

Your letter does not indicate the acreage of land disturbance for this project. If the applicable amount of land disturbance will occur, such as with constructing access roads, the EA should address the SWPPP, which must be prepared and implemented during the course of construction.

We appreciate the opportunity to review and provide comments. If you need further information, please contact Wendy LeStarge of my staff at 602.771.4836 or via e-mail at w11@azdeq.gov, or myself at 602.771.4416 or via e-mail at lc1@azdeq.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Taunt", written in a cursive style.

Linda Taunt, Deputy Director
Water Quality Division



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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

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ROBERT D. BROSCHEID



March 18, 2009

Ms. Patience E. Patterson, RPA
US Department of Homeland Security
SBInet Program Management Office
US Customs and Border Protection, Headquarters
1300 Pennsylvania Ave., NW Room 7.5B
Washington, DC 20229

Re: Proposed Environmental Assessment for the SBInet Ajo-1 Project Deployment, Border Patrol Tucson Sector, Arizona.

Dear Ms. Patterson:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the proposed siting, construction, operation, and maintenance of sensor and communication systems and their associated access roads along the US/Mexico border, Tucson Sector, Arizona. The Department understands the proposed action would include approximately 12 fixed, sensor and communication towers and associated access roads.

The Department supports the efforts of the U.S. Customs and Border Protection (CBP) and the reduction of illegal traffic along the border where illegal traffic can be reduced as a result of project activities. However, the Department believes the loss or degradation of habitat for ESA-listed and other wildlife species should be mitigated by implementing local or regional habitat improvements and/or providing funding for state and federal wildlife management and monitoring needs for species affected. The Department has the following recommendations at this time:

1. Water needed for construction activities should be trucked in when practical, and must not directly drain into existing surface waters to prevent potential spread of pathogens, such as chytrid fungus, tiger salamander virus, Asian tapeworm, etc. Use of water from existing livestock tanks and impoundments should be minimized to ensure those resources remain available for livestock and wildlife during dry periods especially during summer months.
2. Tower site TCA-AJO-209 and TCA-AJO-308 are within 1 mile of a maternity roost for lesser long-nosed bat. The construction of the towers should occur outside the breeding season (April through July) to prevent disturbance to the young.

3. Tower sites TCA-AJO-003, 004, 170, 204, 209, 302, 303, 308, and 309 are within known Sonoran pronghorn habitat. The Department requests construction activities do not occur from May through the end of June. This is a critical time period for pronghorn antelope fawning and a restriction on these activities would help reduce adverse impacts on this species. In addition, construction of these towers may contribute to the decline of pronghorn due to habitat loss and degradation which are the primary factors for their decline. The Department also recommends limiting construction of new roads and limit access to minimize impacts to pronghorn and other wildlife.
4. Although the majority of towers are located near existing roads, the roads may need to be improved and some new roads may need to be constructed. An improved road network attracts motorized recreationists which will increase disturbance to all wildlife, increase spread of noxious weeds, provide an enhanced vector for pathogens and introduced predators/competitors, increase direct mortality from motor vehicle collision, and increased exposure to intentional illegal take of wildlife.
5. Staging areas and construction sites should be located in previously disturbed areas and revegetated with native species that approximate pre-disturbance plant community composition or native, as all efforts should be made to minimize impacts on vegetative communities.

Close coordination with the Department on large scale projects such as this is vital to ensure adequate coordination and analysis of impacts to the state's wildlife resources. The Department proposes quarterly meetings with CPB to coordinate on activities which may have an effect on the Department's responsibility to manage wildlife. In doing so, it may be possible to avoid some negative impacts to wildlife while meeting the project needs of the border patrol agencies. The Department appreciates the opportunity to coordinate with and provide comments to the CPB. For further coordination or if you have questions regarding this letter, please contact me at (623) 236-7606.

Sincerely,



Ginger Ritter

Project Evaluation Program Specialist, Habitat Branch

cc: Laura Canaca, Project Evaluation Program Supervisor
Joan Scott, Habitat Program Manager, Region V

AGFD # M09-02193846

Special Status Species within 3 Miles of SBInet Ajo-1 Project

NAME	COMMON NAME	ESA	USFS	BLM	STATE
<i>Anthocharis cethura</i>	Felder's Orange Tip		S		
<i>Antilocapra americana sonoriensis</i>	Sonoran Pronghorn	LE	S		WSC
<i>Aspidoscelis xanthonota</i>	Redback Whiptail	SC	S		
<i>Bat Colony</i>					
<i>CH for Cyprinodon eremus</i>	Designated Critical Habitat for desert pupfish				
<i>Charina trivirgata trivirgata</i>	Mexican Rosy Boa	SC		S	
<i>Chionactis paratrostris organica</i>	Organ Pipe Shovel-nosed Snake		S		
<i>Cyprinodon eremus</i>	Quitobaquito Desert Pupfish	LE			WSC
<i>Eumops perotis californicus</i>	Greater Western Bonneted Bat	SC			
<i>Eumops underwoodi</i>	Underwood's Bonneted Bat	SC		S	
<i>Ferocactus emoryi</i>	Emory's Barrel-cactus				SR
<i>Gastrophryne olivacea</i>	Great Plains Narrow-mouthed Toad				WSC
<i>Glaucidium brasilianum cactorum</i>	Cactus Ferruginous Pygmy-owl	SC			WSC
<i>Gopherus agassizii (Sonoran Population)</i>	Sonoran Desert Tortoise	SC			WSC
<i>Kinosternon sonoriense longifemorale</i>	Sonoyta Mud Turtle	C	S		
<i>Leptonycteris curasoae yerbabuenae</i>	Lesser Long-nosed Bat	LE	S		WSC
<i>Lophocereus schottii</i>	Senita				SR
<i>Macrotus californicus</i>	California Leaf-nosed Bat	SC			WSC
<i>Myotis velifer</i>	Cave Myotis	SC		S	
<i>Nyctinomops femorosaccus</i>	Pocketed Free-tailed Bat			S	
<i>Peniocereus striatus</i>	Dahlia Rooted Cereus				SR
<i>Rallus longirostris yumanensis</i>	Yuma Clapper Rail	LE			WSC
<i>Stenocereus thurberi</i>	Organ Pipe Cactus				SR
<i>Tohono O'odham Nation</i>	Tohono O'odham Nation				
<i>Tryonia quitobaquitae</i>	Quitobaquito Tryonia	SC	S		
<i>Tumamoca macdougallii</i>	Tumamoc Globeberry		S	S	SR
<i>Tyrannus melancholicus</i>	Tropical Kingbird				WSC

AGFD #M09-02193846. Proposed SBInet Deployment.

Arizona Game and Fish Department, Heritage Data Management System, March 18, 2009.
Project Evaluation Program.



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

Steve Spangle
Field Supervisor
US Fish and Wildlife Service
2321 West Royal Palm Road, Suite 103
Phoenix, AZ 85021-4915

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Spangle:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

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While no final decisions have been made, the proposed action to be described and analyzed in an EA would cover a portion of the United States-Mexico border designated as the Tucson Sector. The sector is comprised of twelve Arizona counties, and contains eight Border Patrol Stations (Ajo, Casa Grande, Douglas, Naco, Nogales, Sonoita, Tucson, and Wilcox). The Sector is divided into three geographic operational corridors.

The Douglas/Naco corridor is adjacent to the New Mexico state line. The San Bernadino Valley is bordered on the east by the Guadalupe and Peloncillo Mountain ranges and to the west by the Chiricahua Mountains, within the Coronado National Forest. The San Pedro Valley is in the western portion of the Douglas-Naco Corridor. The San Pedro Valley's eastern border is the Dragoon and Mule Mountain ranges. To the southwest are the Huachuca Mountains (adjacent to the Mexican border) and to the west are the Whetstone Mountains.

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SBI's proposed action would strengthen and support the Border Patrol's enforcement strategies. The technology components (communication towers, ground sensors, cameras, and other electronic surveillance, communication, and detection equipment) that would be a part of this proposed action are intended to supplement and enhance the effectiveness of existing tactical infrastructure such as fencing, vehicle barriers, and roads near the United States – Mexico border. The technologies that would be utilized under this proposed action would enhance apprehension of IEs in the proximity of the border, which may result in a more compact patrol and enforcement area, and could allow for relocation of agents as necessary. The operational effectiveness of the Border Patrol would be enhanced by increased surveillance capabilities once the technologies are installed and operating.

The need for this proposed action is to decrease illegal border activities in the Tucson Sector. Not only does illegal border activity have direct and indirect costs for all U.S. citizens, it has environmental costs as well. IEs have contributed heavily to the destruction of native vegetation and left litter throughout the Tucson Sector. Illegal cross-border activity threatens public lands, destroys historic and cultural structures and artifacts, harms endangered plant and animal species, and adversely affects other sensitive resources. Additionally, vehicles used by smugglers and IEs are abandoned in national parks and other environmentally sensitive areas. Dealing with the detrimental effects of Illegal cross-border activity is an ever-increasing burden on Federal and State land managers and private landowners.

The Area of Potential Effect (APE) of this proposed action will be defined through the identification of a range of areas within which communications towers and supporting technological components may be placed, accounting for radio frequency connectivity requirements between towers, end users, and a central communications location. Site

Selection Criteria will be applied to assess site feasibility, analyze frequency availability, and balance it with stakeholder input, engineering assessments, and other environmental factors. The design phase of this proposal is planned for completion around Fall 2007. Pending acquisition of all required permits and approvals, construction initiation is planned for late 2007 and is expected to continue for approximately 12 months.

SBI^{net} is seeking input from your organization regarding this proposed action to alleviate illegal border activities. SBI^{net} is currently gathering data and input from state and local governmental agencies, departments, and bureaus that may be affected by or otherwise have an interest in this proposed action. Since your agency may have particular knowledge and expertise regarding potential environmental impacts from SBI^{net}'s proposed action, your input and commentary are sought regarding the likely or anticipated environmental effects of this proposed action in and around the proposed project areas described above. Your response to this solicitation for input should include any state and local restrictions, permitting or other requirements with which SBI^{net} would have to comply during project siting, construction, and operation.

SBI^{net} intends to evaluate the following potential environmental impact areas:

- Land Use and Zoning
- Geology/Soils/Geotechnical concerns
- Hydrology/Drainage/Water Quality
- Floodplains
- Wetlands
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- Farmlands
- Noise
- Visual Quality
- Recreational Resources
- Biological Resources/Protected Species
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- Vehicular Transportation
- Air Resources/Air Quality
- Radiofrequency Emissions
- Socioeconomics/Environmental Justice
- Solid and Hazardous Waste Generation
- Energy Use
- Utilities Infrastructure

Please submit your comments within 30 days after receipt of this notice. Agencies are requested to indicate their applicable statutory responsibilities in connection with this proposed project when responding. Responses should be sent to: Michael Potter, Project Manager at (202) 344-1928 or Michael.B.Potter@cbp.dhs.gov.

Sincerely,



for Kirk Evans
Program Manager, SBI^{net}



U.S. Customs and
Border Protection

James Garrison
Arizona State Historic Preservation Officer
Arizona State Parks
1300 West Washington Street
Phoenix, AZ 85007

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Garrison:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

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SBI-net's proposed action would strengthen and support the Border Patrol's enforcement strategies. The technology components (communication towers, ground sensors, cameras, and other electronic surveillance, communication, and detection equipment) that would be a part of this proposed action are intended to supplement and enhance the effectiveness of existing tactical infrastructure such as fencing, vehicle barriers, and roads near the United States – Mexico border. The technologies that would be utilized under this proposed action would enhance apprehension of IEs in the proximity of the border, which may result in a more compact patrol and enforcement area, and could allow for relocation of agents as necessary. The operational effectiveness of the Border Patrol would be enhanced by increased surveillance capabilities once the technologies are installed and operating.

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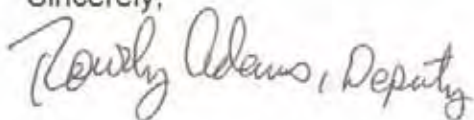
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for Kirk Evans
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U.S. Customs and
Border Protection

Jo Anne Medley
Compliance Specialist/Archaeologist
State Historic Preservation Officer
Arizona State Parks
1300 Washington Street
Phoenix, Arizona 85007

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Ms. Medley:

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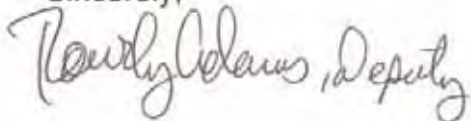
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Sincerely,



for Kirk Evans
Program Manager, SBI*net*



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

Mr. Keith L. Graves
Nogales District Ranger
Coronado National Forest
303 Old Tucson Road
Nogales, AZ 85621

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Graves:

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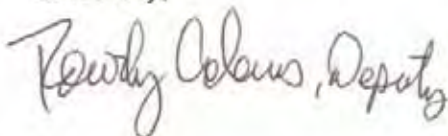
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SBI*net* intends to evaluate the following potential environmental impact areas:

- Land Use and Zoning
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- Noise
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- Recreational Resources
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Please submit your comments within 30 days after receipt of this notice. Agencies are requested to indicate their applicable statutory responsibilities in connection with this proposed project when responding. Responses should be sent to: Michael Potter, Project Manager at (202) 344-1928 or Michael.B.Potter@cbp.dhs.gov.

Sincerely,



for Kirk Evans
Program Manager, SBI*net*



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

Kevin Martin
Chairman
Federal Communications Commission
445 15th Street, SW
Washington, DC 20554

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Martin:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

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While no final decisions have been made, the proposed action to be described and analyzed in an EA would cover a portion of the United States-Mexico border designated as the Tucson Sector. The sector is comprised of twelve Arizona counties, and contains eight Border Patrol Stations (Ajo, Casa Grande, Douglas, Naco, Nogales, Sonoita, Tucson, and Wilcox). The Sector is divided into three geographic operational corridors.

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SBlnet's proposed action would strengthen and support the Border Patrol's enforcement strategies. The technology components (communication towers, ground sensors, cameras, and other electronic surveillance, communication, and detection equipment) that would be a part of this proposed action are intended to supplement and enhance the effectiveness of existing tactical infrastructure such as fencing, vehicle barriers, and roads near the United States – Mexico border. The technologies that would be utilized under this proposed action would enhance apprehension of IEs in the proximity of the border, which may result in a more compact patrol and enforcement area, and could allow for relocation of agents as necessary. The operational effectiveness of the Border Patrol would be enhanced by increased surveillance capabilities once the technologies are installed and operating.

The need for this proposed action is to decrease illegal border activities in the Tucson Sector. Not only does illegal border activity have direct and indirect costs for all U.S. citizens, it has environmental costs as well. IEs have contributed heavily to the destruction of native vegetation and left litter throughout the Tucson Sector. Illegal cross-border activity threatens public lands, destroys historic and cultural structures and artifacts, harms endangered plant and animal species, and adversely affects other sensitive resources. Additionally, vehicles used by smugglers and IEs are abandoned in national parks and other environmentally sensitive areas. Dealing with the detrimental effects of Illegal cross-border activity is an ever-increasing burden on Federal and State land managers and private landowners.

The Area of Potential Effect (APE) of this proposed action will be defined through the identification of a range of areas within which communications towers and supporting technological components may be placed, accounting for radio frequency connectivity requirements between towers, end users, and a central communications location. Site

Selection Criteria will be applied to assess site feasibility, analyze frequency availability, and balance it with stakeholder input, engineering assessments, and other environmental factors. The design phase of this proposal is planned for completion around Fall 2007. Pending acquisition of all required permits and approvals, construction initiation is planned for late 2007 and is expected to continue for approximately 12 months.

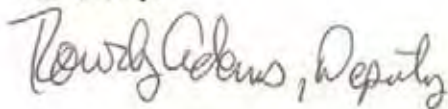
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Sincerely,



Kirk Evans
Program Manager, SBInet



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

Marjorie Blaine
US Army Corps of Engineers
5205 E. Comanche St.
Davis Monthan AFB, AZ 85707

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Ms. Blaine:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

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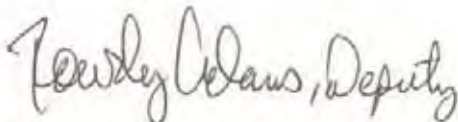
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Sincerely,



 Kirk Evans
Program Manager, SBI^{net}



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

Manuel Rubio
International Boundary Water Commission
4171 North Mesa Street
Suite C100
El Paso, TX 79902

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Rubio:

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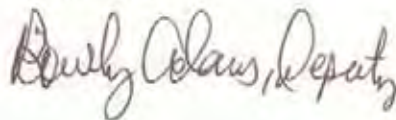
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Sincerely,



 Kirk Evans
Program Manager, SBI*net*



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

Mark Winkleman
State Land Commissioner
Arizona State Land Department
1616 West Adams Street
Phoenix, AZ 85007

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Winkleman:

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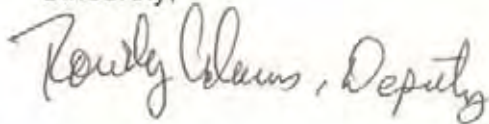
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
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Sincerely,

 Randy Adams, Deputy

 Kirk Evans
Program Manager, SBInet



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

Mitch Ellis
Manager
Buenos Aires National Wildlife Refuge
US Fish and Wildlife Service
2321 West Royal Palm Road, Suite 103
Phoenix, AZ 85021-4915

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Ellis:

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The Area of Potential Effect (APE) of this proposed action will be defined through the identification of a range of areas within which communications towers and supporting technological components may be placed, accounting for radio frequency connectivity requirements between towers, end users, and a central communications location. Site

Selection Criteria will be applied to assess site feasibility, analyze frequency availability, and balance it with stakeholder input, engineering assessments, and other environmental factors. The design phase of this proposal is planned for completion around Fall 2007. Pending acquisition of all required permits and approvals, construction initiation is planned for late 2007 and is expected to continue for approximately 12 months.


SBI^{net} is seeking input from your organization regarding this proposed action to alleviate illegal border activities. SBI^{net} is currently gathering data and input from state and local governmental agencies, departments, and bureaus that may be affected by or otherwise have an interest in this proposed action. Since your agency may have particular knowledge and expertise regarding potential environmental impacts from SBI^{net}'s proposed action, your input and commentary are sought regarding the likely or anticipated environmental effects of this proposed action in and around the proposed project areas described above. Your response to this solicitation for input should include any state and local restrictions, permitting or other requirements with which SBI^{net} would have to comply during project siting, construction, and operation.


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- Utilities Infrastructure

Please submit your comments within 30 days after receipt of this notice. Agencies are requested to indicate their applicable statutory responsibilities in connection with this proposed project when responding. Responses should be sent to: Michael Potter, Project Manager at (202) 344-1928 or Michael.B.Potter@cbp.dhs.gov.

Sincerely,



 Kirk Evans
Program Manager, SBI^{net}



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

Ned Norris
Chairperson
Tohono O'odham Nation
PO Box 837
Sells, AZ 85634

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Norris:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

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While no final decisions have been made, the proposed action to be described and analyzed in an EA would cover a portion of the United States-Mexico border designated as the Tucson Sector. The sector is comprised of twelve Arizona counties, and contains eight Border Patrol Stations (Ajo, Casa Grande, Douglas, Naco, Nogales, Sonoita, Tucson, and Wilcox). The Sector is divided into three geographic operational corridors.

The Douglas/Naco corridor is adjacent to the New Mexico state line. The San Bernadino Valley is bordered on the east by the Guadalupe and Peloncillo Mountain ranges and to the west by the Chiricahua Mountains, within the Coronado National Forest. The San Pedro Valley is in the western portion of the Douglas-Naco Corridor. The San Pedro Valley's eastern border is the Dragoon and Mule Mountain ranges. To the southwest are the Huachuca Mountains (adjacent to the Mexican border) and to the west are the Whetstone Mountains.

The Nogales corridor encompasses the Sonoita and Nogales Border Patrol Station areas of operation. A significant amount of illegal alien traffic attempts to enter the United States through this corridor.

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SBlnet's proposed action would strengthen and support the Border Patrol's enforcement strategies. The technology components (communication towers, ground sensors, cameras, and other electronic surveillance, communication, and detection equipment) that would be a part of this proposed action are intended to supplement and enhance the effectiveness of existing tactical infrastructure such as fencing, vehicle barriers, and roads near the United States – Mexico border. The technologies that would be utilized under this proposed action would enhance apprehension of IEs in the proximity of the border, which may result in a more compact patrol and enforcement area, and could allow for relocation of agents as necessary. The operational effectiveness of the Border Patrol would be enhanced by increased surveillance capabilities once the technologies are installed and operating.

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SBI^{net} intends to evaluate the following potential environmental impact areas:

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- Geology/Soils/Geotechnical concerns
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Please submit your comments within 30 days after receipt of this notice. Agencies are requested to indicate their applicable statutory responsibilities in connection with this proposed project when responding. Responses should be sent to: Michael Potter, Project Manager at (202) 344-1928 or Michael.B.Potter@cbp.dhs.gov.

Sincerely,

Rowdy Adams, Deputy

for Kirk Evans
Program Manager, SBI^{net}



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

Nina Siqueiros
Bureau of Indian Affairs
P.O. Box 578
Sells, AZ 85748

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Ms. Siqueiros:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

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ranges and to the west by the Chiricahua Mountains, within the Coronado National Forest. The San Pedro Valley is in the western portion of the Douglas-Naco Corridor. The San Pedro Valley's eastern border is the Dragoon and Mule Mountain ranges. To the southwest are the Huachuca Mountains (adjacent to the Mexican border) and to the west are the Whetstone Mountains.

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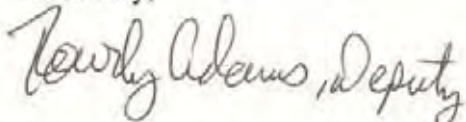
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Sincerely,



for Kirk Evans
Program Manager, SBI^{net}



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

Pima County Board of Supervisors
130 West Congress Street, 11th Floor
Tucson, AZ 85701

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

To Whom It May Concern:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

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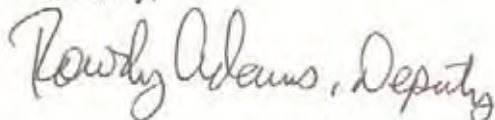
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SBlnet intends to evaluate the following potential environmental impact areas:

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Sincerely,

Rowdy Adams, Deputy



Kirk Evans
Program Manager, SBlnet



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

Patrick Madigan
Field Director, Tucson Field Office
US Bureau of Land Management
12661 E. Broadway Boulevard
Tucson, AZ 85748-7208

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Madigan:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

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Please submit your comments within 30 days after receipt of this notice. Agencies are requested to indicate their applicable statutory responsibilities in connection with this proposed project when responding. Responses should be sent to: Michael Potter, Project Manager at (202) 344-1928 or Michael.B.Potter@cbp.dhs.gov.

Sincerely,



 Kirk Evans
Program Manager, SBI^{net}



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

Peter Steere
Cultural Resources Manager
Tohono O'odham Nation
Building 49, Main Street
Sells, AZ 85634

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Steere:

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The need for this proposed action is to decrease illegal border activities in the Tucson Sector. Not only does illegal border activity have direct and indirect costs for all U.S. citizens, it has environmental costs as well. IEs have contributed heavily to the destruction of native vegetation and left litter throughout the Tucson Sector. Illegal cross-border activity threatens public lands, destroys historic and cultural structures and artifacts, harms endangered plant and animal species, and adversely affects other sensitive resources. Additionally, vehicles used by smugglers and IEs are abandoned in national parks and other environmentally sensitive areas. Dealing with the detrimental effects of Illegal cross-border activity is an ever-increasing burden on Federal and State land managers and private landowners.

The Area of Potential Effect (APE) of this proposed action will be defined through the identification of a range of areas within which communications towers and supporting technological components may be placed, accounting for radio frequency connectivity requirements between towers, end users, and a central communications location. Site

Selection Criteria will be applied to assess site feasibility, analyze frequency availability, and balance it with stakeholder input, engineering assessments, and other environmental factors. The design phase of this proposal is planned for completion around Fall 2007. Pending acquisition of all required permits and approvals, construction initiation is planned for late 2007 and is expected to continue for approximately 12 months.

SBInet is seeking input from your organization regarding this proposed action to alleviate illegal border activities. SBInet is currently gathering data and input from state and local governmental agencies, departments, and bureaus that may be affected by or otherwise have an interest in this proposed action. Since your agency may have particular knowledge and expertise regarding potential environmental impacts from SBInet's proposed action, your input and commentary are sought regarding the likely or anticipated environmental effects of this proposed action in and around the proposed project areas described above. Your response to this solicitation for input should include any state and local restrictions, permitting or other requirements with which SBInet would have to comply during project siting, construction, and operation.

SBInet intends to evaluate the following potential environmental impact areas:

- Land Use and Zoning
- Geology/Soils/Geotechnical concerns
- Hydrology/Drainage/Water Quality
- Floodplains
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- Solid and Hazardous Waste Generation
- Energy Use
- Utilities Infrastructure

Please submit your comments within 30 days after receipt of this notice. Agencies are requested to indicate their applicable statutory responsibilities in connection with this proposed project when responding. Responses should be sent to: Michael Potter, Project Manager at (202) 344-1928 or Michael.B.Potter@cbp.dhs.gov.

Sincerely,

Rowdy Adams, Deputy

for Kirk Evans
Program Manager, SBInet



U.S. Customs and
Border Protection

Shela McFarlin
Special Assistant for International Programs
USDOI Bureau of Land Management
12661 East Broadway Boulevard
Tucson, AZ 85748

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Ms. McFarlin:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

SBI is a comprehensive, multi-year plan to secure America's borders and reduce illegal immigration. SBInet is the component of SBI that is developing and implementing technology and tactical infrastructure that will secure the border by immediately detecting and identifying border entries, classifying the threat, and implementing effective and efficient resolution. For this proposed action, SBInet plans to design, develop, and deploy a technology-based solution to decrease illegal border activities and deter and prevent illegal entry in the Tucson Border Patrol Sector.

While no final decisions have been made, the proposed action to be described and analyzed in an EA would cover a portion of the United States-Mexico border designated as the Tucson Sector. The sector is comprised of twelve Arizona counties, and contains eight Border Patrol Stations (Ajo, Casa Grande, Douglas, Naco, Nogales, Sonoita, Tucson, and Wilcox). The Sector is divided into three geographic operational corridors.

The Douglas/Naco corridor is adjacent to the New Mexico state line. The San Bernadino Valley is bordered on the east by the Guadalupe and Peloncillo Mountain ranges and to the west by the Chiricahua Mountains, within the Coronado National Forest. The San Pedro Valley is in the western portion of the Douglas-Naco Corridor. The San Pedro Valley's eastern border is the Dragoon and Mule Mountain ranges. To the southwest are the Huachuca Mountains (adjacent to the Mexican border) and to the west are the Whetstone Mountains.

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Selection Criteria will be applied to assess site feasibility, analyze frequency availability, and balance it with stakeholder input, engineering assessments, and other environmental factors. The design phase of this proposal is planned for completion around Fall 2007. Pending acquisition of all required permits and approvals, construction initiation is planned for late 2007 and is expected to continue for approximately 12 months.

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
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Sincerely,



 Kirk Evans
Program Manager, SBI^{net}



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

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

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Owens:

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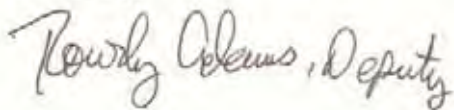
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Sincerely,



for Kirk Evans
Program Manager, SBInet



U.S. Customs and
Border Protection

Carl E. Burleson
Director, Office of Environment and Energy
Federal Aviation Administration
800 Independence Avenue, SW Room 900W
Washington, DC 20591

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Burleson:

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Sincerely,



for Kirk Evans
Program Manager, SBInet



U.S. Customs and
Border Protection

Doug Duncan
Fish Biologist, FWS
201 N. Bonita, Suite 141
Tucson, AZ 85745

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Duncan:

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Sincerely,



 Kirk Evans
Program Manager, SBI^{net}



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

Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

To Whom It May Concern:

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The need for this proposed action is to decrease illegal border activities in the Tucson Sector. Not only does illegal border activity have direct and indirect costs for all U.S. citizens, it has environmental costs as well. IEs have contributed heavily to the destruction of native vegetation and left litter throughout the Tucson Sector. Illegal cross-border activity threatens public lands, destroys historic and cultural structures and artifacts, harms endangered plant and animal species, and adversely affects other sensitive resources. Additionally, vehicles used by smugglers and IEs are abandoned in national parks and other environmentally sensitive areas. Dealing with the detrimental effects of illegal cross-border activity is an ever-increasing burden on Federal and State land managers and private landowners.

The Area of Potential Effect (APE) of this proposed action will be defined through the identification of a range of areas within which communications towers and supporting technological components may be placed, accounting for radio frequency connectivity requirements between towers, end users, and a central communications location. Site Selection Criteria will be applied to assess site feasibility, analyze frequency availability, and balance it with stakeholder input, engineering assessments, and other

environmental factors. The design phase of this proposal is planned for completion around Fall 2007. Pending acquisition of all required permits and approvals, construction initiation is planned for late 2007 and is expected to continue for approximately 12 months.

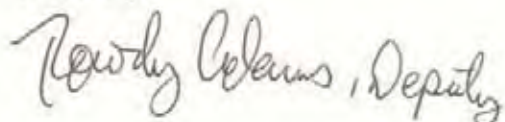
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SBI^{net} intends to evaluate the following potential environmental impact areas:

- Land Use and Zoning
- Geology/Soils/Geotechnical concerns
- Hydrology/Drainage/Water Quality
- Floodplains
- Wetlands
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- Vehicular Transportation
- Air Resources/Air Quality
- Radiofrequency Emissions
- Socioeconomics/Environmental Justice
- Solid and Hazardous Waste Generation
- Energy Use
- Utilities Infrastructure

Please submit your comments within 30 days after receipt of this notice. Agencies are requested to indicate their applicable statutory responsibilities in connection with this proposed project when responding. Responses should be sent to: Michael Potter, Project Manager at (202) 344-1928 or Michael.B.Potter@cbp.dhs.gov.

Sincerely,



for Kirk Evans
Program Manager, SBI^{net}



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

Arizona Game and Fish Department
WMHB – Project Evaluation Program
2221 West Greenway Road
Phoenix, AZ 85023

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

To Whom It May Concern:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

SBI is a comprehensive, multi-year plan to secure America's borders and reduce illegal immigration. SBInet is the component of SBI that is developing and implementing technology and tactical infrastructure that will secure the border by immediately detecting and identifying border entries, classifying the threat, and implementing effective and efficient resolution. For this proposed action, SBInet plans to design, develop, and deploy a technology-based solution to decrease illegal border activities and deter and prevent illegal entry in the Tucson Border Patrol Sector.

While no final decisions have been made, the proposed action to be described and analyzed in an EA would cover a portion of the United States-Mexico border designated as the Tucson Sector. The sector is comprised of twelve Arizona counties, and contains eight Border Patrol Stations (Ajo, Casa Grande, Douglas, Naco, Nogales, Sonoita, Tucson, and Wilcox). The Sector is divided into three geographic operational corridors.

The Douglas/Naco corridor is adjacent to the New Mexico state line. The San Bernadino Valley is bordered on the east by the Guadalupe and Peloncillo Mountain

ranges and to the west by the Chiricahua Mountains, within the Coronado National Forest. The San Pedro Valley is in the western portion of the Douglas-Naco Corridor. The San Pedro Valley's eastern border is the Dragoon and Mule Mountain ranges. To the southwest are the Huachuca Mountains (adjacent to the Mexican border) and to the west are the Whetstone Mountains.

The Nogales corridor encompasses the Sonoita and Nogales Border Patrol Station areas of operation. A significant amount of illegal alien traffic attempts to enter the United States through this corridor.

The West Desert corridor consists of the Ajo, Tucson, and Casa Grande Border Patrol Stations and begins 18 miles east of the Sasabe Port of Entry and heads west to the Tucson county line. The West Desert corridor also encompasses Organ Pipe Cactus National Monument. To the south of the West Desert corridor lies Altar, Sonora, Mexico. An existing infrastructure of ranch roads leading north to or near the international boundary line makes this area attractive to illegal entrants (IE).

SBInet's proposed action would strengthen and support the Border Patrol's enforcement strategies. The technology components (communication towers, ground sensors, cameras, and other electronic surveillance, communication, and detection equipment) that would be a part of this proposed action are intended to supplement and enhance the effectiveness of existing tactical infrastructure such as fencing, vehicle barriers, and roads near the United States – Mexico border. The technologies that would be utilized under this proposed action would enhance apprehension of IEs in the proximity of the border, which may result in a more compact patrol and enforcement area, and could allow for relocation of agents as necessary. The operational effectiveness of the Border Patrol would be enhanced by increased surveillance capabilities once the technologies are installed and operating.

The need for this proposed action is to decrease illegal border activities in the Tucson Sector. Not only does illegal border activity have direct and indirect costs for all U.S. citizens, it has environmental costs as well. IEs have contributed heavily to the destruction of native vegetation and left litter throughout the Tucson Sector. Illegal cross-border activity threatens public lands, destroys historic and cultural structures and artifacts, harms endangered plant and animal species, and adversely affects other sensitive resources. Additionally, vehicles used by smugglers and IEs are abandoned in national parks and other environmentally sensitive areas. Dealing with the detrimental effects of Illegal cross-border activity is an ever-increasing burden on Federal and State land managers and private landowners.

The Area of Potential Effect (APE) of this proposed action will be defined through the identification of a range of areas within which communications towers and supporting technological components may be placed, accounting for radio frequency connectivity requirements between towers, end users, and a central communications location. Site Selection Criteria will be applied to assess site feasibility, analyze frequency availability, and balance it with stakeholder input, engineering assessments, and other

environmental factors. The design phase of this proposal is planned for completion around Fall 2007. Pending acquisition of all required permits and approvals, construction initiation is planned for late 2007 and is expected to continue for approximately 12 months.

SBI*net* is seeking input from your organization regarding this proposed action to alleviate illegal border activities. SBI*net* is currently gathering data and input from state and local governmental agencies, departments, and bureaus that may be affected by or otherwise have an interest in this proposed action. Since your agency may have particular knowledge and expertise regarding potential environmental impacts from SBI*net*'s proposed action, your input and commentary are sought regarding the likely or anticipated environmental effects of this proposed action in and around the proposed project areas described above. Your response to this solicitation for input should include any state and local restrictions, permitting or other requirements with which SBI*net* would have to comply during project siting, construction, and operation.

SBI*net* intends to evaluate the following potential environmental impact areas:

- Land Use and Zoning
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- Energy Use
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Please submit your comments within 30 days after receipt of this notice. Agencies are requested to indicate their applicable statutory responsibilities in connection with this proposed project when responding. Responses should be sent to: Michael Potter, Project Manager at (202) 344-1928 or Michael.B.Potter@cbp.dhs.gov.

Sincerely,

Rowdy Adams, Deputy

for Kirk Evans
Program Manager, SBI*net*

5HPB-2007-1248 (33613) MR

U.S. Department of Homeland Security
Washington, DC 20229



1380 Pennsylvania Ave
U.S. Customs and Border Protection Suite 7.5C

RECEIVED

JUL 03 2007

JM 7/3/07
ARIZONA STATE HISTORIC PRESERVATION

James Garrison
Arizona State Historic Preservation Officer
Arizona State Parks
1300 West Washington Street
Phoenix, AZ 85007

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Mr. Garrison:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

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Selection Criteria will be applied to assess site feasibility, analyze frequency availability, and balance it with stakeholder input, engineering assessments, and other environmental factors. The design phase of this proposal is planned for completion around Fall 2007. Pending acquisition of all required permits and approvals, construction initiation is planned for late 2007 and is expected to continue for approximately 12 months.

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Sincerely,

Rowdy Adams, Deputy

for Kirk Evans
Program Manager, SBInet

cc: *Patricia Patterson,*
Environmental Program
Manager

This NEPA submittal does not constitute consultation under Section 106 of the National Hist. Preservation Act. Provisions at 36 CFR Part 800.6 must be followed in order for this Office to accept NEPA documentation as Section 106 compliance consultation.

Patricia Patterson
for EPO
August 2, 2007



RECEIVED

JUL 05 2007

Jo Anne Medley
Compliance Specialist/Archaeologist
State Historic Preservation Officer
Arizona State Parks
1300 Washington Street
Phoenix, Arizona 85007

Re: Request for information in support of an Environmental Assessment for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona.

Dear Ms. Medley:

The Secure Border Initiative (SBI), SBInet Program Management Office, a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program*.

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Selection Criteria will be applied to assess site feasibility, analyze frequency availability, and balance it with stakeholder input, engineering assessments, and other environmental factors. The design phase of this proposal is planned for completion around Fall 2007. Pending acquisition of all required permits and approvals, construction initiation is planned for late 2007 and is expected to continue for approximately 12 months.

SBlnet is seeking input from your organization regarding this proposed action to alleviate illegal border activities. SBlnet is currently gathering data and input from state and local governmental agencies, departments, and bureaus that may be affected by or otherwise have an interest in this proposed action. Since your agency may have particular knowledge and expertise regarding potential environmental impacts from SBlnet's proposed action, your input and commentary are sought regarding the likely or anticipated environmental effects of this proposed action in and around the proposed project areas described above. Your response to this solicitation for input should include any state and local restrictions, permitting or other requirements with which SBlnet would have to comply during project siting, construction, and operation.

SBlnet intends to evaluate the following potential environmental impact areas:

- Land Use and Zoning
- Geology/Soils/Geotechnical concerns
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- Air Resources/Air Quality
- Radiofrequency Emissions
- Socioeconomics/Environmental Justice
- Solid and Hazardous Waste Generation
- Energy Use
- Utilities Infrastructure

Please submit your comments within 30 days after receipt of this notice. Agencies are requested to indicate their applicable statutory responsibilities in connection with this proposed project when responding. Responses should be sent to: Michael Potter, Project Manager at (202) 344-1928 or Michael.B.Potter@cbp.dhs.gov.

Sincerely,

David L. Evans, Deputy

for Kirk Evans
Program Manager, SBlnet

cc: Patricia Potergeron,
Environmental Program
Manager

This NEPA submittal does not constitute consultation under Section 106 of the National Hist. Preservation Act. Provisions at 36 CFR Part 800.8 must be followed in order for this Office to accept NEPA documentation as Section 106 compliance consultation.

Denne Medley
for SHPO

August 2007



DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
TUCSON PROJECT OFFICE
5205 EAST COMANCHE STREET
TUCSON, ARIZONA 85707

REPLY TO
ATTENTION OF:

July 17, 2007

Office of the Chief
Regulatory Division

Mr. Kirk Evans
Program Manager, SBInet
U.S. Customs and Border Protection
U.S. Department of Homeland Security
Washington, D.C. 20229

File Number: SPL-2007-00856-MB

Dear Mr. Evans:

I am responding to your letter undated but received on July 3, 2007 regarding the construction of a technology-based border security system in the Tucson Sector along the international border of Arizona.

The Corps of Engineers regulates the discharge of dredged and/or fill material into waters of the U.S. including wetlands under Section 404 of the Clean Water Act. Examples of activities which require a permit from the Corps under Section 404 include but are not limited to placing bank protection; temporary or permanent stockpiling of excavated material; grading; mechanized landclearing; filling in of wetlands or watercourses; constructing weirs, dikes, diversions, dams, grade control structures; constructing approach fills, and discharging dredged and/or fill material into waters of the U.S. and wetlands as part of any other activity.

At this time, it is unclear as to whether any of the proposed border security measures discussed in your letter will require a Section 404 permit. We would require more detailed information such as the siting of specific facilities and encourage CBP to avoid all waters of the U.S./wetlands in siting all facilities to the maximum extent possible. Regulated ephemeral washes exist across the entire border of Arizona and even road crossings of those which are jurisdictional under Section 404 will require a permit from the Corps. We would appreciate receiving the draft Environmental Assessment. We are also available to meet with you and/or your consultants to discuss the specifics of the project and permitting requirements once you have the alignment and other details better defined.

If you have questions please contact me at (520) 584-1684.

Sincerely,

Marjorie E. Blaine
Senior Project Manager
Arizona Branch, Regulatory Division



U.S. Customs and
Border Protection

SEP 13 2007

The Honorable Delia Carlisle, Chairperson
ATTN: Nancy Nelson, Cultural Resource Manager
Ak-Chin Indian Community
42507 W. Peters & Nail Rd
Maricopa, AZ 85239

SUBJECT: Section 106 Project Re-Initiation in support of an Environmental Assessment for the siting, construction and operation of a technology-based border security system near Tucson, Arizona

Dear Chairperson Carlisle:

The Secure Border Initiative (SBI), *SBI*net System Program Office (SPO), a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program* and Section 106 of the National Historic Preservation Act, as amended.

SBI is a comprehensive, multi-year plan to secure U.S. borders, reduce illegal cross border activity, and transform border control through technology and infrastructure. *SBI*net is the component of SBI that is designing, developing, and implementing technology and tactical infrastructure to secure the border by detecting and identifying border entries, classifying threats, and implementing effective and efficient resolution. For this proposed action, *SBI*net plans to design, develop, and deploy technology-based solutions to deter and prevent illegal entries in the Tucson Border Patrol Sector.

While no final decisions have been made, the proposed action to be described and analyzed in an EA would cover a portion of the United States-Mexico border designated as the Tucson Border Patrol Sector. The sector is comprised of twelve Arizona counties, and contains eight Border Patrol Stations (Ajo, Casa Grande, Douglas, Naco,

Nogales, Sonoita, Tucson, and Willcox). The Sector is divided into three geographic operational corridors.

The Douglas/Naco corridor is adjacent to the New Mexico state line. The San Bernadino Valley is bordered on the east by the Guadalupe and Peloncillo Mountain ranges and to the west by the Chiricahua Mountains, within the Coronado National Forest. The San Pedro Valley is in the western portion of the Douglas-Naco Corridor. The San Pedro Valley's eastern border is the Dragoon and Mule Mountain ranges. To the west are the Whetstone Mountains.

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SBI^{net}'s proposed action would strengthen and support the CBP's enforcement strategies and operations in this AOR. The technology components (communication towers, ground sensors, cameras, and other electronic surveillance, communication, and detection equipment) that would be a part of this proposed action are intended to supplement existing tactical infrastructure such as fencing, vehicle barriers, and roads near the United States – Mexico border. The technologies to be utilized under this proposed action would provide situational awareness to CBP agents for improved detection, identification, classification, tracking, and expedited interdiction of illegal cross-border activities and Illegal Entrants (IEs) in the proximity of the border. The operational effectiveness of CBP would be enhanced by increased surveillance capabilities once the technologies are installed and operational.

The need for this proposed action is to decrease illegal border activities in the Tucson Sector. Not only does illegal border activity have direct and indirect costs for all U.S. citizens, it has environmental costs as well. IEs have contributed heavily to the destruction of native vegetation and left litter throughout the Tucson Sector. IEs passing through border areas threaten public lands, destroy historic and cultural structures and artifacts, harm endangered plant and animal species, and adversely affect other sensitive resources. Additionally, vehicles used by smugglers and IEs are abandoned in national parks and other environmentally sensitive areas. Dealing with the detrimental effects of IEs is an ever-increasing burden on Federal and State land managers and private landowners.

The Area of Potential Effect (APE) of this proposed action will be defined through the identification of a range of areas within which communications towers and supporting

technological components may be placed, accounting for radio frequency connectivity requirements between towers, end users, and a central communications location. Site Selection Criteria will be applied to assess site feasibility, analyze frequency availability, and balance it with the favorable or unfavorable acceptance of land owners, terrain, natural and man-made features, and other environmental factors. The design phase of this proposal is planned for completion around Fall 2007. Pending acquisition of all required permits and approvals, construction initiation is planned for late 2007 and is expected to continue for approximately 12 months.

SBI*net* intends to evaluate the following potential environmental impact areas:

- Land Use and Zoning
- Geology/Soils/Geotechnical concerns
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We look forward to hearing any concerns you may have regarding known sacred sites or other traditional cultural properties within the proposed project area.

Cultural resource pedestrian surveys are required to determine the existence of cultural resources within the pertinent project areas. Once those surveys have taken place, a report will be produced and sent to you for review and comment and at that time we will ask the State Historic Preservation Officer for concurrence with the appropriate determinations.

If you have any questions pertaining to this project, please do not hesitate to contact Ms. Patience Patterson, Environmental Branch Manager at (202) 344-1131, or Michael Potter, Project Manager, 1300 Pennsylvania Avenue, NW, Room 7.5, Washington, DC 20229 at (202) 344-1928.

Sincerely,



Kirk Evans
Program Manager, SBI*net*

Copy furnished:

Michael Potter, Project Manager
1300 Pennsylvania Avenue, NW
Room 7.5
Washington, DC 20229



U.S. Customs and
Border Protection

SEP 13 2007

The Honorable Herminia Frias, Chairperson
ATTN: Ms. Amalia Reyes
Pascua Yaqui Tribe
7474 S. Camino de Oeste
Tucson, AZ 85746

SUBJECT: Section 106 Project Re-Initiation in support of an Environmental Assessment for the siting, construction and operation of a technology-based border security system near Tucson, Arizona

Dear Chairperson Frias:

The Secure Border Initiative (SBI), *SBI*net System Program Office (SPO), a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program* and Section 106 of the National Historic Preservation Act, as amended.

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While no final decisions have been made, the proposed action to be described and analyzed in an EA would cover a portion of the United States-Mexico border designated as the Tucson Border Patrol Sector. The sector is comprised of twelve Arizona counties, and contains eight Border Patrol Stations (Ajo, Casa Grande, Douglas, Naco,

Nogales, Sonoita, Tucson, and Willcox). The Sector is divided into three geographic operational corridors.

The Douglas/Naco corridor is adjacent to the New Mexico state line. The San Bernadino Valley is bordered on the east by the Guadalupe and Peloncillo Mountain ranges and to the west by the Chiricahua Mountains, within the Coronado National Forest. The San Pedro Valley is in the western portion of the Douglas-Naco Corridor. The San Pedro Valley's eastern border is the Dragoon and Mule Mountain ranges. To the west are the Whetstone Mountains.

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SBInet's proposed action would strengthen and support the CBP's enforcement strategies and operations in this AOR. The technology components (communication towers, ground sensors, cameras, and other electronic surveillance, communication, and detection equipment) that would be a part of this proposed action are intended to supplement existing tactical infrastructure such as fencing, vehicle barriers, and roads near the United States – Mexico border. The technologies to be utilized under this proposed action would provide situational awareness to CBP agents for improved detection, identification, classification, tracking, and expedited interdiction of illegal cross-border activities and Illegal Entrants (IEs) in the proximity of the border. The operational effectiveness of CBP would be enhanced by increased surveillance capabilities once the technologies are installed and operational.

The need for this proposed action is to decrease illegal border activities in the Tucson Sector. Not only does illegal border activity have direct and indirect costs for all U.S. citizens, it has environmental costs as well. IEs have contributed heavily to the destruction of native vegetation and left litter throughout the Tucson Sector. IEs passing through border areas threaten public lands, destroy historic and cultural structures and artifacts, harm endangered plant and animal species, and adversely affect other sensitive resources. Additionally, vehicles used by smugglers and IEs are abandoned in national parks and other environmentally sensitive areas. Dealing with the detrimental effects of IEs is an ever-increasing burden on Federal and State land managers and private landowners.

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SBI^{net} intends to evaluate the following potential environmental impact areas:

- Land Use and Zoning
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- Hydrology/Drainage/Water Quality
- Floodplains
- Wetlands
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- Farmlands
- Noise
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We look forward to hearing any concerns you may have regarding known sacred sites or other traditional cultural properties within the proposed project area.

Cultural resource pedestrian surveys are required to determine the existence of cultural resources within the pertinent project areas. Once those surveys have taken place, a report will be produced and sent to you for review and comment and at that time we will ask the State Historic Preservation Officer for concurrence with the appropriate determinations.

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Sincerely,



Kirk Evans
Program Manager, SBI^{net}

Copy furnished:

Michael Potter, Project Manager
1300 Pennsylvania Avenue, NW
Room 7.5
Washington, DC 20229



U.S. Customs and
Border Protection

SEP 13 2007

The Honorable Ned Norris, Chairman
ATTN: Mr. Peter Steere, Cultural Resource Program Manager
Tohono O'odham Nation
Main Tribal Building
Sells, AZ 85634

SUBJECT: Section 106 Project Re-Initiation in support of an Environmental Assessment for the siting, construction and operation of a technology-based border security system near Tucson, Arizona

Dear Chairman Norris:

The Secure Border Initiative (SBI), *SBI*net System Program Office (SPO), a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program* and Section 106 of the National Historic Preservation Act, as amended.

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The need for this proposed action is to decrease illegal border activities in the Tucson Sector. Not only does illegal border activity have direct and indirect costs for all U.S. citizens, it has environmental costs as well. IEs have contributed heavily to the destruction of native vegetation and left litter throughout the Tucson Sector. IEs passing through border areas threaten public lands, destroy historic and cultural structures and artifacts, harm endangered plant and animal species, and adversely affect other sensitive resources. Additionally, vehicles used by smugglers and IEs are abandoned in national parks and other environmentally sensitive areas. Dealing with the detrimental effects of IEs is an ever-increasing burden on Federal and State land managers and private landowners.

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SBI*net* intends to evaluate the following potential environmental impact areas:

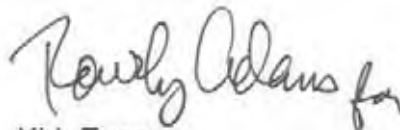
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Sincerely,



Kirk Evans
Program Manager, SBI*net*

Copy furnished:

Michael Potter, Project Manager
1300 Pennsylvania Avenue, NW
Room 7.5
Washington, DC 20229



U.S. Customs and
Border Protection

SEP 13 2007

The Honorable Wendsler Nosie, Sr., Chairman
ATTN: Ms. Vernelda J. Grant
San Carlos Tribal Council
San Carlos Avenue
San Carlos, AZ 85550

SUBJECT: Section 106 Project Re-Initiation in support of an Environmental Assessment for the siting, construction and operation of a technology-based border security system near Tucson, Arizona

Dear Chairman Nosie:

The Secure Border Initiative (SBI), SBI^{net} System Program Office (SPO), a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program* and Section 106 of the National Historic Preservation Act, as amended.

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Sincerely,



Kirk Evans
Program Manager, SBI^{net}

Copy furnished:

Michael Potter, Project Manager
1300 Pennsylvania Avenue, NW
Room 7.5
Washington, DC 20229



U.S. Customs and
Border Protection

SEP 13 2007

The Honorable Ronnie Lupe, Chairman
ATTN: Mr. Mark Atalha, THPO
White Mountain Apache Tribal Council
202 East Walnut Street
Whiteriver, AZ 85941

SUBJECT: Section 106 Project Re-Initiation in support of an Environmental Assessment for the siting, construction and operation of a technology-based border security system near Tucson, Arizona

Dear Chairman Lupe:

The Secure Border Initiative (SBI), SBI^{net} System Program Office (SPO), a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program* and Section 106 of the National Historic Preservation Act, as amended.

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Sincerely,



Kirk Evans
Program Manager, SBI^{net}

Copy furnished:

Michael Potter, Project Manager
1300 Pennsylvania Avenue, NW
Room 7.5
Washington, DC 20229



U.S. Customs and
Border Protection

SEP 13 2007

The Honorable Joni Ramos, President
ATTN: Ms. Dezbah Hatathli, Cultural Programs Supervisor
Salt River Pima-Maricopa Indian Community
10005 East Osborn Road
Scottsdale, AZ 85256

SUBJECT: Section 106 Project Re-Initiation in support of an Environmental Assessment for the siting, construction and operation of a technology-based border security system near Tucson, Arizona

Dear President Ramos:

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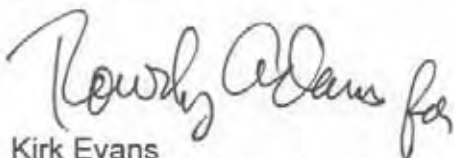
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Sincerely,



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

SEP 13 2007

The Honorable William Rhodes, Governor
ATTN: Mr. Barnaby V. Lewis
Gila River Indian Community
Cultural Resources Management Program
315 W. Casa Blanca Rd.
Sacaton, AZ 85247

SUBJECT: Section 106 Project Re-Initiation in support of an Environmental Assessment for the siting, construction and operation of a technology-based border security system near Tucson, Arizona

Dear Governor Rhodes:

The Secure Border Initiative (SBI), *SBI*net System Program Office (SPO), a program in the Commissioner's Office of U.S. Customs and Border Protection (CBP), is preparing an Environmental Assessment (EA) for the siting, construction, and operation of a technology-based border security system that will cover a portion of the international border in Arizona. The EA will be prepared in compliance with Section 102(c) of the National Environmental Policy Act (NEPA) of 1969, as amended, the Council on Environmental Quality's NEPA implementing regulations at 40 C.F.R. 1500 et seq., and Department of Homeland Security's *Management Directive 5100.1 – Environmental Planning Program* and Section 106 of the National Historic Preservation Act, as amended.

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SBI*net* intends to evaluate the following potential environmental impact areas:

- Land Use and Zoning
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- Floodplains
- Wetlands
- Water Resources/Water Quality
- Farmlands
- Noise
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- Cultural/Archaeological/Historic Resources
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- Radiofrequency Emissions
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- Solid and Hazardous Waste Generation
- Energy Use
- Utilities Infrastructure

We look forward to hearing any concerns you may have regarding known sacred sites or other traditional cultural properties within the proposed project area.

Cultural resource pedestrian surveys are required to determine the existence of cultural resources within the pertinent project areas. Once those surveys have taken place, a report will be produced and sent to you for review and comment and at that time we will ask the State Historic Preservation Officer for concurrence with the appropriate determinations.

If you have any questions pertaining to this project, please do not hesitate to contact Ms. Patience Patterson, Environmental Branch Manager at (202) 344-1131, or Michael Potter, Project Manager, 1300 Pennsylvania Avenue, NW, Room 7.5, Washington, DC 20229 at (202) 344-1928.

Sincerely,



Kirk Evans
Program Manager, SBI*net*

Copy furnished:

Michael Potter, Project Manager
1300 Pennsylvania Avenue, NW
Room 7.5
Washington, DC 20229



U.S. Customs and
Border Protection

SEP 13 2007

The Honorable Wayne Taylor, Jr., Chairman
ATTN: Mr. Leigh J. Kuwanwisiwma
Hopi Tribal Council
Main Street
Kykotsmovi, AZ 86039

SUBJECT: Section 106 Project Re-Initiation in support of an Environmental Assessment for the siting, construction and operation of a technology-based border security system near Tucson, Arizona

Dear Chairman Taylor:

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- Land Use and Zoning
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- Floodplains
- Wetlands
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Sincerely,



Kirk Evans
Program Manager, SBI^{net}

Copy furnished:

Michael Potter, Project Manager
1300 Pennsylvania Avenue, NW
Room 7.5
Washington, DC 20229



U.S. Customs and
Border Protection

SEP 13 2007

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

SUBJECT: Section 106 Project Re-Initiation in support of an Environmental Assessment for the siting, construction and operation of a technology-based border security system near Tucson, Arizona. **Ref: SHPO-2007-1248/1362 (33613/33641)**

Dear Mr. Garrison:

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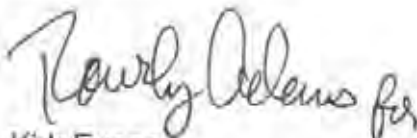
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Sincerely,



Kirk Evans
Program Manager, SBInet

Copy furnished:

Michael Potter, Project Manager
1300 Pennsylvania Avenue, NW
Room 7.5
Washington, DC 20229

SHPO- 2007-1248 (34277)

SHPO- 2007-1362 (34278)

U.S. Department of Homeland Security
Washington, DC 20229



U.S. Customs and
Border Protection

SEP 13 2007

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

RECEIVED

SEP 14 2007

ARIZONA STATE PARKS/SHPO

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Sincerely,

Kirk Evans for

Kirk Evans
Program Manager, SBI~~net~~

*Thank you for the information.
We look forward to continuing
to consult and reviewing
survey reports.*

*Donna Hedley
FRESHPO
Oct. 19, 2007*



TOHONO O'ODHAM NATION

CULTURAL AFFAIRS PROGRAM

P.O. BOX 837 • SELLS, ARIZONA 85634

Telephone (520) 383-3622 • Fax (520) 383-3377



September 20, 2007

Kirk Evans

**Program Manager, SBInet, U.S. Department of Homeland Security
U.S. Customs and Border Protection
Washington, D.C. 20229**

Dear Mr. Evans:

Thanks you for your letter of September 13, 2007, informing the Tohono O'odham Nation of a Section 106 project Re-Initiation in Support of an Environmental Assessment (EA) for the siting, construction and operation of a technology-based border security system near Tucson, Arizona.

The Cultural Affairs Office has a few comments:

- 1. Please make sure a draft EA is sent to the Tohono O'odham Nation with a minimum of 30 days allowed for comments to be returned.**
- 2. Please send copies of the EA to the following individuals for review**

**Ned Norris, Chairman, Tohono O'odham Nation, P.O. Box 837,
Sells, Arizona 85634**

**Verlon Jose, Chairman, Tohono O'odham Nation Legislative Council
P.O. Box 837, Sells, Arizona 85634**

**Marla Henry, Chairwoman, Chukut Kuk District, Tohono O'odham Nation
P.O. Box 278, Sells, Arizona 85634**

**Geneva Ramon, Chairwoman, Gu Vo District, Tohono O'odham Nation,
P.O. Box 880 Ajo, Arizona 85321**

**Selso Villegas, Director, Department of Natural Resources, Tohono O'odham
Nation, P.O. Box 837, Sells, Arizona 85634**

**Karen Howe, Ecologist, Wildlife and Vegetation Management, Department
of Natural Resources, Tohono O'odham Nation P.O. Box 837, Sells, Arizona
85634**

**Peter L. Steere, Manager, Cultural Affairs Office, Tohono O'odham Nation
P.O. Box 837, Sells, Arizona 85634**

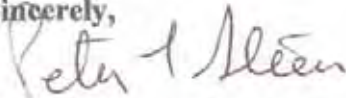
3. The description of the proposed action is very general, please keep the Tohono O'odham Nation informed when you are able to designate a more specific area that will be covered by this EA.

4. On page 2 of your letter – paragraph 4 – line 4 “Alter” is spelled Altar

Also in paragraph 4 - In your description of the West Desert corridor, you mention that the Organ Pipe Cactus National Monument, but neglect to mention that a significant portion of this land is taken up by the lands of the Tohono O'odham Nation (3 million acres – 65 + miles of border with Mexico. Hopefully this oversight will be addressed in the draft EA.

5. Please send copies of the design phase of the proposal to the Tohono O'odham Nation when completed in the Fall, 2007.
6. Since a significant portion of the geographic area of the EA will be on the lands of the Tohono O'odham Nation – the Cultural Affairs Office will have approval review on who will conduct the cultural resource inventories on Tohono O'odham Lands. The Wildlife and Vegetation Management Program should have approval review over who will conduct biological surveys on Tohono O'odham lands.
7. Any specific project areas for towers, fences etc. located on the Tohono O'odham Nation need to be reviewed and approved by the appropriate District government. The Chukut Kuk and Gu Vo Districts are the two districts of the Tohono O'odham Nation that border on Mexico.
8. Suggest that when your very general proposed action is better defined, more specific and detailed, that you contact the Chairman of the Tohono O'odham Nation to make arrangements for a presentation at a public meeting in Sells.

Sincerely,



Peter L. Steere, Manager
Cultural Affairs Office
Tohono O'odham Nation
P.O. Box 837
Sells, Arizona 85634

cc:

Patience Patterson, Environmental Branch Manager
Michael Potter, Project Manager

AK-CHIN INDIAN COMMUNITY

Cultural Resources Office

42507 W Peters & Nall Road • Maricopa, Arizona 85239 • Telephone: (520) 568-1369 • Fax: (520) 568-1366



September 25, 2007

Patience Patterson
Environmental Branch Manager
U.S. Customs and Border Protection
1300 Pennsylvania Avenue
NW, Room 7.5
Washington, DC 20229

Re: EA for the siting, construction, and operation of a technology-based border security system near Tucson, Arizona

Dear Ms. Patterson:

The Ak-Chin Cultural Resources Office did receive a letter dated September 13, 2007 regarding the above-referenced undertaking. The purpose of this security system is to deter and prevent illegal entries into the Tucson Border Patrol Sector.

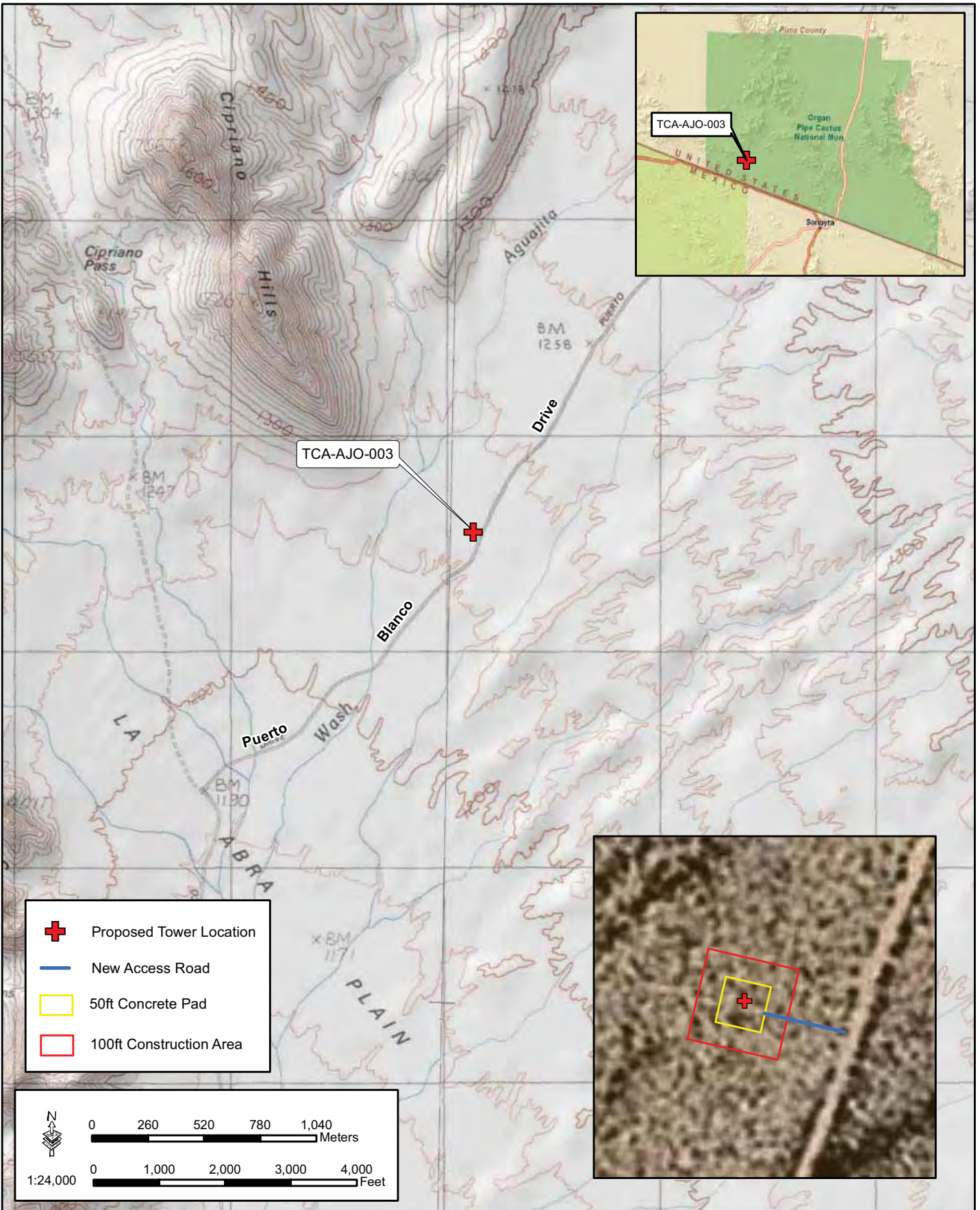
At this time, our office will defer comments to the Tohono O'odham Nation for comments.

Thank you for informing our office about this undertaking. If you have any questions, please call me at (520) 568-1369. I can also be reached via email at: Ggilbert@ak-chin.nsn.us.

Sincerely,

Gary Gilbert
Cultural Resources Technician II
Cultural Resources Office
Ak-Chin Indian Community

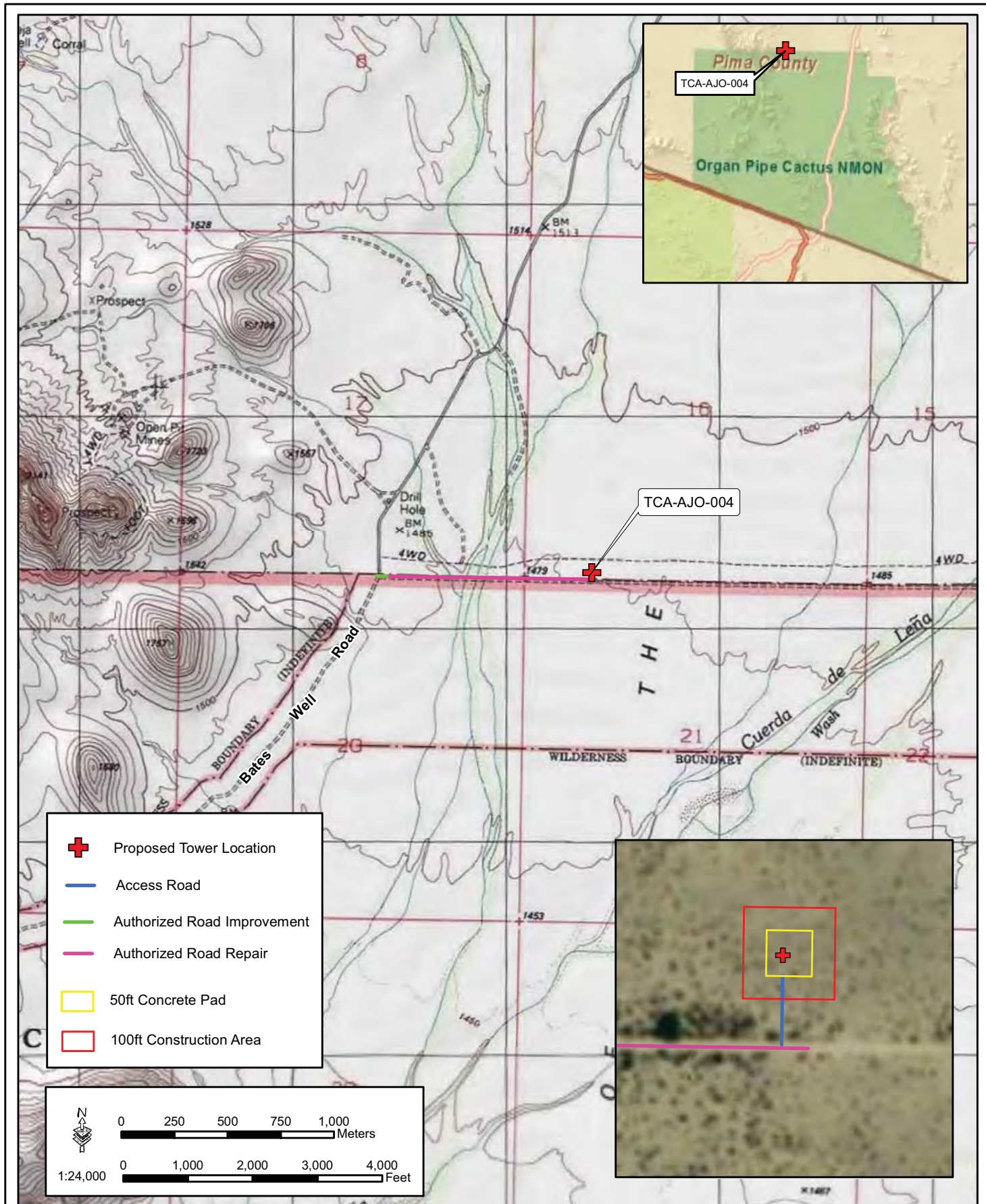
APPENDIX C
TOWER SITE MAPS



TCA-AJO-003 Tower and Access Road



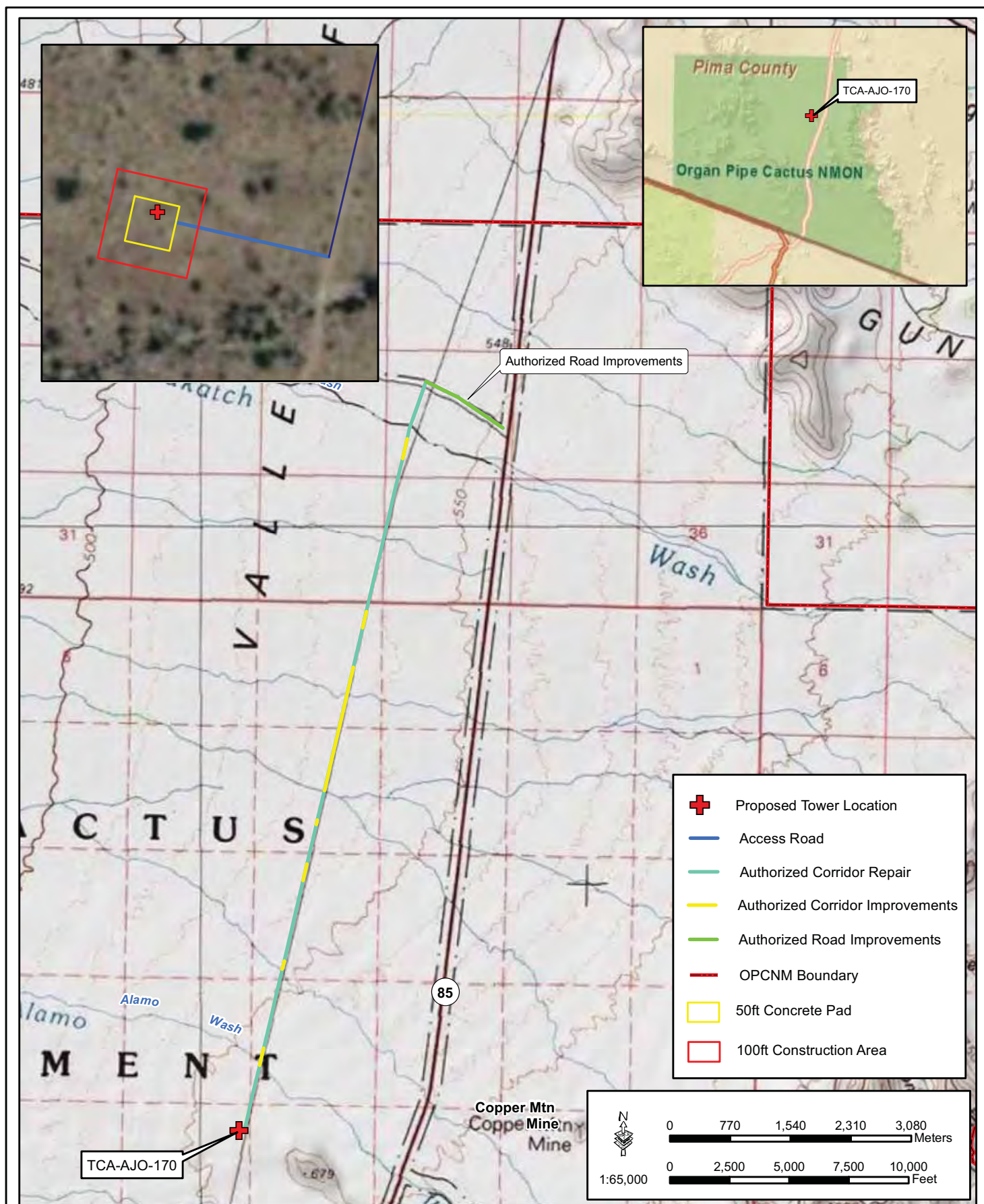
April 2009



TCA-AJO-004 Tower and Access Road



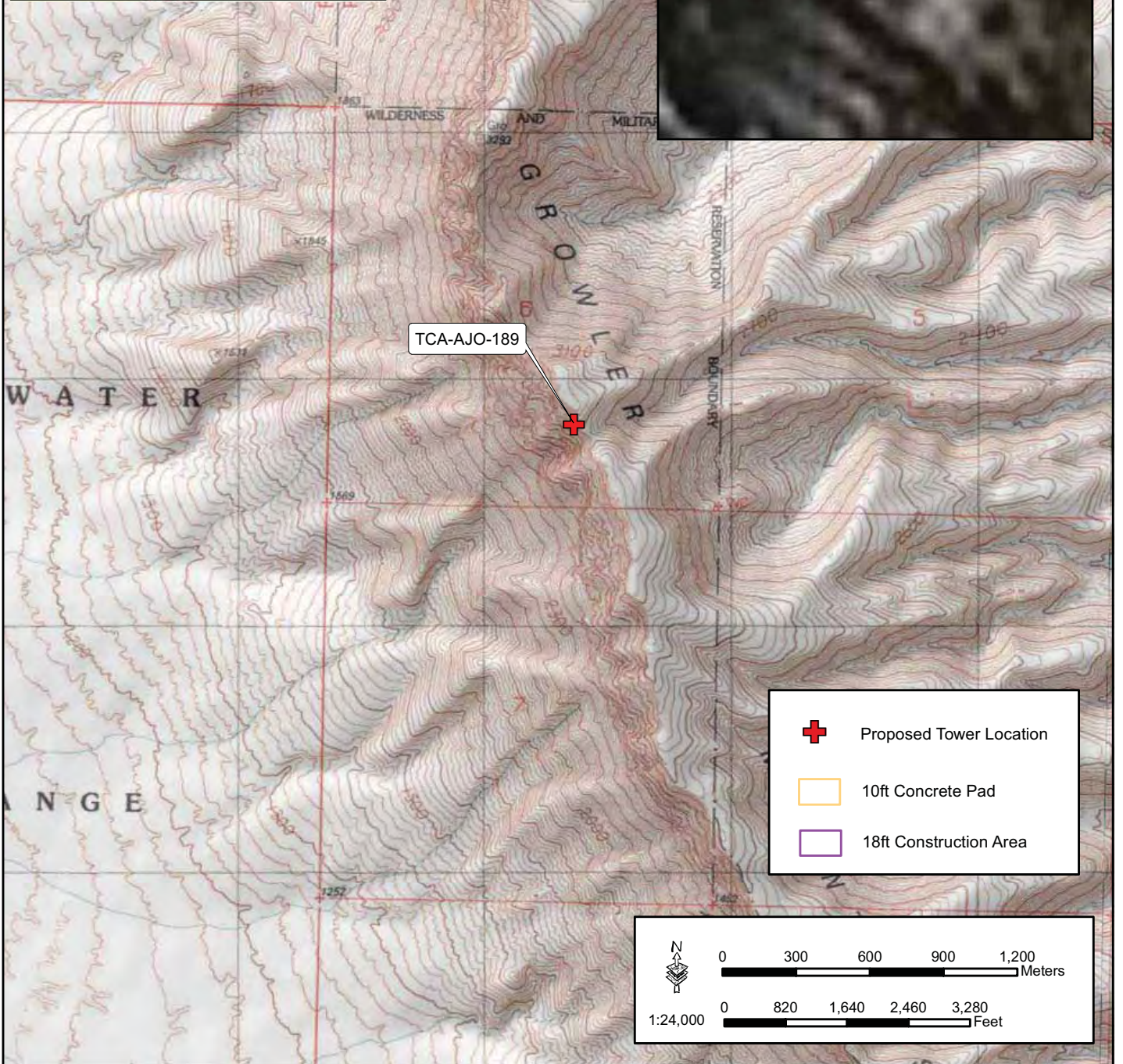
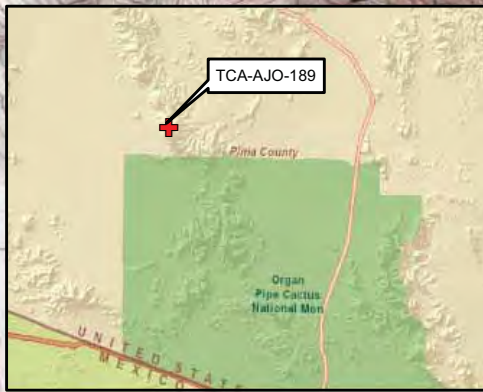
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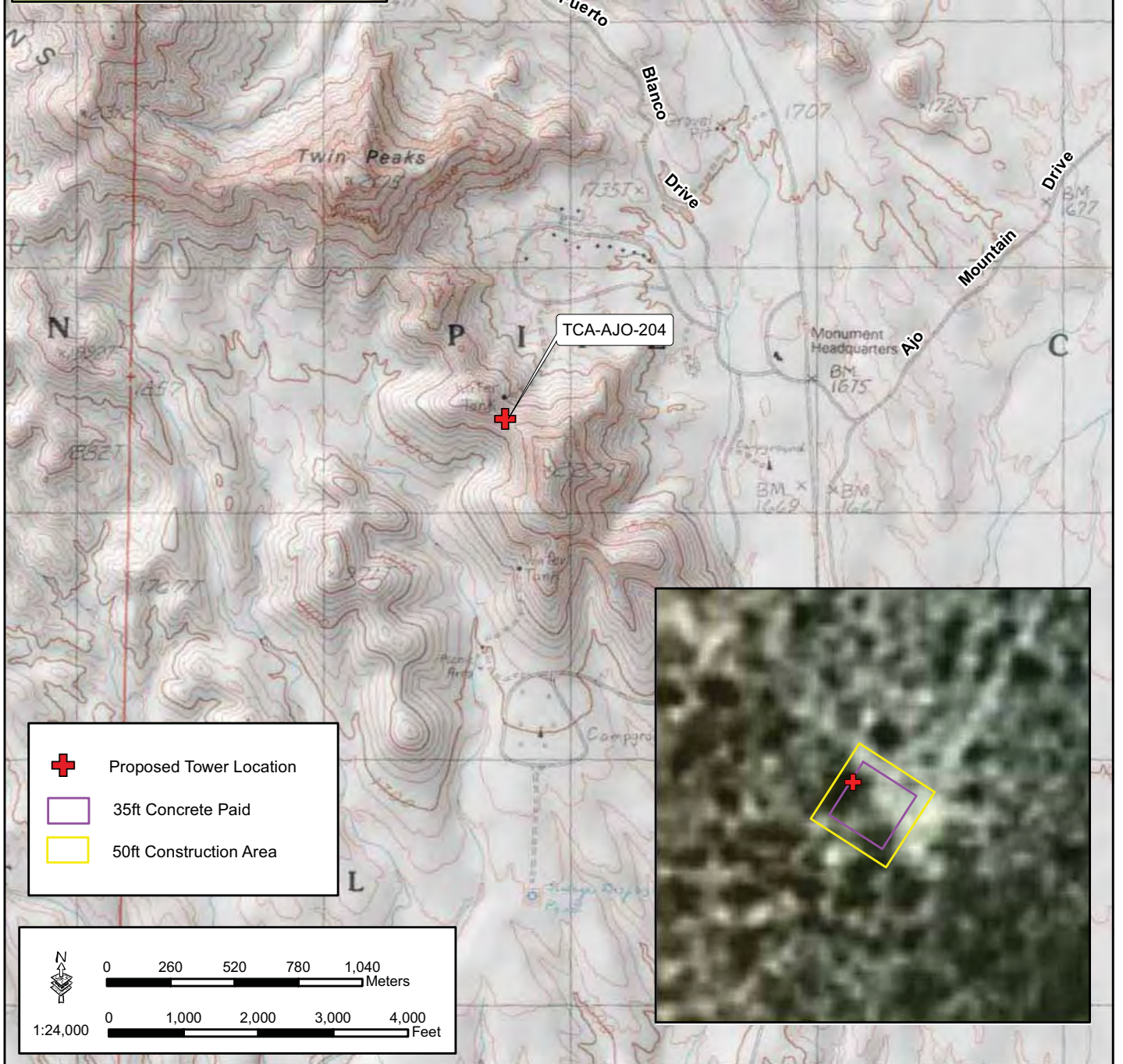


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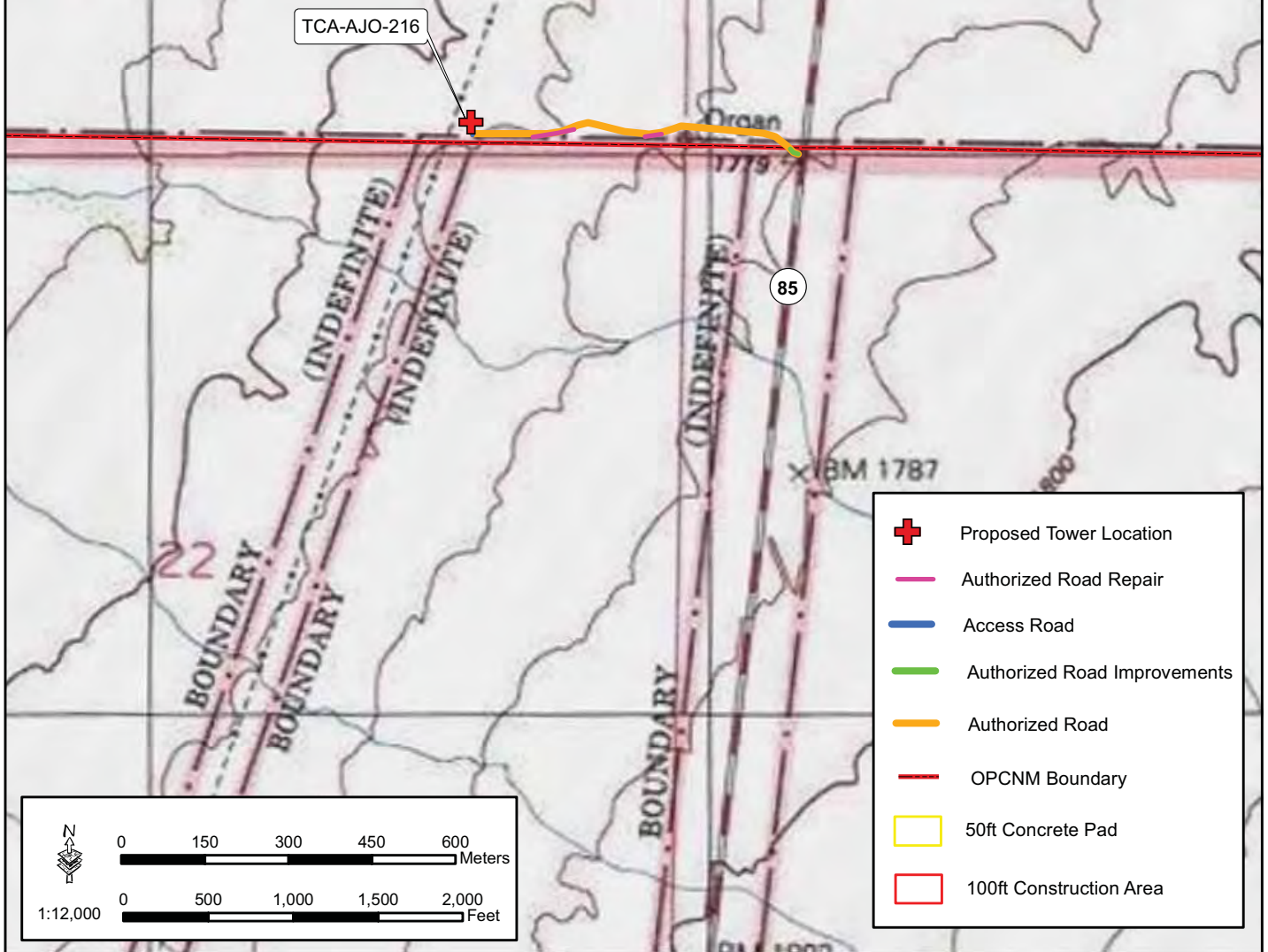
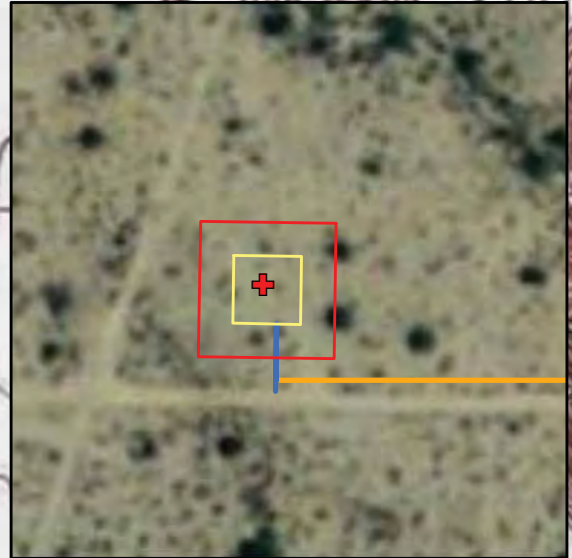
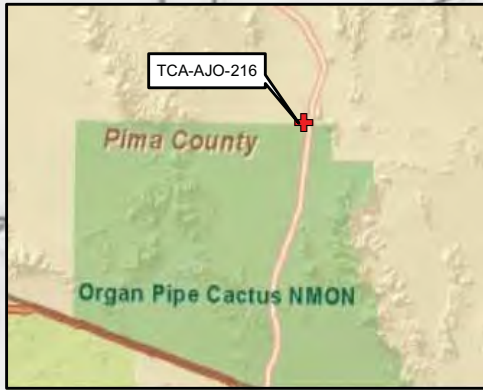
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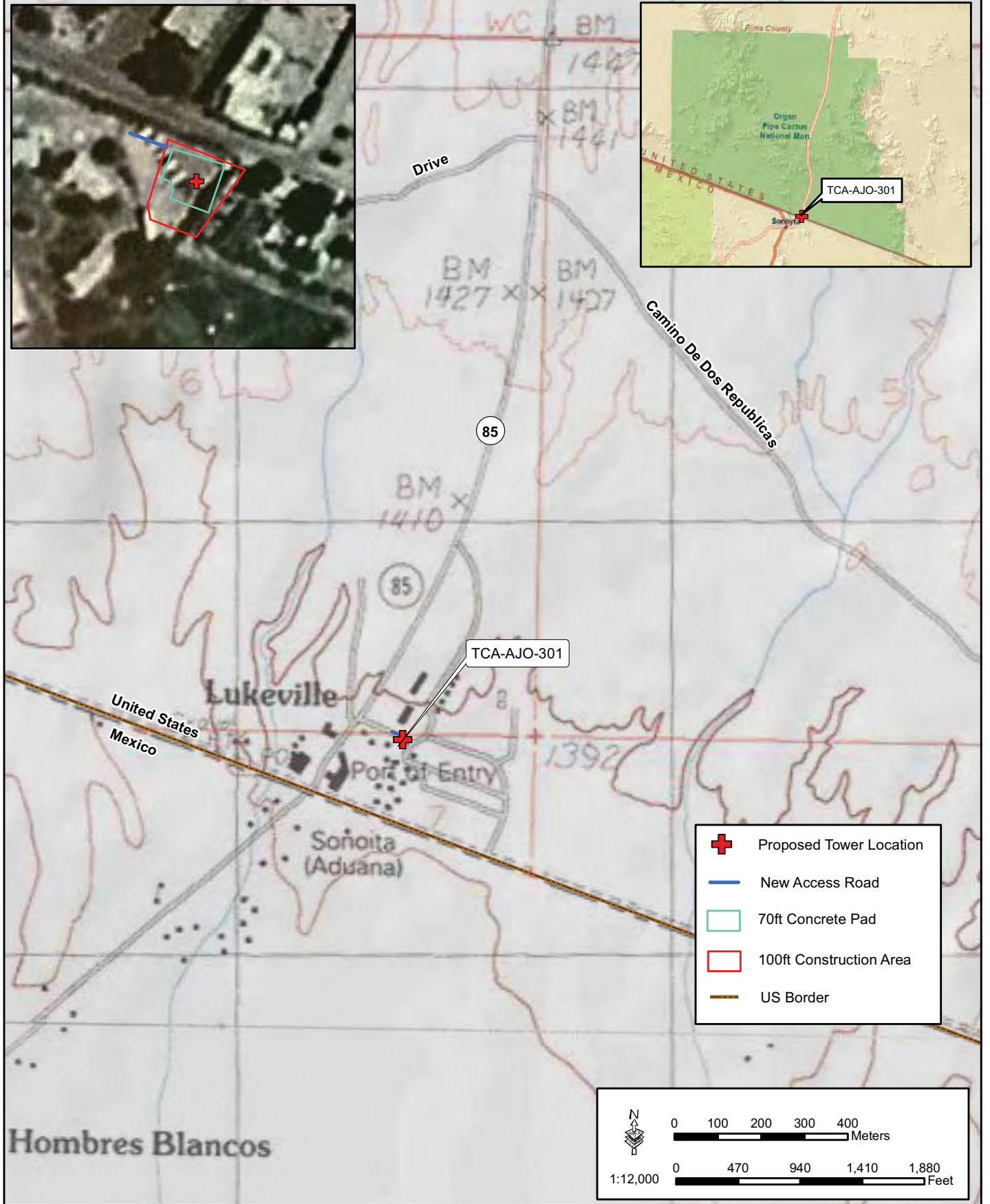
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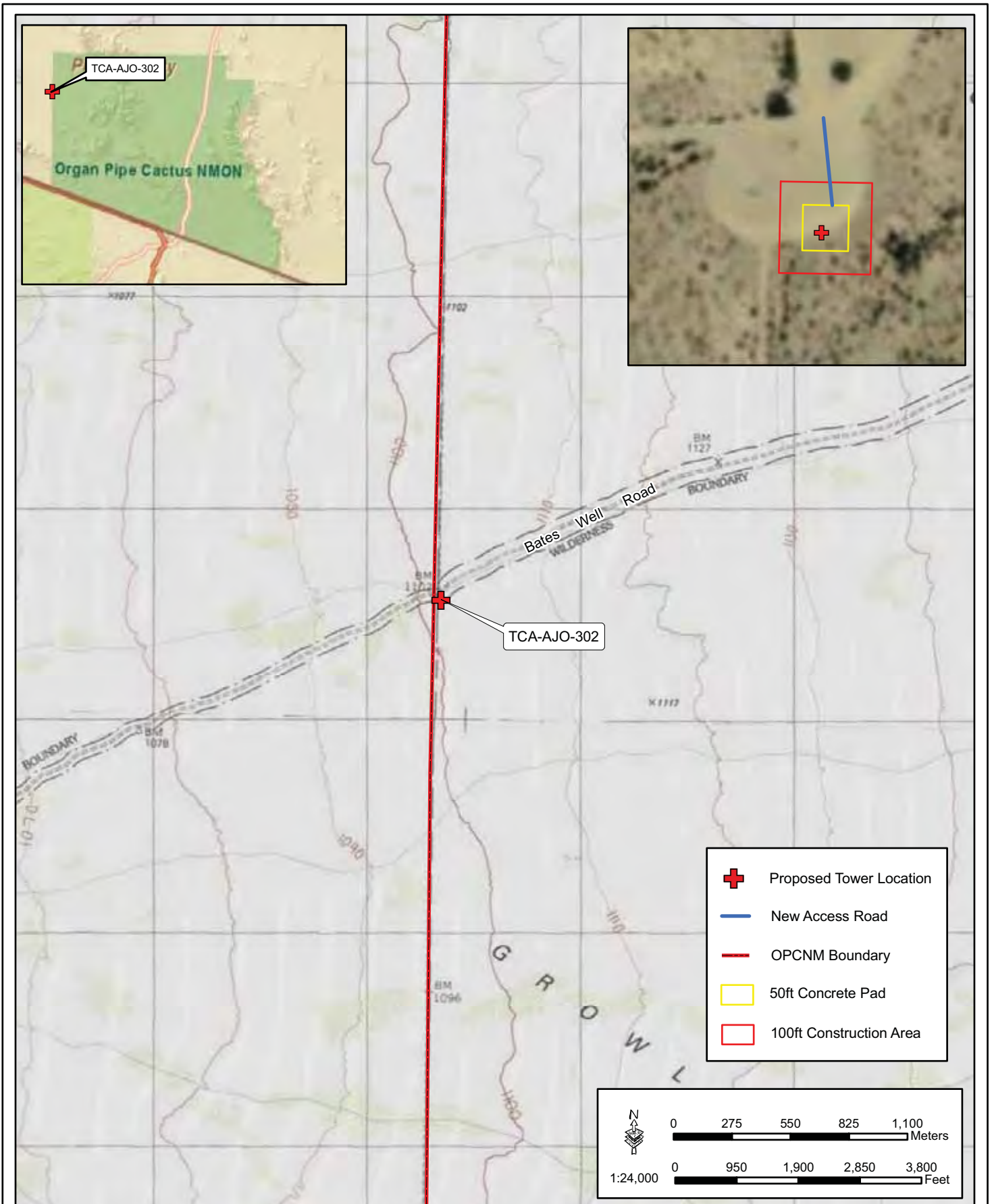
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TCA-AJO-301 Tower

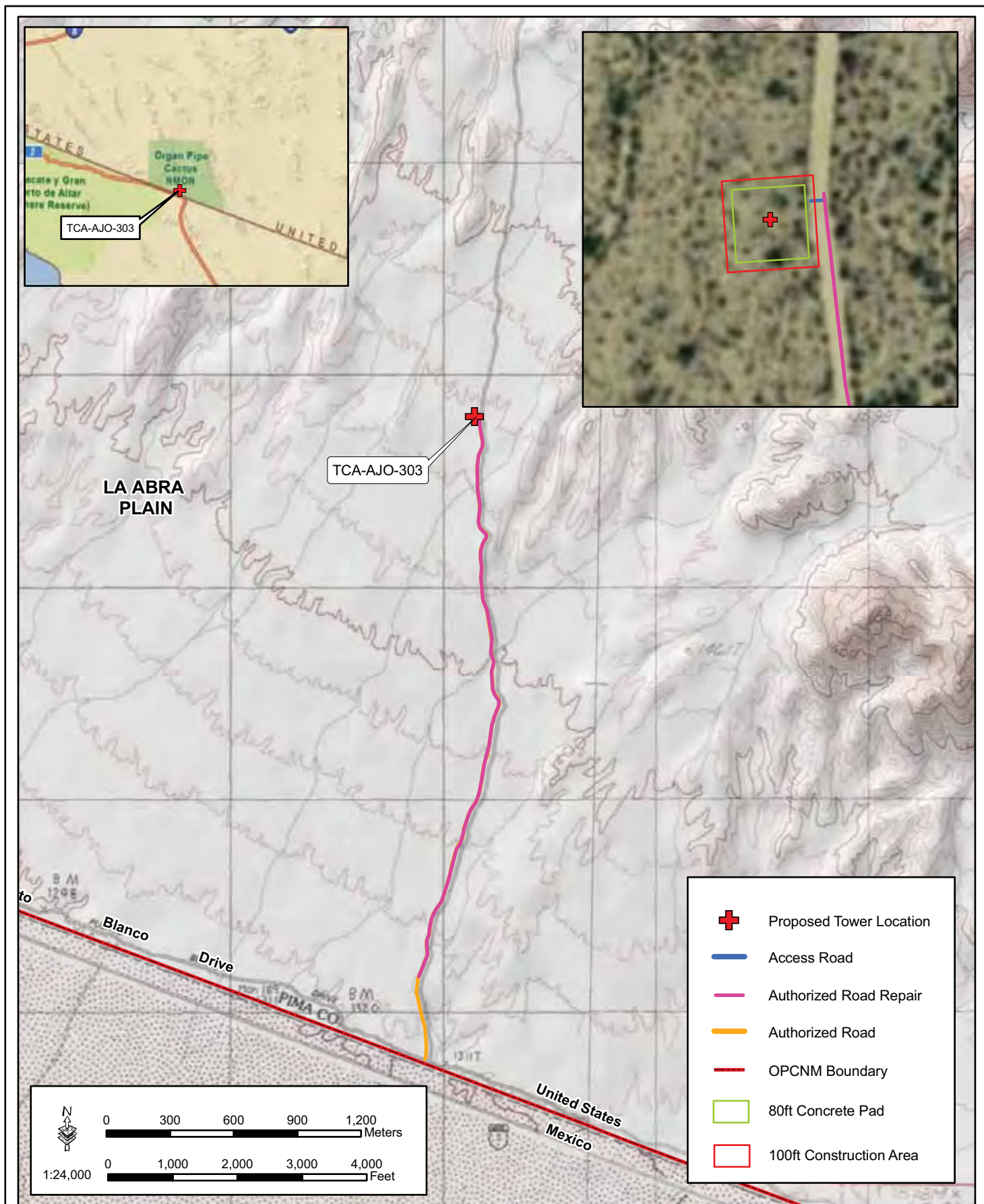




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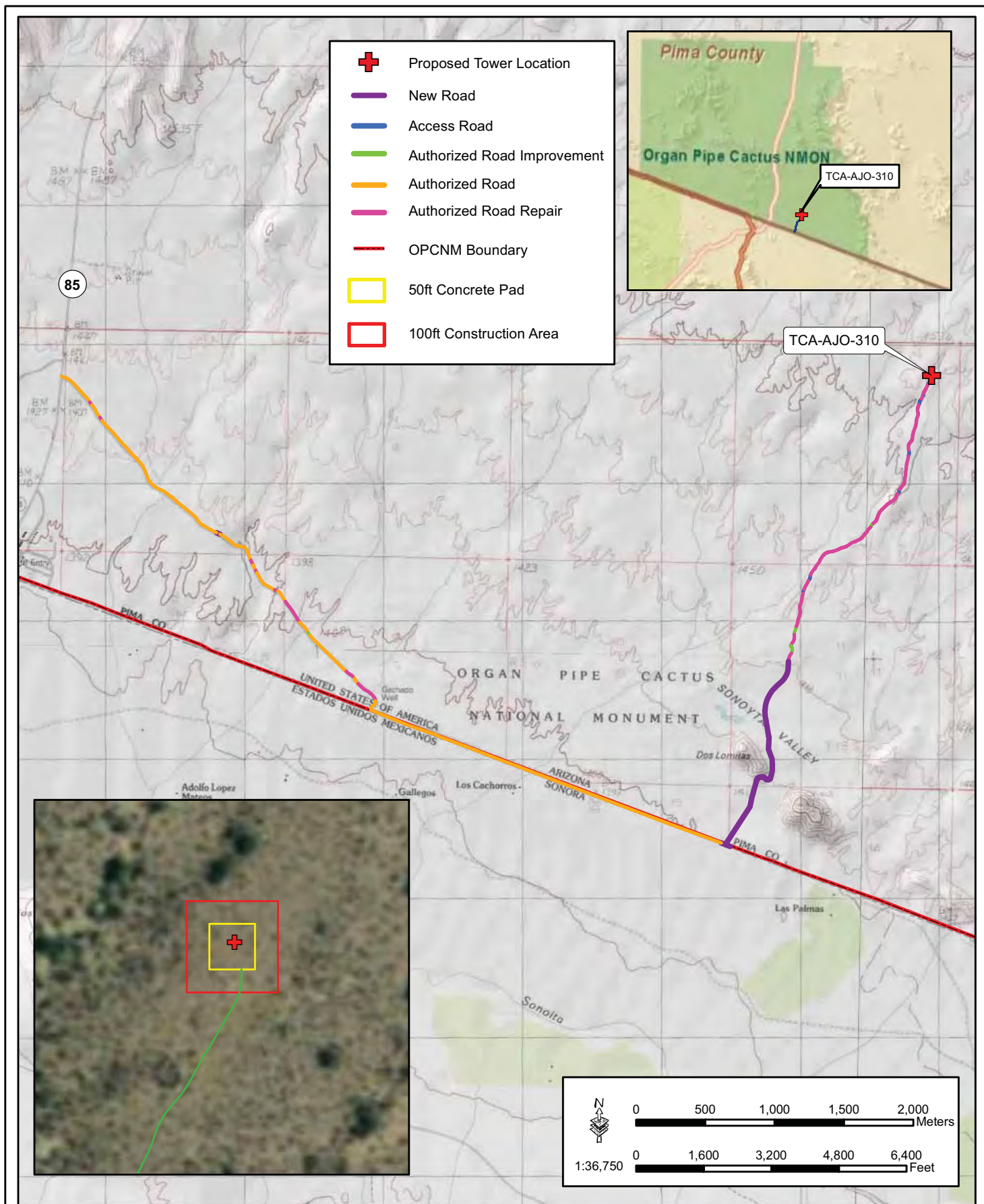
March 2009



TCA-AJO-303 Tower and Access Road



September 2009



TCA-AJO-310 Tower and Access Road



June 2009

APPENDIX D
BIOLOGICAL EVALUATION OF 14 PROPOSED
CUSTOMS AND BORDER PROTECTION TOWER LOCATIONS

A BIOLOGICAL EVALUATION OF 14 PROPOSED CUSTOMS AND BORDER PROTECTION TOWER LOCATIONS

WITHIN THE
ORGAN PIPE CACTUS
NATIONAL MONUMENT

Pima County

Prepared for:

United States Customs and Border Protection
Secure Border Initiative (SBI~~net~~)

Submitted to:

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**Version 1.6
4 December 2008**

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1.0 EXECUTIVE SUMMARY

Harris Environmental Group, Inc. (Harris Environmental) was contracted by the Boeing Company (Boeing) to conduct biological surveys in support of the Secure Border Initiative (SBI*net*) program in the Organ Pipe Cactus National Monument (OPCNM). SBI*net* is part of the United States Department of Homeland Security (DHS) strategy efforts to control international borders through the transformation and improvement of technology, infrastructure, staffing and response platforms. The proposed United States Customs and Border Protection (CBP) action involves construction activities to erect a tower at 14 locations with some ancillary equipment and minor road improvements (Figure 1.1). Biological field surveys were conducted at all of the proposed tower locations and along portions of any existing roadway that would require improvements to facilitate the project.

CBP is preparing a Biological Assessment and an Environmental Assessment for proposed installations within the project area. CBP is conducting consultation with the United States Fish and Wildlife Service (USFWS) and acquiring all applicable land-use permits from OPCNM, Bureau of Land Management (BLM), Arizona State Land Department (ASLD) and other pertinent resource agencies. Table 1.1 shows land jurisdictions and federally-listed species that may occur within the project area. Table 1.2 contains land jurisdictions and a summary of other special-status species of concern to federal and state agencies. Some of the identified species concerns may be eliminated through project design and the incorporation of conservation and avoidance measures into project plans as determined through agency consultation.

The objectives of this Biological Evaluation (BE) were to determine whether habitats in the project area may support special status species. A special status species is any species of interest to any regulatory or management agency of the federal, state, or local government. The special status species considered in this BE were identified from a list published by the USFWS through their Information Planning and Consultation (IPaC) system and the species list provided for Pima County. Other special-status species were identified using the Arizona Game and Fish Department's (AGFD) Heritage Data Management System (HDMS) and the BLM sensitive species list.

The area of potential effect (APE) considered for this project included all of the proposed tower locations and portions of any existing roadway that would require improvements to facilitate the project. The Lesser long-nosed bat and the Sonoran pronghorn are both federally protected species with the potential to occur within the APE. The Lesser long-nosed bat is federally-listed as *endangered* and as a *wildlife species of special concern* in the State of Arizona (AGFD 2008) and has the potential to occur at all 14 proposed tower sites. Sonoran pronghorn is listed as *endangered* and as a *species of concern* in the State of Arizona (AGFD 2008) and has the potential to occur at eight proposed tower sites. Other special-status species such as Sonoran desert tortoise, and birds protected by the Migratory Bird Treaty Act (MBTA) are known to occur at all proposed tower locations (see Table 1.2).

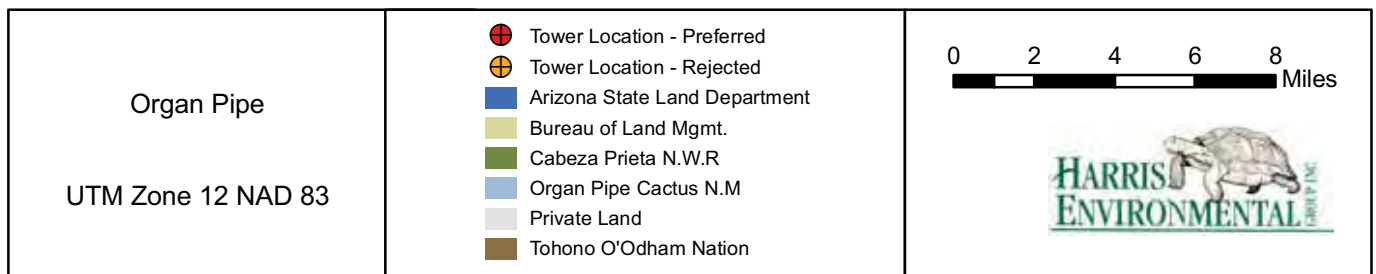
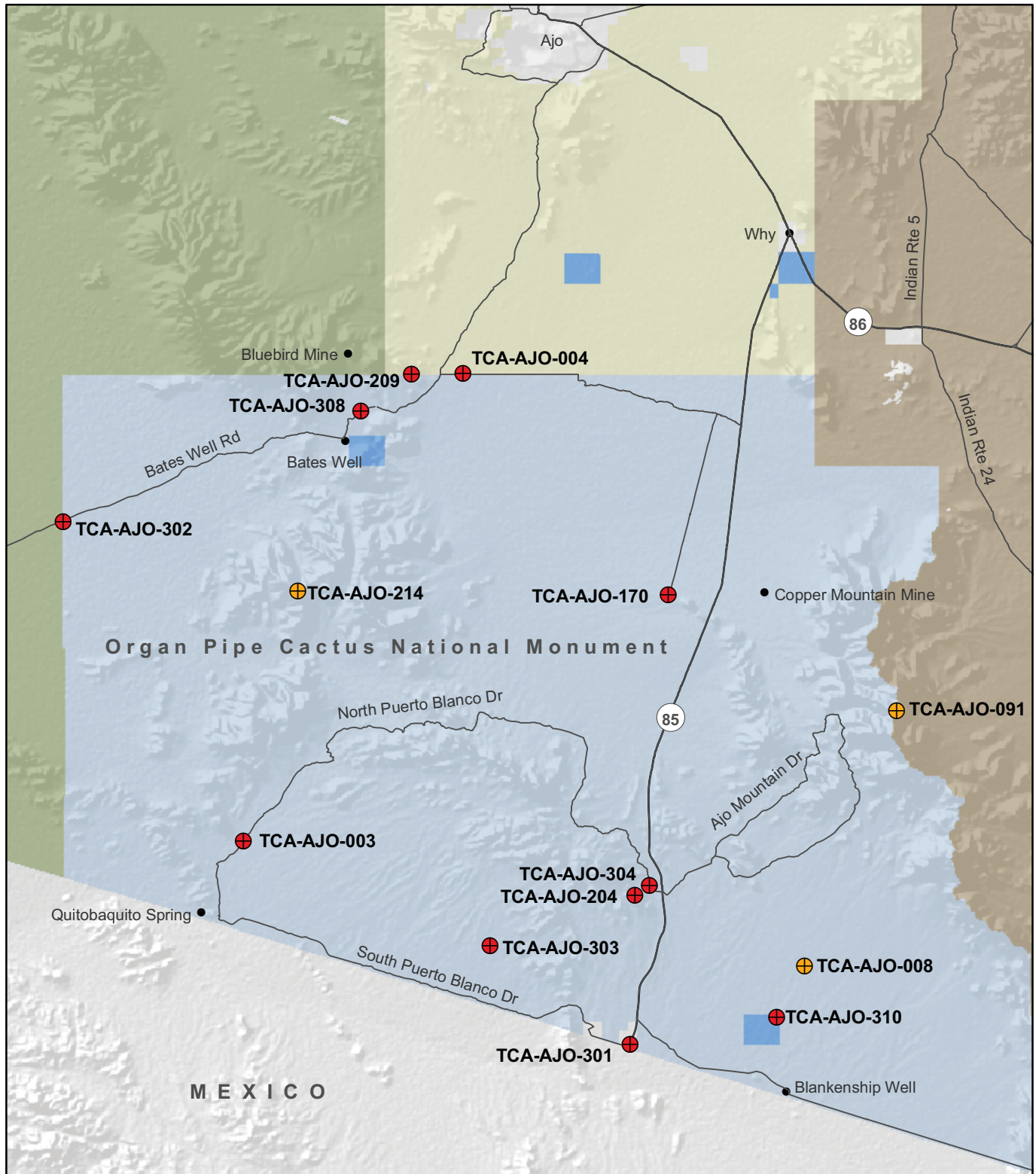


Figure 1.01 Overview of the proposed tower locations

Table 1.1. Summary of land jurisdictions and federally protected species concerns.

Tower	Jurisdiction	Species protected under the ESA
TCA-AJO-003	OPCNM	Lesser Long-nosed Bat, Sonoran Pronghorn
TCA-AJO-004	BLM	Lesser Long-nosed Bat, Sonoran Pronghorn
TCA-AJO-008	OPCNM, ASLD	Lesser Long-nosed Bat
TCA-AJO-091	OPCNM	Lesser Long-nosed Bat
TCA-AJO-170	OPCNM	Lesser Long-nosed Bat, Sonoran Pronghorn
TCA-AJO-204	OPCNM	Lesser Long-nosed Bat
TCA-AJO-209	OPCNM	Lesser Long-nosed Bat, Sonoran Pronghorn
TCA-AJO-214	OPCNM	Lesser Long-nosed Bat, Sonoran Pronghorn
TCA-AJO-301	GSA	Lesser Long-nosed Bat
TCA-AJO-302	OPCNM	Lesser Long-nosed Bat, Sonoran Pronghorn
TCA-AJO-303	OPCNM	Lesser Long-nosed Bat, Sonoran Pronghorn
TCA-AJO-304	OPCNM	Lesser Long-nosed Bat
TCA-AJO-308	OPCNM	Lesser Long-nosed Bat, Sonoran Pronghorn
TCA-AJO-310	ASLD	Lesser Long-nosed Bat

Table 1.2. Summary of land jurisdictions and other special status species concerns.

Tower	Jurisdiction	Other special status species concerns
TCA-AJO-003	OPCNM	MBTA bird species, Sonoran desert tortoise
TCA-AJO-004	BLM	MBTA bird species, Sonoran desert tortoise, Mexican rosy boa
TCA-AJO-008	OPCNM, ASLD	MBTA bird species, Sonoran desert tortoise, Mexican rosy boa, ANPL protected plant species
TCA-AJO-091	OPCNM	MBTA bird species, Sonoran desert tortoise, red-back whiptail
TCA-AJO-170	OPCNM	MBTA bird species, Sonoran desert tortoise, Mexican rosy boa
TCA-AJO-204	OPCNM	MBTA bird species, Sonoran desert tortoise, Mexican rosy boa, red-back whiptail
TCA-AJO-209	OPCNM	MBTA bird species, Sonoran desert tortoise, Mexican rosy boa
TCA-AJO-214	OPCNM	MBTA bird species, Sonoran desert tortoise, Mexican rosy boa, red-back whiptail
TCA-AJO-301	GSA	MBTA bird species, Sonoran desert tortoise
TCA-AJO-302	OPCNM	MBTA bird species, Sonoran desert tortoise
TCA-AJO-303	OPCNM	MBTA bird species, Sonoran desert tortoise, Mexican rosy boa
TCA-AJO-304	OPCNM	MBTA bird species, Sonoran desert tortoise, Mexican rosy boa, red-back whiptail
TCA-AJO-308	OPCNM	MBTA bird species, Sonoran desert tortoise, Mexican rosy boa
TCA-AJO-310	ASLD	MBTA bird species, Sonoran desert tortoise, Mexican rosy boa, ANPL protected plant species

2.0 INTRODUCTION

Project Summary

Part of the *SBI*net plan includes the installation of towers equipped with surveillance and communications equipment. CBP is preparing an Environmental Assessment for this project that covers locations within the operational region defined as *Organ Pipe* which mostly utilizes land in the OPCNM. This report documents the results of a biological evaluation conducted for 14 proposed tower compounds. Under consideration for this report is ground activity and construction-associated disturbances that would adversely affect natural resources. Consultation with the USFWS is being conducted by CBP.

Project Description

The proposed action involves construction activities to erect a tower at 14 locations with some ancillary equipment and minor road improvements. Biological field surveys were conducted at all of the proposed tower locations and along portions of any existing roadway that would require improvements to facilitate the project. Tower compounds typically encompass about 0.4 hectare (1.0 acre). The tower and its supporting equipment are secured within a 15 meter (m) by 15 m (50 feet [ft] by 50 ft) fenced area. Limited surface disturbance will be necessary to accommodate the tower, grounding rods, communications and power equipment. Unattended Ground Sensors (UGS) will require additional surface disturbance. Cameras and radar units will be mounted on each tower. Microwave equipment will relay data between sites. Aircraft anti-collision lighting will be incorporated above the highest point on each tower.

A propane fueled generator will be used when commercial power is unavailable or for emergency power. Liquid propane tanks will be mounted on pre-formed concrete slabs. Maintenance will include changing oil, oil filter, spark plugs, engine coolant, and batteries. Each generator will be placed in an enclosure and will have a spill containment basin with a volume five times that of the total engine fluids. On average, the generator sound levels range from 82.0 dBA at 1 m (3 ft) to 72.5 dBA at 10 m (34 ft). Solar panels will be a part of the build for all towers which minimizes the use of generators. Road improvements may be required to accommodate construction equipment, materials, and service trucks. Typical construction access roads are 5 m (15 ft) wide with an additional 1 m (4 ft) of shoulder vegetation cut back.

3.0 METHODS

Between October and December 2007 and during March, April, August, and September of 2008, Harris Environmental conducted field visits to 14 proposed tower locations and associated ingress/egress routes for the CBP *Organ Pipe* project. Survey work was conducted by biologists John Cornell, Stephen Emerson, John Lindsey, Robin Llewellyn, Elizabeth Majchrowicz and Thomas Staudt.

Tower compounds and portions of approach and access roads were subjected to systematic pedestrian survey to collect information regarding vegetation communities and wildlife habitat in or adjacent to the APE. Prior to fieldwork, surveyors were provided with lists of special status plants and wildlife known to occur near the project area along with information regarding key

life requisites, associations with specific types of vegetation or substrates, and known elevation range for a given species. Information collected for each tower was recorded on a standardized data sheet.

The APE for this project includes a total of 203.86 hectares (503.76 acres). The coverage includes (Table 3.1 and Table 3.2):

- Block Survey of about 0.4 hectares (1.0 acre) at 14 distinct parcels; for a total of about 5.6 hectares (14 acres) and
- Linear Survey along about 49.27 kilometers (km)/30.61 miles (mi) of roadway. The examined corridor was 40 m-wide (132 ft-wide) with 20 m (66 ft) of coverage on either side of the roadway centerline. Total linear survey coverage was about 198.20 hectares (489.76 acres).

Each field team consisted of the Harris Environmental biologist and archaeologist, Boeing Systems Engineers, a CBP agent, and a team of civil engineers charged with recording geo-referenced spatial data and planning routings and road improvements (if any). Boeing and CBP handled the acquisition of all rights of entry for surveyed areas.

Table 3.1 Approximate survey coverage at each location.

Preferred Towers	Block Survey		Linear Road Survey	
	Acres	Hectares	Miles	Kilometers
TCA-AJO-003	1	0.40	3.33	5.36
TCA-AJO-004	1	0.40	0.64	1.02
TCA-AJO-170	1	0.40	6.03	9.70
TCA-AJO-204	1	0.40	0.00	0.00
TCA-AJO-209	1	0.40	0.82	1.32
TCA-AJO-301	1	0.40	0.00	0.00
TCA-AJO-302	1	0.40	10.05	16.17
TCA-AJO-303	1	0.40	1.34	2.16
TCA-AJO-304	1	0.40	0.00	0.00
TCA-AJO-308	1	0.40	2.91	4.68
TCA-AJO-310	1	0.40	1.19	1.92
Rejected Towers				
TCA-AJO-008	1	0.40	4.31	6.94
TCA-AJO-091	1	0.40	0.00	0.00
TCA-AJO-214	1	0.40	0.00	0.00
Totals	14	5.60	30.62	49.27

Table 3.2. Summary of tower compound location information.

Tower	Latitude	Longitude	Jurisdiction	Elevation (amsl)
Preferred Tower Locations				
TCA-AJO-003	31.97806	-112.99953	OPCNM	374 m (1,227 ft)
TCA-AJO-004	32.20079	-112.89474	BLM	452 m (1,483 ft)
TCA-AJO-170	32.09547	-112.79696	OPCNM	563 m (1,846 ft)
TCA-AJO-204	31.95224	-112.81270	OPCNM	586 m (1,921 ft)
TCA-AJO-209	32.20058	-112.91929	BLM	492 m (1,615 ft)
TCA-AJO-301	31.88105	-112.81508	GSA	426 m (1,398 ft)
TCA-AJO-302	32.13009	-113.08538	OPCNM	336 m (1,102 ft)
TCA-AJO-303	31.92797	-112.88192	OPCNM	444 m (1,458 ft)
TCA-AJO-304	31.95661	-112.80584	OPCNM	516 m (1,693 ft)
TCA-AJO-308	32.18275	-112.94334	OPCNM	434 m (1,424 ft)
TCA-AJO-310	31.893536	-112.745856	ASLD	463 m (1,519 ft)
Rejected Tower Locations				
TCA-AJO-008	31.91848	-112.73198	OPCNM	498 m (1,634 ft)
TCA-AJO-091	32.0401	-112.68800	OPCNM	1,204 m (3,950 ft)
TCA-AJO-214	32.09705	-112.97344	OPCNM	727 m (2,385 ft)

Establishing Lists of Special Status Species for Consideration

The special status species considered in this BE were identified from a list published by the USFWS through their IPaC system and the species list provided for Pima County. Other special-status species were identified using the AGFD HDMS and the BLM sensitive species lists.

Other Relevant Documents

In addition to a review of published species lists, documents pertinent to the management of the OPCNM were reviewed, including the following:

- Biological Assessment: International Boundary Vehicle Barrier. Organ Pipe Cactus National Monument (NPS 2003).
- Biological Opinion for the Permanent Vehicle Barrier Project on the Barry M. Goldwater Range and Cabeza Prieta National Wildlife Refuge, Arizona. (USFWS 2006).
- Organ Pipe Cactus Final General Management Plan Development Concept Plans Environmental Impact Statement (NPS 1997).
- Draft Supplemental EIS Re-Analysis of Cumulative Impacts on the Sonoran Pronghorn (NPS 2001).
- Supplement to the Draft General Management Plan (NPS 1996).

Best Management Practices (BMP)

In 2006, CBP and USFWS entered into a *Statement of Work* to develop an expedited consultation system for achieving compliance with Section 7 of the Endangered Species Act (ESA) of 1973, as amended. The IPaC system is intended to provide CBP with current information on species and critical habitats that may be adversely affected by CBP activities. The BMPs should be addressed in project planning and if implemented as part of the proposed action, would avoid,

minimize and/or mitigate for the potential adverse effects to listed or proposed threatened or endangered species, candidate species and proposed or designated critical habitat.

USFWS will review specific information on this project and determine project-specific BMPs and mitigation measures through ESA Section 7 consultation. USFWS provided information on their IPaC system and the 2007 BMP to CBP via email in June 2007 and during an early consultation meeting regarding this project (October 16, 2007). USFWS requested that an IPaC query for species occurring in the project area be included in the Biological Evaluation and information included in the 2007 BMP be considered during project design.

The Arizona Ecological Services Office (AESO) developed potential BMPs using biological information on the 34 threatened and endangered species that occur in southern Arizona. According to USFWS, draft BMPs were discussed with CBP on the 4th and 5th of April 2007 at the CBP Tucson Sector office and on the 20th of April 2007 at the Yuma Sector office (USFWS 2007). Comments on the draft BMPs from CBP were discussed in meetings on the 8th and 9th of May 2007. At that meeting the decision was made to focus BMP development on the construction and maintenance portion of the CBP project list. Thus, the draft BMP document developed at the May 2007 meeting should be considered as applicable to construction.

4.0 ENVIRONMENTAL SETTING

The *SBI*net *Organ Pipe* project extends across approximately 48 km (30 mi) of the U.S. and Mexico International Border that includes land within portions of southwestern Pima County. The project area begins at the southwestern boundary of the Tohono O'odham Nation and extends west to the southern extent of the San Cristobal Valley and Growler Valley. The proposed locations of the *Organ Pipe* towers fall within two unique subdivisions of the Sonoran desertscrub biotic community as defined by Brown (Brown 1994) and Brown and Lowe (Brown and Lowe 1980). A biotic community is generally described as a community or aggregation of distinct organisms or species occurring within the same habitat or region. The two subdivisions within the project area are described below; Appendix A provides a key for the scientific names of plants and animals used in this report.

Sonoran Desertscrub — Arizona Upland Subdivision

The Arizona upland subdivision of Sonoran desertscrub is characterized by slopes, broken surface areas and dissected sloping plains. The dominant upper-story trees represented throughout this subdivision include blue palo verde, foothill palo verde, ironwood, mesquite and cat-claw acacia. The prevalence of multiple cacti and succulent species within the Arizona upland subdivision is of great significance in characterizing the overall structure and composition of this landscape. The genera *Cylindropuntia* and *Opuntia* are by far the best represented in terms of the numbers of species present throughout the Sonoran desertscrub community. The following are well represented within this subdivision: buckhorn cholla, cane cholla, staghorn cholla, chain-fruit cholla, teddy bear cholla, desert Christmas cactus, pencil cholla, saguaro, organ pipe cactus, senita, night-blooming cereus, hedgehog cactus and fishhook barrel cactus.

Sonoran Desertscrub — Lower Colorado River Subdivision

The lower Colorado River subdivision is the driest and least vegetated of the Sonoran desertscrub subdivisions because of high temperatures and low precipitation. The resulting vegetative structure is also the least variable and diverse. The lower elevations generally offer less topographic relief. Drainages typically take two basic forms distinguished by whether or not they provide “through-flow” to a significant regional drainage. Plants typically associated with the drainage areas of the lower Colorado River subdivision are: mesquite, ironwood, blue palo verde, smoketree, desert willow, desert honeysuckle, canyon ragweed, cat-claw acacia, burrobrush anderson wolfberry and desert broom. Away from drainages, the dominant plant species are creosote, white bursage, ocotillo, brittlebush, foothill palo verde, saguaro and ironwood.

Non-Native Plants and Noxious Weeds

Non-native plants and noxious weeds are typically associated with disturbed areas and were observed at some tower locations during field surveys.

Geomorphology

Arizona is part of the Basin and Range Province of the southwest where linear mountain ranges alternate with basins of varying widths. All of the mountains in the OPCNM are fault-block ranges, but they differ in topography because of differences in type and age of the formations.

They can be classed into four groups:

- Flat-topped, cliff-edged mesas topped with Quaternary basalt lava flows, as in the Bates Mountains of the northwest part of the monument. Slight faulting and tilting of the basalt lavas show that mountain-building forces were active here in comparatively recent times (Chronic 1988).
- Quite rugged, deeply eroded ranges of Tertiary volcanic rocks, with tilted layers of lava, tuff and breccia faulted upward, as in the Ajo Range and the northwest slope of the Puerto Blanco Mountains (Chronic 1988).
- Rounded hills of Mesozoic granite, such as those near Senita Basin in the southern Puerto Blanco Mountains (Chronic 1988).
- Rougher hills of light-colored Mesozoic metamorphic rock-gneiss and schist-as in the rugged central part of the Puerto Blanco Mountains (Chronic 1988).

Of the rocks types exposed in these ranges, the gneiss and schist are the oldest, the basalt lava flows the youngest. Mesozoic granite intruded the gneiss and schist. Volcanism came early enough in Tertiary period that most Tertiary volcanic rocks were bent and broken during mid-Tertiary mountain-building and later disrupted again by Basin and Range faulting.

Geologic Units

The proposed tower locations occur within three geologic units, Quaternary superficial deposits, early Pleistocene to latest Pliocene superficial deposits, middle Miocene to Oligocene volcanic and sedimentary rocks, and Pliocene to middle Miocene deposits.

Quaternary Superficial Deposits (Undivided) (0-2 Ma)¹

These deposits include unconsolidated to strongly consolidated alluvial and aeolian deposits, including coarse, poorly sorted alluvial-fan and terrace deposits on middle and upper piedmonts and along large drainages; sand, silt and clay on alluvial plains and playas; and wind-blown sand deposits (AGS 2000). Tower locations in this unit are TCA-AJO-004 and TCA-AJO-302.

Early Pleistocene to Latest Pliocene Superficial Deposits (0.75-3 Ma)

These deposits include coarse relict alluvial-fan deposits form rounded ridges or flat isolated surfaces that are moderately to deeply incised by streams. The deposits are generally topographically high and have undergone substantial erosion. Deposits are moderately to strongly consolidated and commonly contain coarser grained sediment than younger deposits in the same area (AGS 2000). Tower locations in this unit include TCA-AJO-008, TCA-AJO-170, TCA-AJO-301, TCA-AJO-303, and TCA-AJO-310.

Middle Miocene to Oligocene Volcanic and Sedimentary Rocks, Undivided (11-38 Ma)

These deposits include lava, tuff, fine-grained intrusive rock and diverse pyroclastic rocks. These compositionally variable volcanic rocks include basalt andesite, dacite and rhyolite. Thick felsic volcanic sequences form prominent cliffs and range fronts. This unit includes regionally extensive ash-flow tuffs. Most volcanic rocks are 20-30 Ma in central and western Arizona (AGS 2000). Tower locations in this unit include TCA-AJO-091, TCA-AJO-204, TCA-AJO-209, TCA-AJO-214, TCA-AJO-304, and TCA-AJO-308.

Pliocene to Middle Miocene Deposits (2-16 Ma)

These deposits include moderately to strongly consolidated conglomerate and sandstone deposited in basins during and after late Tertiary faulting. The unit includes lesser amounts of mudstone, siltstone, limestone and gypsum. The deposits are generally light gray or tan and commonly form high rounded hills and ridges in modern basins and prominent bluffs. Deposits of this unit are exposed widely in the dissected basins of southeastern and central Arizona (AGS 2000). A single tower location, TCA-AJO-003, occurs in this unit.

Soils

A soil association consists of a group of related geomorphological areas that contribute to the composition of the soil mantle covering the earth's surface. Each association consists of two or more soils that occur together in a characteristic and repetitious manner (Hendricks 1985). Soils associated with the proposed tower locations in the *Organ Pipe* project area are mostly hyperthermic arid soils prevalent at low elevations across much of western and southwestern Arizona.

Hyperthermic Arid Soils

The soils in the *Organ Pipe* area are generally formed from mixed alluvium and colluvium and derived from igneous, basalt, and granite sources. The soils range from deep to shallow, and are well drained. Texture varies from very stony, sandy, and gravelly loams to bedrock and clay (Hendricks 1985). Hyperthermic Soil types (HA) have a mean soil temperature of more than

¹ Ma is defined as "Million Years Ago"

22°C (72°F) and less than 250 millimeters (10 inches) mean annual precipitation and occur across much of south western Arizona, being found in Yuma and western Pima County. Within this type, three different soil associations are present across the proposed tower locations.

- **(HA1) Torrifluents Association:** Deep, stratified, coarse to fine texture, nearly level to gently sloping soils on floodplains and lower alluvial fans.
- **(HA4) Gunsight-Rillito-Pinal Association:** Deep and shallow, limy, gravelly, medium and moderately coarse-textured, nearly level to strongly sloping soils on alluvial surfaces and valley plains.
- **(HA6) Lithic Camborthids-Rock Outcrop-Lithic Haplargids Association:** Shallow, gravelly and cobbly, moderately coarse to moderately fine textured, gently sloping to very steep soils and rock outcrops on hills and mountains.

5.0 TOWER DESCRIPTIONS AND FIELD OBSERVATIONS

PREFERRED TOWER LOCATIONS

TCA-AJO-003

TCA-AJO-003 is located within the OPCNM in southwestern Pima County, approximately 4.7 km (2.9 mi) north of the U.S./Mexico International Border and 20.4 km (12.7 mi) northwest of the Lukeville Point of Entry (POE) (Figure 5.01). The tower compound is southeast of the Cipriano Hills at an elevation of 374 m (1,227 ft) amsl. The substrate at the tower compound is mostly gravel with scattered cobbles and the soils are composed of sandy loam with coarse sand (Photograph 5.01).

TCA-AJO-003 is on the OPCNM and approached via North Puerto Blanco Drive an unpaved road that connects with South Puerto Blanco Road and provides access to the core of the park along an approximate 40 mile loop road. The approach route travels north within the non-wilderness corridor that exists between the western edge of La Abra Plain and the eastern flank of Quitobaquito Hills. Access to TCA-AJO-003 would be via a short, unpaved road extending from North Puerto Blanco Drive. Survey coverage for this proposed tower installation included the 0.4 hectare (1.0 acre) tower compound, access road, and an approximate 4.4 km (2.5 mi) portion of North Puerto Blanco Drive (Figure 5.02).

Field Observations

TCA-AJO-003 and the surrounding area are within the Arizona Upland Subdivision. Plants include blue palo verde, cat-claw acacia, chain-fruit cholla, creosote, foothill palo verde, graythorn, ironwood, ocotillo, saguaro, triangle-leaf bursage, wolfberry and mixed forbs. Wildlife and evidence of wildlife include Harris' hawk (*Parabuteo unicinctus*), raven (*Corvus* sp.), whiptail (*Aspidoscelis* sp.), zebra-tailed lizard (*Callisaurus draconoides*) and jackrabbit (*Lepus* sp.) scat. Special status species documented include organ pipe cactus, which is categorized as *salvage restricted* on the ADA protected native plant list. The tower compound is approximately 0.4 km (0.2 mi) east of Aguajita Wash, which supports a xeroriparian vegetation community.

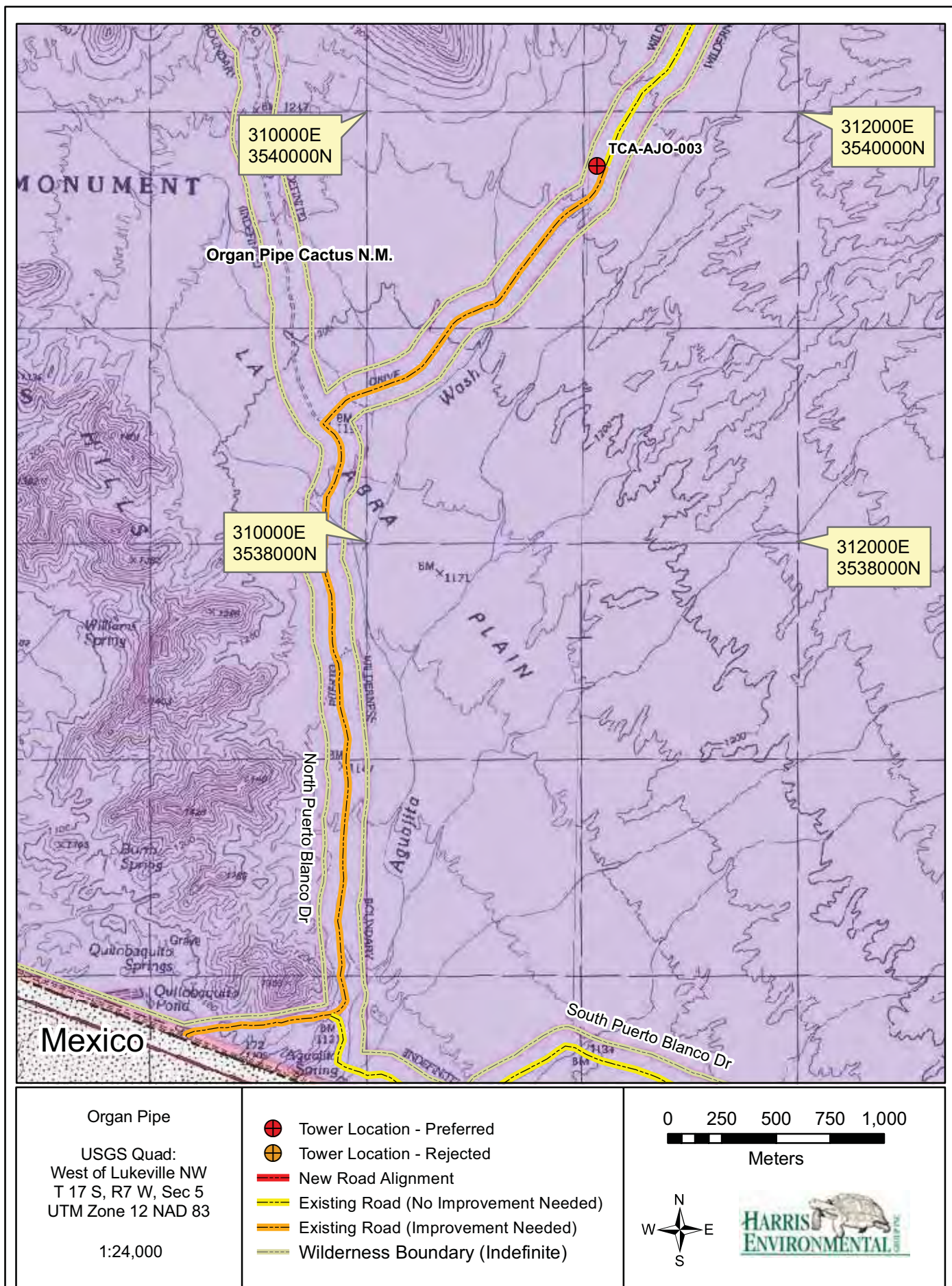


Figure 5.01 UTM registered location and land jurisdiction for TCA-AJO-003.

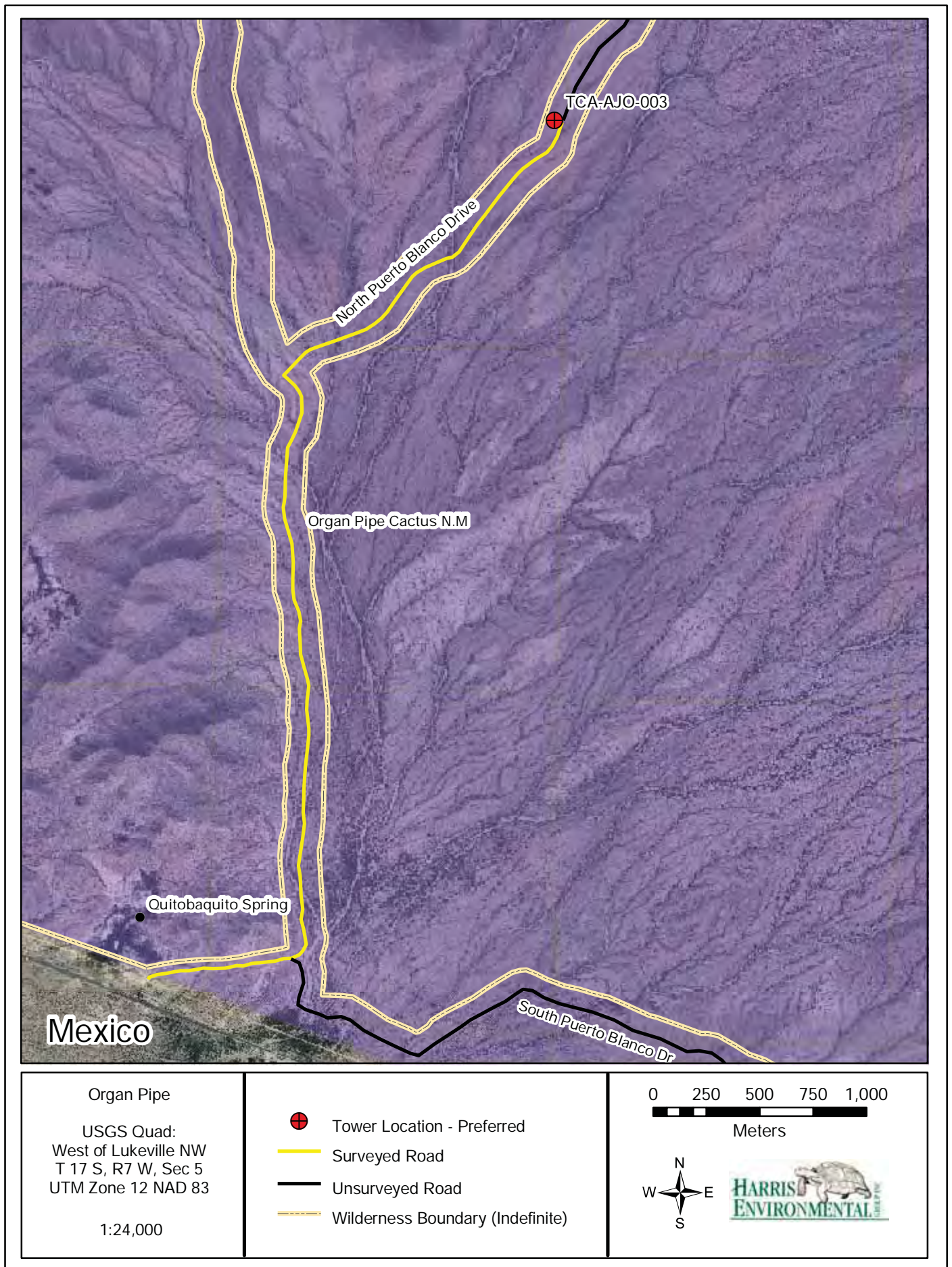


Figure 5.02 Tower Location and Surveyed Area for TCA-AJO-003.



Photograph 5.01 Center of TCA-AJO-003 looking south.

TCA-AJO-004

TCA-AJO-004 is located on BLM land in western Pima County immediately north of the OPCNM border (Figure 5.03). The site is approximately 32.1 km (20.0 mi) north of the U.S./Mexico International Border, and 36.4 km (22.5 mi) northwest of the Lukeville POE. The compound is located at the western edge of the Valley of the Ajo, east of Scarface Mountain and west of the Cuerda de Lena Wash (Photograph 5.02). The elevation is 452 m (1,483 ft) amsl. The substrate at the compound is gravel, with soils composed of fine sandy loam with a high percentage of silt.

TCA-AJO-004 shares a similar position in the northwest part of the OPCNM near TCA-AJO-308 and TCA-AJO-209. TCA-AJO-004 is located 0.9 km (0.6 mi) west of Cuerda de Leña Wash. The location is approached via two possible routes: Approach Route 1 from the east and State Route (SR) 85 and Approach Route 2 from the west via Bates Well Road. Approach Route 1 accesses TCA-AJO-004 via SR 85 south from the Town of Why for about 10.3 km (6.4 mi) and then via an unpaved, unmaintained OPCNM road called “Road 59.4” by CBP personnel. The tower compound is located just off the unpaved route about 13.1 km (8.1 mi) west of SR 85. Approach Route 2 accesses TCA-AJO-004 via Bates Well Road, an OPCNM maintained dirt road. Using this approach, access to TCA-AJO-004 is via an existing and maintained unpaved road that intersects with Bates Well Road about 19.3 km (12.0 mi) south and west of its intersection with the Tucson-Ajo Highway.

Approach Route 1 was rejected to avoid adverse effects to an historic ranch house identified along the route. Only the portion of Approach Route 2 that would require improvements was surveyed. Total survey coverage for this proposed tower installation included the 0.4 hectare (1.0 acre) tower compound, the full extent of the roadway segments that would require improvements on Approach Route 1 and Approach Route 2 (Figure 5.04).

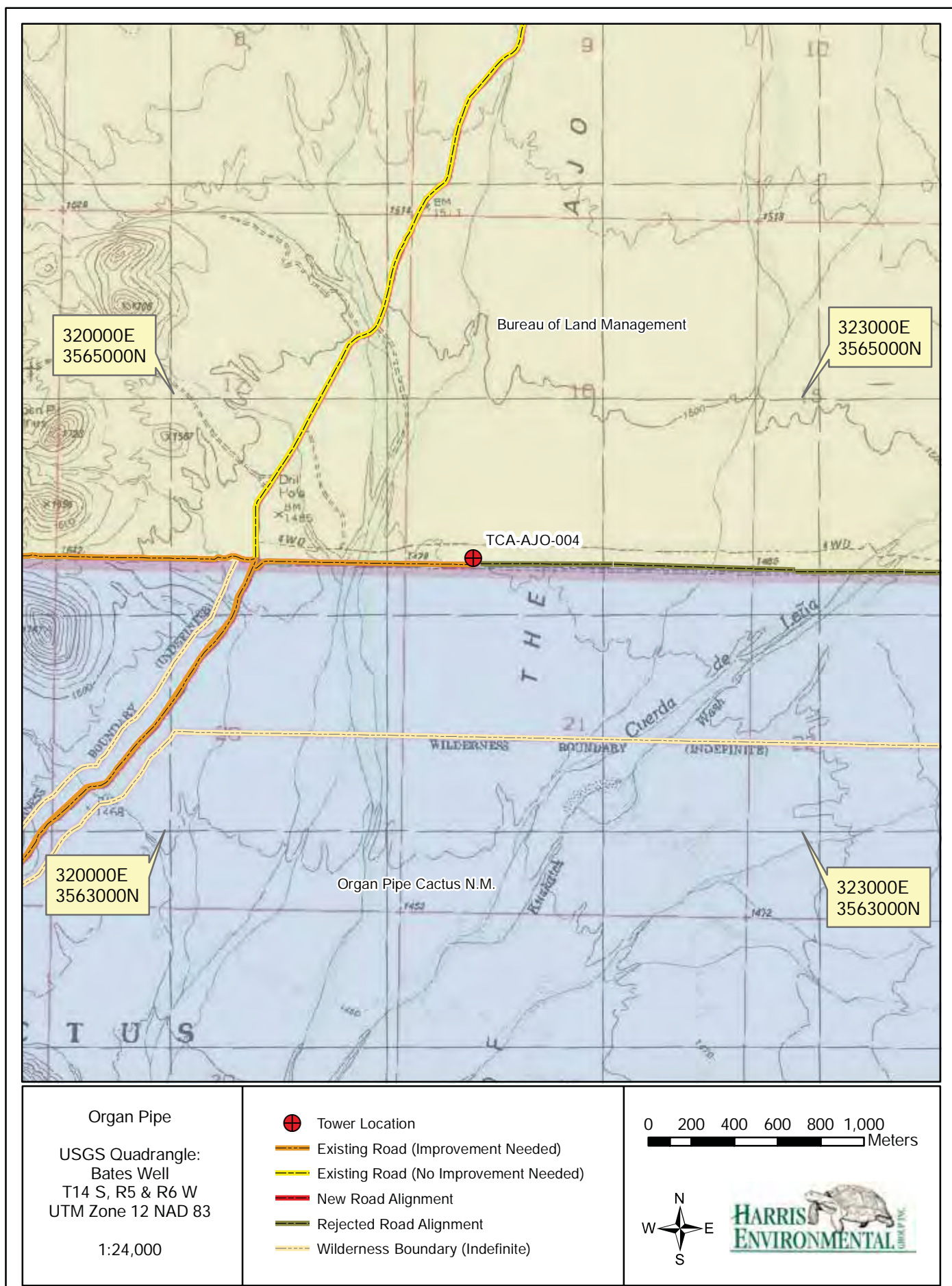


Figure 5.03 UTM registered location and land jurisdiction for TCA-AJO-004.

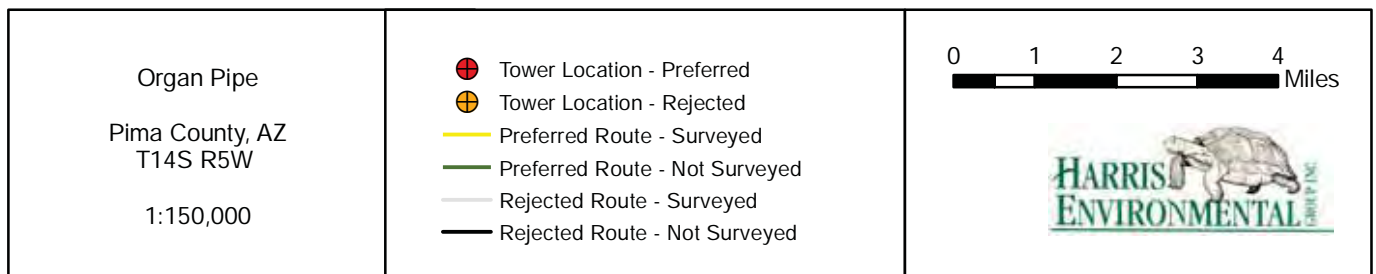
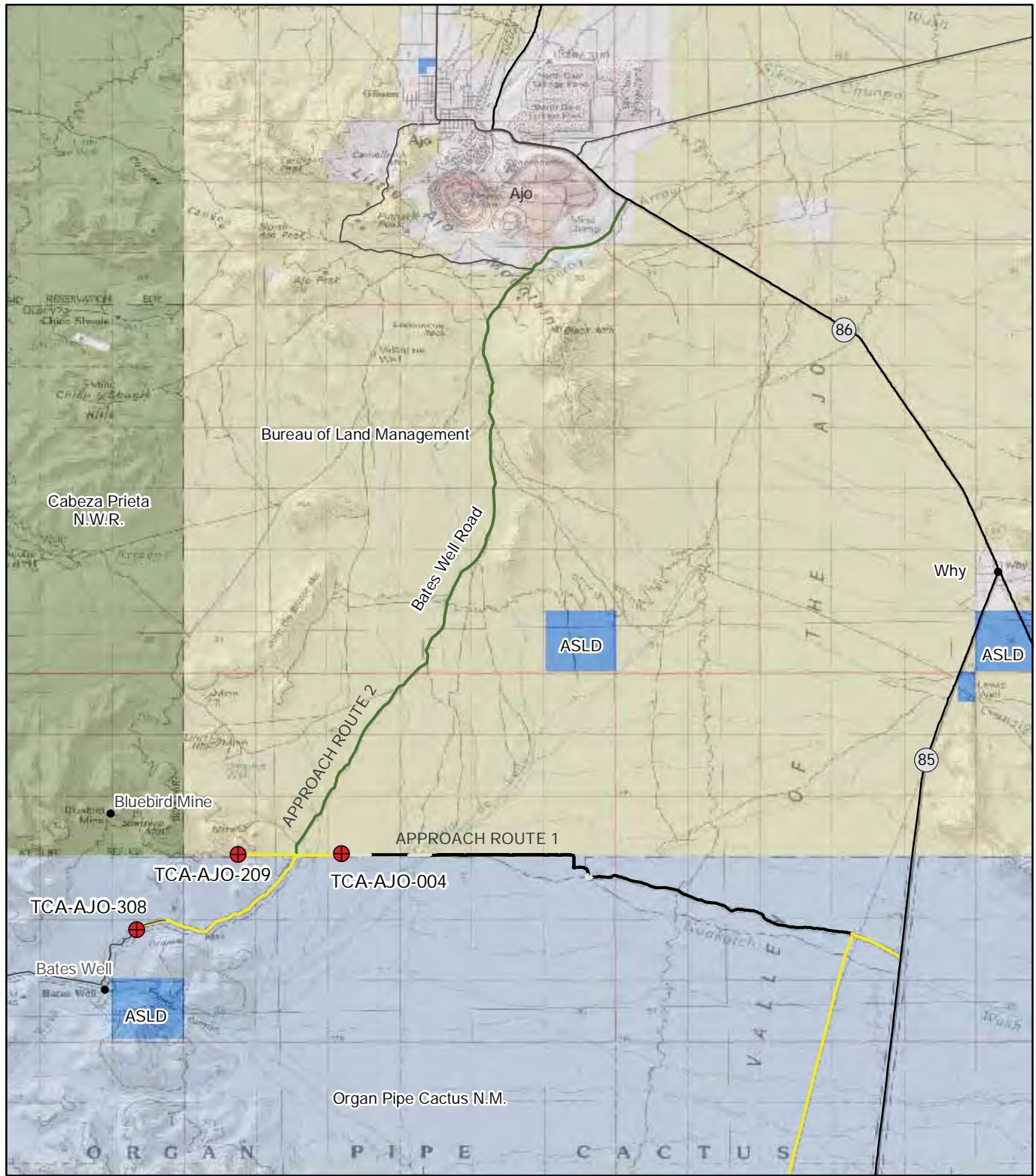


Figure 5.04 Tower Location and Surveyed Area for TCA-AJO-004.



Photograph 5.02 TCA-AJO-004 at tower compound center looking south.

Field Observations

TCA-AJO-004 and the surrounding area are within the Lower Colorado River Subdivision of Sonoran desertscrub. Plants observed during the survey include cat-claw acacia, creosote, fishhook barrel cactus, velvet mesquite, white bursage and mixed grasses and forbs. Wildlife and evidence of wildlife documented at the tower compound include avian, lizard and jackrabbit scat. Special status species were not observed during the field survey. The tower compound is approximately 0.5 km (0.3 mi) east of an unnamed wash and 0.9 km (0.6 mi) west of the Cuerda de Leña Wash, both supporting xeroriparian vegetation.

TCA-AJO-170

TCA-AJO-170 is located within the OPCNM in southwestern Pima County, approximately 23.9 km (14.9 mi) north of the U.S./Mexico International Border and the Lukeville POE (Figure 5.05). The tower compound is at the southern end of the Valley of the Ajo, south of Alamo Wash, west of SR 85. The elevation at the tower compound is 563 m (1,846 ft) amsl. The substrate and soils at the tower compound are composed of alluvial gravel mixed with sand (Photograph 5.03).

Approach to TCA-AJO-170 would be via an unpaved, unmaintained road that branches off SR 85 about 26 km (15 mi) north of Lukeville. The road travels west for 1.2 km (0.7 mi) then turning south and stretching 9 km (5.5 mi) before arriving at the proposed tower compound. Access to TCA-AJO-170 would be via a short section of new road stemming from the existing approach route. Survey coverage for this proposed tower installation included the 0.4 ha (1.0 acre) tower compound and 9.7 km (6.03 mi) of access road (Figure 5.06).

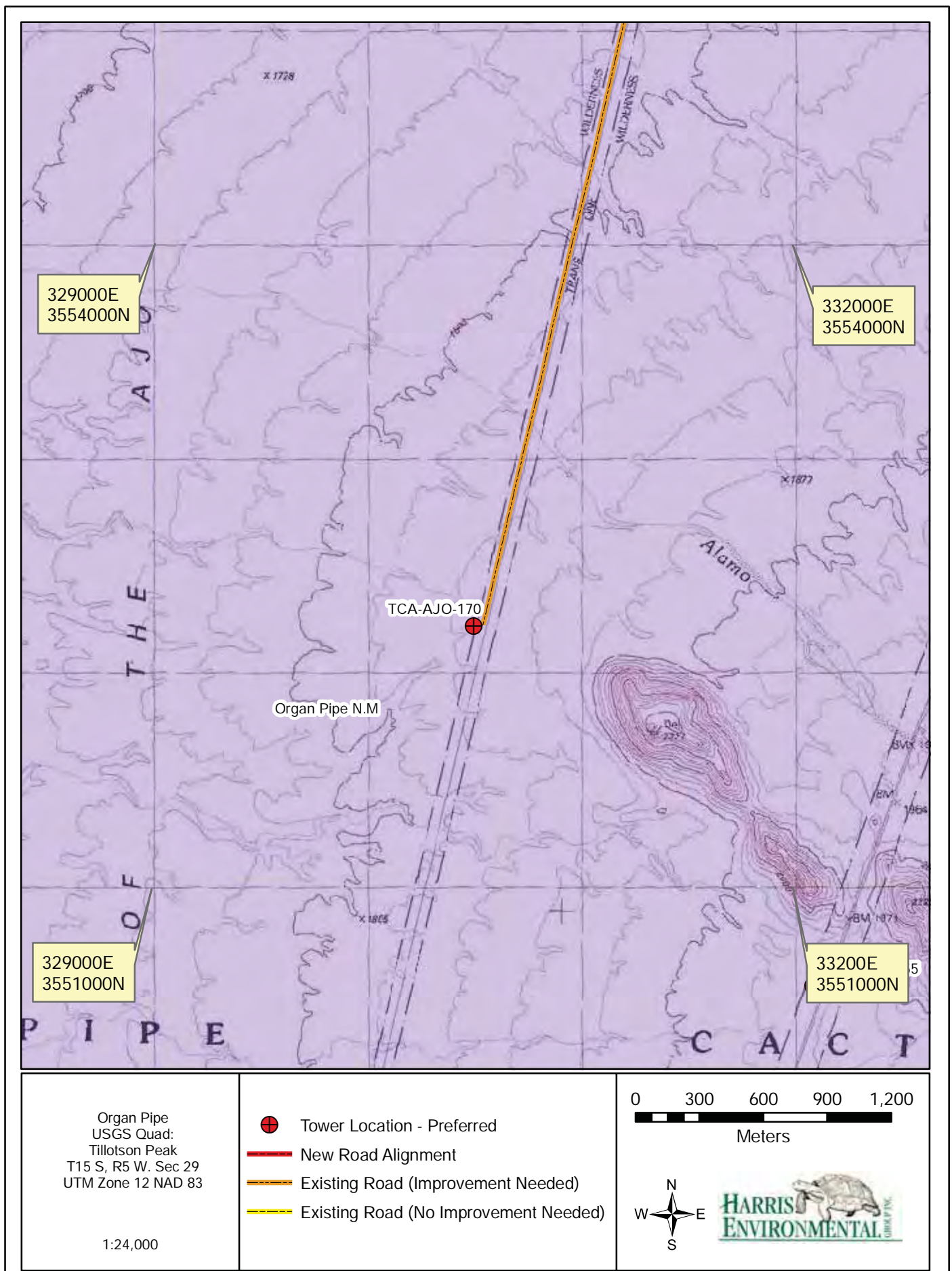


Figure 5.05 UTM registered location and land jurisdiction for TCA-AJO-170.

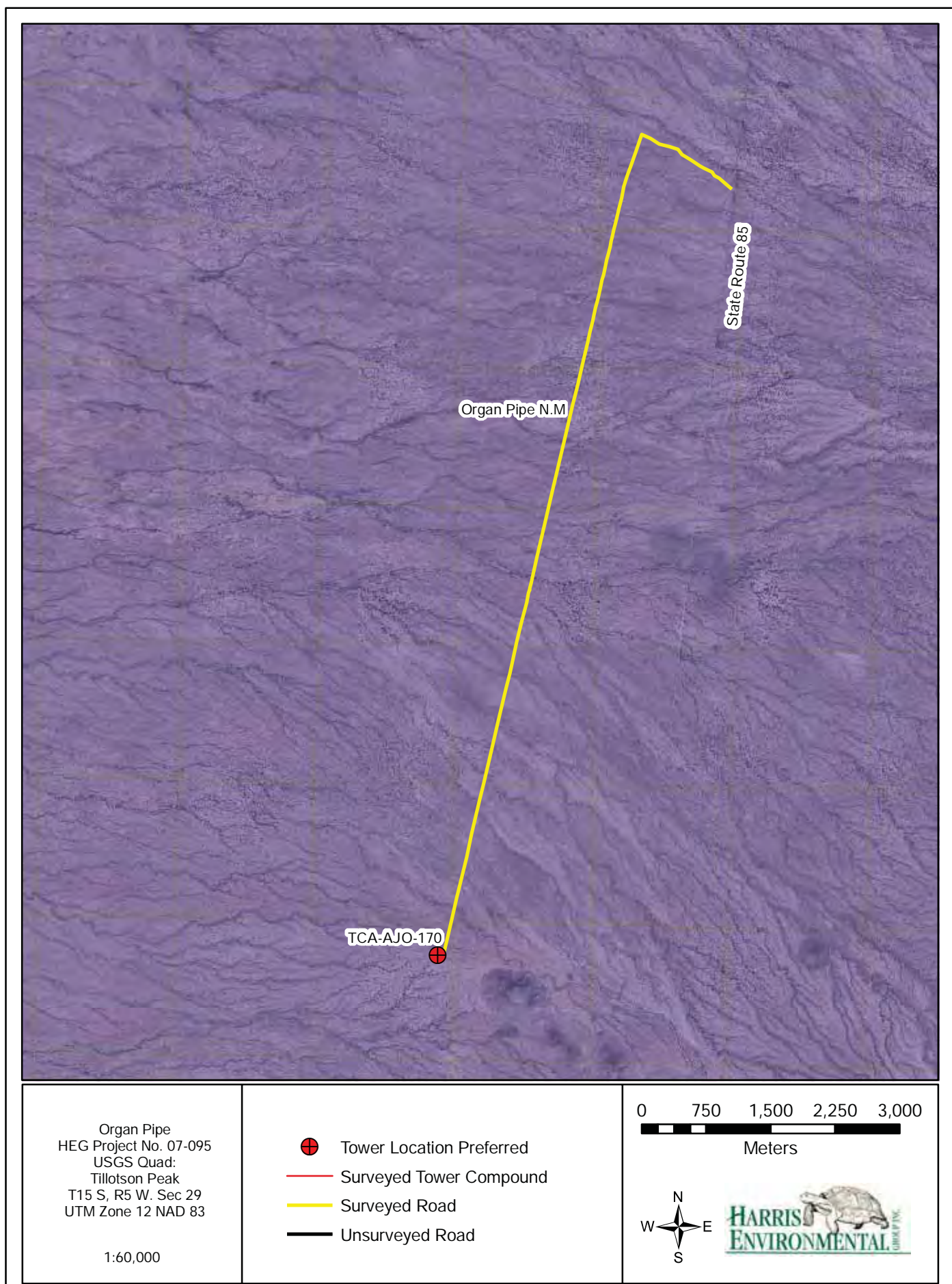


Figure 5.06 Tower location and surveyed area for TCA-AJO-170.



Photograph 5.03 TCA-AJO-170 center looking east.

Field Observations

TCA-AJO-170 and the surrounding area are within the Arizona Upland subdivision of Sonoran desertscrub. Plants observed during the survey include buckhorn cholla, chain-fruit cholla, creosote, ironwood, ocotillo, palo verde, saguaro and triangle-leaf bursage. Wildlife and evidence of wildlife documented at the tower compound include black-tailed gnatcatcher (*Poliophtila melanura*), Gila woodpecker (*Melanerpes uropygialis*), side-blotched lizard (*Uta stansburiana*), western white-throated woodrat midden and Gambel's quail (*Callipepla gambelii*) dusting spots. Special status species were not observed during the field survey. The tower compound is located on a broad swale between two unnamed drainages, approximately 1.0 km (0.6 mi) south of Alamo Wash that support xeroriparian vegetation.

TCA-AJO-204

TCA-AJO-204 is located in western Pima County on the OPCNM approximately 8 km (5 mi) north of the Lukeville POE and the U.S./Mexico International Border (Figure 5.07). The tower compound is approximately 1.2 km (0.7 mi) west of the monument headquarters at an elevation of about 598 m (1,962 ft) amsl. The site is positioned at the extreme southeastern end of the Puerto Blanco Mountains on a small saddle between two hill-tops south of Twin Peaks. The dominant substrate is fractured rock and gravel (Photograph 5.04).

Access to TCA-AJO-204 would be via air lift. Survey coverage for this proposed tower installation included the 0.4 ha (1.0 acre) tower compound (Figure 5.08).

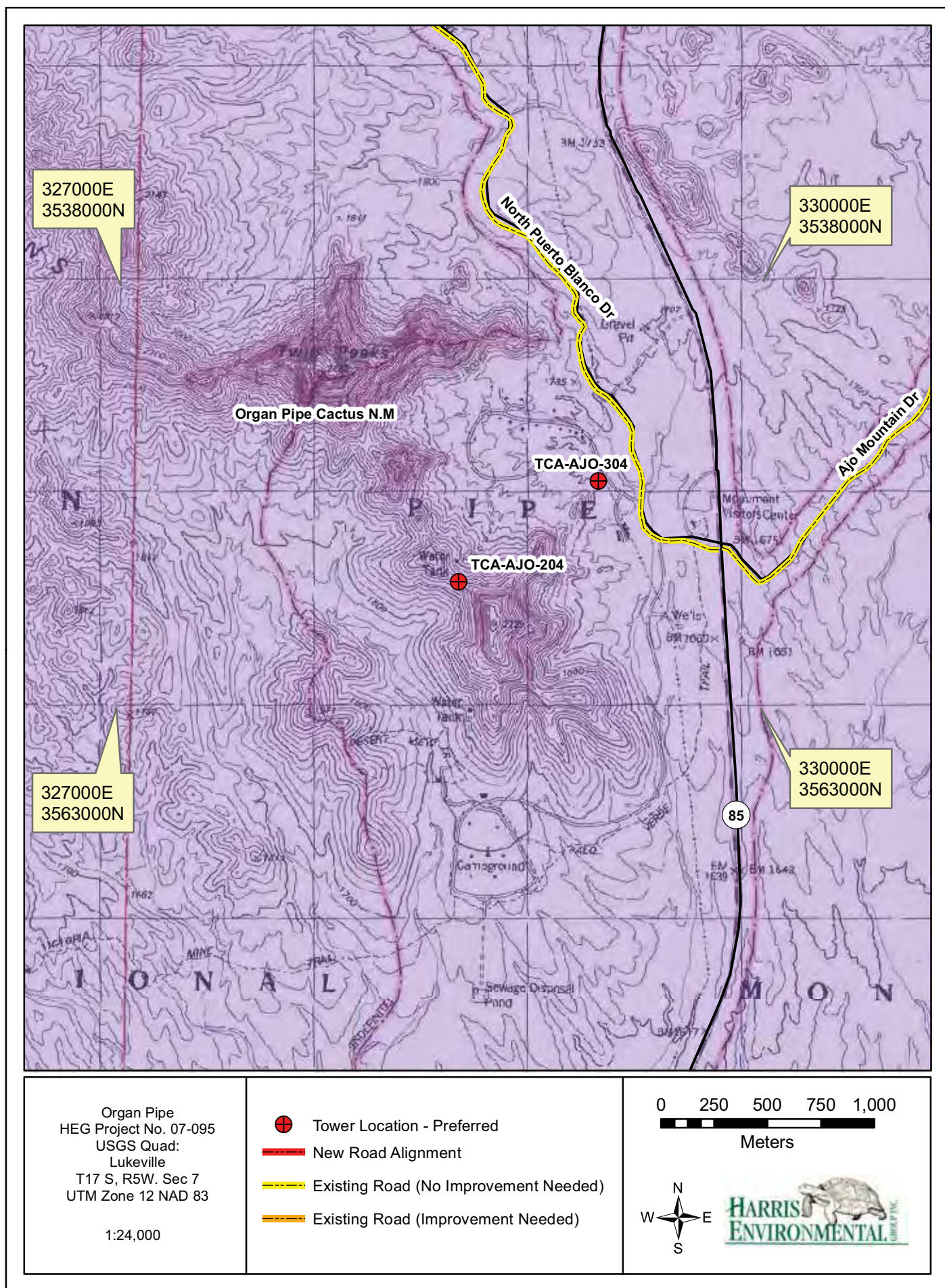


Figure 5.07 UTM registered location and land jurisdiction for TCA-AJO-204.

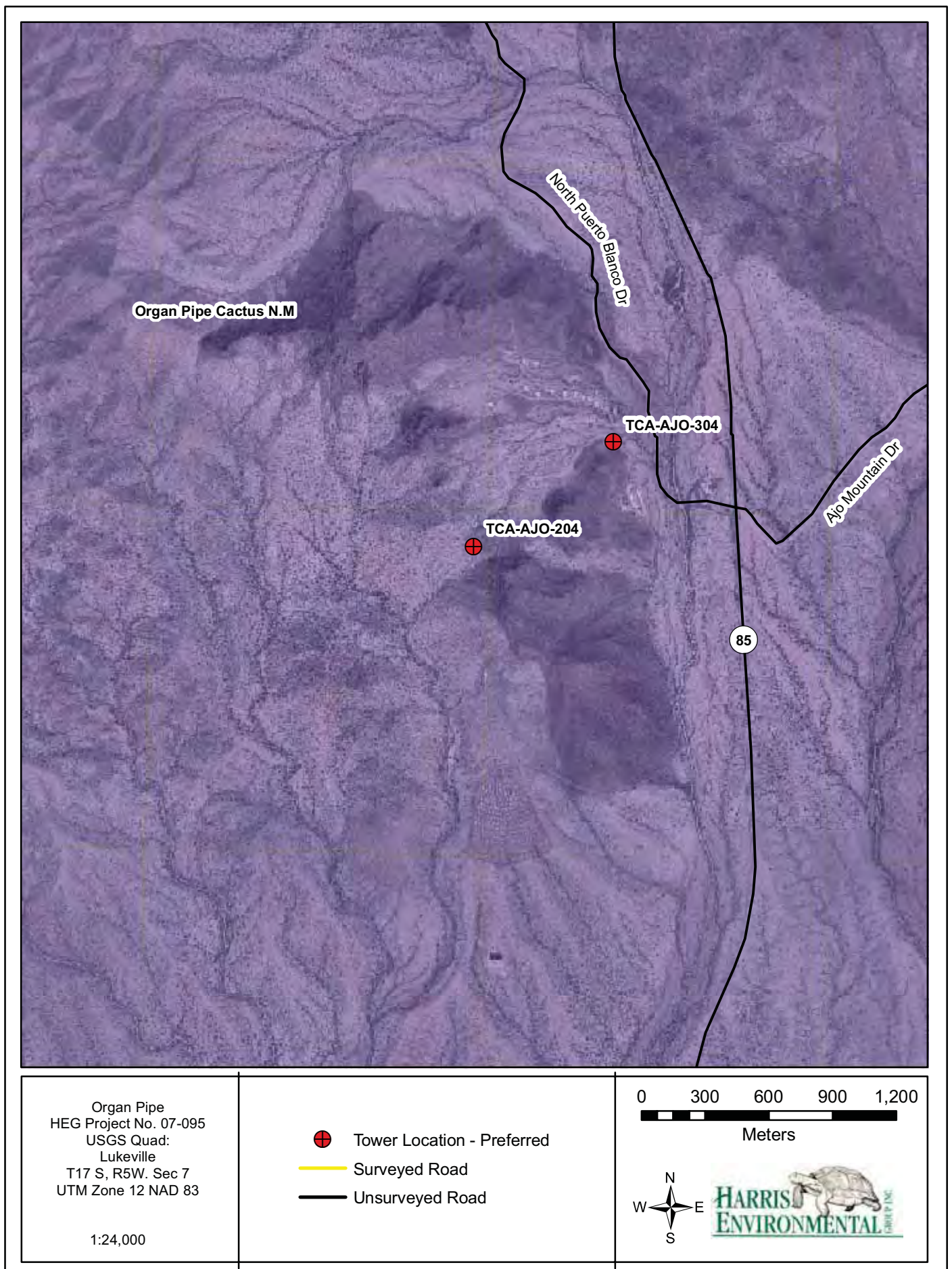


Figure 5.08 Tower location and surveyed area for TCA-AJO-204.



Photograph 5.04 TCA-AJO-204 center looking south.

Field Observations

TCA-AJO-204 and the surrounding area are within the Arizona Upland subdivision of Sonoran desertscrub. Plants observed during the survey include cane cholla, creosote, hedgehog cactus, organ pipe cactus, palo verde, saguaro, teddy bear cholla and triangle-leaf bursage. Wildlife and evidence of wildlife documented at the tower compound include phainopepla (*Phainopepla nitens*) and rock wren (*Salpinctes obsoletus*). Organ pipe cactus, a *salvage restricted* species, was observed at this tower location. The tower compound is approximately 0.5 km (0.3 mi) east of an unnamed drainage of the Puerto Blanco Mountains. This drainage supports xeroriparian vegetation.

TCA-AJO-209

TCA-AJO-209 was included in *A Biological Evaluation of 60 Proposed Tower Locations for the Tucson West Sector* (Harris Environmental 2008). The information is repeated in this document because this tower is now included in the *Organ Pipe* operational area. TCA-AJO-209 is in western Pima County, approximately 18.6 km (11.6 mi) southwest of the town of Why and 32.2 km (20.0 mi) north of the international border. The proposed installation for the tower compound is on BLM land; however, the southern portion of the surveyed tower compound partially extends on to OPCNM land. Elevation is approximately 492 m (1,615 ft) amsl. Substrate at the tower compound is composed of basalt and limestone cobbles and gravel with soil composed of silty loam with coarse sand (Photograph 5.05).

TCA-AJO-209 is approached via Bates Well Road an OPCNM maintained road. Access to TCA-AJO-209 would be via an existing and maintained unpaved road that intersects with Bates Well Road about 19.3 km (12.0 mi) south and west of its intersection with the Tucson-Ajo Highway. The tower compound is about 1.3 km (0.8 mi) west of Bates Well Road. Some road

improvements are proposed for the access road and a portion of Bates Well Road. Survey coverage for this proposed tower installation included the 0.4 ha (1.0 acre) tower compound and the full extent of the roadway segments that would require improvements (Figure 5.09 and Figure 5.10).



Photograph 5.05 TCA-AJO-209 center looking east.

Field Observations

TCA-AJO-209 and the surrounding area are within the Lower Colorado River Subdivision of Sonoran desertscrub. Plants observed during the survey include foothill palo verde, creosote, limberbush, triangle-leaf bursage, brittlebush, white ratany, saguaro, organ pipe cactus, teddy bear cholla, staghorn cholla, golden-spined hedgehog and mixed grasses and forbs. Wildlife documented included jackrabbit, raven, rodent burrows and a zebra-tailed lizard. Special status species documented include Emory's barrel cactus, organ pipe cactus and staghorn cholla. These species are all categorized as *salvage restricted* on the Arizona Department of Agriculture protected native plant list.

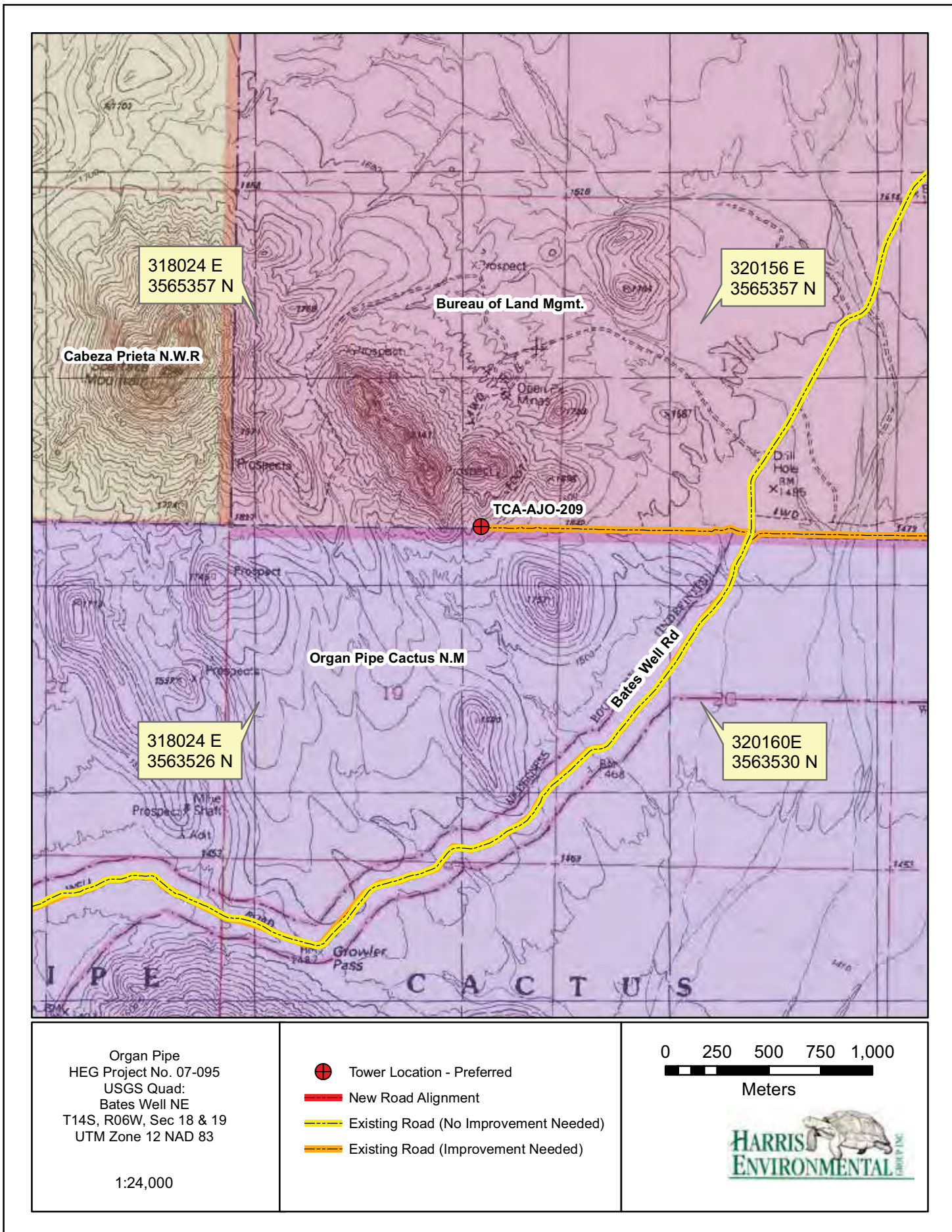


Figure 5.09 UTM registered location and land jurisdiction for TCA-AJO-209.

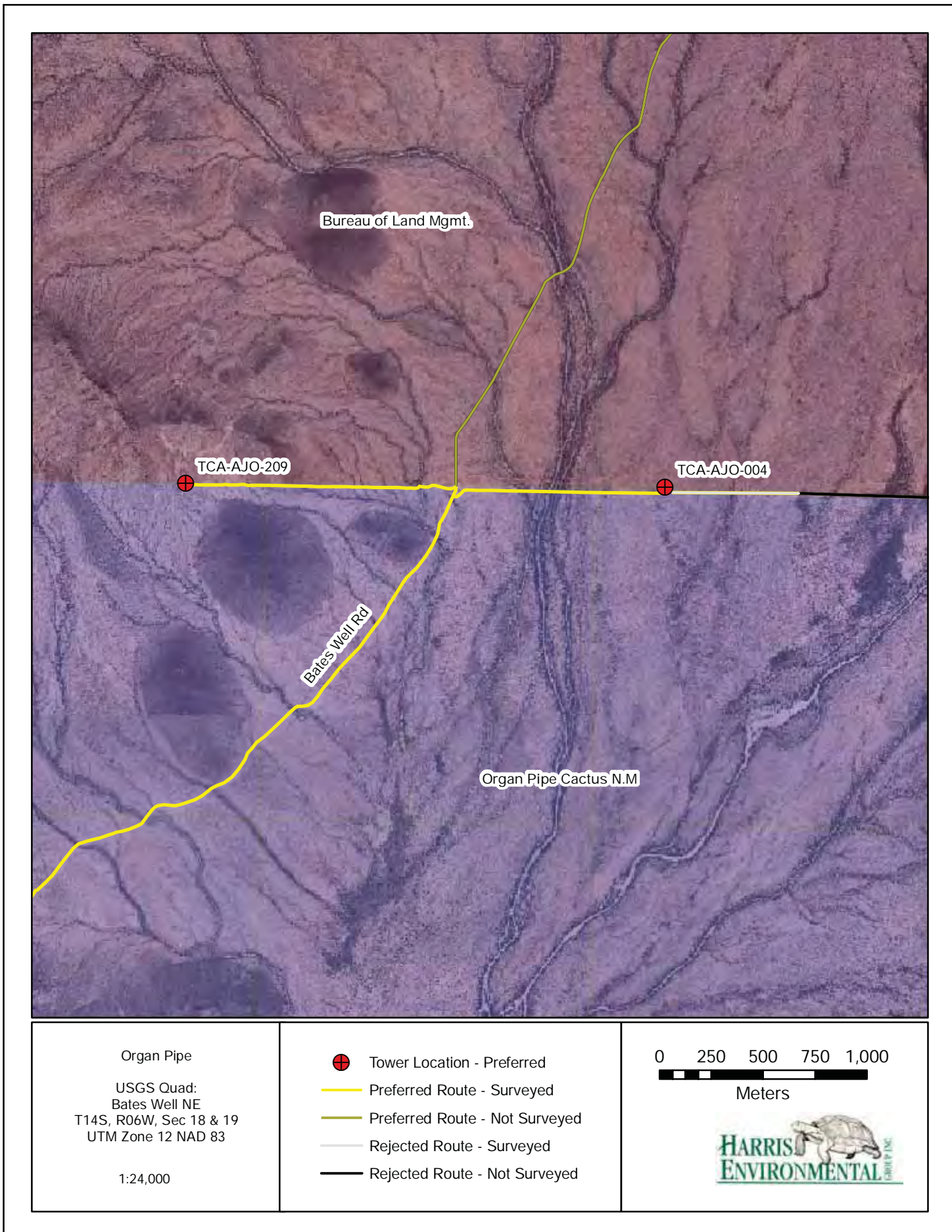


Figure 5.10 Tower Location and Surveyed Area for TCA-AJO-209.

TCA-AJO-301

TCA-AJO-301 is located at the Lukeville POE at the southern border of the OPCNM, southwestern Pima County (Figure 5.11). The tower compound is located within a modified open area surrounded by high oleander hedges. The elevation is 426 m (1,398 ft) amsl. The substrate at the tower compound is partly bare ground, with soils composed of sandy to gravelly loam (Photograph 5.06).



Photograph 5.06 TCA-AJO-301 center looking south.

TCA-AJO-301 is approached from the Town of Why via SR 85 to the Lukeville POE and is accessed via a paved road that winds through the existing facility buildings. Survey coverage for this proposed tower installation included the 0.4 ha (1.0 acre) tower compound (Figure 5.12).

Field Observations

TCA-AJO-301 and the surrounding area are within the Arizona Upland subdivision of the greater Sonoran desertscrub vegetative community. Plants observed during the survey include Mexican palo verde, oleander, Russian thistle and velvet mesquite. Wildlife or special status species were not observed at the tower compound during the field survey.



Figure 5.12 Tower location and surveyed area for TCA-AJO-301.

TCA-AJO-302

TCA-AJO-302 was previously surveyed and recorded as TCA-AJO-286 and is located at the western border of the OPCNM adjacent to the Cabeza Prieta National Wildlife Refuge (CPNWR) (Figure 5.13). The tower compound is approximately 18.6 km (11.6 mi) north of the U.S./Mexico border at the southeast end of the lower San Cristobal Valley. The elevation is 336 m (1,102 ft) amsl. The substrate at the tower compound is silty to sandy soil, devoid of rock (Photograph 5.07).



Photograph 5.07 TCA-AJO-302 center looking south.

Approach to TCA-AJO-302 would be via Bates Well Road an unpaved OCPNM-maintained road that is reached from SR 85. This western section of the access road traverses the greater Growler Valley and crosses the highly braided Growler Wash midway between Bates Well and the location for TCA-AJO-302. Survey coverage for this proposed tower installation included the 0.4 ha (1.0 acre) tower compound and the full extent of the access routes (Figure 5.14).

Field Observations

TCA-AJO-302 and the surrounding area are within the Lower Colorado River subdivision of the greater Sonoran desertscrub vegetative community. Plants observed during the survey include creosote, triangle-leaf bursage and mixed forbs. Wildlife and evidence of wildlife documented at the tower compound include western whiptail (*Aspidoscelis tigris*), desert cottontail (*Sylvilagus audubonii*) scat and rodent (Rodentia) burrows. Special status species were not observed during the field surveys. The tower compound is located between two tributaries of San Cristobal Wash that support a xeroriparian vegetation community.



Figure 5.13 UTM registered location and land jurisdiction for TCA-AJO-302

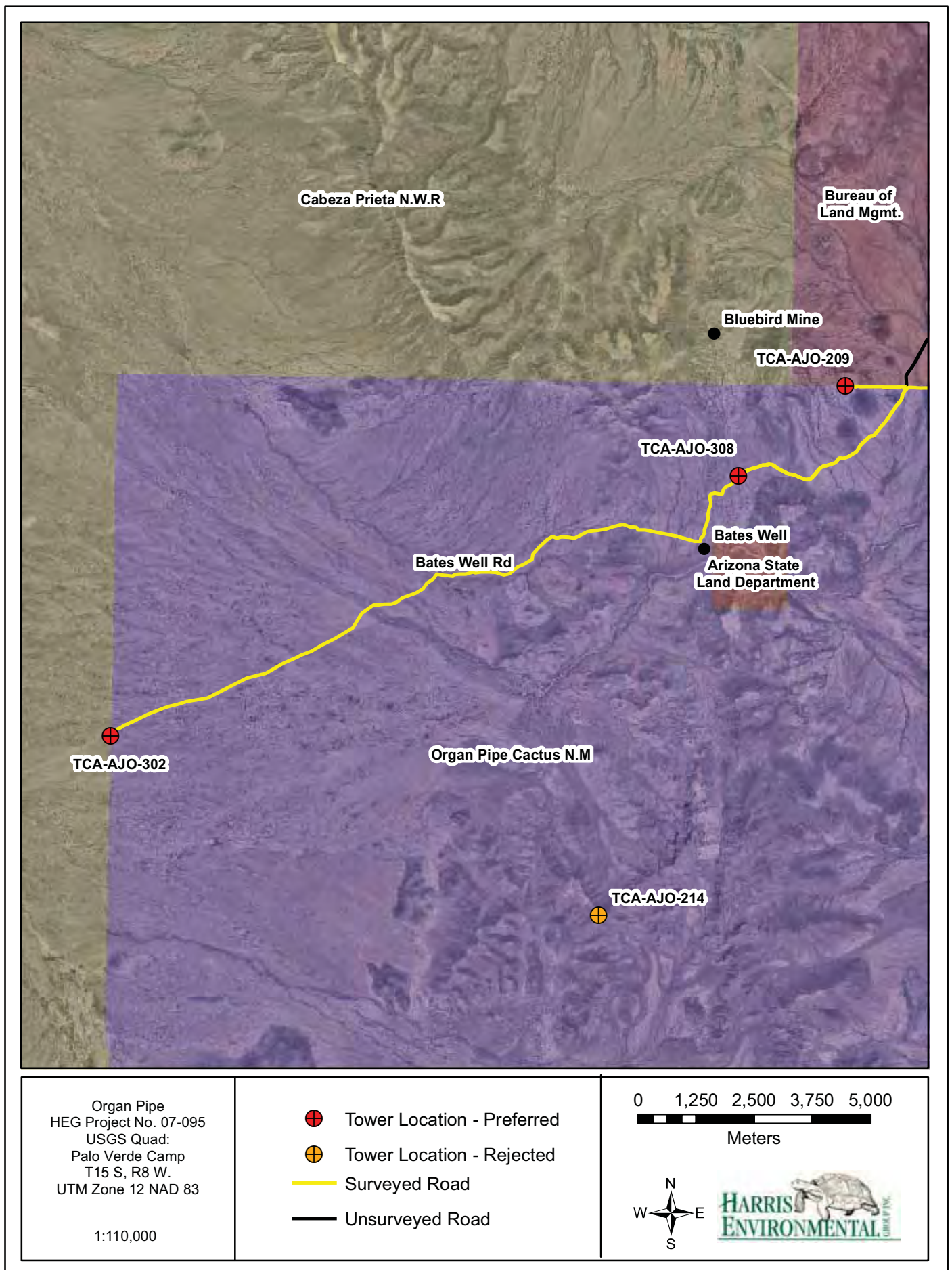


Figure 5.14 Tower location and surveyed area for TCA-AJO-302.

TCA-AJO-303

TCA-AJO-303 is located within the OPCNM, approximately 2.9 km (1.8 mi) north of the U.S./Mexico International Border and 8.1 km (5.0 mi) northwest of the Lukeville POE in southwestern Pima County (Figure 5.15). The tower compound is located at the eastern end of La Abra Plain at the western base of the Sonoyta Mountains. The elevation is 444 m (1,458 ft) amsl. The substrate at the tower compound is sand and small gravel and soils are composed of sandy loam (Photograph 5.08).



Photograph 5.08 TCA-AJO-303 center looking northwest.

TCA-AJO-303 is approached from the Lukeville POE via the International Border Road and is accessed via a maintained National Park Service road approximately 6.6 km (4.1 mi) west of the Lukeville POE. The tower compound is adjacent to the western shoulder of the access road and is located in a flat area that includes the road within the survey area. Survey coverage for this proposed tower installation included the 0.4 ha (1.0 acre) tower compound and portions of the approach road (Figure 5.16).

Field Observations

TCA-AJO-303 and the surrounding area are within the Arizona Upland subdivision of the greater Sonoran desertscrub vegetative community. Plants observed during the survey include bursage, creosote, ocotillo, saguaro and velvet mesquite. A tree lizard (*Urosaurus* sp.) was the only wildlife documented at the tower compound. Special status species were not observed during field surveys. The tower compound is located between two unnamed drainages of the Puerto Blanco and Sonoyta Mountains which support xeroriparian vegetation.

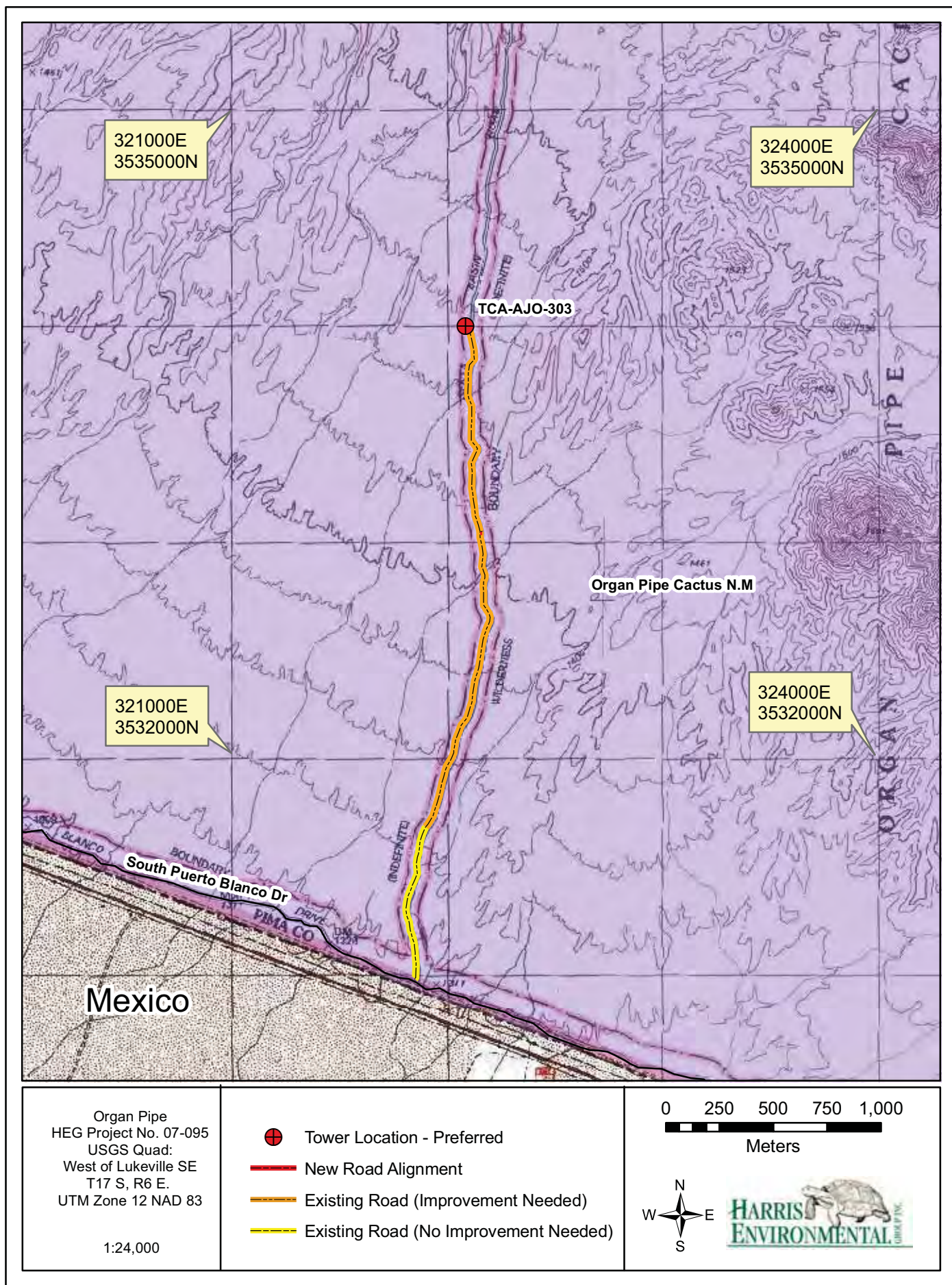


Figure 5.15 UTM registered location and land jurisdiction for TCA-AJO-303.

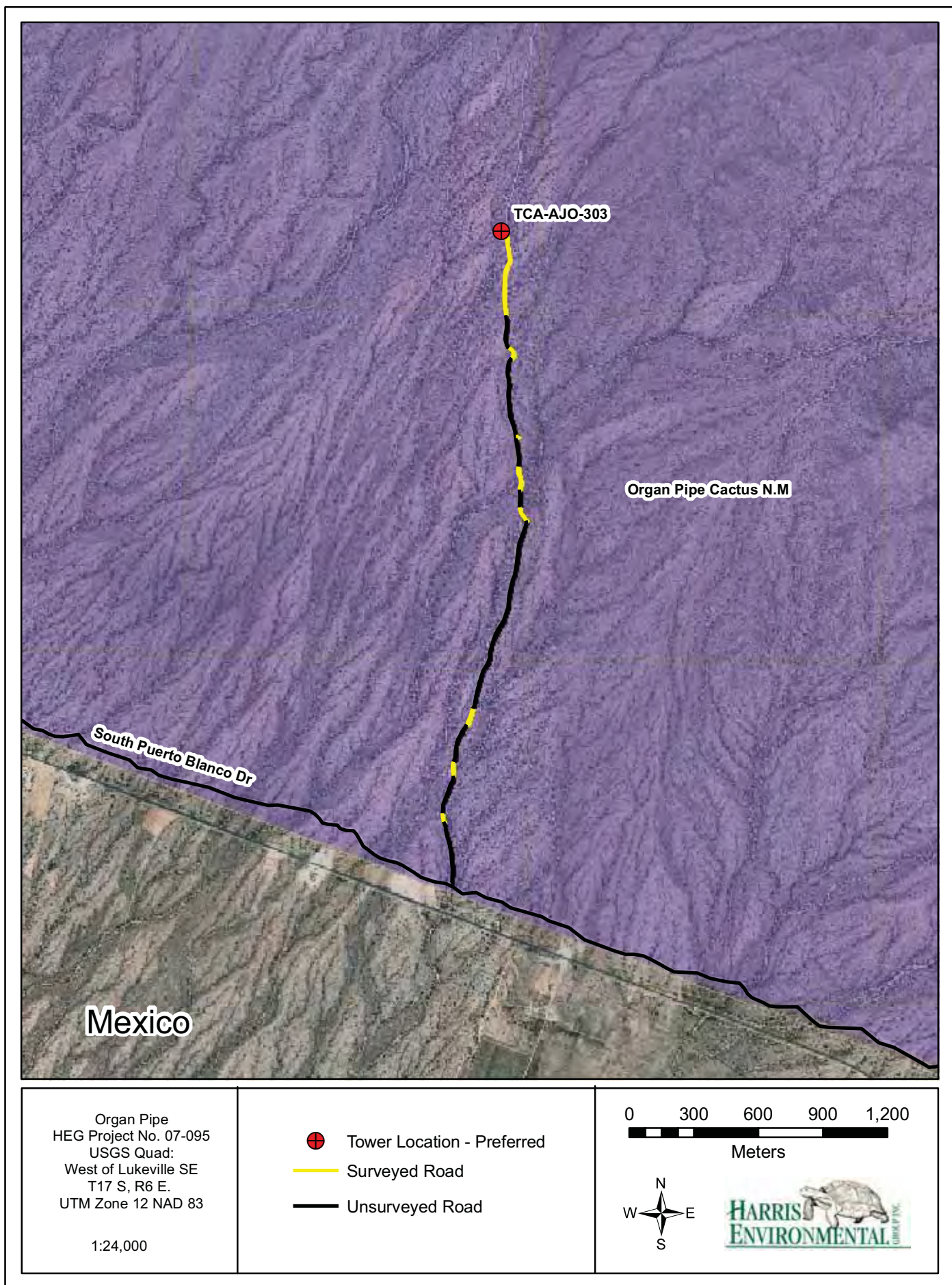


Figure 5.16 Tower location and surveyed area for TCA-AJO-303.

TCA-AJO-304

TCA-AJO-304 is located in the OPCNM, approximately 8.8 km (5.5 mi) north of the U.S./Mexico International Border and the Lukeville POE in southwestern Pima County (Figure 5.17). The tower compound is at the base of a small ridge at the southeast end of the Puerto Blanco Mountains approximately 0.5 km (0.3 mi) northwest of the monument headquarters. The elevation is 516 m (1,693 ft) amsl. The substrate at the tower compound is granitic cobble and pebbles and the soils are composed of volcanic, granitic, and limestone deposits (Photograph 5.09).



Photograph 5.09 TCA-AJO-304 center looking south.

TCA-AJO-304 is approached from the Town of Why via SR 85 to a paved road heading west from the OPCNM headquarters and is accessed via a small unpaved area within the tower compound. The proposed route traverses federal land and requires some surface disturbance along this section of the proposed access. Survey coverage for this proposed tower installation included the 0.4 ha (1.0 acre) tower compound (Figure 5.18).

Field Observations

TCA-AJO-304 and the surrounding area are within the Arizona Upland subdivision of the greater Sonoran desertscrub vegetative community. Plants observed during the survey include brittlebush, buckhorn cholla, creosote, foothill palo verde, hedgehog cacti, ocotillo, organ pipe cacti, saguaro, staghorn cholla, teddy bear cholla, triangle-leaf bursage and mixed grasses and forbs. Wildlife documented at the tower compound include cactus wren, Gambel's quail, Gila woodpecker, phainopepla and western whiptail. Staghorn cholla and organ pipe cacti, both categorized as *salvage restricted* species on the ADA projected native plants list, were observed during field surveys. The tower compound is approximately 0.1 km (0.5 mi) northwest of a small unnamed drainage that supports xeroriparian vegetation.

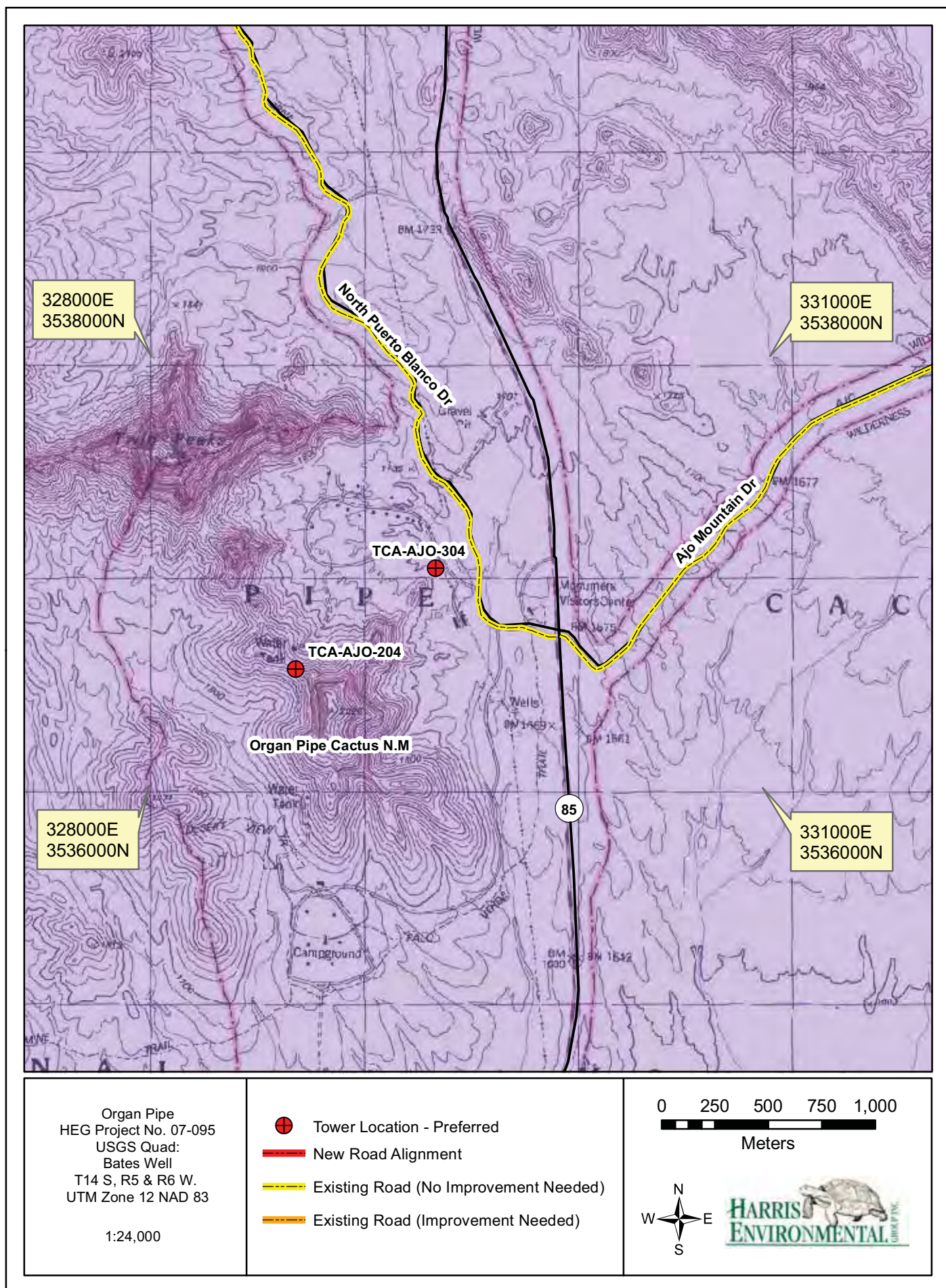


Figure 5.17 UTM registered location and land jurisdiction for TCA-AJO-304.

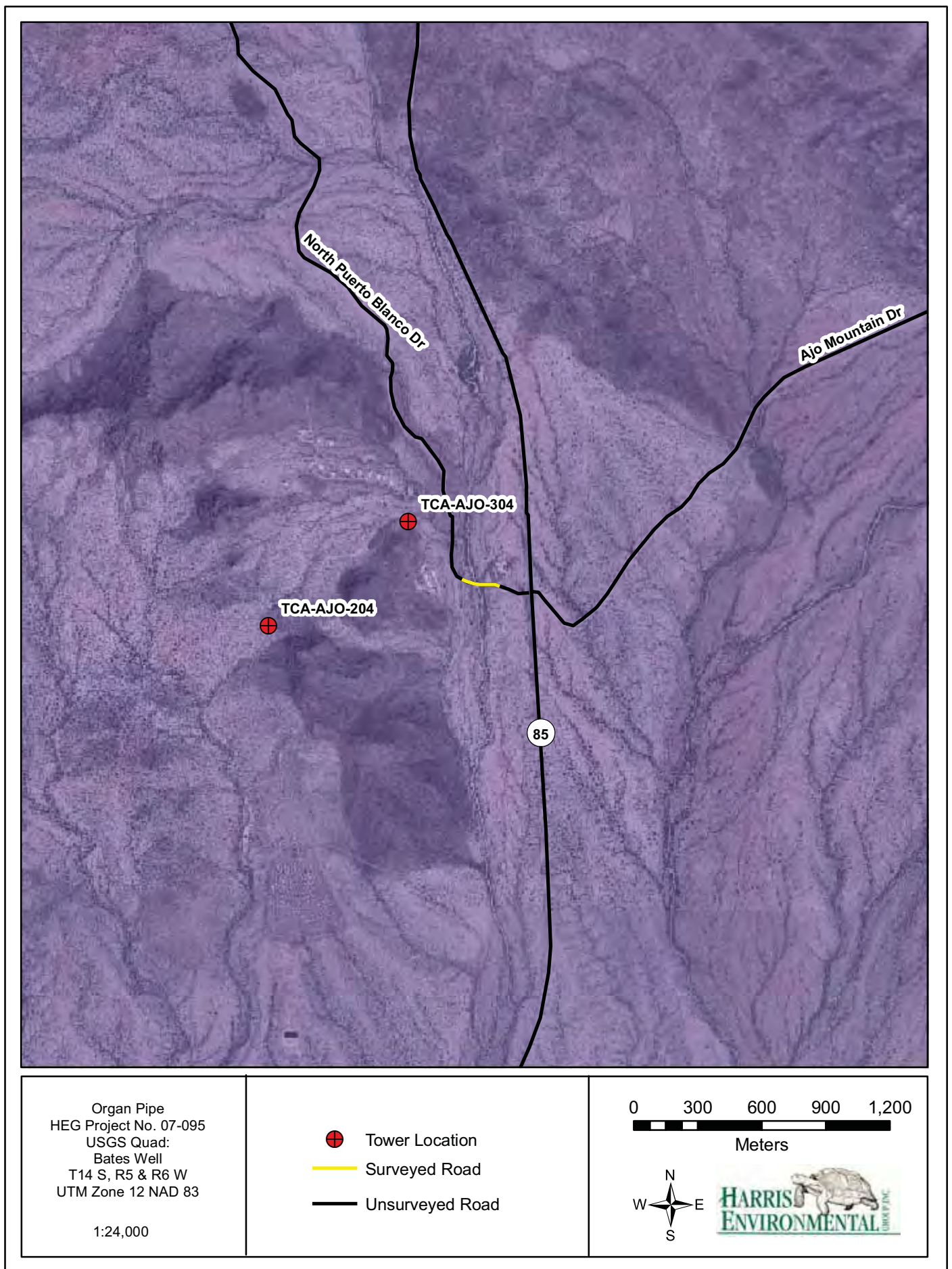


Figure 5.18 Tower location and surveyed area for TCA-AJO-304.

TCA-AJO-308

TCA-AJO-308 is located within the OPCNM in southwestern Pima County, approximately 21.3 km (13.2 mi) southwest of the Town of Why and 29.3 km (18.2 mi) north of the International Border (Figure 5.19). The tower compound is located near Growler Pass, between the Growler Mountains and the Bates Mountains. The elevation is 434 m (1,424 ft) amsl. The substrate at the tower compound is composed of angular rock and gravel with some sand (Photograph 5.10).

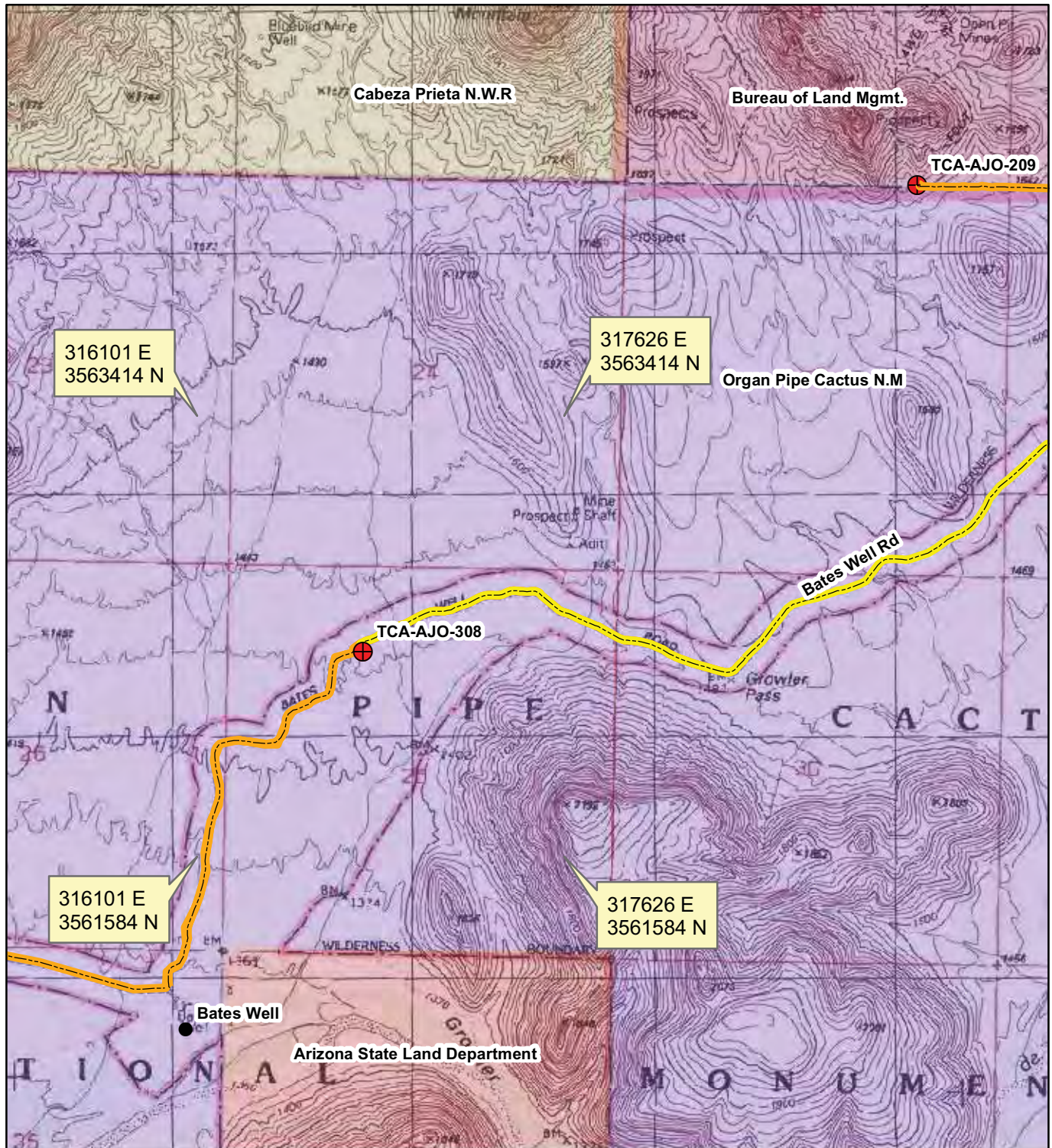


Photograph 5.10 TCA-AJO-308 looking south.

Approach to TCA-AJO-308 would be via Bates Well Road an unpaved OCPNM-maintained road that is reached from SR 85. Access to the tower compound is gained from the south shoulder of Bates Well Road within the tower compound. Survey coverage included the 0.4 ha (1.0 acre) tower compound (Figure 5.20).

Field Observations

TCA-AJO-308 and the surrounding area are within the Arizona Upland subdivision of Sonoran desertscrub. Plants observed during the survey include foothill palo verde, ironwood, creosote, white ratany, triangle-leaf bursage, white bursage, ocotillo, golden-spined hedgehog, pencil cholla, saguaro, buckhorn cholla, teddy bear cholla, chain-fruit cholla and mixed grasses and forbs. There was no evidence of wildlife or special status species documented at the tower compound.



Organ Pipe
HEG Project No. 07-095
USGS Quad:
Bates Well SW
T14S, R07W, Sec 25
UTM Zone 12 NAD 83

1:24,000



Tower Location - Preferred



New Road Alignment



Existing Road (No Improvement Needed)



Existing Road (Improvement Needed)

0 250 500 750 1,000



Meters



Figure 5.19 UTM registered location and land jurisdiction for TCA-AJO-308.

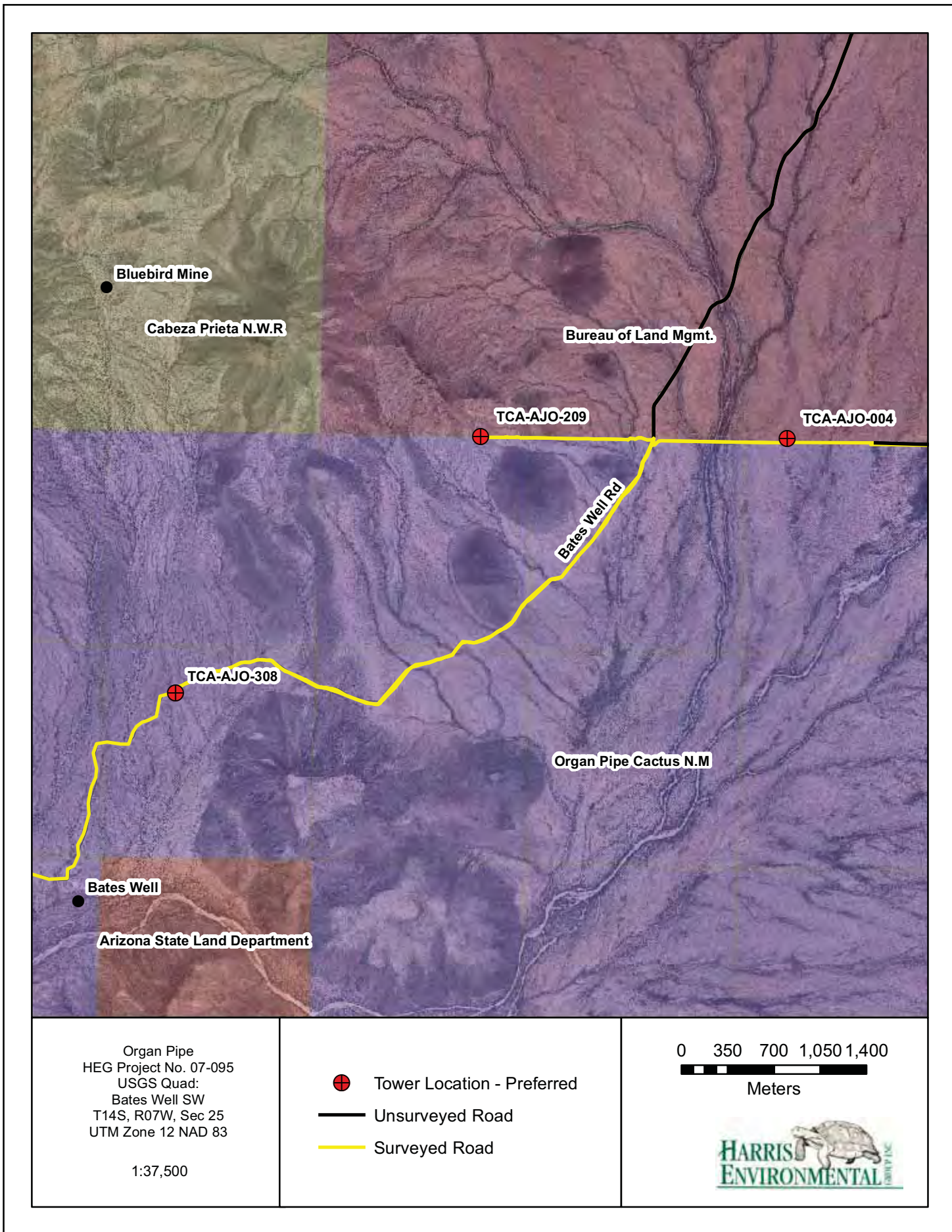


Figure 5.20 Tower location and surveyed area for TCA-AJO-308.

TCA-AJO-310

The proposed compound for TCA-AJO-310 is 7.0 km (4.3 mi) northeast of the Lukeville POE and 4.0 km (2.5 mi) north of the U.S./Mexico International Border (Figure 5.21). The compound is located within Sonoyta Valley southwest of the Ajo Mountains. Elevation is approximately 463 m (1,519 ft) amsl. The substrate at the compound is composed of angular gravel with some larger rocks, and soils are composed of fine sand with some silt (Photograph 5.11).



Photograph 5.11 TCA-AJO-310 center looking south.

TCA-AJO-310 is approached from the Lukeville POE via the International Border Road and the compound is accessed via an existing jeep trail heading north to the compound just east of Dos Lomas approximately 2.0 km (1.2 mi) northwest of Blankenship Well. Survey coverage within ASLD land included the 0.4 ha (1.0 acre) tower compound and approximately 1.92 km (1.19 mi) of the proposed access road (Figure 5.22).

Field Observations

TCA-AJO-310 and the surrounding area are within the Arizona upland subdivision of Sonoran desertscrub. Plants observed during the survey include velvet mesquite, foothill palo verde, ironwood, creosote, triangle-leaf bursage, ocotillo, golden-spined hedgehog, chain-fruit cholla, buckhorn cholla, and mixed grasses and forbs. Wildlife documented at the compound included white-winged dove (*Zenaida asiatica*), Gila woodpecker (*Melanerpes uropygialis*) and verdin (*Auriparus flaviceps*). There were no special status species documented. The compound is between two unnamed xeroriparian washes.

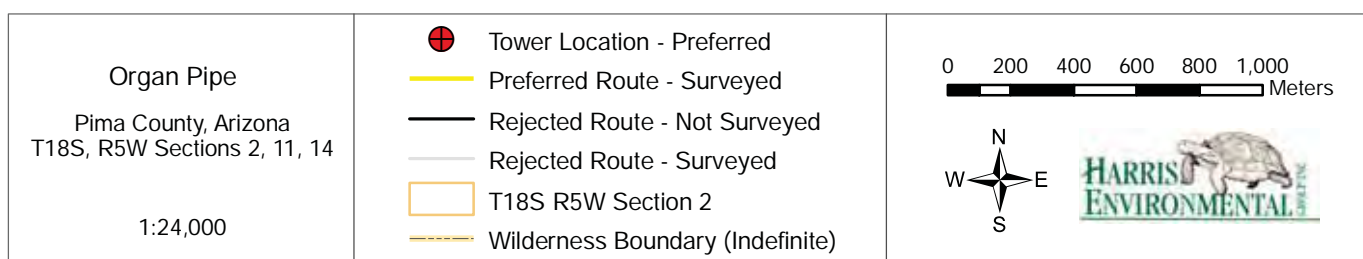


Figure 5.22 Tower location and surveyed area for TCA-AJO-310

REJECTED TOWER LOCATIONS

TCA-AJO-008

TCA-AJO-008 is located within the OPCNM in southwestern Pima County, approximately 7.2 km (4.5 mi) north of the U.S./Mexico International Border and 9.1 km (5.6 mi) northeast of the Lukeville POE (Figure 5.23). The tower compound is located in the Sonoyta Valley, west of the Ajo Range and east of SR 85 at an elevation of 498 m (1,634 ft) amsl. The substrate at the tower compound is described as desert pavement with scattered gravel and cobbles. Soils are composed of sand and silt with a low percentage of clay (Photograph 5.12).

TCA-AJO-008 is approached via the unpaved International Border Road leading east from the Lukeville POE. Approximately 5.7 km (3.6 mi) east of the Lukeville POE three alternate entry routes off of the border road heading northeast were examined to potentially provide access to the proposed tower location. Survey coverage for this rejected tower location included the 0.4 hectare (1.0 acre) tower compound and three rejected access routes, with the exception of about 0.5 mi of the southern end of the central access route and 0.5 mi of the southern end of the easternmost route (Figure 5.24).

Field Observations

TCA-AJO-008 and the surrounding area are within the Arizona Upland Subdivision of Sonoran desertscrub. Plants observed during the survey include buckhorn cholla, chain-fruit cholla, creosote, foothill palo verde, ironwood, saguaro, triangle-leaf bursage, velvet mesquite, white bursage, white ratany and mixed grasses and forbs. Wildlife and evidence of wildlife documented at the tower compound include cactus wren (*Campylorhynchus brunneicapillus*), turkey vulture (*Cathartes aura*), jackrabbit scat and a western white-throated woodrat (*Neotoma albigula*) midden. Desert night-blooming cereus were documented during the field survey and are categorized as *salvage restricted* on the ADA protected native plant list. The tower compound is located approximately 0.2 km (0.1 mi) west of an unnamed drainage of the Ajo Mountains which supports a xeroriparian vegetation community.

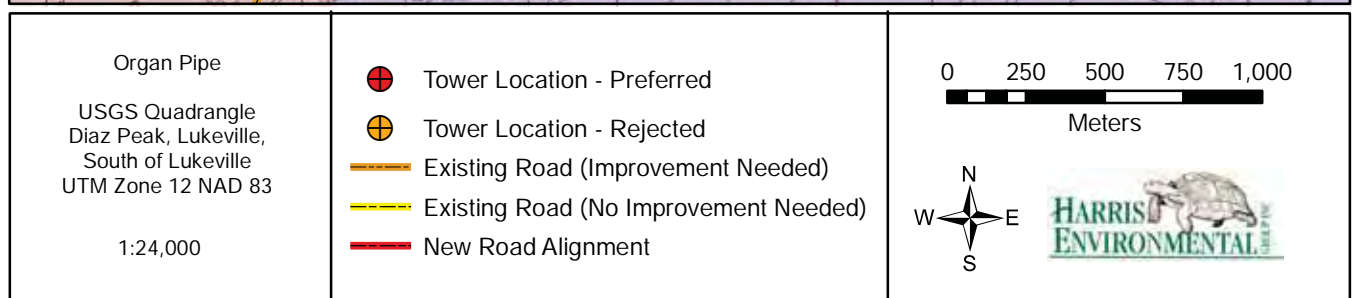
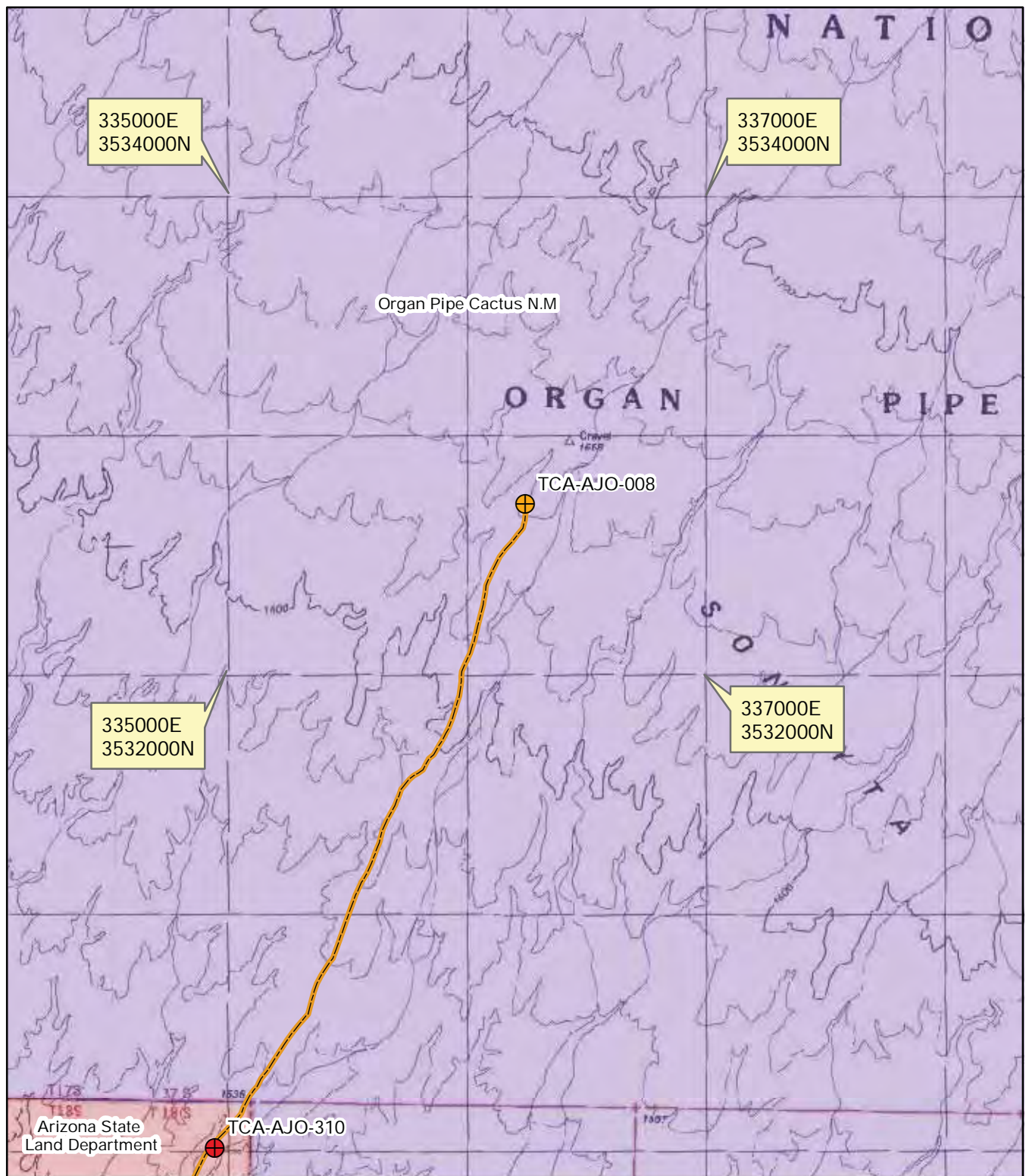


Figure 5.23 UTM registered location and land jurisdiction for TCA-AJO-008.

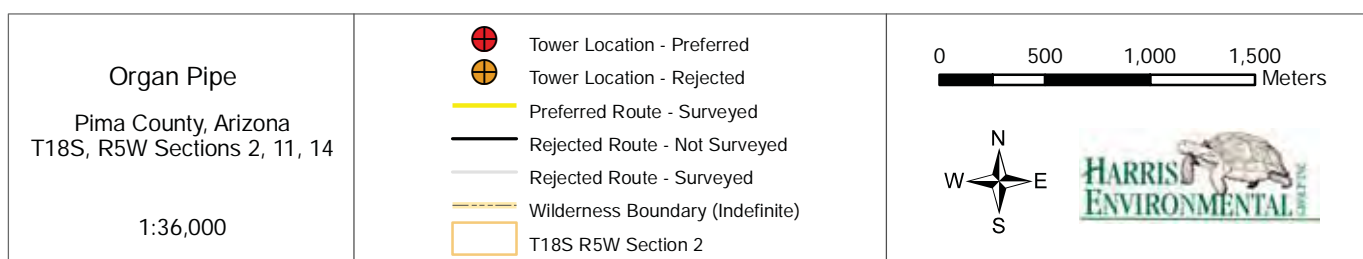
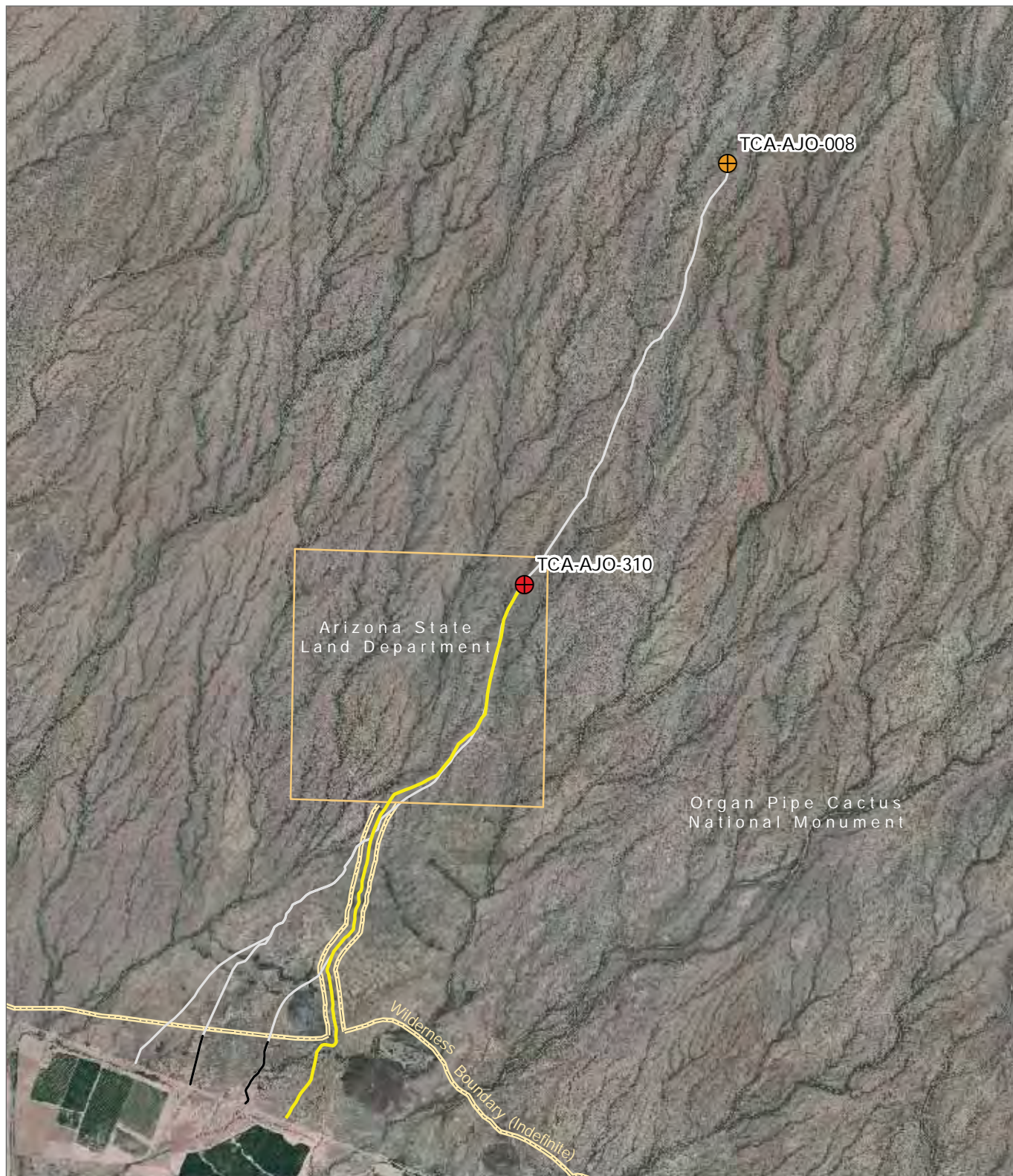


Figure 5.24 Tower Location and Surveyed Area for TCA-AJO-008.



Photograph 5.12 Center of TCA-AJO-008 looking east.

TCA-AJO-091

TCA-AJO-091 is located within the OPCNM in southwestern Pima County approximately 20.9 km (13.0 mi) north of the U.S./Mexico International Border and 21.5 km (13.4 mi) northeast of the Lukeville POE (Figure 5.25). The location is near the Tohono O’odham Nation western land boundary. The proposed tower compound is located on a flat top of a high basalt dome within the Ajo Mountains at an altitude of 1,447 m (4,748 ft) amsl. Surrounding land is rugged and undeveloped. Granite and volcanic basalt rock outcrops account for much of the tower compound site with decomposing rocky soils providing a substrate for vegetative communities on the peak of this mountain (Photograph 5.13).

Access to TCA-AJO-091 would be via air lift. The steepness and ruggedness of the terrain precludes access to the tower by ground vehicles. Survey coverage for this proposed tower installation included the 0.4 ha (1.0 acre) tower compound (Figure 5.26).

Field Observations

TCA-AJO-091 and the surrounding area are within the mapped boundaries of the Arizona Upland Subdivision of Sonoran desertscrub; however, vegetation in the tower compound area more closely corresponds to Brown’s (1994) semidesert Grassland. Plants observed during the survey include agave, Arizona rosewood, beargrass, juniper, ocotillo, pine-needle milkweed and prickly-pear. A peregrine falcon (*Falco peregrinus*), which is a federal *Species of Concern*, was documented during the field survey. The tower compound is approximately 0.7 km (0.4 mi) east of Arch Canyon which supports xeroriparian vegetation.

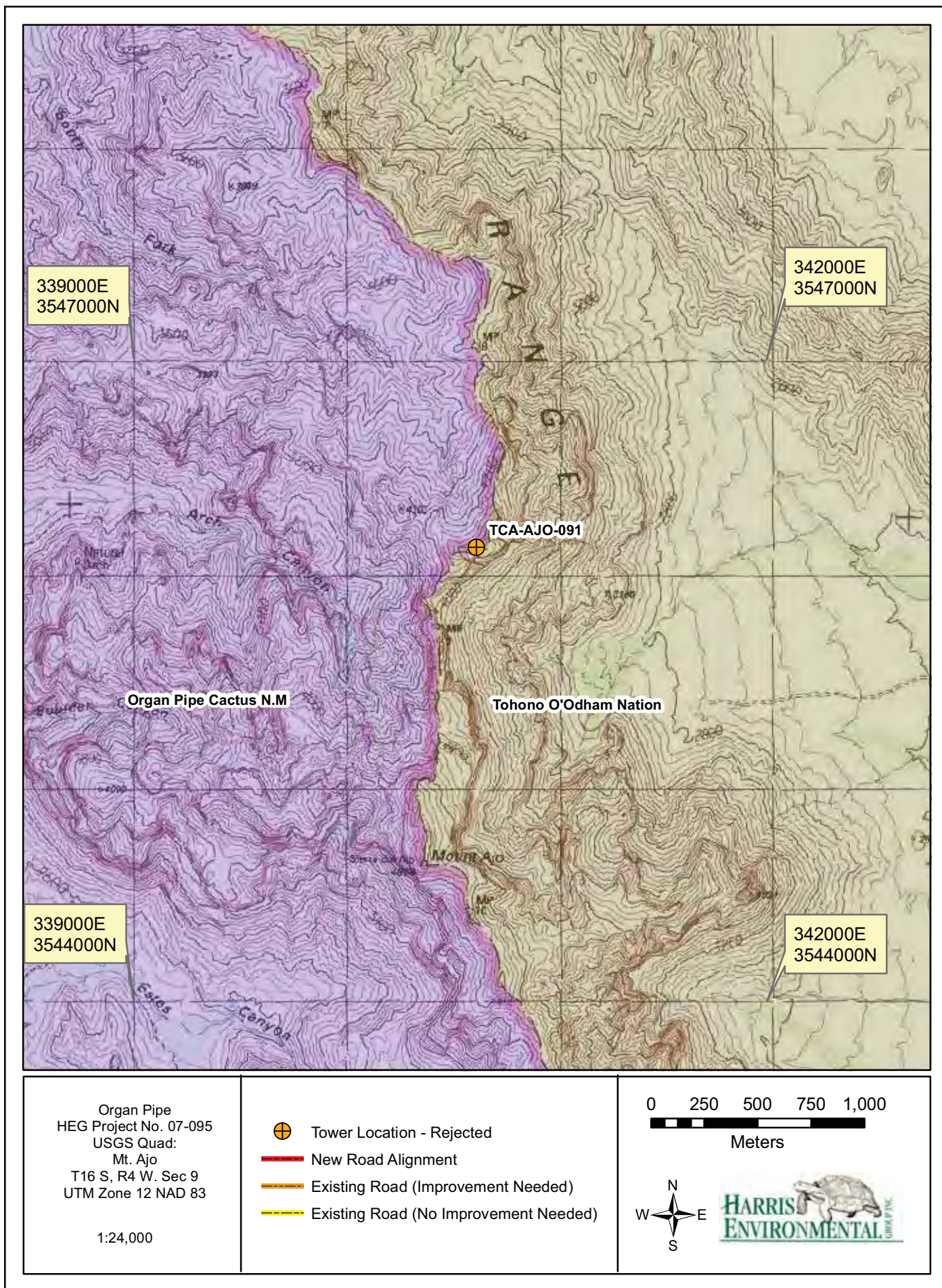


Figure 5.25 UTM registered location and land jurisdiction for TCA-AJO-091.

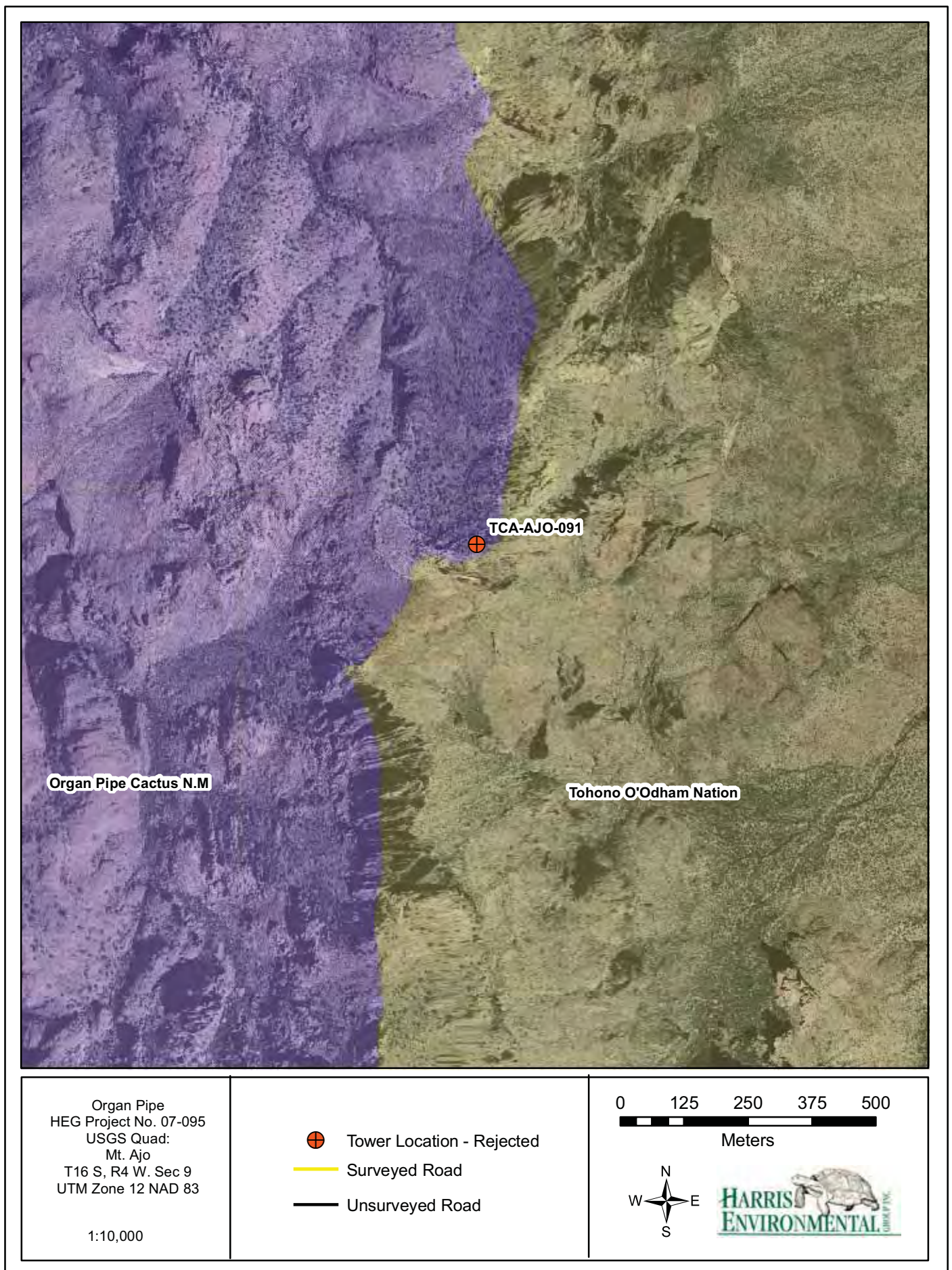


Figure 5.26 Tower location and surveyed area for TCA-AJO-091



Photograph 5.13 Overview of TCA-AJO-091 looking east-southeast.

TCA-AJO-214

TCA-AJO-214 is located in western Pima County on the OPCNM approximately 33.0 km (20.0 mi) southwest of the community of Ajo and 28.2 km (17.5 mi) northwest of the Lukeville POE (Figure 5.27). This location is on a high peak west of Kino Peak in the Bates Mountains at an elevation of 850 m (2,790 ft) amsl. The tower compound is covered with cobbles and small basalt boulders decomposing from the mountain bedrock (Photograph 5.14).

Access to TCA-AJO-214 would be via air lift but the location was rejected. SR 85 is 19 km (12 mi) to the east of the tower. Survey coverage for this proposed tower installation included the 0.4 ha (1.0 acre) tower compound (Figure 5.28).

Field Observations

TCA-AJO-214 and the surrounding area are within the Arizona Upland subdivision of Sonoran desertscrub. Plants observed during the survey include Emory's barrel cactus, foothill palo verde, ocotillo, organ pipe cactus, saguaro, triangle-leaf bursage and white bursage. Wildlife observed at the tower compound includes Gila woodpecker and kingbird (*Tyrannus* sp.). Organ pipe cactus and Emory's barrel cactus, both categorized as *salvage restricted* on the Arizona protected native plant list, were observed during the field survey.



Photograph 5.14 TCA-AJO-214 center looking west.

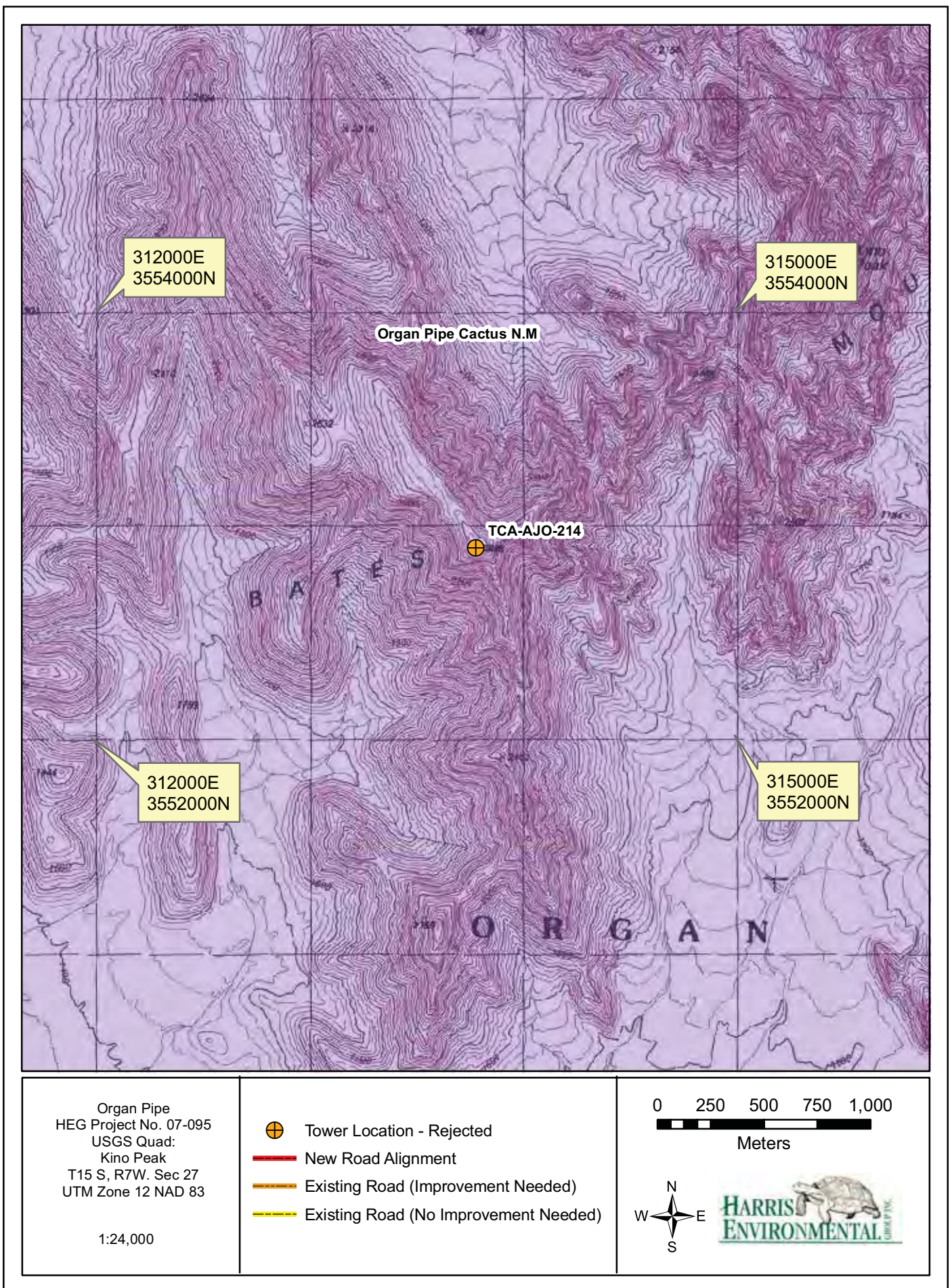


Figure 5.27 UTM registered location and land jurisdiction for TCA-AJO-214.



Figure 5.28 Tower location and surveyed area for TCA-AJO-214.

6.0 RESULTS

The objectives of this BE were to determine whether habitats in the project area may support special status species. A special status species is any species of interest to any regulatory or management agency of the federal, state, or local government. The special status species considered in this BE were identified from a list published by the USFWS through their IPaC system and the species list provided for Pima County. Other special-status species were identified using the AGFD HDMS and the BLM's sensitive species list.

The OPCNM is known to support populations of lesser long-nosed bat and Sonoran pronghorn. Both are federally listed as *endangered* by USFWS and the species also are listed as *wildlife of special concern* in Arizona by AGFD (AGFD 2008). The implementation of any of the proposed tower locations evaluated by this BE have the potential to affect the lesser long-nosed bat. The Sonoran pronghorn has the potential to be affected by eight tower locations. These species are discussed further in the following section on *Species Protected under the Endangered Species Act*. Other special status species also were evaluated and include federal *species of concern*, *wildlife of special concern* in the State of Arizona, *state protected plants*, and *BLM-sensitive species*. The proposed action has the potential to affect 19 species under these designations. These results are discussed in the following section on *Other Special Status Species*.

Species Protected Under the Endangered Species Act

Federally listed, proposed, or candidate species are known to occur within Pima County (Table 6.1). The known range and suitable habitat for each of these species was reviewed and contrasted with the findings of the biological survey for each proposed tower location. The table indicates "YES" in the Potential to Occur column when the proposed towers or access roads are within the known range and have suitable habitat for *federally-listed, proposed, or candidate* species. Species outside the known range or that do not have suitable habitat are listed as "NO" under Potential to Occur and are not further discussed in this report.

Lesser Long-nosed Bat (*Leptonycteris yerbabuenae*)

The lesser long-nosed bat is federally-listed as *endangered* and as a *wildlife species of special concern* in the State of Arizona (AGFD 2008). Declines in lesser long-nosed bat populations are attributed to reductions in the size and number of maternity colonies as a result of roost site exclusion and disturbance in Sonora and Arizona (AGFD 2003). Further causes may be related to large-scale depletions of agaves in Mexico for tequila production.

Life History Information

This nectarivorous bat consumes the pollen and fruit of agaves and columnar cacti including saguaro and organ pipe cactus. In Arizona, this bat typically forages from dusk to dawn from April through September and has been documented foraging up to 48 km (30 mi) from daytime roost sites in a single nighttime foraging event. Gravid females begin to arrive in Arizona in early April and gather at large maternity colonies. Males arrive later and form separate, smaller colonies. One offspring is born annually in May and is volant by late June. Maternity colonies dissociate by the end of July (AGFD 2003).

Table 6.1. Federally listed, proposed and candidate species occurring in Pima County.

Species by Taxa	Status			Potential to Occur
	ESA	BLM	State	
Amphibians				
Chiricahua leopard frog <i>Lithobates chiricahuensis</i>	LT		WSC	NO
Sonoran tiger salamander <i>Ambystoma tigrinum stebbinsi</i>	LE		WSC	NO
Birds				
bald eagle <i>Haliaeetus leucocephalus</i>	LT(PDL)		WSC	NO
California brown pelican <i>Pelecanus occidentalis californicus</i>	LE			NO
masked bobwhite <i>Colinus virginianus ridgewayi</i>	LE		WSC	NO
Mexican spotted owl <i>Strix occidentalis lucida</i>	LT(DCH)		WSC	NO
southwestern willow flycatcher <i>Empidonax trailii extimus</i>	LE(DCH)		WSC	NO
western yellow-billed cuckoo <i>Coccyzus americanus occidentalis</i>	C		WSC	NO
Yuma clapper rail <i>Rallus longirostris yumanensis</i>	LE		WSC	NO
Fish				
desert pupfish <i>Cyprinodon macularis</i>	LE(DCH)		WSC	NO
Gila chub <i>Gila intermedia</i>	LE(DCH)		WSC	NO
Gila topminnow <i>Poeciliopsis occidentalis occidentalis</i>	LE		WSC	NO
Quitobaquito desert pupfish <i>Cyprinodon eremus</i>	LE		WSC	NO
Sonora chub <i>Gila ditaenia</i>	LT(DCH)		WSC	NO
Mammals				
jaguar <i>Panthera onca</i>	LE		WSC	NO
lesser long-nosed bat <i>Leptonycteris curasoe yerbabuenae</i>	LE		WSC	YES
ocelot <i>Leopardus pardalis</i>	LE		WSC	NO
Sonoran pronghorn <i>Antilocapra americana sonoriensis</i>	LE		WSC	YES
Reptiles				
Sonoyta mud turtle <i>Kinosternon sonoriense longifemorale</i>	C			NO

Table 6.1. (continued).

Plants				
Acuña cactus <i>Echinomastus erectocentrus acunensis</i>	C		HS	NO
Canelo Hills ladies' tresses <i>Spiranthes delitescens</i>	LE		HS	NO
Huachuca water umbel <i>Lilaeopsis schaffneriana recurva</i>	LE(DCH)		HS	NO
Kearney blue star <i>Amsonia kearneyana</i>	LE		HS	NO
Nichol's turk's head cactus <i>Echinocactus horizonthalonius nicholii</i>	LE		HS	NO
Pima pineapple cactus <i>Coryphantha scheeri robustispina</i>	LE		HS	NO
Key to Status: C = Candidate, DCH = Designated Critical Habitat, HS = Highly Safeguarded, LE = Listed Endangered, LT = Listed Threatened, PDL = Post delisting, WSC = Wildlife of Special Concern				

Lesser long-nosed bat ranges from the southern United States to northern South America in semiarid to arid habitats. Suitable roosting habitat within commuting distance of the food source is requisite. In Arizona, lesser long-nosed bat roosts in caves, mines, and tunnels in desert scrub, grassland, and oak woodlands from 363 m to 2,231 m (1,190 to 7,320 ft) amsl. This bat does not hibernate and leaves Arizona during the winter migration to the southern portions of its range (AGFD 2003).

Habitat Evaluation and Suitability

Lesser long-nosed bat has the potential to occur at all 14 proposed tower sites. The largest documented maternity colony of lesser long-nosed bats (16,000 to 25,000 adult females in May/June) is located in the OPCNM at the Copper Mountain Mine (NPS 2003). A second large maternity roost is also known from the Bluebird Mine on the eastern border of the CPNWR located in the Growler Mountains adjacent to OPCNM. The Bluebird Mine supports an estimated 3,000 lesser long-nosed bats at the peak of annual occupancy (USFWS 2006). Lesser long-nosed bats are extremely sensitive to human disturbance and abandoned the mine in 2002, 2003 and 2005 because of disturbance from illegal activities. In 2004, the bats returned to the mine after CPNWR staff installed a high steel fence to prevent disturbance. The bats returned to the mine in 2005 but abandoned the site again when the fence was damaged (presumably by illegal immigrants or smugglers). Approximate distances to these maternity colonies are presented in Table 6.2.

Discussion

The potential effects this project may have on lesser long-nosed bats include disturbance to maternity colonies and roosting sites, disturbance to foraging areas and placement of obstructions between known colonies or roosting sites and foraging areas. Potential detrimental effects could occur from removal of vegetation, use of artificial light, noise near roosting or maternity colonies, collision hazards and human disturbance from foot and vehicle traffic, or construction of tower structures near roosts or maternity colonies. In addition, the potential to

disrupt foraging and migration routes should be considered. A possible beneficial effect to the lesser long-nosed bat may occur from the reduction in illegal pedestrian and vehicle traffic in the OPCNM.

USFWS established a suggested list of Best Management Practices (BMPs) to address construction and maintenance effects on lesser long-nosed bat. The BMPs (USFWS 2007) recommend that proposed towers should be located at least 8.0 km (5.0 mi) from any known roost site and that project infrastructure is not located between roosts and known foraging sites because of potential disturbance to bats traveling between the two locations. TCA-AJO-004, TCA-AJO-170, TCA-AJO-209 and TCA-AJO-308 all occur within 8.0 km (5.0 mi) from known roost sites and may require additional consultation to analyze potential project effects, particularly if tower deployment is scheduled between May 1 and September 30 because of these towers' proximity to known maternity roosts.

Table 6.2. Distances to known lesser long-nosed bat maternity colonies.

TOWER ID	Bluebird Mine (km)	Bluebird Mine (mi)	Copper Mtn. Mine (km)	Copper Mtn. Mine (mi)
TCA-AJO-003	26.1	16.2	26.9	16.7
TCA-AJO-004	5.2	3.2*	17.8	11.1
TCA-AJO-008	38.2	23.7	19.8	12.3
TCA-AJO-091	31.0	19.2	8.6	5.4
TCA-AJO-170	19.1	11.9	4.4	2.7*
TCA-AJO-204	31.3	19.4	17.0	10.6
TCA-AJO-209	3.0	1.9*	19.6	12.2
TCA-AJO-214	12.7	7.9	21.0	13.1
TCA-AJO-301	38.5	23.9	24.7	15.3
TCA-AJO-302	15.6	9.7	31.8	19.8
TCA-AJO-303	31.8	19.8	22.4	13.9
TCA-AJO-304	31.1	19.3	16.4	10.2
TCA-AJO-308	3.1	1.9*	20.5	12.8

* These towers are located within 5 miles of a maternity roost.

In the event that tower site preparation or road modifications displace an agave or columnar cacti, affected plants should be salvaged and transplanted. If the plant is not salvageable, a replacement should be purchased and planted outside the APE. Salvage, transplantation, and container planting should be carried out in accordance with a restoration plan which should include guidelines for success criteria and post-transplant monitoring.

Sonoran Pronghorn (*Antilocapra americana sonoriensis*)

Sonoran pronghorn is listed as *endangered* and as a *species of concern* in Arizona (AGFD 2008). Population declines for Sonoran pronghorn in the state are attributed to loss of habitat and drought. Sonoran pronghorn habitat has been drastically altered in southwestern Arizona by the desiccation of major rivers and overgrazing of cattle. Although cattle grazing in key pronghorn habitat ceased in the early 1980s, populations have not recovered. In Mexico, the exploitation of habitat for grazing and agriculture, as well as poaching are still causing population declines. The

presence of fences in key areas of pronghorn movement also is a significant factor in pronghorn mortality, particularly when they restrict accessibility to food and water resources (AGFD 2002).

Life History Information

Sonoran pronghorn is recognized as the smallest of the five extant subspecies of pronghorn. In Arizona, they are found on the CPNWR, OPCNM, Luke Air Force Barry M. Goldwater Gunnery Range (BMGR) and the Tohono O'odham Indian Reservation. In Mexico, they are believed to be confined to northwest Sonora. Sonoran pronghorn habitat is characterized by broad alluvial valleys separated by block-faulted mountains within the Lower Sonoran Desert life zone (AGFD 2002). The population of Sonoran pronghorn in the United States has been as low as 18 individuals in the last decade (USFWS, informal consultation meeting, 16 October 2007). The population is the focus of intensive cooperative management efforts to recover this species. The USFWS is managing a portion of the remaining population as a semi-captive herd on the CPNWR. The 2007 population numbers approximately 80 individuals (USFWS, informal consultation meeting, 16 October 2007).

Habitat Evaluation and Suitability

The current range of Sonoran pronghorn is restricted to portions of the Tohono O'odham Nation, the CPNWR, OPCNM and the BMGR (AGFD 2002). The remaining population in the United States is closely monitored and managed by USFWS. Within the proposed project area Sonoran pronghorn has the potential to occur in the vicinity of eight proposed towers: **AJO-003, AJO-004, AJO-170, AJO-209, AJO-214, AJO-302, AJO-303, and AJO-308.**

Although the proposed towers positioned east of SR 85 contain suitable habitat for Sonoran pronghorn, the International Vehicle Barrier Biological Assessment (NPS 2003) states that SR 85 marks the eastern boundary of the population occurring in the U.S. and the species "no longer (or very rarely) occurs" east of this roadway. Only three records exist of pronghorn east of SR 85 from thirty years of documentation with the most recent occurrences recorded in 2002 (NPS 2003).

Sonoran pronghorn are known to occur within the OPCNM throughout the year. During summer, individuals from north and west of the monument migrate to areas in the southwestern portion of the OPCNM, further emphasizing the importance of conserving the viability of the "crucial habitat" which exists within OPCNM (NPS 2003). Telemetry data and visual records from the monument have shown that areas associated with the Valley of the Ajo, the Growler Valley and San Cristobal Wash are commonly occupied by this species (NPS 2003).

Discussion

Potential adverse effects to this species that should be considered in project evaluation include removal of vegetation, disturbance of individuals during construction, maintenance, and CBP activity related to ongoing law enforcement operations. USFWS is particularly concerned with disturbance of mothers and fawns in their first year because of the potential lower recruitment success (USFWS, informal consultation meeting, 16 October 2007). The potential beneficial effects of the project stemming from reduced illegal pedestrian and vehicle traffic also should be considered in project evaluation. USFWS established a suggested list of BMPs to address construction and maintenance effects on Sonoran pronghorn such as presence of a biological