

4.8 Visual Resources

Visual resources consist of the natural and man-made landscape features that give a particular environment its visual characteristics. The Preferred Alternative site is not in an area subject to any local, state, or federal agency visual quality objectives. BLM-managed land adjacent to the west side of the Preferred Alternative site is subject to visual quality objectives. The BLM-managed land adjacent to the Preferred Alternative site is classified as Class IV (BLM 2005). The level of change to the characteristic landscape can be high in Class IV and remain consistent with the BLM visual quality objectives. This class is typically adjacent to urban areas and recognizes that major modifications to visual landscapes are expected. No additional visual resources were identified in the Preferred Alternative site area.

Preferred Alternative

The Preferred Alternative would not have an impact on visual resources. The Preferred Alternative site is currently developed and zoned as residential. The addition of a housing development is in keeping with the current and former uses of the property. Development of the site is not in conflict with the adjacent BLM visual quality objectives. The Preferred Alternative would not result in adverse impacts to visual resources.

No Action Alternative

The No Action Alternative would not have an effect on visual resources because no visual resources were identified and no development or changes to the current land use would take place.

4.9 Water Resources

4.9.1 Clean Water Act Section 404

The U.S. Army Corps of Engineers (Corps) regulates the discharge of fill material to Waters of the United States, pursuant to Section 404 of the Clean Water Act (CWA), and issues permits for actions proposed within such waters. Jurisdictional, non-tidal Waters of the United States regulated by the Corps are defined in 33 CFR 328.4 (c) as those that compose the area of a water course that extends up to the ordinary high water mark in the absence of wetlands.

The Preferred Alternative site is bordered on the north and south by two unnamed ephemeral washes. The drainages are dry except during times of heavy rainfall. The northern wash (running southwest to northeast along the northern portion of the 801–841 Esperanza Avenue parcels) drains to a culvert passing under Montecito Street on the east side of the property. The southern wash (running west to east along the southern boundary of the 55 S. Sahuaro St. parcel) drains to a Pima County Flood Control District retention basin adjacent to the east side of the Preferred Alternative site (Figure 4).

According to the Pima County Regional Flood Control District, the wash along the southern boundary of the Preferred Alternative site supports Xeroriparian D habitat regulated by the county (Ruther 2010).

Preferred Alternative

A formal assessment of the potential jurisdictional limits of the two washes on the Preferred Alternative site would be required prior to construction activities if construction activities are proposed to encroach on or impact the washes. Based on planning level site development information, no construction has been identified within the washes. Through the development of detailed site plans and engineering, a review of potential encroachment on the washes would occur. If encroachment is proposed the preparation of a Jurisdictional Delineation and evaluation of the need for a CWA permit will be required.

No Action Alternative

No assessment of Section 404 of the CWA would be required under the No Action Alternative because no development would take place.

4.9.2 Clean Water Act Section 401

Under Section 401 of the CWA, the ADEQ reviews activities for water quality compliance. Section 401 establishes a framework through which states and tribes can develop a water quality certification process to ensure that standards will not be violated by discharge activities. Section 401 certification is required for any action regulated under Section 404. State water quality certification is not required if no Section 404 permit is needed. As noted above, Section 401 would apply only if a Section 404 permit is needed.

4.9.3 Clean Water Act Section 402

CWA Section 402 authorizes the national and state pollutant discharge elimination system programs. These permit programs are intended to maintain water quality by regulating discharges of pollutants into surface waters, including sediment and pollutants that can be generated during ground-disturbing activities and transported by storm water runoff.

Preferred Alternative

The Preferred Alternative would disturb more than one acre of land. The contractor would be required to complete an Arizona Pollutant Discharge Elimination System (AZPDES) construction general permit, including a Notice of Intent and a Notice of Termination. In accordance with AZPDES, a Storm Water Pollution Prevention Plan (SWPPP) would need to be developed and implemented for the project. The SWPPP would specify control measures to reduce soil erosion while containing and minimizing the release of construction pollutants.

No Action Alternative

No AZPDES permit or SWPPP would be required under the No Action Alternative because no development would take place.

4.10 Floodplains

EO 11998 (Floodplain Protection) requires federal agencies to avoid or minimize development in the floodplain except where there are no practicable alternatives. Federal Emergency Management Agency (FEMA) regulations related to the implementation and enforcement of EO 11998 are set forth in 44 CFR Chapter 1 (10-1-03 Edition). A review of the FEMA Flood

Insurance Rate Map (FIRM) for the Preferred Alternative site indicates that the Preferred Alternative site is not in a 100-year or 500-year floodplain. FIRM Map Number 04019C1255K (FEMA 1999) encompasses the Preferred Alternative site.

Preferred Alternative

The Preferred Alternative would have no impact on floodplains because the Preferred Alternative site is not in a 100-year or 500-year floodplain.

No Action Alternative

The No Action Alternative would have no impact on floodplains because no development would occur.

4.11 Hazardous Materials

4.11.1 Phase I Environmental Site Assessment

A Phase I Environmental Site Assessment (ESA) was prepared for the Preferred Alternative site in February 2010 by EcoPlan Associates, Inc. (EcoPlan 2010b). The main objective of the ESA was to identify *recognized environmental conditions* in connection with the site, defined in the American Society for Testing and Materials (ASTM) Standard Practice E1527-05 (ASTM International 2005) as the presence or likely presence of any hazardous substances or petroleum products that indicate an existing release, a past release, or a material threat of a release.

The ESA includes a summary of state and federal environmental databases, including the Arizona Superfund Program; the Comprehensive Environmental Response, Compensation, and Liability Act; leaking underground storage tanks; the National Priority Lists (for Superfund); and the Water Quality Assurance Revolving Fund. A review of these and additional databases revealed no hazardous materials concerns for the Preferred Alternative site or its immediate surroundings.

From at least the late 1930s or the early 1940s, the Preferred Alternative site was developed with a federal government housing project for military housing. Surrounding properties to the north were primarily occupied by residential development from the late 1800s or early 1900s. Residential development to the south dates from at least the 1960s. Properties to the west were primarily undeveloped until the 1990s. The federal government housing project residences were razed in portions beginning in the 1970s. The current residential mobile homes at the site were constructed between 1997 and 2005.

The ESA identified no evidence of *recognized environmental conditions* in connection with the Preferred Alternative site.

Preferred Alternative

Construction of the Preferred Alternative would not adversely impact any known *recognized environmental conditions* or any potential hazard to human health. If *recognized environmental conditions* are encountered at the Preferred Alternative during construction, appropriate measures for the proper assessment, remediation, and Preferred Alternative site management of the contamination would be initiated in accordance with applicable federal, state, and local

regulations. The contractor would take appropriate measures to prevent, minimize, and control hazardous materials, if necessary, during construction.

No Action Alternative

The No Action Alternative would have no impact on areas of *recognized environmental conditions* or create any potential hazard to human health because no development would occur.

4.11.2 Asbestos-Containing Material

The purpose of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) program is to protect public health from exposure to Regulated Asbestos-Containing Material (RACM) during NESHAP facility renovation/demolition activities, asbestos removal, and transport and disposal, and closely monitor those activities for proper notification and asbestos emissions control. Asbestos is known to cause cancer and other respiratory diseases in humans. Asbestos is not considered a *recognized environmental condition* under ASTM Standard Practice E1527-05.

Under Section 112 of the Clean Air Act, Congress gave the EPA the responsibility for enforcing regulations relating to asbestos renovations and demolitions activities. The Clean Air Act allows the EPA to delegate this authority to state and local agencies. The asbestos NESHAP program in Arizona is enforced by federal, state, and county agencies.

The Pima County Department of Environmental Quality (PDEQ) has NESHAP jurisdiction for asbestos in Pima County. The PDEQ administers the asbestos program under Title 17 of the Pima County Code. The asbestos NESHAP has been adopted by reference in Section 17.16.530. The program's intent is to minimize the release of asbestos fibers during activities involving the processing, handling, and disposal of asbestos-containing material. Accordingly, the asbestos NESHAP specifies work practices to be followed during demolitions and renovations of all structures, installations, and buildings. A survey for potential RACM was not conducted at the Preferred Alternative site. Potential RACM at the Preferred Alternative site could include, but is not limited to, building foundations, structures, culverts, and utility installations.

Prior to beginning renovation or demolition activities of a facility, a certified Asbestos Hazard Emergency Response Act building inspector must thoroughly inspect the facility or part of the facility where the renovation or demolition operation would occur for the presence of asbestos, including friable and non-friable asbestos-containing materials. For all demolitions (even when no asbestos is present) and renovations activities involving threshold amounts of RACM, the operator will provide PDEQ with a NESHAP notification at least 10 working days prior to the demolition or renovation activity.

Preferred Alternative

A survey for potential RACM was not conducted at the Preferred Alternative site. As such, the potential presence of RACM is unknown. Under the Preferred Alternative, potential RACM should be tested prior to demolition, and an asbestos NESHAP notification should be provided to the PDEQ 10 days prior to demolition activities.

No Action Alternative

Under the No Action Alternative, a NESHAP notification would not be required because no demolition or renovation would occur.

Cumulative impacts are defined in 40 CFR 1508.7 as “the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.”

The level and scale of the cumulative analysis should be commensurate with the proposed project’s potential impacts, scale, and other factors. NEPA documents consider those past, present, and future actions that incrementally contribute to the cumulative effects on resources affected by the proposed action.

There are currently no additional GSA or CBP plans or funding to acquire land or provide housing in the Ajo area beyond the Preferred Alternative. The maximum number of residential units that could be built at the Preferred Alternative site is 56. The units beyond the initial proposed 22 units could be built over an extended period of time, depending on funding availability.

Other known federal projects in the area include improvement to the Lukeville POE (adding traffic flow lanes and inspection booths), planned for 2010–2011; expansion of Ajo Station in Why, planned for 2011; and the ongoing U.S.–Mexico border fencing projects. The Lukeville POE and Ajo Station expansions contribute to the need for housing that could not be met by the 56 total units. Those projects are 7 to 40 miles from the Preferred Alternative site.

The Pima County Department of Transportation is planning an Ajo Historic Depot Restoration Project for 2010–2011. The depot is approximately one-half mile east of the Preferred Alternative site. There are no known subdivision plans or building permits in the vicinity of the Preferred Alternative site (Pima County Development Services 2010).

The above actions are all subject to individual environmental review and analysis, are dispersed in location, and feature a wide range of improvement types (roads, government complexes, fences, and building renovations).

There are no reasonably linked past actions associated with the Preferred Alternative. The Pima County Regional Flood Control District project to construct the detention basin adjacent to the Preferred Alternative site occurred circa 2008. Conversion of the closed Curley School to apartments and art studios occurred in 2007. Former government housing on the Preferred Alternative site was demolished in the 1970s.

Impacts from implementation of the Preferred Alternative are expected to be negligible on a cumulative basis, except for the minor localized effects on air quality, noise, and visual resources during construction.

6.1 Agency Coordination

Letters were mailed to the following 17 Federal, state, and local organizations on April 20, 2010 (see Appendix B, Scoping Letter and Mailing List):

- Bureau of Land Management
- U.S. Fish and Wildlife Service
- Arizona Department of Public Safety
- Arizona Game and Fish Department
- Pima Association of Governments
- Pima County Administrator
- Pima County Board of Supervisors
- Pima County Department of Community Development and Neighborhood Conservation
- Pima County Department of Environmental Quality
- Pima County Department of Natural Resources, Parks and Recreation
- Pima County Development Services
- Pima County Regional Flood Control District
- Pima County Sheriff's Department
- Ajo Fire Department
- Ajo Unified School District #15
- Ajo Historical Society Museum
- International Sonoran Desert Alliance

6.1.1 Agency Responses

See Appendix C for copies of agency responses to the GSA.

USFWS

The USFWS contacted EcoPlan by phone on June 9, 2010, and stated that its only comment on the housing project is that no nonnative or invasive species should be used in landscaping the Preferred Alternative.

GSA response: Landscaping plans have not been developed to date. The GSA intends to use native plants in landscaping.

Arizona Game and Fish Department

The AGFD contacted the GSA via letter on April 30, 2010, and stated that the Sonoran pronghorn, the Acuña cactus, and the Sonoran Desert tortoise may be within 3 miles of the project site.

GSA response: These species are discussed in Chapter 4.4, Biological Resources.

Pima County Development Services

Pima County Development Services contacted EcoPlan via phone on April 26, 2010, and inquired whether the project was proposed to be constructed on government-owned land or whether it would purchase private land for the project.

GSA response: The Preferred Alternative would require purchase of private land.

The GSA received a letter from the Pima County Development Services Office dated May 19, 2010. The letter outlined the following Pima County concerns:

- Department of Transportation

- Right-of-way use permits and air quality permits should be obtained from Pima County, as needed, for any construction extending into the right-of-way.

GSA response: Design plans have not been developed to determine connection to the Pima County roadway system. During design, the GSA will coordinate with Pima County.

- Pima County Regional Flood Control District

- A county-regulated wash runs along the southern boundary of the parcel, with associated Xeroriparian D habitat that is regulated by the county.
- The district can provide the official riparian habitat maps and the drainage report prepared for the construction of the Curley School Basin to the east.

GSA response: Based on planning-level project design, no encroachment on the south wash would occur. The GSA will coordinate design plans with the Pima County Regional Flood Control District.

- Pima County Planning

- The design and architecture of the housing units should be compatible with the first and second historically platted additions to the Ajo Townsite Historic District.

GSA response: The GSA will address this issue during the design process and coordinate with Pima County Planning.

- Cultural Resources Department

- The proposed development is a Federal undertaking and is subject to Section 106 of the NHPA.
- Federal agencies are encouraged to coordinate compliance with Section 106 of the NHPA.

- EO 13006 directs Federal agencies to use and maintain historic properties and districts wherever economically prudent and operationally appropriate.
- The Ajo Townsite Historic District, which is listed on the National Register of Historic Places, is in close proximity to the Preferred Alternative site. The effects of the proposed development, direct and indirect, must be assessed as part of NHPA and NEPA compliance.
- A portion of the Preferred Alternative site is within the second historically platted addition to the Ajo Townsite Historic District, and the remainder of the site is adjacent to the first and second historically platted additions. The GSA will need to evaluate the eligibility of the two additions and assess the effects of the proposed development on them should they be eligible.
- The Preferred Alternative site has not been inventoried for historic properties.
- The GSA is expected to initiate and conclude consultation with SHPO as part of its compliance requirements under NEPA.
- The county’s Office of Cultural Resources and Historic Preservation (OCRHP) requests that GSA actively and comprehensively include OCRHP in the planning, review, evaluation of significance, and assessments of effects regarding historic properties within, adjacent to, and in close proximity to the Preferred Alternative site.

GSA response: The GSA determined that there are no historic properties present and that the undertaking will not have an effect on the Ajo Townsite. Section 106 consultation was initiated on October 27, 2010 (letter, Appendix B). EO 13006 is not applicable to this project. No acquisition within the historic district would occur, and it is not economically prudent or operationally feasible to purchase scattered single-family homes within the historic district to meet the purpose and need of the project.

Pima County Cultural Resources and Historic Preservation Office

The OCRHP participated in a conference call with the GSA on May 4, 2010, to discuss the project specifics and to supply information relating to the Ajo Townsite Historic District.

Pima County Administrator’s Office

The GSA received a letter dated May 10, 2010, from the Pima County Administrator’s Office. The letter outlined the following concerns:

- Under what mandate does the CBP provide housing to its employees?

GSA response: Discussed in Chapter 2, Project Purpose and Need.

- How many CBP employees do you anticipate needing to accommodate?

GSA response: Approximately 410 employees. Discussed in Chapter 2, Project Purpose and Need.

- Please provide any housing studies that demonstrate this shortage.

GSA response: See Chapter 9.0, Bibliography (Garrison Architects 2009 and CBP 2010).

- How have agencies, tribes, and the public been involved in the early planning process to identify the Ajo housing project as the proposed undertaking?

GSA response: Discussed in Chapter 6, Public Involvement/Project Coordination.

- Which agencies, tribes, and community organizations were contacted, and when did the early planning take place?

GSA response: Discussed in Chapter 6, Public Involvement/Project Coordination.

- What is the cumulative scope of current, proposed, and future operations in western Pima County?

GSA response: Discussed in Chapter 2, Project Purpose and Need.

- What alternatives are being considered?

GSA response: Discussed in Chapter 3.0, Alternatives.

- Why are modular units the only housing type being considered?

GSA response: The project needs require rapidly deployable housing. Discussed in Chapter 2, Project Purpose and Need.

- Why is the rehabilitation of existing historic buildings and other housing stock not being considered as an alternative?

GSA response: Discussed in Chapter 3, Alternatives.

- EO 13006, Locating Federal Facilities on Historic Properties in Our Nation's Central Cities, states that Federal agencies "shall give first consideration to historic properties within historic districts ... or other developed or undeveloped sites within historic districts." How is the GSA complying with EO 13006?

GSA response: EO 13006 is not applicable to this project. No acquisition within the Historic District would occur, and it is not economically prudent or operationally feasible to purchase scattered single-family homes within the Historic District to meet the purpose and need of the project.

- Should the Ajo location be selected, we feel direct investment in Ajo by the GSA has the potential to provide a large economic benefit to the community, bring new residents and employment opportunities to the town, and expand the community's economic base.

GSA response: The GSA agrees.

- If historic homes and buildings within the Ajo Townsite Historic District are rehabilitated by the GSA, the built environment and fabric of the community will be greatly enhanced.

GSA response: No acquisition is proposed within the Historic District.

- If new architecturally compatible housing is developed within the Ajo Townsite Historic District on undeveloped lots, the character of the surrounding Ajo Townsite Historic District and other properties will be greatly enhanced.

GSA response: The GSA is not proposing any housing within the Historic District.

- How will the GSA expenditures for this project directly benefit the Ajo community? What economic assessments are planned?

GSA response: Discussed in Section 4.3, Social and Economic Resources.

Office of Congressman Raul Grijalva

The Office of Congressman Grijalva contacted the GSA via e-mail on June 6, 2010. The e-mail outlined the following:

- GSA is in the process of acquiring property in Ajo that is to be used for manufactured homes for Border Patrol agents. Community members are concerned that these actions will keep Border Patrol agents in an enclave and prevent them from integrating into the Ajo community. In moving forward with the Ajo project, we encourage the GSA to continue prioritizing the integration of Border Patrol in the community. Furthermore, the idea of bringing manufactured homes to the City of Ajo is of concern. Ajo's unemployment rate is at an average 14 percent, significantly above the county, state, and national average. The need for local jobs is great, and we would urge the GSA to invest current efforts in the community. Instead of bringing manufactured homes, we encourage you to build homes or perhaps even renovate vacant homes.

GSA response: See Appendix C for response letter.

6.2 Public Involvement

6.2.1 Scoping Process

Scoping outreach included notices in the general distribution newspaper serving the Ajo area, the *Ajo Copper News*, as well as a direct letter to leaseholders at the 55 S. Sahuaro St. property and adjacent property owners of the 55 S. Sahuaro St. and 801–841 W. Esperanza Ave. parcels. See Appendix B for a copy of the scoping letter and the mailing list.

6.2.2 Newspaper Notice

A notice to the public was published in the *Ajo Copper News* on February 17, 2010; February 24, 2010; and March 4, 2010. The notice summarized the purpose and need for the CBP housing in Ajo, contained a map depicting the location of the Preferred Alternative site, and invited interested parties to a 7 p.m. meeting on March 4, 2010, at the Ajo Community Center. See Appendix D for a copy of the notice published in the *Ajo Copper News*.

6.2.3 Public Scoping Meeting

A public, open house–style meeting was held at the Ajo Community Center in conjunction with the monthly Western Pima County Community Council meeting on March 4, 2010. The purpose of the meeting was to provide information on the proposed Ajo Housing Development Project, the NEPA process and associated timelines, and the project background, purpose, need, and alternatives, as well as to solicit input from the public. Figures of the proposed alternative locations and the Preferred Alternative site were displayed, and an informational handout and comment form were provided to attendees (Appendix E).

Approximately 60 people attended the public meeting. After a brief introduction to the project by the GSA, EcoPlan Associates, Inc., and the CBP, public comments were invited. Comments and issues raised included:

- Uncertainty of modular home design (i.e., are they equivalent to FEMA trailers?)
- Would modular homes fit into the community character?
- Would local contractors have the ability to bid on construction?
- Framed or “stick” built homes are better than modular construction.
- Use of existing, available homes in the Ajo market should be a priority for the GSA.
- What will be the economic impact to the real estate market if the GSA builds new homes?

One written comment was received during the meeting—a prepared letter from Jim Sharp. The letter objected to the proposed housing project based on a disproportionate amount of minority and low-income residents in Ajo and proposed that the GSA had prematurely identified and negotiated with property owners prior to involving the public in the process. The letter stated that the GSA should consider purchasing or leasing existing housing units in Ajo (see Appendix F for a copy of the letter).

The following table summarizes the public comments received as a result of the meeting. See Appendix F for copies of letters and comment forms received from the public.

Table 5. Public scoping comments.

Name	Comments/Concerns
Linda Sharp	<ul style="list-style-type: none"> • Local real estate agent • Ajo has a disproportionate number of minority and low-income residents • The GSA should focus on purchasing existing properties, not constructing new homes • The GSA has prematurely contracted with property owners
Gregory Brader	<ul style="list-style-type: none"> • Abutting property owner • Will the GSA units compete with his property in the open markets for rentals? • Will lighting be installed to the benefit of the neighboring property? • Will biological/archaeological studies be required? • Will there be a mechanism for the community to provide input?
Mike Walker	<ul style="list-style-type: none"> • Abutting property owner • Requested that a sight/sound barrier be constructed between his property and the proposed development
Sam Tucker	<ul style="list-style-type: none"> • Adjacent property owner • Commented that the southern arroyo should be protected from the planned development
Ronald Hurlburt	<ul style="list-style-type: none"> • The GSA proposal assumes incorrectly that there is insufficient housing available in Ajo • Opposes an “enclave of government-owned modular dwellings”
Edie and Char	<ul style="list-style-type: none"> • Local real estate agents • Plenty of housing available in Ajo • CBP agents would choose to live in the newer, more affordable housing • GSA housing would hurt individuals who purchased rental income properties in Ajo

7.1 Summary of Impacts

The potential environmental impacts of the Preferred Alternative were evaluated based on both the context of the effects on the project area and the intensity or severity of impacts as defined in CEQ regulations. Table 6 summarizes the potential environmental impacts of the Preferred Alternative.

Table 6. Results of environmental analysis.

Environmental Consideration	Result of Alternative Evaluation
Ownership, Jurisdiction and Land Use	No significant impact
Title VI/Environmental Justice	No significant impact
Social and Economic Resources	No significant impact
Biological Resources	No significant impact
Cultural Resources	No significant impact
Air Quality	No significant impact
Noise Analysis	No significant impact
Visual Resources	No significant impact
Water Resources	No significant impact
Hazardous Material	No significant impact
Cumulative Impacts	No significant impact

7.2 Best Management Practices

- The contractor shall stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to inactive and active sites during workdays, weekends, holidays, and windy conditions.
- When hauling material and operating non-earthmoving equipment, the contractor shall prevent spillage and limit speeds to 15 miles per hour (mph).
- The contractor shall limit the speed of earthmoving equipment to 10 mph.
- The contractor shall reduce use, trips, and unnecessary idling from heavy equipment.
- Internal combustion engines used for any purpose on the Preferred Alternative or related to work on the Preferred Alternative shall be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine shall be operated without its muffler being in good working condition.
- If *recognized environmental conditions* are encountered during construction, appropriate measures for the proper assessment, remediation, and management of the contamination would be initiated in accordance with applicable federal, state, and local regulations. The contractor would take appropriate measures to prevent, minimize, and control hazardous materials, if necessary, during construction.

7.3 Mitigation Measures

The following mitigation measures would be implemented to ensure that the Preferred Alternative would have no significant impact on the quality of the human environment.

- Removal of mature native tree and cactus species would be subject to the Arizona Native Plant Law administered by the AZDA and the Pima County Protected Plant Ordinance. Native plant removal would be minimized to the extent practicable. The construction contractor would be required to contact the AZDA at least 60 calendar days prior to construction to arrange for proper native plant treatment.
- The contractor shall employ a qualified biologist to complete preconstruction surveys for Sonoran Desert tortoises and conduct a Sonoran Desert tortoise awareness program. Preconstruction surveys for Sonoran Desert tortoises shall be conducted within 48 hours prior to construction in areas that will be disturbed.
- If any Sonoran Desert tortoises are encountered during construction, the contractor shall adhere to the AGFD “Guidelines for Handling Sonoran Desert Tortoises Encountered on Development Projects” revised October 23, 2007.
- The contractor would be required to comply with Pima County Air Quality Control ordinances and would be required to complete an Air Quality Activity Permit.
- The GSA project manager shall arrange for a formal assessment of the potential jurisdictional limits of the two washes on the Preferred Alternative site prior to construction activities if construction activities are proposed to encroach on or impact the washes. Should a Section 404/401 Permit be required, the GSA would obtain the permit prior to any construction in the washes.
- The contractor shall not disturb any of the drainages surrounding the project area until a determination has been made by the Corps that the project may proceed under a Nationwide Permit and an Individual Water Quality Certification from the ADEQ has been obtained.
- The contractor would be required to complete an AZPDES construction general permit, including a Notice of Intent and a Notice of Termination. In accordance with the AZPDES requirements, a SWPPP would need to be developed and implemented for the project. The SWPPP would specify control measures to reduce soil erosion while containing and minimizing the release of construction pollutants.
- Because the Preferred Alternative would require demolition of existing structures, the GSA shall engage an Asbestos Hazard Emergency Response Act–certified inspector to inspect all structures to be demolished. If RACM is present in the structure, the GSA shall develop a work plan to remove, transport, and dispose of these materials.
- At least 10 days prior to demolition of any structure, the GSA shall provide the ADEQ NESHAP coordinator with a NESHAP notification form for each structure to be demolished.

General Services Administration

Greg Smith	Regional Environmental Quality Advisor
Osmahn Kadri	NEPA Project Manager
Gene Gibson	Regional Public Affairs Officer
Jane Lehman	Regional Historic Preservation Officer

Customs and Border Protection

Robin Coachman	Project Manager
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EcoPlan Associates, Inc.

Michael R. Dawson	Senior Environmental Planner
Steven Reuter	Environmental Planner
F. Bruce Brown	Principal
Thomas C. Ashbeck	Director, Biological Resources Group
Stephen Hale	Senior Project Scientist
Tricia Balluff	Environmental Planner
Leslie J. Stafford	Director, Environmental Planning Group

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Appendix A. USFWS threatened, endangered, and special status species.

Name	Status	Habitat Requirements	Potential for Occurrence
California least tern <i>Sterna antillarum browni</i>	E	Open, bare, or sparsely vegetated sand, sandbars, gravel pits, or exposed flats along shorelines of inland rivers, lakes, reservoirs, or drainage systems. Elevation: <2,000 feet.	No suitable habitat is in the project vicinity. Breeding occasionally has been documented in Arizona. Migrants may be observed frequently. The nearest documented breeding site in Arizona is along the Salt River near Phoenix.
Chiricahua leopard frog <i>Lithobates chiricahuensis</i>	T	Springs, streams, rivers, backwaters, ponds, and stock tanks that are mostly free of introduced fish, crayfish, and bullfrogs. Elevation: 3,300 to 8,900 feet.	No suitable perennial stream habitat is in the project vicinity. The nearest known populations occur in the southern Baboquivari Mountains in southern Pima County, approximately 80 miles southeast of the project area.
Desert pupfish <i>Cyprinodon macularius</i>	E	Streams, backwaters, springs, marshes, and cienegas. Elevation: <5,000 feet.	No suitable habitat is in the project vicinity. Arizona Game and Fish Department (AGFD) Heritage Data Management System (HDMS) program supervisor indicates that examples of these fish are maintained in an artificial pond at the Cabeza Prieta Visitor Center within 3 miles of the project (personal communication). Because project activity will not affect this pond, this captive population will not be affected.
Gila chub <i>Gila intermedia</i>	E	Smaller creeks, cienegas, and, more recently, artificial impoundments. Elevation: 2,000 to 3,500 feet.	No suitable habitat is in the project vicinity. The nearest known population occurs in Sabino Canyon in the Santa Catalina Mountains near Tucson, approximately 100 miles east of the project area.
Gila topminnow <i>Poeciliopsis occidentalis occidentalis</i>	E	Warm waters with slow currents and abundant aquatic vegetation along shallow margins of main river channels, backwaters, tributaries, and associated natural springs. Elevation: <4,500 feet.	No suitable habitat is in the project vicinity. The nearest population occurs in eastern Pima County, at least 90 miles southeast of the project area.
Huachuca water umbel <i>Lilaeopsis schaffneriana recurva</i>	E	Cienegas and gentle perennial stream habitats. Elevation: 4,000 to 6,500 feet.	No cienegas or other perennial waters are in or near the project vicinity. The project area lies more than 2,000 feet below the known elevation range of the species. The nearest population occurs in Cienega Creek in eastern Pima County, approximately 120 miles east of the project area.

Appendix A. USFWS threatened, endangered, and special status species.

Name	Status	Habitat Requirements	Potential for Occurrence
<p>Jaguar <i>Panthera onca</i></p>	<p>E</p>	<p>Prefers areas near water in warm tropical savannah and forest habitats; rarely in extensively arid areas. Elevation: 1,600 to 9,800 feet.</p>	<p>No breeding populations are in Arizona. Occasional individuals cross into the state from Mexico. Migrant jaguars would not be expected to remain in the project vicinity due to the presence of humans, noise, traffic, and activity in the area. The nearest recent sightings were in the Baboquivari Mountains in 2002 and again in 2004, when two jaguars were photographed approximately 80 miles southeast of the project area.</p>
<p>Kearney's blue star <i>Amsonia kearneyana</i></p>	<p>E</p>	<p>Species is restricted to stable, partially shaded coarse alluvium along a single west-facing dry wash in the Baboquivari Mountains. Elevation: 3,600 to 3,800 feet.</p>	<p>No suitable habitat. The project area does not lie in the known distribution of this species and is more than 1,500 feet below the known elevation range of the species. The known population is in the Baboquivari Mountains, approximately 70 miles southeast of the project area.</p>
<p>Masked bobwhite <i>Colinus virginianus ridgewayi</i></p>	<p>E</p>	<p>Found in desert grassland habitat with a high diversity of moderately dense native grasses and forbs and adequate brush cover. Elevation: 1,000 to 4,000 feet.</p>	<p>No suitable habitat. Outside species' current known range. Current populations in Arizona are experimental captive-raised and are restricted to the Buenos Aires National Wildlife Refuge and vicinity in the southern Altar Valley, approximately 90 miles southeast of the project area.</p>
<p>Mexican spotted owl <i>Strix occidentalis lucida</i></p>	<p>T</p>	<p>Mixed conifer or pine forest with multilayered foliage structure in steep canyons or on high mesas. Elevation: 4,800 to 9,000 feet.</p>	<p>No suitable habitat. No mixed conifer or pine forest with multilayered foliage structure is present in the project vicinity. The project area lies approximately 3,000 feet below the species' elevation range. The nearest known populations are in the Santa Catalina Mountains, approximately 120 miles east of the project area.</p>
<p>Nichol's Turk's head cactus <i>Echinocactus horizonthalonius</i> var. <i>nicholii</i></p>	<p>E</p>	<p>Known from unshaded microsites in Sonoran desertscrub on dissected alluvial fans at the foot of limestone mountains and on inclined terraces and saddles of limestone mountains. Elevation: 2,400 to 4,100 feet.</p>	<p>No suitable habitat. The project area is outside the known distribution of the species. The nearest known populations are in the Vekol Mountains, approximately 40 miles northeast of the project area.</p>
<p>Northern Mexican gartersnake <i>Thamnophis eques megalops</i></p>	<p>C</p>	<p>Cienegas, stock tanks, large-river riparian woodlands and forests, streamside gallery forests. Elevation: 130 to 8,500 feet.</p>	<p>Formerly widely distributed along, and mostly south of, the Mogollon Rim and in southern Arizona. Recent population declines and local extirpations have restricted the species to fragmented populations in the middle/upper Verde River drainage, middle and lower Tonto Creek, the Cienega Creek drainage, and several isolated wetland areas in southeastern Arizona. The nearest historic occurrence records and extant populations lie approximately 100 miles east in eastern Pima County.</p>

Appendix A. USFWS threatened, endangered, and special status species.

Name	Status	Habitat Requirements	Potential for Occurrence
Ocelot <i>Leopardus pardalis</i>	E	Humid tropical forests, coastal mangroves, and swampy savannahs. In Arizona, it has been observed in desertscrub and Madrean evergreen woodland communities. Elevation: <8,000 feet.	No suitable habitat. The project is outside of the species' current known range. Breeding populations have been extirpated from Arizona, though several unconfirmed sightings have been noted from southern Arizona in recent years.
Pima pineapple cactus <i>Coryphantha scheeri</i> var. <i>robustispina</i>	E	Sonoran desertscrub and semidesert grassland communities. Elevation: 2,300 to 5,000 feet.	No suitable habitat. The project area is outside the known distribution of the species. The nearest known populations are approximately 80 miles east of the project area, at the northern end of the Baboquivari Mountains.
Sonoran pronghorn <i>Antilocapra americana sonoriensis</i>	E	Restricted to Lower Colorado River Valley and Central Gulf Coast subdivision of Sonoran desertscrub habitat. Elevation: 2,000 and 4,000 feet.	No suitable habitat is in the project area. The AGFD (2010) indicates that pronghorn occur south and west of the project and that although the project is within a mile or so of the "range" of the species, they are not often seen close to Ajo, remain in the valleys, and would not be expected in foothill habitat, where the project is located.
Sonoyta mud turtle <i>Kinosternon sonoriense longifemorale</i>	C	Restricted to pond and stream habitat at Quitobaquito Springs in Organ Pipe Cactus National Monument (OPCNM), Arizona, and in nearby Rio Sonoyta, Sonora, Mexico. Elevation: 1,000 to 1,100 feet.	No suitable habitat. The project does not lie in the known distribution of this subspecies. The nearest known populations lie approximately 30 miles south of the project area, at Quitobaquito Springs in the OPCNM.
Southwestern willow flycatcher <i>Empidonax traillii extimus</i>	E	Cottonwood/willow and saltcedar vegetation communities along rivers and streams. Elevation: <8,500 feet.	No suitable habitat. No dense thickets of vegetation are along perennial streams in the project vicinity. The nearest known seasonal populations occur along the Colorado River and in eastern Pima County, each 80 miles or more distant.
Yellow-billed cuckoo <i>Coccyzus americanus</i>	C	Large blocks of riparian woodlands. Cottonwood, willow, or tamarisk galleries. Elevation: <6,500 feet.	No suitable habitat is in the project vicinity. No large blocks of riparian woodlands, cottonwood, willow, or tamarisk galleries are closer than the Colorado River. However, one specimen record is from a site along the U.S.–Mexico border in southern Pima County, approximately 60 miles southeast of the project area.

C = Candidate, E = Endangered, T = Threatened (USFWS 2010)

U.S. Customs and Border Protection Ajo Housing Development Project
Scoping Distribution List

Affiliation	M	First	Last	Title	Agency	A1	City	ST	Zip
Agencies	Ms.	Sharon	Bronson	District 3 County Supervisor	Board of Supervisors	130 W. Congress St., 11th Floor	Tucson	AZ	85701
	Ms.	Elaine	Raper	Acting District Manager, Lower Sonoran Field Office	Bureau of Land Management	21605 N. 7th Ave.	Phoenix	AZ	85027
	Ms.	Ursula	Kramer	Director	Pima County Department of Environmental Quality	150 W. Congress St., Suite 109	Tucson	AZ	85701
	Mr.	Arlan	Colton	Planning Director	Pima County Development Services	210 N. Stone Ave.	Tucson	AZ	85701
	Mr.	Bill	Zimmerman		Pima County Regional Flood Control District	97 E. Congress St., 3rd Floor	Tucson	AZ	85701
	Mr.	C.H.	Huckelberry	County Administrator	County Administrator	130 W. Congress St., 10th Floor	Tucson	AZ	85701
	Mr.	Rafael	Payan	Director	Natural Resources, Parks, and Recreation	3500 W. River Road	Tucson	AZ	85741
	Ms.	Margeret	Kish	Director	Community Development and Neighborhood Conservation	2797 E. Ajo Way	Tucson	AZ	85716
	Lt.		Anderson	District 4	Arizona Department of Public Safety	2111 E. Gila Ridge Road	Yuma	AZ	85365
	Chief	David	Tibbett		Ajo Fire Department	400 E. Taladro Ave.	Ajo	AZ	85321
	Lt.	Billy	Clements	Ajo District	Pima County Sheriff's Department	1249 N. Ajo Well Road	Ajo	AZ	85321
	Mr.	Gary	Hayes	Executive Director	Pima Association of Governments	177 N. Church Ave., Suite 405	Tucson	AZ	85701
	Dr.	Robert	Dooley	Superintendent	Ajo Unified School District #15	P.O. Box 68, 111 N. Well Road	Ajo	AZ	85321
	Mr.	Steve	Spangle	Field Supervisor	U.S. Fish and Wildlife Service	2321 W. Royal Palm Road, Suite 103	Phoenix	AZ	85021
	Ms.	Sherry	Barrett	Assistant Field Supervisor for Southern Arizona	U.S. Fish and Wildlife Service	201 N. Bonita Ave., Suite 141	Tucson	AZ	85745
	Ms.	Laura	Canaca	Project Evaluation Program Supervisor	Arizona Game and Fish Department	5000 W. Carefree Highway	Phoenix	AZ	85086
	Ms.	Tracy	Taft	Executive Director	International Sonoran Desert Alliance	401 W. Esperanza Ave.	Ajo	AZ	85321
	Sir or Madam			Ajo Historical Society Museum	160 Mission St., Box 778	Ajo	AZ	85321	
Adjacent Landowners	Mr.	James	Schneider			2040 N. Elliott Road	Ajo	AZ	85321
	Mr.	Michael	Zarecor			P.O. Box 8297	Spokane	WA	99203
	Mr.	Michael	Walker			700 W. Guest House Road	Ajo	AZ	85321
	Mr.	Sam	Tucker			86 Eastman Hill Road	Lebanon	NH	3766
		Sir or Madam		ATTN: Douglas R. and Janie Brader TR	Brader Living Trust	1580 W. North St.	Ajo	AZ	85321
	Ms.	Sally	Morrow			100 S. Sahuaro St.	Ajo	AZ	85321
	Mr.	Jodean	Morrow			100 S. Sahuaro St.	Ajo	AZ	85321
	Mr.	Gerado	Chi			911 W. Esperanza Ave.	Ajo	AZ	85321
	Mr.	Anthony	Kavanagh			606 Eucalyptus Way	Mill Valley	CA	95941
	Ms.	Kathie	Cumming			P.O. Box 162	Darrington	WA	98241
	Ms.	Anny	Junemann	ATTN: Jayson James Ouellette		731 W. Esperanza Ave.	Ajo	AZ	85321
	Mr.	Gerald	Luttmer			Box 1 Site, RR 2	Sundre	AB	TOM 1X0, Canada
Mr.	Joaquin	Betancourt			711 W. Esperanza Ave.	Ajo	AZ	85321	
Ms.	Francisca	Munoz			6337 W. Chickasaw St.	Phoenix	AZ	85043	
55 Sahuaro Lease Tenants	Vance and Patricia		Higdon			55 Sahuaro St., Lot #3	Ajo	AZ	85321
	Mr.	Bruce	Keith			55 Sahuaro St., Lot #32	Ajo	AZ	85321
	Ms.	Linda	Feidt			55 Sahuaro St., Lot #28	Ajo	AZ	85321
	Ms.	Phyllis	Williams			55 Sahuaro St., Lot #38	Ajo	AZ	85321
	Ramon and Rita		Salcido			55 Sahuaro St., Lot #37	Ajo	AZ	85321
	Ms.	Genny	Speckman			55 Sahuaro St., Lot #2	Ajo	AZ	85321
	Ben and Veronica		Hyink			55 Sahuaro St., Lot #30	Ajo	AZ	85321
Joshua and Wendy		Hamilton			55 Sahuaro St., Lot #40	Ajo	AZ	85321	
801 Esperanza	Ms.	Hilda	Alvarez			900 W. Esperanza Ave.	Ajo	AZ	85321
	Mr.	Jason	Slate			840 W. Esperanza Ave.	Ajo	AZ	85321
	Ms.	Sunia	Cox			492 W. 30 North	Burley	ID	83318
	Mr.	Victory	Salazar			701 N. Jefferson Ave.	Ajo	AZ	85321
		Sir or Madam		ATTN: Land and Water Department - S. Turton	Phelps Dodge Corp.	1 N. Central Ave.	Phoenix	AZ	85004
	Ms.	Karen	Hammett			800 W. Esperanza Ave.	Ajo	AZ	85321
	Ms.	Lynn	Terrell			740 W. Esperanza Ave.	Ajo	AZ	85321

On General Services Administration Letterhead

February XX, 2010

«M» «First» «Last»

«Title»

«Agency»

«A1»

«City», «ST» «Zip»

Re: U.S. Customs and Border Protection Ajo Housing Development Project

Dear «M» «Last»:

The General Services Administration (GSA) is planning to construct housing for U.S. Customs and Border Protection (CBP) employees. The GSA is proposing to develop seven parcels in south Ajo, in unincorporated Pima County, Arizona. The first parcel is at 55 S. Sahuaro St. and currently supports a partially occupied, 11.54-acre mobile home park. The next is a small unaddressed parcel, approximately 0.42 acre, immediately adjacent to the southwestern corner of the 55 S. Sahuaro St. parcel. The remaining five parcels consist of vacant parcels, addressed as 801, 811, 821, 831, and 841 W. Esperanza Ave., totaling approximately 0.78 acre immediately adjacent to, and north of, the 55 Sahuaro St. parcel. For the purposes of this project, all seven parcels will herein be referred to as the “subject property” (Figures 1 and 2).

This notice is being offered to allow early and meaningful participation in the National Environmental Policy Act (NEPA) review of this proposed housing development project. After the scoping period has ended, the GSA will prepare an Environmental Assessment to evaluate the potential environmental consequences of the proposed project. This letter is a request for comments, concerns, or issues relevant to the project.

There is currently insufficient housing available to accommodate CBP employees who work at the Lukeville Land Port of Entry (LPOE) and the Ajo Station in Why, Arizona. Existing housing that is available for CBP employees is poorly maintained and scheduled for demolition or replacement. Other housing options for CBP employees in the vicinity of the Lukeville LPOE are limited due to a scarcity of available rental properties. The GSA is proposing to address this need by constructing housing for CBP employees in Ajo, Arizona, at the subject property. Project construction of Phase 1 is proposed to begin in 2011.

The scope of work for this project consists of:

- Constructing 18 to 28 modular homes on the subject property (Phase 1)
- Constructing associated sidewalks, landscaping, and infrastructure, as needed
- Constructing up to 28 additional units at the subject property if funding becomes available in the future (Phase 2)

An agency and public scoping meeting will be held at 7 p.m. on March 4, 2010, at the Ajo Community Center, 290 5th St., Ajo. The meeting will be held in conjunction with a regular meeting of the Western Pima County Community Council.

If you have specific concerns, suggestions, or recommendations regarding this project and you cannot attend the above-mentioned meeting, please contact Michael R. Dawson at EcoPlan Associates, Inc., by e-mail at mdawson@ecoplanaz.com; by phone at 480.733.6666, extension 177; by fax at 480.733.6661; or by mail at:

GSA
c/o Michael R. Dawson
EcoPlan Associates, Inc.
701 W. Southern Ave.
Mesa, AZ 85210

We would appreciate receipt of your comments by **March XX, 2010**. Thank you for your time and assistance.

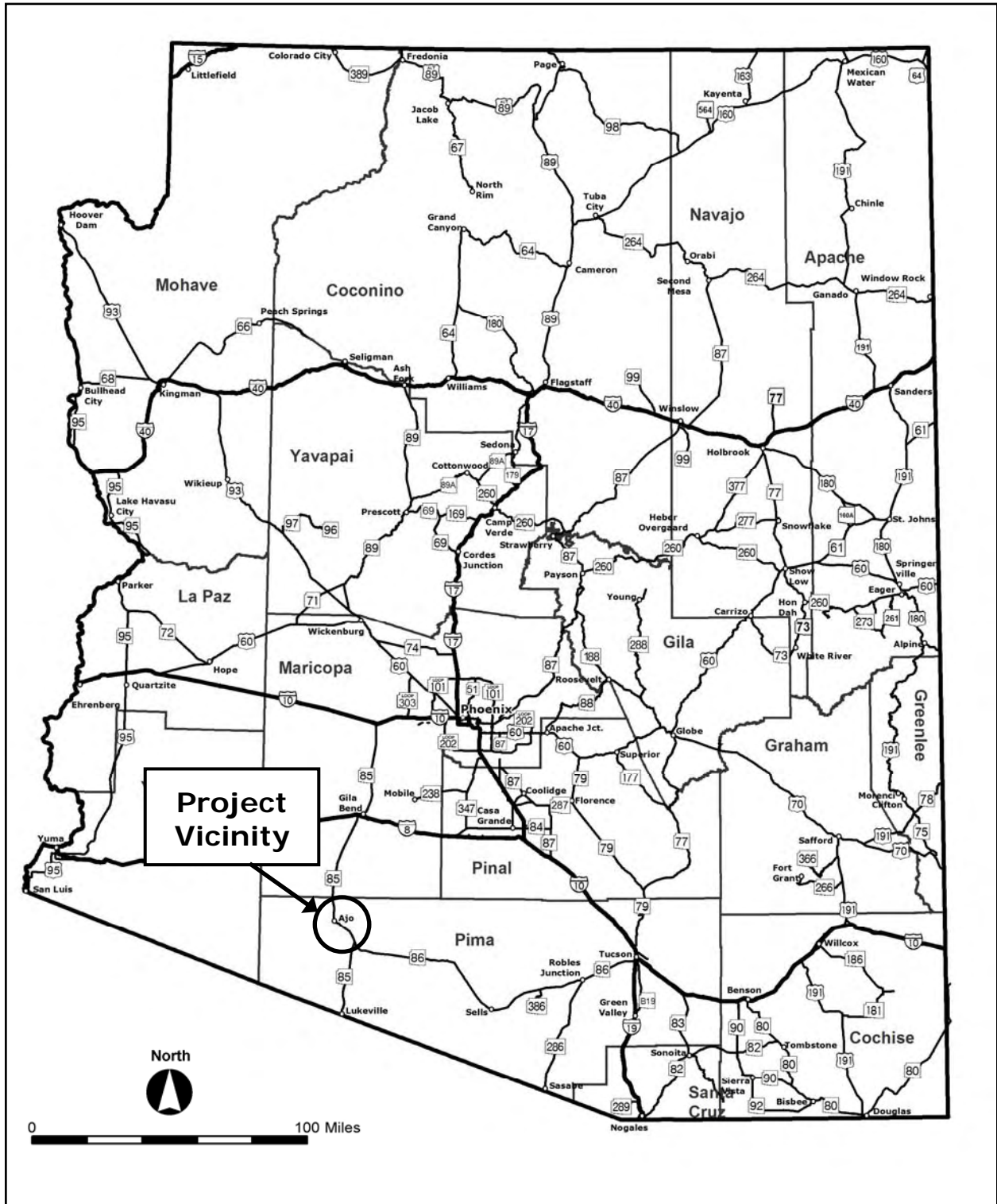
Sincerely,

Signature Pending

Mr. Osmahn Kadri
NEPA Project Manager
Portfolio Management Division
Pacific Rim Region

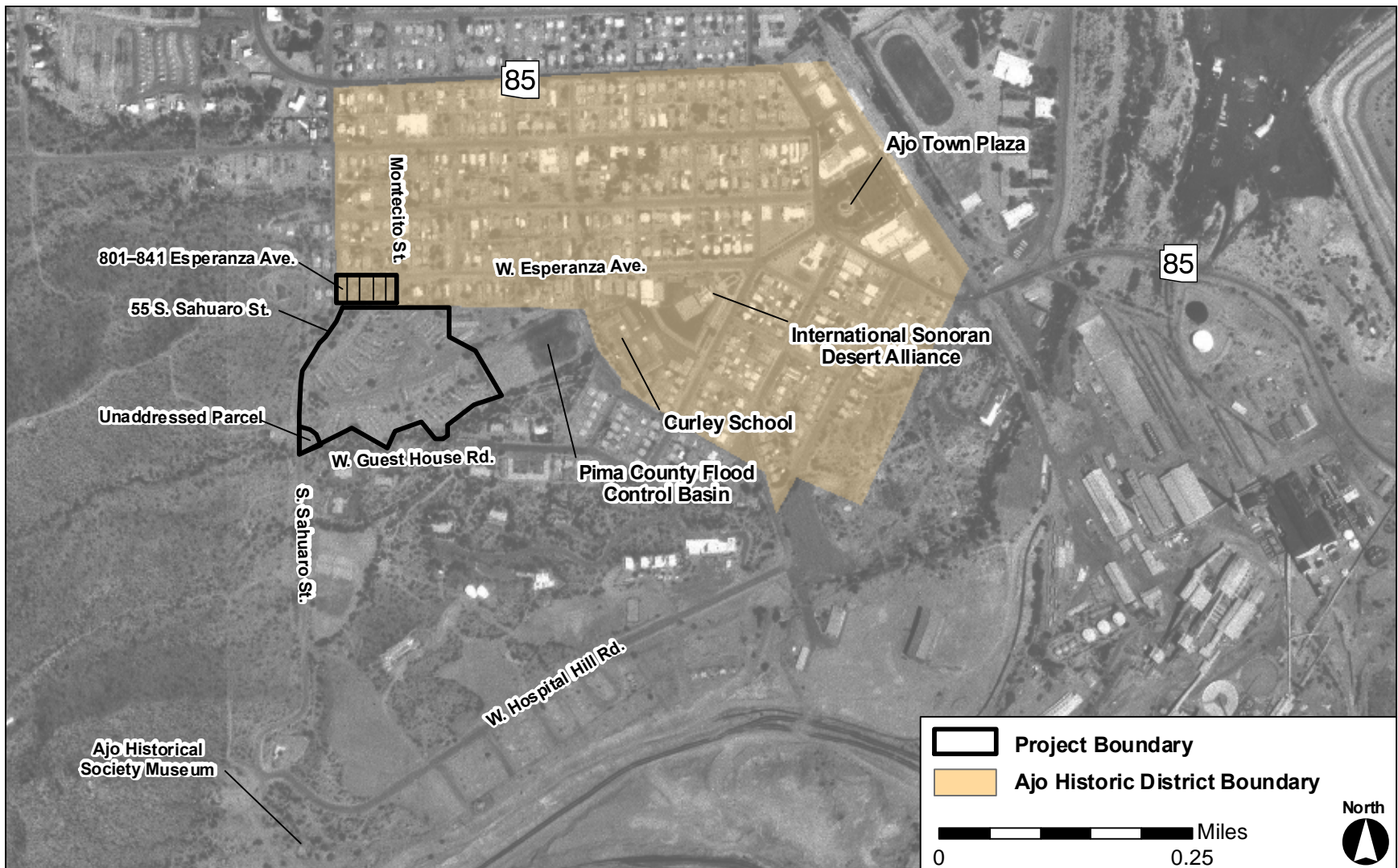
Enclosures: Figure 1–Project location
Figure 2–Project vicinity

c: Michael R. Dawson, EcoPlan Associates, Inc. (without enclosures)



U.S. Customs and Border Protection Ajo Housing Development Project

Figure 1. Project vicinity.



U.S. Customs and Border Protection Ajo Housing Development Project

Figure 2. Project vicinity.



GSA Pacific Rim Region

October 27, 2010

Mr. Robert Frankeberger
Arizona Office of Historic Preservation
Arizona State Parks
1300 West Washington
Phoenix, AZ 85007

Re: Ajo Housing Development, Ajo, AZ

Dear Mr. Frankeberger,

The General Services Administration (GSA) has received funding through a Reimbursable Work Authorization (RWA) from Customs and Border Protection (CBP) for the design and construction of new modular housing in Ajo, Arizona (Undertaking) for the CBP officers and agents working at the Lukeville Land Port of Entry and the Ajo CBP Office of Field Operations. The proposed new modular housing will provide 20-22 one, two or three bedroom units with garages. There are possibly two additional phases of housing construction anticipated in the future, but these phases are neither scheduled, nor funded at this time and thus are not part of this determination letter.

GSA is purchasing property at 55 South Sahuaro Street, Ajo (Site) from a private individual on which to construct the new housing units. Once the construction is complete, GSA will transfer ownership and all other responsibilities for the project to CBP. The site, classified as a Mobile Home Park according to Pima County, currently has 42 lots, 13 lots have structures on them and the remaining lots are vacant.

GSA has determined that the Area of Potential Effects (APE) for this project is the boundaries of the Site (attachment 1). There is an existing National Register historic district, Ajo Townsite Historic District (attachment 2), located in the town. The Northeastern corner of the Site is approximately three blocks from the edge of the historic district at its closest point. Given the geographical distance between the Undertaking and the historic district, and the fact that this undertaking is removing and replacing existing one-story residential units, GSA has determined that this undertaking will not have an effect on the Ajo Townsite Historic District, therefore it is not included within the APE.

GSA has determined that there are no historic properties within the APE. Of the 13 existing structures on the Site, 12 are one-story, single or double-wide modular residences, constructed in

U.S. General Services Administration
450 Golden Gate Avenue
San Francisco, CA 94102-3434
www.gsa.gov

1997 or later (attachment 3). These buildings are not yet 50 years old, nor do they meet the exceptional significance criteria of the National Register.

One structure is a one-story brick building ("office") (attachment 4). The construction date is unknown, but it appears to date from the 1940s as an office (1941 Sanborn Map) associated with a military housing project previously located on the site. GSA has determined that the "office" is not significant under any of the National Register criteria. Its primary association is with the military housing development that occupied the site from the 1940s through the 1980s or 1990s, however all the other structures associated with this housing development are gone, leaving the "office" out of context. The "office" is not associated with the Ajo Townsite Historic District either, which draws its significance as a socially responsible, planned company town, significant for its City Beautiful inspired town site plan as well as architect-designed and vernacular buildings formerly owned by the company. The architecture of the "office" is not representative of any of the styles referenced in the Ajo Townsite nomination form. The "office" is currently unused, appears to have been abandoned for several decades, and suffers so much from a loss of integrity of design, setting, materials, workmanship, feeling and association, that further study on whether it meets eligibility criteria is unwarranted.

A search of the archaeological records retained at the Arizona State Museum (attachment 5) found the proposed project area had never been inspected for cultural resources and no sites are recorded within the project boundary.

GSA plans to begin Site design for the project in the near future. Once the design is complete, available funding will determine exactly how many units can be constructed, but it will most likely be between 20 and 22. The units will be constructed along the western and southern edges of the Site (attachment 6). Preliminary floor plans and perspectives are also included.

GSA has determined that there are no historic properties present within the APE. If you do not object to this determination within 30 days of receipt of this letter, GSA will consider its responsibilities fulfilled under section 106 of the National Historic Preservation Act. By copy of this letter we are notifying the Native American tribes listed below of our undertaking and our determination and soliciting any comments they may have.

If you have any questions or require additional information, please contact me at jane.lehman@gsa.gov or (415) 522-3098.

Sincerely,



Jane Lehman
Regional Historic Preservation Officer

Attachments

CC:

Kirsten Brinker-Kulis
Advisory Council on Historic Preservation
The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

Paul Baranowski, Chief, Housing Branch
Facilities Management and Engineering
U.S. Customs & Border Protection
1331 NW Pennsylvania Ave
Washington DC 20229

Herminia Frias, Chairperson
Pascua Yaqui Tribe
7474 S. Camino de Oeste
Tucson, AZ 85746
Attn: Ms Amalia Reyes, Cultural Preservation Spec

Wendsler Nosie, Chairperson
San Carlos Apache Tribe
San Carlos Ave
San Carlos, AZ 85550
Attn: Ms Vernelda Grant, THPO

Ned Norris, Chairperson
Tohono O'odham Nation
Main Tribal Building, Business Loop
Sells, AZ 85634
Attn: Mr. Peter Steere, Cultural Affairs Prog. Mgr.

Ronnie Lupe, Chairman
White Mountain Apache Tribe
202 E. Walnut St.
Whiteriver, AZ 85941
Attn: Mr. Mark Atalha, THPO

Leigh Kuwanwisiwma, Cultural Preservation Office
Hopi Tribe
P.O. Box 837
Kykotsmovi, AZ 86039

Ajo Historical Society Museum
160 Mission St, Box 778
Ajo, AZ 85321



Ajo Townsite Historic District

- KEY**
- HISTORIC RESOURCES
 - INVENTORY AREA BOUNDARIES
 - NON-CONTRIBUTORS
 - PLAT BOUNDARIES
 - DISTRICT BOUNDARIES

AJO, ARIZONA
HISTORIC RESOURCES INVENTORY

3645 N. CAMINO BLANCO PL. • TUCSON, AZ 85718 • 602-677-0058
JOHNS & STRITTMATTER INC.
 ARCHITECTURE • PLANNING • PRESERVATION

3645 N. CAMINO BLANCO PL. • TUCSON, AZ 85718 • 602-677-0058

AMENDED BY
JANET H. STRITTMATTER INC.
 HISTORIC ARCHITECT

3016 OGLE CIRCLE TUCSON, AZ 85718 TELEPHONE: 624-5880 FAX: 624-5880

JAN. 11, 2001
 JAN. 5, 2001 (ADDITION OF ISRAEL PHILES DOOR HOUSING)
 (INVENTORY NUMBERS BEGINNING WITH "A")