adam Knaus	Gulf South Research Corporation	Forestry/Wildlife	14 years natural resources	EA review
Eric Worsham	Gulf South Research Corporation	Botany	16 years botany/NEPA/wetlands studies	EA preparation and review
Sharon Newman	Gulf South Research Corporation	GIS/graphics	6 years GIS/graphics experience	GIS/graphics
Kate Koske Roussel	Gulf South Research Corporation	Forestry/Wildlife	2 years in NEPA and related studies	EA preparation and review; Field survey
Mike Schulze	Gulf South Research Corporation	Wildlife	5 years in NEPA and related studies	Field survey
Donna Marie Bankston	Gulf South Research Corporation	Forestry	1 year in NEPA and related studies	Field survey

APPENDIX A
CORRESPONDENCE

The Daily Dispatch

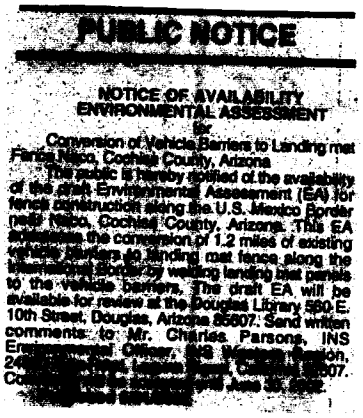
530 11th Street, Douglas, AZ 85607 • (520) 364-3424

Marissa Rivera, being first duly sworn deposes and says that she is an agent of The Daily Dispatch, a daily newspaper, published in the City of Douglas, County of Cochise, State of Arizona:

That the Notice, a copy of which is hereto attached, described as follows:

Gulf South Research

Notice of Availability



PUBLIC NOTICE

NOTICE OF AVAILABILITY ENVIRONMENTAL ASSESSMENT

for

Conversion of Vehicle Barriers to Landing mat Fence Naco, Cochise County, Arizona

The public is hereby notified of the availability of the draft Environmental Assessment (EA) for fence construction along the U.S. Mexico Border near Naco, Cochise County, Arizona. This EA addresses the conversion of 1.2 miles of existing vehicle barriers to landing mat fence along the International Boundary by welding landing mat panels to the vehicle barriers. The draft EA will be available for review at the Douglas Library 560 E. 10th Street, Douglas, Arizona 85607. Send written comments to: Mr. Charles Parsons, INS Environmental Officer, [redacted] Douglas, Arizona 85607. [redacted] June 30, 2002

was published daily in the entire and regular issue of said THE DAILY DISPATCH, for

1 consecutive weeks, the FIRST publication of said notice being

_____ in the issue dated

May 31, 2002, and the LAST publication being in the issue dated

May 31, 2002.

The deponent further says that the Notice was published in the newspaper proper, and not in a supplement thereof.

(SIGNED) Marissa Rivera

Sworn and Subscribed to me this

19 day of

August, 2002

OFFICIAL SEAL
LAWRENCE L. BLASKEY
NOTARY PUBLIC - ARIZONA
COCHISE COUNTY
My Comm. Expires June 2, 2003

Notary Public

My commission expires: June 2, 2003

SHPO- 2002 - 1073 (11457)

PER-E

DEPARTMENT OF THE ARMY
FORT WORTH DISTRICT, CORPS OF ENGINEERS
P. O. BOX 17300
FORT WORTH, TEXAS 76102-0300

REPLY TO
ATTENTION OF:

June 10, 2002

SUBJECT: Immigration Naturalization Service (INS) /U.S. Border Patrol (USBP), Tucson Sector, Naco Area of Operations (AO) Conversion of Vehicle Barriers to Landing Mat Fence

Mr. James Garrison, State Historic Preservation Officer
ATTN: Joanne Medley
Arizona State Parks
1300 West Washington
Phoenix, Arizona 85007

Dear Mr. Garrison:

The U.S. Army Corps of Engineers, Fort Worth District, acting on behalf of INS, has prepared a Draft Environmental Assessment (EA) addressing U.S. Border Patrol (USBP) activities within the Naco Station AO. The proposed action is to convert 1.2 miles of vehicle barriers east of Naco, Arizona into landing mat fence.

Vehicle barriers along the Naco corridor, which were constructed under a previous EA, have proven to be ineffective in impeding the continuing influx of illegal foot traffic. The purposed action is to create a structure that would halt or substantially hinder illegal foot traffic in areas that provide easy escape routes for illegal entrants.

The preferred action would involve minimal construction activities within an area that has been previously disturbed. Site-specific surveys and coordination for the previous action for cultural resources has been undertaken for the previous Joint Task Force – Six (JTF-6) EA. The enclosed draft EA is tiered from that JTF-6 EA.

No cultural resource sites that are considered eligible or potentially eligible for inclusion to the National Register of Historic Places (NRHP) are found within the proposed project area. Therefore, based on the project procedures, which will require no ground disturbing activities associated with the preferred alternative, the Fort Worth District, acting on behalf of the INS, has determined in accordance with 36 CFR Part 800.3(a)(1), there is no potential to cause effects.

If you require additional information or have any questions, please contact Ms. Patience Patterson at (817) 886-1723. Thank you for your assistance with this project.

Sincerely,

William Fickel, Jr.
Chief, Planning, Environmental
and Regulatory Division

Enclosure

Concur.
No Historic Properties Affected
Arizona State Historic Preservation Officer
Arizona State Parks Board
July 8, 2002

SOUTHWEST ALLIANCE TO RESIST MILITARIZATION
842 S. SIXTH AVE. TUCSON, AZ 85701 (520) 623-4944
SWARM@RESISTMILITARIZATION.ORG

June 24, 2002

Mr. Charles Parsons
INS Environmental Officer,
INS Western Region
24000 Avilia Road
Laguna Nigel, CA 92607

Dear Mr. Parsons,

Please accept these comments on behalf of the Southwest Alliance to Resist Militarization (SWARM). The comments below are in reference to the May 2002 Draft Environmental Assessment for Conversion of Vehicle Barriers to Landing Mat Fence near Naco, Arizona.

This Environmental Assessment (EA) appears to have several deficiencies that I will address in these comments. These deficiencies include: 1). The EA does not adequately address or misrepresents the impacts of the proposed project on wildlife or the environment; 2). The EA does not adequately address the Cumulative Effects of Border Patrol and JTF-6 activities within the Naco area, and also makes claims it does not support; and 3). The EA does not adequately address the Human Health and Safety impacts of the proposed project.

1). Impacts of the Proposed Project on the Environment and Wildlife:

The document claims that the proposed project will have no significant impact on either vegetation or wildlife. It states that the project will have no impact on vegetation because the area the project is to be constructed has already been disturbed by Border Patrol activities. This is an absurd argument. The Border Patrol must be held accountable for all of its activities.

The preparers state that during field and pedestrian surveys of the area in March and April of 2002, no wildlife species were observed, so thus there will be no impact on wildlife. This claim is ludicrous. Even if the surveyors did not see any wildlife, that does not mean there isn't any wildlife in the area. Also, this assertion seems hard to believe in an area over a mile wide that is teeming with wildlife.

The EA also does not adequately address the potential effects this project may have on Federally listed threatened or endangered species including the ocelot, jaguar, and jaguarondi. As stated in the EA, an ocelot has been spotted in the area within the past two years, and a jaguar was spotted a short distance outside the area within the past six months. We would like to see what effects this project might have on these species, and what is going to be done to mitigate these effects.

2). Cumulative Effects:

The Cumulative Effects section of the document (section 4.12) does not seem to support the conclusion. The section reveals impacts on wildlife and vegetation, or uncertainties about impacts on wildlife and vegetation, and then concludes that there are no significant impacts. How can this be? Within the document itself you claim that "Long term indirect cumulative effects have occurred and would continue to occur to the area's natural habitats. However, these effects, both beneficial (?) and adverse, are difficult, if not impossible to quantify."

The preparers do make claims about the lack of impacts projects have on wildlife, but then make no attempt to support these claims. Some of the claims I'm referring to include:

> "that wildlife populations in the area were not significantly impacted by habitat loss due to the linear nature of clearing for road construction, upgrade, and fence and stadium lighting right-of-ways..."
>
> "Mobile animals escaped to areas of similar habitat..."
>
> "Larger terrestrial wildlife movements in the construction and maintenance areas were not affected due to the short duration of construction activities."

Statements like these are meaningless without support. What studies exist to support these conclusions? We would like to see these studies included in the EA.

The section also leaves out the effects of Border Patrol activities other then construction, such as off-roading, helicopter flights, and tire-dragging. Surely these activities will have a synergistic impact on the overall cumulative effects? We would like to see the cumulative effects of all Border Patrol and JTF-6 activities included in the EA.

The EA states that vegetation in the area beyond the project would be indirectly effected by "illegal" foot traffic. The EA leaves out the effects that Border Patrol activities, such as road construction and driving over vegetation in the area beyond the project to patrol for foot traffic, will have on the vegetation and wildlife. And it leaves out what will be done to mitigate these effects.

3). Impacts on the Human Environment:

The EA does not take into consideration the effects the extension of the wall will have on human health and safety. Since Operation Safeguard started in the mid-90's, the amount of construction and other activities by the Border Patrol and JTF-6 have dramatically increased. At the same time, the number of migrants dying crossing the border has skyrocketed. Since Oct. 1st, 2001, at the time of this writing 55 migrants have died in the Tucson Sector. These deaths can be directly attributed to the US Border Policy of pushing migrants into desolate and dangerous areas where there is no water or shelter from the elements. The construction of and extension of border walls is one of the primary ways in which the Border Patrol pushes migrants into these dangerous areas. And that is of course the purpose of this proposed project, to push migrants into dangerous and desolate areas. We would like to see what

potential health and safety impacts this project will have on persons crossing in the area. And we would like to see what is going to be done to mitigate these effects.

The EA also does not adequately address the environmental health and safety risks to children as specified by Executive Order 13045, "Protection of Children from Environmental Health Risks". As we have seen over the past several weeks along the Arizona border, children are in fact put at risk and die as a result of Border Patrol activities and construction projects that push them into remote and dangerous areas.

In conclusion, this document does not clearly show whether this project will or will not have a significant impact on wildlife or the environment. Instead it merely discusses some of the impacts of the project, and then asserts a conclusion whose relationship to the analysis is not always very clear.

The conclusion of the EA, that there's no significant impact, should be clearly supported by the EA. I hope that the final EA supports the conclusions it asserts. I also hope the final EA includes the impacts this project will have on the human environment. If not, then I believe the "No Action Alternative" must be implemented by the Border Patrol.

Thank you in advance for your careful consideration of our comments.

Sincerely,

Chris Ford
Co-Director
Southwest Alliance to Resist Militarization.

July 15, 2002

Mr. Charles Parsons
INS Environmental Officer,
INS Western Region
24000 Avilia Road
Laguna Nigel, CA 92607

Dear Mr. Parsons,

Please accept these comments regarding the May 2002 Draft Environmental Assessment regarding the extension of the border wall in Naco, Arizona.

As a resident of Naco, I believe that the Border Patrol and Immigration and Naturalization Service (INS), should make every effort to ensure that the community's input is included in construction projects, such as the current plans to extend the border wall east of Naco, which will affect our community. Until I saw the landing mats that apparently will be used to extend the wall, I was unaware that you were planning to do so. And until just recently, I was unaware that the community was able to comment on these projects. I think that it should be the INS' and Border Patrol's responsibility to make the community aware that we have the right to submit comments and suggestions about such projects. After all, we are the ones who live here and we are the ones who will be most affected by the impacts of the projects. In the future, I would like to be notified about upcoming projects in the Naco area.

It also seems odd to me that the materials for the proposed project would be placed at the proposed site before the public review period of the draft Environmental Assessment has closed and the public has been given a chance to comment. It gives the appearance that your agency is not acting in good faith to the community and is not going to comply with the law, because you have already made up your mind that the project will go through. I would like to see your response to this addressed in the final EA.

Thank you.

Sincerely,

Name: ERNEST M. ROGERS
Address: P.O. Box 608
NACO, AZ. 85620

P.S. I AM in FAVOR of EXTENDING THE WALL

2002 JUL 25 AM 9:30

Julio 15, 2002

Señor Charles Parsons
INS Environmental Officer,
INS Western Region
24000 Avilia Road
Laguna Nigel, CA 92607

Estimado Mr. Parsons,

Espero que acepte mis comentarios sobre el Draft Environmental Assessment de Mayo 2002 con respecto al muro metálico fronterizo en Naco, Arizona.

Como residente de Naco, pienso que la patrulla fronteriza y el INS debe de asegurar que las opiniones de la comunidad están incluidas en el proceso de construir cada segmento del muro metálico. Hasta que vi las materiales de construcción que supongo se usarán para extender el muro, no sabía que ustedes estaban planeando hacer este proyecto.
Además, hasta que recientemente, no sabía que la comunidad podría entregar sus comentarios sobre estos proyectos suyos. Yo creo que debe de ser la responsabilidad del INS y de la patrulla fronteriza avisar a la comunidad que tenemos el derecho de entregar nuestros comentarios y sugerencias con respecto a proyectos así. Después de todo, nosotros somos los que vivimos aquí y somos los que serán más afectados por los impactos de esta construcción. En el futuro, me gustaría saber de los planes para construir más del muro metálico en Naco.

También me parece un poco extraño que las materiales para el proyecto propuesto ya estarían en el lugar correcto para empezar la construcción antes de que el tiempo para repaso público del Draft Environmental Assessment haya terminado y el público haya tenido suficiente tiempo para entregar sus comentarios. Todo esto da la apariencia de que su agencia no está siguiendo las reglas de construcción, y que la agencia de la patrulla fronteriza no va a cumplir con las leyes porque ya ha decidido que va a construir lo propuesto sin oír lo que la gente quiera decir. Me gustaría ver su respuesta a esta carta en el EA final.

Gracias.

Sinceramente,

Nombre: Alejandro Jiménez S.
Domicilio: P.O. Box 320
Naco AZ. 85620

Por Favor, comuniquense muy pronto.
Muchas Gracias
A. J. S.

July 15, 2002

Mr. Charles Parsons
INS Environmental Officer
INS Western Region
24000 Avila Road
Laguna Niguel, CA 92607

TRANSLATION

Dear Mr. Parsons,

I hope you accept my comments regarding the Environmental Draft Assessment from May of 2002 about the building of the metallic fence in the Naco, Arizona border.

As a Naco resident, I think the Border Patrol and the INS must reassure opinions of the whole community should be included in the process of building each segment of this metallic fence. Up until now is when I saw the construction materials that I suppose will be used to extend this fence, I did not know that you were planning to get this project done.
Besides, until recently, I did not know that our community was able to give out their comments regarding this project. I believe that the INS and the Border Patrol should be the responsible parties to inform the community about their rights to comments and suggestions regarding this project. After all, we are the ones that live here and are the affected ones by the impact of this construction. In the future, I would like to be informed more about the plans for the construction of this metallic fence here in Naco.

Also, it seems kind of strange that the materials for this proposed project are already in place to start the construction not giving the community enough time to submit their opinions on the Environmental Draft Assessment. Apparently, your agency is not following the constructions rules neither the Border Patrol Agency, because they already decided to build this project without listening to the community. I would like to have an answer to this letter in the EA final.

Thanks.

Sincerely,

Name: Alejandro Jimenez S.
Address: P.O. Box 220
Naco, AZ 85620

Please, let me know soon. Thank you very much,

gsrc / GULF SOUTH RESEARCH CORPORATION

Phone Log/Contact Report

Project No.:	80305136/80305137	Date:	09/13/02	Time:	15:10
Project Name:	Naco fence EA and Naco/Douglas TVB				
Employee:	Chris Ingram	Person Contacted:	Thetis Gamberg		
Organization:	USFWS	Telephone No.:	520-620-4619		
Reason for Call/Topics Discussed:	Discuss draft EA				
Copies to:	Kate Roussel/Brad Yarbrough				

Comments: Thetis called to ask about the difference between the Naco vehicle barrier to landing mat fence and the Naco/Douglas temporary vehicle barriers EAs. She also wanted to inform us that the status of the Gila chub and Chirachua leopard frog had changed. I explained the differences between the two projects and thanked her for bringing the status changes to our attention.

Decisions/ Agreements Reached:

Thetis stated that would take care of her concerns and that she would probably not have any official comments on the project.

Action Items: None required