

**Comments on Draft Environmental Assessment for the Scorpion Bay Marina
and Yacht Club**

- Overall: Various spelling, tense, and grammatical errors are present. Recommend editing. | 1-1
- Overall: Using an internet address in a citation is not correct style. Please see the MLA Handbook, Chicago Manual of Style or other guide and fix throughout the EA. | 1-2
- Overall: Why is so much evidence cited in the EA from personal communications? Are there hard copy sources for these data? | 1-3
- Table of Contents, page i: Chapters 4-7 should be added. | 1-4
- Section 1.3, page 3, line 30: What is the 1997 EA? | 1-5
- Section 1.5, page 4: reference the list of consultations in Chapter 5. Also, line 6 says that 70 parties were contacted, but the list in the back is approximately 25 parties. Recommend including a complete list of parties contacted. | 1-6
- Section 2.1, page 7: Again there is reference to a "...Plan 6 commitment..." on line 15. Is this a legal requirement of Reclamation? How does the "commitment" factor into analysis of the proposed action and alternatives? Please clarify this "commitment". | 1-7
- Section 2.2, page 7: Please describe the estimated number of years the proposed action would take to complete. | 1-8
- Section 2.2, page 7, lines 33-34: These lines describe the "major" facilities. What facilities are not described? Recommend a full disclosure of the proposed action here. | 1-9
- Section 2.2, page 10, line 6 and page 13, line 24: What plants are determined suitable by whom? | 1-10
- Section 2.2, page 11, line 36: What is "vault and haul"? | 1-11
- Section 2.2, page 13, line 35: Recommend square yards be changed to square feet, since other measurements throughout the EA are described in feet and acres. | 1-12
- Section 2.2, page 14, line 1: What kind of chemical? Why not water? | 1-13
- Section 2.3, page 14, line 16: Why would a marina not associated with the County not fulfill the purpose and need of the project? What is the crucial part being associated with the County? | 1-14
- Section 2.3, pages 14-15: The bulleted list of criteria used in the past opportunities and constraints analysis may be appropriate in discussing criteria used to evaluate alternatives, but where are the alternatives themselves discussed? What about alternatives eliminated from analysis? | 1-15

Section 2.3, page 15, lines 31-34: If a previous analysis identified the same location for the marina as the currently proposed action, why is it discussed as an alternative?	1-16
Section 3.1.1, page 17: Recommends analyzing topography, soils, minerals, and the potential presence of paleontological resources.	1-17
Section 3.1.2.2, page 17: Recommend more clearly analyzing environmental consequences of proposed action. For example, what about dust suppressant during excavation? Where will extra rock debris be disposed?	1-18
Section 3.2, page 18: Also analyze water rights and water quality. What about any tribal water rights?	1-19
Section 3.2.2.2, page 21, line 16: Is this the first time that placement of rock fill within the lake is mentioned?	1-20
Section 3.2.2.2, page 21, line 25: What are the engineering controls? Be specific, this is the environmental consequences section.	1-21
Section 3.2.2.2, page 21, line 39: What is the secondary containment?	1-22
Section 3.2.2.2, page 22, lines 7-8: Why would undisturbed native vegetation receive water when available?	1-23
Section 3.2.2.2, page 22, line 16: As with other personal communications, is "...no restrictions on quantity of groundwater that is pumped..." verifiable?	1-24
Section 3.2.2.2, page 22, lines 30-34: What are safe levels of these constituents?	1-25
Section 3.2.2.2, page 23, lines 10-11: Floodplain analysis deserves more treatment than currently described and should be coordinated with EO 11988 on page 43.	1-26
Section 3.3, page 23: Land use, recreation, and noise should be discussed under separate subheadings.	1-27
Section 3.3.1, page 23, lines 46-48: The sentence on vehicular travel is confusing. Please clarify.	1-28
Section 3.3.1, page 24, lines 4-8: Is there a Wilderness section to analyze impacts? For example, could traffic issues along SR 74 during construction of the proposed action affect access, etc. to the Hells Canyon Wilderness?	1-29
Section 3.3.1, page 25, Table 2: We recommend to reformat the table.	1-30
Section 3.3.2.1, page 27, lines 15-16: How is looking for other proposals for marina construction the no-action alternative?	1-31

Section 3.3.2.2, page 27, lines 20-21: Is this new information being addressed for the first time regarding the timing of all excavation and grading activities?	1-32
Section 3.3.2.2, page 27, lines 36-38: "...ample alternative locations..." Where these alternative locations for recreation activities during construction analyzed anywhere herein? Since they are part of the proposed action, how were they mapped and how were the locations selected?	1-33
Section 3.3.2.2, page 28, lines 12-13: The guarantee to construct through phase III; does this contradict page 27, lines 20-21 where it says that excavation/grading for all <u>four</u> phases would be completed under phase I?	1-34
Section 3.3.2.2, page 29, lines 5-14: Should this be analyzed in the current EA for cumulative impacts to recreation and safety?	1-35
Section 3.4.1, page 30, lines 12-14: What is this specifically about? Please clarify, provide more data, and relate to the action.	1-36
Section 3.5, page 33: Here and in the rest of the EA, site numbers should be written properly to include their quad location, i.e. "AZ" and the numbering institution, i.e. "ASM", so that a site number is read: AZ T:4:55 (ASM).	1-37
Section 3.5, page 33: What type of information was gathered during consultation with tribes regarding TCPs?	1-38
Section 3.5.1, page 34, lines 15-18: Please clarify which two sites are being discussed out of the four. Or, are all four being discussed?	1-39
Section 3.5.2, page 25, lines 15-18: These development areas are mentioned here and elsewhere. It would be very helpful to see these illustrated on a map.	1-40
Section 3.5.3.1, page 35: We recommend to simplify the no-action alternative.	1-41
Section 3.6, page 36: What about a discussion concerning migratory birds?	1-42
Section 3.6.2.1, page 38: We recommend to simplify the no-action alternative. Also, in line 24, change "disbursed" to "dispersed".	1-43
Section 3.6.2.2, page 39, lines 6-8: Clarify that the "breeding area" is for the bald eagle. Also, would echoes and reverberations from blasting echo through the lake and canyons to the nest site? Was this considered?	1-44
Section 3.6.2.2, page 39: For the mitigation measures, were the following considered: blasting outside of breeding season? Increased signage and enforcement to keep boaters out of the closure area?	1-45

Section 3.6.2.2, page 38: Is there a quantifiable projection associated with the loss of animal species associated with the loss of habitat? Which species are most likely to be affected? Also, what about direct impacts of construction and machinery?	1-46
Section 3.6.2.2, page 38: Has consultation (informal/formal) been completed with the USFWS? Include consultation letters and responses as part of the appendices.	1-47
Section 3.7, page 40: What about environmental justice? Coordinate with EO 12898 on page 44.	1-48
Section 3.7.2.2, page 41: What about the potential for more accidents and the infrastructure to respond to such emergencies? What about additional law enforcement? Who will supply the personnel? These are important issues to be analyzed.	1-49
Section 4, page 42-44: These “related environmental laws/directives” should receive a short treatment in Section 3 of the EA.	1-50
Section 4, page 42, line 28-37: The biological report is referred to alternatively as a “BE”, “biological evaluation” and “biological assessment”. Please clarify.	1-51
Section 4, page 43, line 12: Is the first time that “turbidity booms” have been mentioned in the EA?	1-52
Section 4, page 43, line 28: “No significant impact” is not correct if the SHPO has concurred with a finding of “no historic properties affected” as described in line 31.	1-53
Section 4, page 44, line 1: “Per Maricopa County representatives...”; this is not necessarily good documentation. Hard copy documentation should be available on FEMA or Army Corps of Engineers maps for floodplains.	1-54
Section 4.4, page 44, line 12: A conclusion is made “Neither of these conditions exists...” without a discussion, description, or explanation of the analysis.	1-55
Section 5, Page 45: The BIA recommends including a list of those agencies who have received copies of the Draft EA for review and which newspaper(s) the Notice of Availability was published in and on what date(s).	1-56
Section 5, page 45: Please include an example tribal consultation letter.	1-57
Section 5, page 45: Please include an example scoping letter for other parties.	1-58
Section 5, page 45: Where other Yavapai tribes contacted? Were the Four Southern Tribes contacted or just the Salt River Pima-Maricopa Indian Community?	1-59
Page 6 of the Biological Evaluation: All 14 species were not eliminated because mitigation was developed for the bald eagle.	1-60

Page 11, Biological Evaluation: the Southwestern Willow Flycatcher was documented near Waddell Dam in 2004? How near? | 1-61

Additionally, the BIA also recommends addressing the following elements in the EA, where applicable:

- Please address transportation networks in the park and outside the park (including SR 74), including any associated impacts anticipated during the duration of construction activities (large equipment requiring special guidance to the project work site, estimated frequency of travel along the roads, which roads would most often be used, etc.). | 1-62
- In lines 40-43 on page 3, a set of criteria are given against which impacts analyzed in this EA will be judged. We could not find any summary at the conclusion of the document, or anywhere else, that judged analyzed impacts against these criteria. | 1-63
- We also recommend continued coordination efforts with the tribes and neighboring landowners and agencies on the status of the EA and future construction efforts. | 1-64
- Cumulative effects need to be discussed. | 1-65