

### ***San Luis-Commercial Port of Entry Truck Route***

This route would duplicate access to San Luis provided by Avenue E to County 23<sup>rd</sup>. The reason the City of San Luis gave for wanting the commercial port of entry to the east of San Luis (and not in the current port area) was to keep truck traffic from going through San Luis. The truck route proposal, which would go east from San Luis to County 24<sup>th</sup> Street, would route trucks through San Luis. At the least, Reclamation should indicate cooperation can only occur if the project goes through and passes environmental compliance; at best, Reclamation should reject this proposal.

### ***Border Patrol Protective Zone***

The Border Patrol has requested Reclamation to approve increasing the width of a protective zone along the border from 90 to 150 feet. The rationale given for this is that Border Patrol agents have been subjected to stone-throwing incidents. Has this been a problem in the 5-Mile Zone Study Area? It is unclear from the Plan whether this request results from incidents in the 5-Mile Zone Study Area or instead from incidents elsewhere that led the Border Patrol to request a uniform 150-foot zone along the border.

### **Land Exchanges**

Reclamation's proposal to participate in a land exchange for the Hillander "C" tract has merits. It could prevent development from occurring in the midst of the 5-Mile Zone Study Area. It should be evaluated for the contribution it could make to Flat-tailed Horned Lizard habitat, although being bisected by construction of a paved truck road along Avenue E places limits on its value to Flat-tailed Horned Lizards. The farmland would have to be returned to desert habitat, although some of the fields appear to be abandoned and are already beginning to revert to desert.

However, the western area of the 5-Mile Zone Study Area north of County 23<sup>rd</sup> also has habitat value, including for Flat-tailed Horned Lizards, so Reclamation should not use lands in the "western portion of the study area" (Plan, IV-8) in exchange for Hillander "C" or any other land exchange. Lands outside the 5-Mile Zone with lower habitat value should be considered for exchange for the Hillander "C" parcel.

Similarly, Reclamation's proposal to keep the same base land acreage in the 5-Mile Study Area is good as far as it goes, but if land use changes, even though the same amount of land is in the 5-Mile Zone Study Area, it could be less valuable for wildlife, including the Flat-tailed Horned Lizard. We are also concerned about the language in the Plan (p. IV-8) that would allow the size of the 5-Mile Zone Study Area to decrease if there were "just compensation." Please explain what "just compensation" would be. Overall, accepting "just compensation" doesn't sound like a good idea.

The Plan should also propose a land exchange to reacquire the section (more accurately, two half-sections) allocated for future use as a landfill by the City of Yuma. The City of Yuma has so far chosen not to use this site, preferring instead to use a private landfill east of Yuma. The proposed landfill site is so far essentially undeveloped and has excellent Flat-tailed Horned Lizard Habitat.

#### **Partnerships and Coordination with Other Entities**

On p. IV-18, the Plan proposes a "partnership with AGDF [sic] to enhance habitat for game species" without further specifying what would be involved. In general, given the environmentally sensitive nature of this area, including the presence of the Flat-tailed Horned Lizard, we believe that any special status species (because of concerns about their potential survival) need special management more than game species. The only area where game species management might be appropriate is the citrus orchard east of Avenue E on the way to the cattle crossing at the border. This could be managed for doves if it remains in citrus. Please clarify what is envisioned by the Plan.

#### **Recreation Management**

The proposed alternative (p. IV-18) envisions the establishment of overnight campgrounds in the western part of the 5-Mile Zone Study Area, "based on public demand." We urge Reclamation not to establish developed campgrounds in this area unless dispersed camping is causing more problems than concentrated camping would. As Reclamation notes, this is affected by "demand." What is the demand for camping in this area? Does Reclamation have any information on how many persons are camping for recreation or other purposes in this area?

Figure V-2, "Recreation Facilities and Attractions near Yuma, Arizona" should be expanded to include the Betty's Kitchen area at Laguna Dam, managed by the Bureau of Land Management. The column on facilities/attraction should include hiking and rock collecting as activities for the Kofa National Wildlife Refuge (rock collecting is prohibited on most of the Kofa Refuge, but it is permitted under certain conditions at Crystal Hill). The Barry M. Goldwater Range and Cabeza Prieta National Wildlife Refuge should also be included as recreation facilities and attractions. Tinajas Altas on the Barry M. Goldwater Range is a popular destination for Yuma residents. There are also areas in Mexico that are popular for recreation use by Yuma residents, such as El Golfo, the Ciénega de Santa Clara, and the Pinacate national park.

Please note that development of the 5-mile zone could make it easier for persons who have crossed the border illegally to hide. This could affect Border Patrol operations.

### **Off-Highway Vehicle Use**

We applaud Reclamation's proposal to close the 5-Mile Zone to off-road vehicle use under three of the four alternatives (Alternatives B, C, and D). Reclamation should post signs at entry points to the 5-Mile Zone Study Area indicating that the area is closed to vehicular travel unless there is a paved road or a road that is signed as open, rather than having to post many closed signs throughout the area. In areas where enforcement is a problem, it may be necessary to post closed signs, but these should state that the 5-Mile Zone is closed to vehicular travel unless posted open.

### **Monitoring**

Reclamation needs to develop a more specific monitoring plan for the 5-Mile Zone Study Area and it should have been included in the draft so it could be evaluated before the Plan is approved. Specific standards should be set for the elements of the Plan and if these are approached or exceeded, specified actions should be taken to correct the problem. We hope that Reclamation will develop a more detailed monitoring plan. In addition, Reclamation should specify where funding for monitoring will come from.

### **Corrections and Technical Issues**

The following references in the text of the plan have no citation in the Bibliography: Start and Love, 1965 referenced on p. V-27, Arizona Sonoran Desert Museum, 2000 referenced on p. V-28, Federal High [sic] Administration et al., 2001 referenced on p. V-33, Crownover, 1996; Courtright, 2001; and Potter, 1993; all referenced on p. V-67.

The Army will be surprised to discover that Yuma Proving Grounds are managed by the Marine Corps (Figure V-2, p. V-52 of Plan).

There is a problem with one of the fonts used in the Bibliography that I downloaded from Reclamation's web site. The italicized font used for titles of publications won't print if the letter is a lower case "u," "v," "w," "x," "y," or "z." The upper case letters print correctly.

### **Conclusion**

Reclamation has done a commendable job of producing a proposed plan that has many positive elements that will protect natural resources in the 5-Mile Zone, especially the Yuma Desert Management Area. However, too much development is proposed for the western part of the area, which still has much undeveloped desert and Flat-tailed Horned Lizard habitat. The 5-Mile Zone is a special area for at least two reasons—its use as a groundwater source to meet treaty obligations to Mexico and the special status species that occur in what to many seems a barren area, in particular the Flat-tailed Horned Lizard. A number of projects have already been

authorized for this area, some of them deep in Flat-tailed Horned Lizard habitat. The balance now needs to tip in the other direction, and the remaining habitat in desert and natural state in all parts of the 5-Mile Zone, east and west, needs to be protected from further development and degradation. We encourage Reclamation to modify the Plan in the direction of Alternative B and our suggestions. Thank you for the opportunity to comment on this draft environmental assessment and proposed plan.

Sincerely,



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