

scarce. This is in part why we feel that even Alternative D is not enough to protect the Flat-tailed Horned Lizard and its habitat, along with the other special status species of the 5-Mile Zone Study Area, and why development in the western area should also be prevented to a much greater degree than proposed under Alternative D. P. E-3 of Attachment E, listing the plan elements, states that Reclamation, under the proposed alternative (D) will "Allow uses that adversely affect endangered or threatened species or critical habitat only with appropriate mitigation." Reclamation should add "and only when such uses are for life-threatening safety or health purposes." The Area Service Highway is not such a purpose.

Elements Common to All Alternatives

In general, the problem here is that Reclamation has already granted approval of projects with certain serious impacts on the environment (including the Flat-tailed Horned Lizard) without evaluating the impacts. These proposed projects have not yet gone through National Environmental Policy Act (NEPA) and other compliance. Reclamation's language concerning these projects should be much more conditional at this point, indicating that if a proposal passes environmental compliance, Reclamation would consider cooperation. Some of the proposed projects just shouldn't happen, however.

We do appreciate Reclamation's mitigation provision under Alternative D that impacts to Flat-tailed Horned Lizards must be mitigated and compensated not only within the Yuma Desert Management Area (YDMA) but also for projects outside the YDMA (Plan, P. V-48). However, we still feel that many of the impacts proposed in Alternative D are too great for the Flat-tailed Horned Lizard to resist successfully, even with mitigation and compensation. The lizard's habitat needs to remain undisturbed. Most of the lizard's habitat is already in federal ownership, so very little land remains to compensate for federal land converted from Flat-tailed Horned Lizard habitat to something else. Perhaps the best remaining lands that could be acquired for the Flat-tailed Horned Lizard in Arizona are the state trust lands north of the 5-Mile Zone Study Area and just west of the Barry M. Goldwater Range.

We understand that the Flat-tailed Horned Lizard rangewide management strategy has been updated as of this year. Does Reclamation plan to use the updated strategy? How will this affect the analysis in the Plan?

The Area Service Highway

This proposed project is a major undertaking, yet so far only a draft environmental assessment has been issued and comments accepted. Therefore, it is premature for Reclamation to ". . . cooperate with ADOT and the Federal Highway Administration to obtain needed permits and environmental clearances to construct the Area Service Highway (ASH) within the Study Area, including a major interchange at 23rd Street and Avenue E." (Plan, p. IV-5). The Area Service Highway may not even go through the 5-Mile Zone Study Area after NEPA compliance is completed.

Reclamation's language in the Plan should reflect that Reclamation would cooperate only when and if the Area Service Highway route through the 5-Mile Zone Study Area is authorized through the NEPA and other environmental compliance processes.

Avenue E North Extension/Rolle Airfield

As with the Area Service Highway, this proposed project has not gone through environmental compliance. Reclamation's language again should reflect cooperation only when and if the project meets environmental compliance. In fact, Reclamation should also look at an alternative to retire this facility, rather than allow it to further develop, and what the impacts would be if it were taken out of operation. The proposed road to Rolle Airfield, which would be built north along the Avenue E alignment from County 23rd Street, would cross desert that is Flat-tailed Horned Lizard habitat and currently has little access. It should stay in a natural condition, and, among other purposes, continue to serve as Flat-tailed Horned Lizard habitat. Reclamation should also note that the Yuma Metropolitan Planning Organization is proposing to not only construct a road from County 23rd to the Rolle Airfield, but then extend it north to County 19th Street. The proposed route would only follow the Avenue E alignment north for a short distance, then curve to align with Somerton Avenue, which is to the west of Avenue E. Such a route would further fragment the 5-Mile Zone and should be rejected. The Plan should also look at the effects of improving the existing access to Rolle Airfield if it is going to continue in operation, rather than simply approving the proposed Avenue E route.

County 23rd Street Water and Sewer Corridor

This would cause considerable disturbance to Flat-tailed Horned Lizard habitat, including within the Yuma Desert Management Area. Again, Reclamation should indicate cooperation would occur only if the project passes environmental compliance requirements. In addition, Reclamation should also consider the impacts of not approving this project. Is a water and sewer line something the prison has requested? What is the current situation, and what will future needs be? This all needs to be considered before Reclamation gives blanket approval to the project. In addition, it should be clear that such a project would require mitigation for Flat-tailed Horned Lizards in accordance with the rangewide management strategy.

County 23rd Street Highway from San Luis to ASH Interchange

Again, Reclamation should indicate that approval for this project would occur only if it met environmental compliance. In addition, it should be clear that it would require mitigation similar to that required for the Area Service Highway in terms of keeping Flat-tailed Horned Lizards off the road (fences and culverts).