

There are no Federally listed species known to be resident on the USBR lands in the Zone. Habitat for the threatened Peirson's milkvetch (*Astragalus magdalenae* var *peirsonii*) may exist within the Zone, but the location and extent of this possible habitat, and its relationship to projects common to all alternatives or directions contained within the alternatives is not provided. The protections afforded a listed species on Federal land, from the effects of Federal actions, are not different depending on the alternative. The Endangered Species Act, even under the No Action Alternative, requires evaluation of effects to listed species from any Federal action. The analyses for the other special status species can evaluate the differing levels of adverse or beneficial effects to those species but this does not apply to listed species. Habitat for the dune spurge (*Euphorbia platysperma*), a species of concern, is found on the Yuma Dunes just east of the Zone. Additional information on protection or management for this species and its habitat would be appropriate to consider in the effects of the action.

The amount of flat-tailed horned lizard (*Phrynosoma mcallii*) habitat outside of the Yuma Desert Management Area should be included in the discussions of effects of the alternatives. While all alternatives hold protection of the management area in common (although the types of protection require updating to reflect the 2003 management strategy), effects to any suitable habitat outside that area are likely to be different. As there is horned lizard habitat outside the management area, we suggest that the analysis for effects be expanded to include this discussion.

Specific Comments

Page Ex-5, paragraph 3:

Reference to 1997 flat-tailed horned lizard management plan should be updated to the 2003 version.

Page I-11, 5th bullet:

Reference to 1997 flat-tailed horned lizard management plan should be updated to the 2003 version.

Page IV-2, 6th bullet:

Reference to 1997 flat-tailed horned lizard management plan should be updated to the 2003 version.

Page IV-17, paragraph 2:

The 2003 flat-tailed horned lizard management strategy does not provide for exchanges out of Federal ownership of lands in the Yuma Desert Management Area. The description of Alternative D should be modified to reflect this.

Page IV-18, Recreation Management:

Please clarify that the term "western portion" includes lands outside of the Yuma Desert Management Area. Although the later sentence states that no recreational facilities would be in the management area, a clear description here, or at another suitable place in the RMP/EA that clarifies this point would be of assistance to the reader.

Page V-8, paragraph 5:

The last sentence in this paragraph discusses the unsuitability of some soils found on the Zone to accommodate recreational development. However, there is no discussion of these limitations in the effects of the alternatives sections, particularly for Alternative C.

Page V-10, paragraph 1:

Please describe in this introductory section what portions of the Zone within the study area have been annexed by the cities of Yuma and San Luis, and what preliminary zoning is proposed for those areas. To some extent, this is done on page V-16 for San Luis, but more information is needed. The ability of each alternative to meet preliminary zoning should be more fully described in this section.

Page V-14, Figure V-1:

We suggest also referencing back to the list of proposed projects that are included in the baseline for the existing environment, since they are a factor in this discussion. The projects discussed on pages V-15 to 16 should be separated into those that are common to alternatives and those which are speculative at this time and may be officially proposed later.

Page V-21, paragraph 3:

The baseline discussion on groundwater should reference back to the reservation of the 140,000 af and the degree of latitude available in USBR making some of that water available for other purposes. The discussion under the alternatives, particularly under the No Action Alternative, should include future predictions of the amount of water that will need to be pumped from the wellfield relative to the stability of other water sources that currently make up the bulk of the 140,000 af delivery. For example, if water availability from the Yuma Project declines and forces higher pumping from the wellfield, does that have an effect on the amount of development and changes to land use that could be supported under each alternative? Some of this information is in paragraph 2 on page V22, but should be expanded for at least the 10-year period the RMP/EA will be in effect.

Page V-22, map V-4:

Please differentiate USBR wells in the Zone from those of other users.

Page V-23, paragraph 6:

Could the Hillander "C" tract be converted from agriculture to urban-suburban development under any alternative? What would be the effects to groundwater under that situation? At full development, how much water would be needed to support homes and businesses, and how would that affect water use and percolation back into the soil? Given the much larger effect of farming outside of this tract, would any difference be noticeable?

Page V-38, paragraph 3: