

RECLAMATION

Managing Water in the West

Draft Environmental Assessment

City of San Luis County 24th Street - 10th Avenue (Avenue H) to Avenue F-1/2



Interior Region 8 - Lower Colorado Basin
Arizona, California, Nevada
Yuma Area Office
Yuma, Arizona

October 2022

Mission Statements

The U.S. Department of the Interior protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated Island Communities. The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

Draft Environmental Assessment
City of San Luis County 24th Street - 10th Avenue (Avenue H) to Avenue F-1/2

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October 2022

Acronyms and Abbreviations

Acronym or Abbreviation	Description
ABC	Aggregate Base Coarse
AC	Asphaltic Concrete
ADEQ	Arizona Department of Environmental Quality
ADOT	Arizona Department of Transportation
ADWR	Arizona Department of Water Resources
AGFD	Arizona Game and Fish Department
APE	Area of Potential Effect
ASLD	Arizona State Land Department
APN	Assessor's Parcel Number
AZPDES	Arizona Pollutant Discharge Elimination System
BLM	Bureau of Land Management
BMPs	Best Management Practices
C	Candidate
CBI	Conservation Biology Institute
CCA	Candidate Conservation Agreement
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
City	City of San Luis
EA	Environmental Assessment
ECOS	Environmental Conservation Online System
EFH	Essential Fish Habitat
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
ERIS	Environmental Risk Information Services
ESA	Endangered Species Act
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FLUP	Future Land Use Plan
FONSI	Finding of No Significant Impact
FTHL	Flat-tailed Horned Lizard
GIS	Geographic Information System
HURF	Highway User Revenue Fund
IPaC	Information for Planning and Consultation
ITA	Indian Trust Asset
LE	Listed Endangered
License	Land Use License
LT	Listed Threatened
MA	Management Area

Minor	Negligible
MSL	Mean Sea Level
NAAQS	National Ambient Air Quality Standards
NHPA	National Historic Preservation Act
NEPA	National Environmental Policy Act
NOI	Notice of Intent
OERT	Online Environmental Review Tool
PM ₁₀	Particulate matter that is 10 micrometers in diameter or smaller
Reclamation	Bureau of Reclamation
ROW	Right-of-Way
SGCN	Species of Greatest Conservation Need
SHPO	State Historic Preservation Officer
SWPPP	Stormwater Pollution Prevention Plan
STBG	Surface Transportation Block Grant
USDA	U.S. Department of Agriculture
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WOTUS	Waters of the U.S.

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Chapter 1. Introduction

1.1 Introduction

The Bureau of Reclamation (Reclamation) has prepared this Environmental Assessment (EA) to evaluate potential impacts associated with the proposed City of San Luis (City) County 24th Street – 10th Avenue (Avenue H) to Avenue F-1/2 Project (“Project” or “Proposed Action”). This EA was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. 4321 et seq.), the Council on Environmental Quality (CEQ) regulations (40 CFR 1500-1508) for implementing NEPA, the Department of the Interior’s NEPA Regulations (43 CFR Part 46), and Reclamation Manual NEPA Policy (ENV P03). Reclamation is the lead Federal agency pursuant to NEPA. Because the Project would construct new improvements (paving 24th Street and installing signage, lighting, and utility improvements) within Reclamation’s land, a land use license agreement from Reclamation is required in accordance with Reclamation’s Directives and Standards LND 08-01, dated 1/3/2002.

The City intends to undertake the Proposed Action if a land use license (license) is granted by Reclamation. The Proposed Action consists of construction of a 1.9-mile long paved roadway (24th Street) including two 13-foot travel lanes and 8-foot shoulders. Additional scope would include installing signage, lighting, and utility improvements and would be constructed within an existing 66-foot easement along 10th Avenue (Avenue H) and 24th Street, and a proposed 33-foot easement along Avenue F-1/2.

1.2 Project Location

The Proposed Action is located along the 24th Street alignment between 10th Avenue (Avenue H) and Avenue F-1/2 in the City of San Luis, Yuma County, Arizona (**Figure 1-1. Project Location**). The Proposed Action is surrounded by Reclamation, Arizona State Land Department (ASLD), and private land. The Project is located on portions of four parcels (Assessor’s Parcel Number (APN) 227-08-001, 227-09-001, 227-17-001, 227-16-001) owned by Reclamation, cumulatively totaling 14.4 acres. The Project area is depicted on the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle maps *Gadsden OE S* and *South of Somerton* in Sections 7-9, 16, and 17, Township 11 South, Range 24 West (**Figure 1-2. Vicinity Map**). The latitude and longitude coordinates are 32.480110° and -114.738614°. The Proposed Action is located on City existing and proposed easement on Reclamation land. The Proposed Action is located approximately one mile south of Cesar Chavez Boulevard and 0.25 miles north of the U.S./Mexico border. Adjacent lands consist of undeveloped native desert and single-family residential subdivisions (see **Figure 1-3. Proposed Action**).

1.3 Project Background

24th Street is a major route in the Future Land Use Plan (FLUP) of the City’s General Plan and land north of 24th Street is a Growth Area which would consist of additional single-family neighborhood

development. Lands south of 24th Street are conservation lands managed by Reclamation. The City and the Arizona Department of Transportation (ADOT) authorized an exchange of Surface Transportation Block Grant (STBG) funds to Highway User Revenue Fund (HURF) for the construction of the Project. The Proposed Action area consists of existing portions of 10th Avenue (Avenue H) and Avenue F-1/2 (paved roadways), and a dirt/gravel road on 24th Street utilized for maintenance of the existing 16-inch water line that was previously authorized and constructed within Reclamation land as well as a connector between east/west San Luis.

1.4 Project Purpose and Need

Under NEPA, an EA “shall briefly specify the underlying purpose and need to which the agency is responding” with the Proposed Action (40 CFR 1502.13). The purpose of the Proposed Action is to provide a paved roadway along 24th Street between 10th Avenue (Avenue H) and Avenue F-1/2. The Project is needed due to the substantial population growth anticipated within eastern and western San Luis. It is critical to provide an alternative east-west route that would alleviate traffic congestion on the main corridor of Cesar Chavez Boulevard. The 24th Street connection would improve the efficiency and reliability of east-west travel. In addition, 24th Street would provide an alternative connection for both residents and public safety personnel to address emergency calls in western San Luis. In the past, public safety personnel have been forced to close Cesar Chavez Boulevard during fatal vehicle accidents. Public safety and emergency service personnel and residents are disconnected from the western portion of the City creating a public safety concern. The new medical mall was designated to have a landing path for emergency helicopters, and it is critical for public safety personnel to have an alternative access during closure of the main corridor. The Proposed Action is consistent with the City’s 2020 General Plan.

1.5 Reclamation Authority and Policy

Reclamation’s authority to grant land use authorizations is stated in the Reclamation Manual, Directives and Standards LND 08-01 (dated 1/3/2002). This document provides standard procedures for issuing land use authorization documents such as easements, leases, licenses, and permits, which allow others to use Reclamation lands and interests in its lands, facilities, and water surfaces. According to LND 08-01 item 2.C, “Permits and licenses are similar in nature. Permits are generally considered a form, or subset, of licenses. They do not convey possessory interest, but grant only permission to use real property under specific, limited conditions. Licenses, including permits, are use authorizations that grant personal, revocable permission or authority for a person or entity to utilize a specific parcel of land for a specific purpose or purposes. Licenses, including permits do not convey any ownership interest in the land and are not generally considered appurtenant to a parcel of land, thus are personal in nature. In Reclamation, the term ‘permit’ is generally used to refer to short-term and less intense uses (less than 3 years) and ‘license’ generally is used to refer to longer and more substantial uses.”

The City is requesting a license from Reclamation. The license would grant the City permission to construct and maintain the Proposed Action. It would be the responsibility of the City to adhere to guidance detailed in this EA concerning implementation. It would also be the responsibility of the City to provide funding, labor and materials to implement and maintain the Proposed Action.

Therefore, since the Project would result in the addition of permanent infrastructure located on Reclamation land that would be a long and substantial use requiring a license, the Project is subject to the provisions in LND 08-01 item 7.A-C regarding licenses.

1.6 Purpose of the Environmental Assessment

The Proposed Action consists of construction, operation, and maintenance of a 1.9-mile long paved roadway (24th Street) including two 13-foot travel lanes and 8-foot shoulders along the 24th Street alignment between 10th Avenue (Avenue H) and Avenue F-1/2. Additional scope would include installing signage, lighting, and utility improvements. Reclamation's decision to issue a license to the City is considered a federal undertaking and triggers the requirement under NEPA to conduct an assessment of environmental effects. Reclamation is the lead federal agency for NEPA compliance because Reclamation must authorize the City to construct the Project. This EA evaluates the environmental effects of construction, use, and maintenance of the Proposed Action. The environmental process includes a public comment period, during which Reclamation will solicit the public, agencies, and Tribes for comment (see Chapter 4).

This EA includes an assessment of the effects that could reasonably be expected should Reclamation issue a license to the City granting them permission to facilitate the construction, use, and maintenance of the Proposed Action. This EA identifies minimization and mitigation measures that will help to minimize potential environmental effects and considers alternatives to the Proposed Action. The scope of this EA is focused on potential environmental effects and serves as an informational document to provide public disclosure of potential effects of the Project, identify ways to minimize those effects, and consider alternatives to the Proposed Action. Fieldwork and resource mapping conducted to evaluate conditions within the Proposed Action area focused on the 14.4-acre 24th Street corridor.

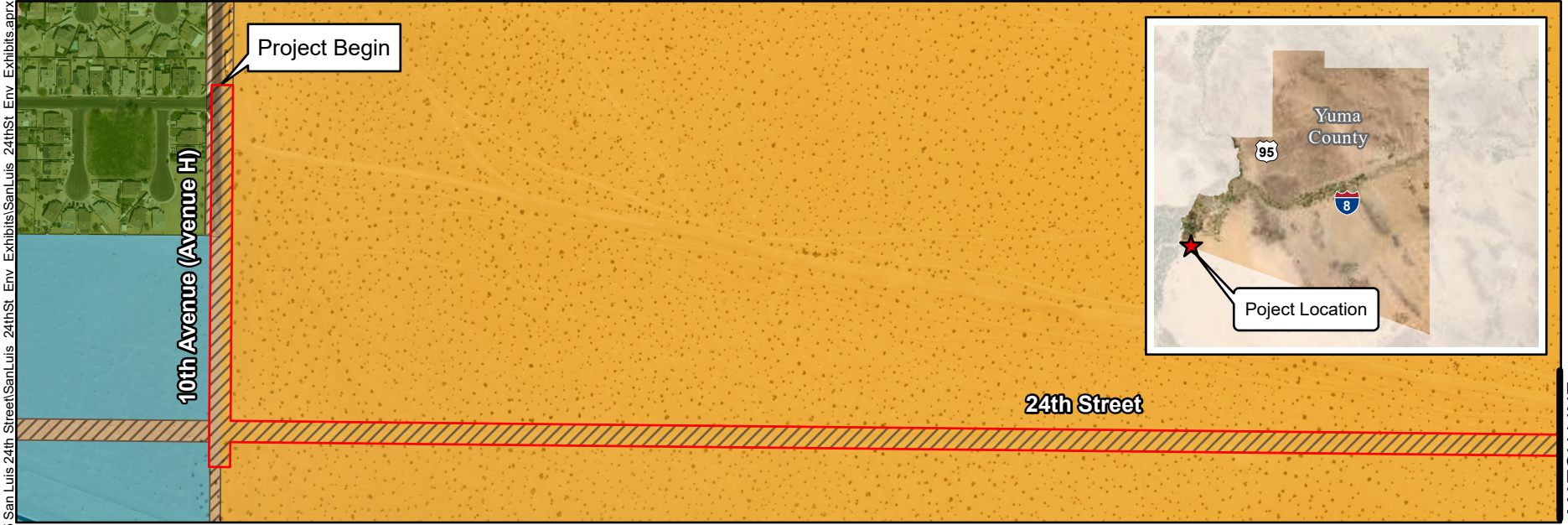
1.7 Determinations to be Made

Although the City is the agency preparing the environmental documentation and responsible for construction, operation, and maintenance of the Proposed Action, Reclamation is the lead Federal agency under NEPA. Because the Project would construct new improvements (constructing a 1.9-mile long paved roadway (24th Street) including two 13-foot travel lanes and 8-foot shoulders; additional scope would include installing signage, lighting, and utility improvements and would be constructed within an existing 66-foot easement along 10th Avenue (Avenue H) and 24th Street, and a proposed 33-foot easement along Avenue F-1/2) within Reclamation's right-of-way (ROW), a land use authorization license agreement from Reclamation is required in accordance with Reclamation's Directives and Standards LND 08-01, dated January 3, 2002. This EA will serve to inform the Yuma Area Office Manager with the information and analysis necessary to determine whether a Finding of No Significant Impact (FONSI) is appropriate and an Environmental Impact Statement (EIS) is not required. This decision will be based on a determination that all potential effects are either non-significant or can be reduced to non-significant levels through the implementation of mitigation measures. If any potential effects are considered significant and cannot be avoided or reduced to non-significant levels, the preparation and processing of an EIS is required to implement the Proposed Action.

Permits and Approvals

Permits, and approvals required from other responsible agencies to authorize construction, maintenance, and operation of the Proposed Action include but may not be limited to those detailed below. Approvals by Reclamation or coordinated through Reclamation are as follows:

- **License Agreement:** Reclamation would issue a license to the City, to allow for construction and operation of a 1.9-mile long paved roadway (24th Street) including two 13-foot travel lanes and 8-foot shoulders. Additional scope would include installing signage, lighting, and utility improvements and would be constructed within an existing 66-foot easement along 10th Avenue (Avenue H) and 24th Street, and a proposed 33-foot easement along Avenue F-1/2.
- **Section 7 of the Federal Endangered Species Act:** Prior to issuing a license, Reclamation will determine whether the Project would adversely affect threatened or endangered plants or wildlife.
- **Section 106 of National Historic Preservation Act:** Prior to issuing a license, Reclamation shall determine whether the Proposed Action would adversely affect cultural or historic resources and ensure that the Section 106 process is complete.

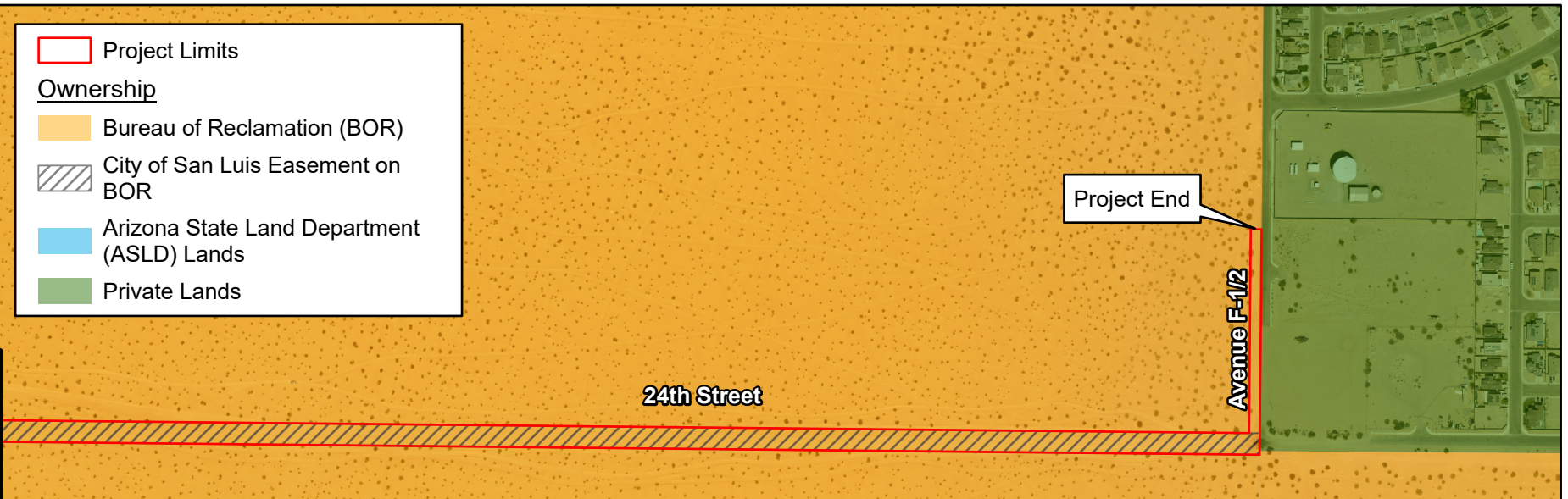


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Project Limits

Ownership

- Bureau of Reclamation (BOR)
- City of San Luis Easement on BOR
- Arizona State Land Department (ASLD) Lands
- Private Lands



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Figure 1-1. Project Location	City of San Luis County 24th Street - 10th Avenue (Avenue H) to Avenue F-1/2 Roadway Project	City of San Luis, Arizona	<p>0 250 500 Feet</p> <p>Scale: 1" = 500'</p>
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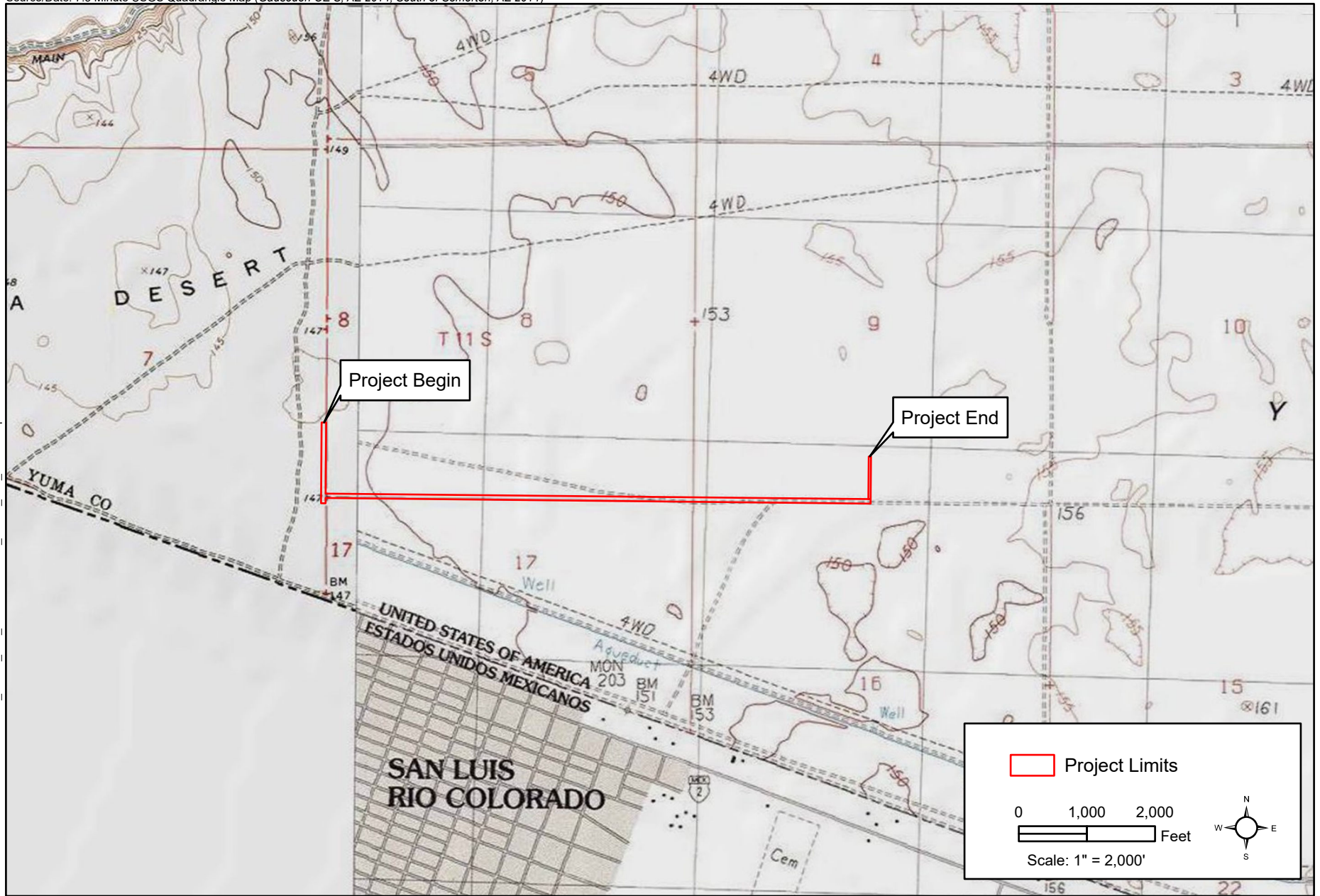


Figure 1-2. Vicinity Map

City of San Luis County 24th Street -
10th Avenue (Avenue H) to Avenue F-1/2 Roadway Project

City of San Luis, Arizona

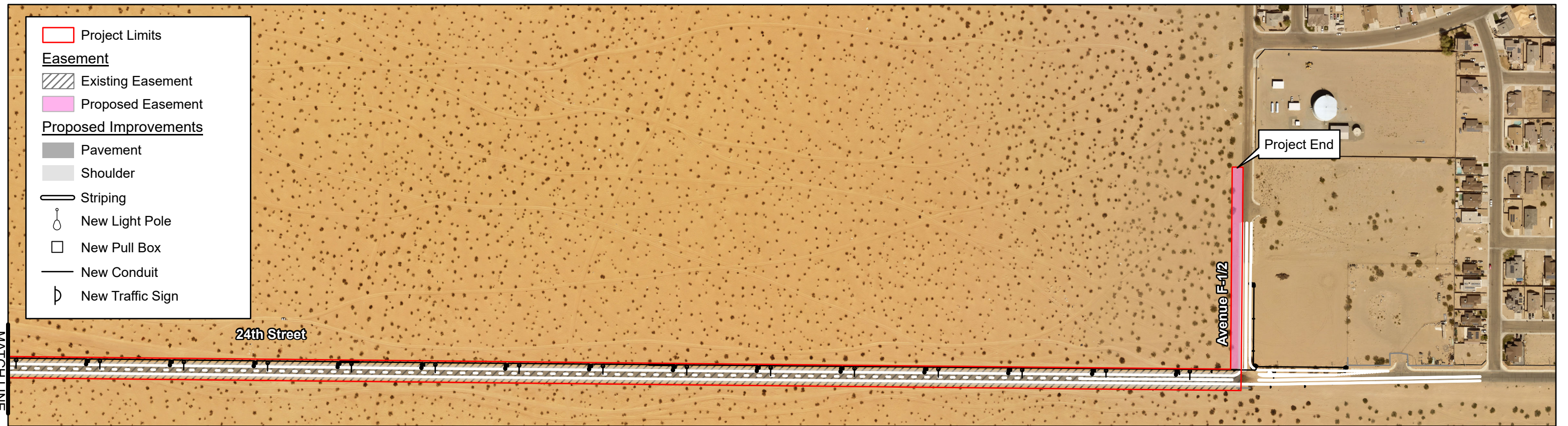
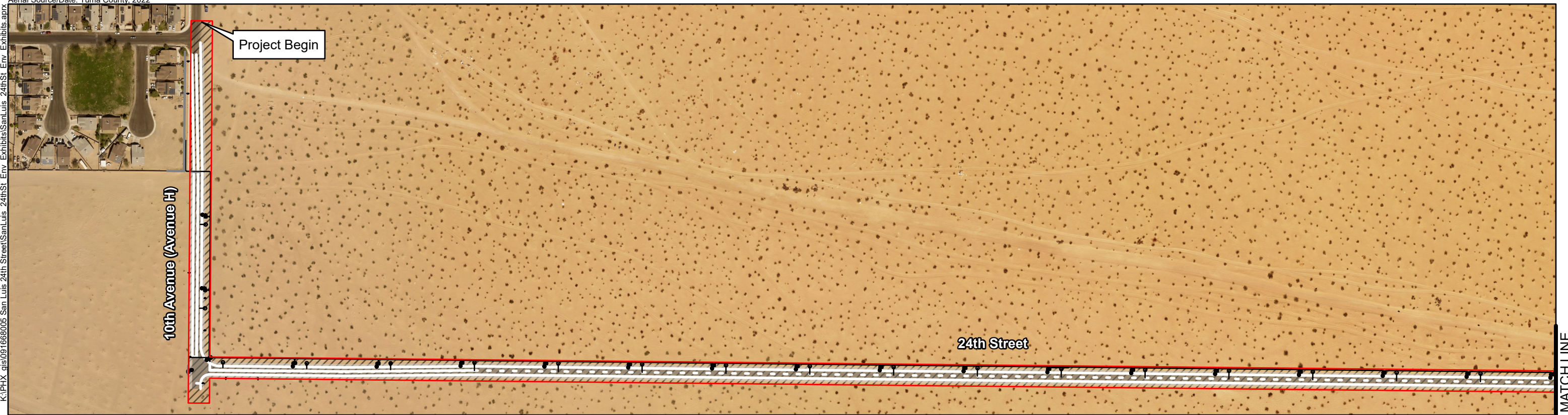
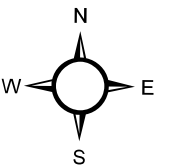
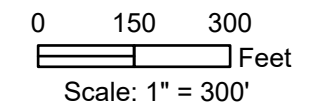


Figure 1-3. Proposed Action

City of San Luis County 24th Street -
 10th Avenue (Avenue H) to Avenue F-1/2 Roadway Project

City of San Luis, Arizona



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Chapter 2. Alternatives

2.1 Introduction

NEPA guidelines require that an EA evaluate the “No Action” alternative in addition to the Proposed Action. This chapter describes the alternatives considered for the Proposed Action, including a No Action alternative.

2.2 No Action Alternative

The No Action alternative provides a basis for comparison of the environmental consequences of the Proposed Action or any other potential action. In this EA, the No Action alternative assumes that the Proposed Action would not be constructed and the current dirt/gravel road on 24th Street would remain in its current condition.

2.3 Proposed Action

The Proposed Action consists of constructing a 1.9-mile long paved roadway (24th Street) including two 13-foot travel lanes and 8-foot shoulders. Additional scope would include installing signage, lighting, and utility improvements and would be constructed within an existing 66-foot easement along 10th Avenue (Avenue H) and 24th Street, and a proposed 33-foot easement along Avenue F-1/2.

Construction Activities

Construction is anticipated to begin in December 2022 with a construction duration of approximately four months. Construction will involve three phases (construction preparation, Project construction, and construction footprint restoration).

Construction Preparation: Staging and stockpiling activities are anticipated and would consist of equipment and/or material being staged/stockpiled on or near the Proposed Action during construction. Once the Project is complete, equipment and material would be removed, and the area would be returned to pre-construction conditions to the maximum extent practicable. Staging and stockpiling locations will be determined by the contractor.

Project Construction: Installation of traffic control signs and barricades may include the use of an auger drill, post-pounder, and hand tools. Vegetation removal would be minor and would consist only of shrubs. Removal may require a chainsaw for cutting. Shrubs removed from the construction footprint will be hauled off by the contractor. Roadway work includes sawcut and remove existing asphalt along 10th Avenue (Avenue H) and Avenue F-1/2, grading for pavement and roadway shoulders, and construct two 13-foot travel lanes with asphaltic concrete (AC) and 8-foot shoulders with aggregate base coarse (ABC) subbase.

Construction of additional improvements includes installing signage, lighting, and utility improvements. Installation of signs may include the use of an auger drill, post-pounder, and hand tools. Installation of a support pole involves drilling or excavating a footing to the necessary depth to support the pole, constructing a concrete foundation, and installing the pole atop the foundation. Utility relocation and/or installation will be conducted via trenching and/or directional boring.

Construction Footprint Restoration: Once the roadway work has been completed, the construction footprint will be restored to preconstruction conditions to the extent practicable.

Access

The Proposed Action site is accessible from 10th Avenue (Avenue H) and Avenue F-1/2.

Maintenance

Maintenance would be undertaken by the City in accordance with existing practices for inspections and repair.

2.4 Alternatives Considered and Eliminated from Further Analysis

No additional alternatives were considered as a part of public scoping or internal review of this Project.

Chapter 3. Affected Environment and Environmental Consequences

3.1 Introduction

This section describes the existing environmental resources in the Proposed Action area that may be affected by the Proposed Action and the No Action alternative, if implemented. It also serves as the baseline for the comparisons of alternatives.

3.2 Resources Considered and Eliminated from Further Analysis

Some resources were considered but eliminated from further analysis because they did not occur in the Proposed Action area or because the potential effect to the resource is so minor (negligible) that it was discounted. The resources were either not present or found to not be affected by the Proposed Action because they would be completely mitigated with the implementation of standard stipulations. Resources eliminated from further analysis include Access and Transportation, Agricultural Resources, Conservation Lands, Floodplains, Forestry, Geology and Soils, Hydrology and Water Quality, Livestock Grazing, Magnuson-Stevens Fishery Conservation and Management Act, Noxious and Invasive Weeds, Public Health and Safety, Visual Resources, and Wildlife Connectivity (see **Appendix A**).

3.3 Biological Resources

3.3.1 Affected Environment

A site visit of the Proposed Action area was conducted on September 14, 2022, to document onsite conditions. The vegetation observed within the Proposed Action area consisted of creosote (*Larrea tridentata*). Wildlife observed included the house finch (*Haemorhous mexicanus*) and desert iguana (*Dipsosaurus dorsalis*). The Proposed Action area is located within the Lower Colorado River Subdivision of the Sonoran Desertscrub biotic community and occurs at an elevation of approximately 150 feet above mean sea level (MSL) and is relatively flat (CBI, 2022). The Proposed Action area consists of a previously disturbed dirt/gravel road on 24th Street and Avenue F-1/2, a paved road along 10th Avenue (Avenue H), and creosote flats along the undisturbed edges of the ROW. Additionally adjacent areas have been disturbed by off road vehicle use.

Endangered Species Act (ESA)

An official species list was obtained from the USFWS Information for Planning and Consultation (IPaC) system on September 13, 2022. The list included four threatened, endangered or candidate species that should be evaluated. A qualified biologist reviewed the list to determine species that may occur in the Proposed Action area. Species included in the USFWS list but excluded from further evaluation are addressed in **Table 1**. Reclamation has determined that the Project would have no effect on the species listed in **Table 1**. There is no federally designated Critical Habitat within the Proposed Action area.

Table 1. ESA Species Exclusion Table

Species	Status	Habitat Requirements	Exclusion Justification
Birds			
Southwestern Willow Flycatcher (<i>Empidonax traillii extimus</i>)	ESA LE	Cottonwood/willow and tamarisk vegetation communities along rivers and streams below 8,500 feet. ¹	Suitable habitat for this species is not present in the Project area and the Proposed Action area is outside the historic, present, and potential distribution range for this species. No individuals were identified within three miles of the Project in Arizona Game and Fish Department (AGFD) species occurrence data.
Yellow-billed Cuckoo (<i>Coccyzus americanus</i>)	ESA LT	Large blocks of riparian woodlands (cottonwood, willow, or tamarisk galleries) below 6,500 feet. ¹	Suitable habitat for this species is not present in the Project area and the Proposed Action area is outside the historic, present, and potential distribution range for this species. No individuals were identified within three miles of the Project in AGFD species occurrence data.
Yuma Ridgway's Rail (<i>Rallus obsoletus yumanensis</i>)	ESA LE	Fresh water and brackish Marshes below 4,500 feet. ¹	Suitable habitat for this species is not present in the Project area and the Proposed Action area is outside the historic, present, and potential distribution range for this species. No individuals were identified within three miles of the Project in AGFD species occurrence data.
Insects			
Monarch butterfly (<i>Danaus plexippus</i>)	ESA C	Open grasslands and meadows consisting of a variety of flowering plants. Particularly drawn toward milkweed. ²	Suitable habitat for this species is not present in the Project area. No individuals were identified within three miles of the Project in AGFD species occurrence data.
Status Definitions: ESA = Endangered Species Act; LE = Listed Endangered, LT = Listed Threatened, C = Candidate ¹ USFWS Quick Reference Guide to all Arizona Species (04/28/16). Accessed September 28, 2022. https://www.fws.gov/southwest/es/arizona/Documents/MiscDocs/AZSpeciesReference.pdf ² USFWS Environmental Conservation Online System (ECOS). Monarch Butterfly (<i>Danaus plexippus</i>). Accessed September 28, 2022. https://ecos.fws.gov/ecp/species/9743			

Federal and State Protected Species

The AGFD Online Environmental Review Tool (OERT) report on September 14, 2022. The AGFD OERT listed sandfood (*Pholisma sonora*), flat-tailed horned lizard (*Phrynosoma mcallii*), and Yuma hispid cotton rat (*Sigmodon hispidus eremicus*) within three miles of the Project vicinity.

Sandfood (*Pholisma sonora*)

Sandfood is listed as a species of concern by USFWS. Sandfood is found in dune scrub habitat and requires unstabilized, sandy soils between 100 feet and 450 feet MSL. It is a parasitic plant on roots and is typically found on desert shrub hosts (AGFD, 2022). According to AGFD the nearest occurrence of sandfood is approximately 1.7 miles west of the Proposed Action area (Jennylyn Redner, AGFD, pers. Comm. 2022). Suitable habitat for this species is not present in the Proposed Action area; therefore, impacts to this species are not anticipated.

Flat-tailed Horned Lizard (*Phrynosoma mcallii*)

Flat-tailed horned lizards (FTHLs) are listed as a Tier 1A Species of Greatest Conservation Need (SGCN) by AGFD and are protected under a Candidate Conservation Agreement (CCA). The Flat-tailed Horned Lizard *Rangewide Management Strategy* implemented in May 1997 (revised in May 2003) provides guidance for conservation and management of five Management Areas (MAs) to its signatory agencies (Flat-tailed Horned Lizard Interagency Coordinating Committee, 2003). According to AGFD, FTHLs prefer fine packed sand or pavement, overlain with loose, fine sand in areas that are sparse or lacking in vegetation with flat to modest slopes between 155-540 feet in elevation in Arizona. The diurnal lizard will often burrow into the sand to avoid heat during the day and burrows to escape the cool of night. Burrows typically range from 2-3.9 inches of the surface. Hibernation of most adults may begin as early as October and end as late as March (AGFD, 2010). The active season for FTHLs is considered April to October. FTHLs have been documented within the Proposed Action area (Jennylyn Redner, AGFD, pers. Comm. 2022). To alleviate potential impacts to the FTHL, the Project will be constructed outside of the active season. The Project will begin construction in December 2022 and take four months to construct (complete prior to April 2023 when the active season begins). If the construction schedule changes, daily monitoring will be required. The City and Reclamation will coordinate closely regarding construction schedule. Mitigation measures will be required.

Yuma Hispid Cotton Rat (*Sigmodon hispidus eremicus*)

The Yuma hispid cotton rat is classified as a Tier 1B SGCN by the AGFD and is a species of concern by the USFWS. They are typically found at elevations between 120 and 160 feet in dense grassy areas. The Yuma hispid cotton rat's primary food source are insects, stems, leaves, nuts, and seeds (AGFD, 2004). According to AGFD species occurrence data, historic, present, and potential distribution for the Yuma hispid cotton rat is located within the Proposed Action area. The nearest

City of San Luis County 24th Street - 10th Avenue (Avenue H) to Avenue F-1/2

occurrence of the Yuma hispid cotton rat is approximately 0.5 miles west of the Proposed Action area (Jennylyn Redner, AGFD, pers. Comm. 2022). Suitable habitat is not located within the Proposed Action area; therefore, impacts to this species are not anticipated.

Migratory Bird Treaty Act

Migratory birds may nest on the ground or in shrubs within the Proposed Action area. No nests were observed within the Proposed Action area; however, sparse shrubs suitable for nesting will be trimmed and/or removed during construction; therefore, mitigation measures will be required.

3.3.2 Environmental Consequences

No Action

Under the No Action Alternative, the Proposed Action would not be constructed and the current dirt/gravel road on 24th Street would remain in its current condition. Biological resources would remain as is and there would be no new adverse effects to biological resources.

Proposed Action

The Proposed Action is not located within a wildlife movement corridor. Less than one acre of vegetation will be removed within the Proposed Action area. Issuance of the land use license agreement from Reclamation would allow for construction of the Proposed Action and would result in short term, localized disturbances to habitat for the flat-tailed horned lizard; however, the Proposed Action will be complete by April 2023, therefore there would be no long term effect to this species.

3.3.3 Minimization and Mitigation Measures

The following mitigation measures will be implemented:

- Prior to project initiation, an individual shall be designated as a field contact representative. The field contact representative shall have the authority to ensure compliance with protective measures for the FTHL and will be the primary agency contact dealing with these measures. The field contact representative shall have the authority and responsibility to halt activities that are in violation of these terms and conditions.
- All project work areas shall be clearly flagged or similarly marked at the outer boundaries to define the limit of work activities. All construction and restoration workers shall restrict their activities and vehicles to areas that have been flagged to eliminate adverse impacts to the FTHL and its habitat. All workers shall be instructed that their activities are restricted to flagged and cleared areas.

- Within FTHL habitat, the area of disturbance of vegetation and soils shall be the minimum required for the project. Clearing of vegetation and grading shall be minimized. Wherever possible, rather than clearing vegetation and grading the ROW, equipment and vehicles shall use existing surfaces or previously disturbed areas. Where grading is necessary, surface soils shall be stockpiled and replaced following construction to facilitate habitat restoration. To the extent possible, disturbance of shrubs and surface soils due to stockpiling shall be minimized.
- Existing roads shall be used for travel and equipment storage whenever possible.
- Where feasible and desirable, in the judgment of the lead agency, newly created access routes shall be restricted by constructing barricades, erecting fences with locked gates at road intersections, and/or by posting signs. In these cases, the project proponent shall maintain, including monitoring, all control structures and facilities for the life of the project and until habitat restoration is completed.
- A biological monitor shall be present in each area of active surface disturbance throughout the workday from initial clearing through habitat restoration, except where the project is completely fenced and cleared of FTHLs by a biologist. The biological monitors shall meet the requirements set in Appendix 6 (Flat-tailed Horned Lizard Interagency Coordinating Committee, 2003). The monitor(s) shall perform the following functions:
 - a) Develop and implement a worker education program. Wallet-cards summarizing this information shall be provided to all construction and maintenance personnel. The education program shall include the following aspects at a minimum:
 - biology and status of the FTHL,
 - protection measures designed to reduce potential impacts to the species,
 - function of flagging designating authorized work areas,
 - reporting procedures to be used if a FTHL is encountered in the field, and importance of exercising care when commuting to and from the project area to reduce mortality of FTHLs on roads.
 - b) Ensure that all project-related activities comply with these measures. The biological monitor shall have the authority and responsibility to halt activities that are in violation of these terms and conditions.
 - c) Examine areas of active surface disturbance periodically (at least hourly when surface temperatures exceed 85°F) for the presence of FTHLs. In addition, all hazardous sites (e.g., open pipeline trenches, holes, or other deep excavations) shall be inspected for the presence of FTHLs prior to backfilling.
 - d) Work with the project supervisor to take steps, as necessary, to avoid disturbance to FTHLs and their habitat. If avoiding disturbance to a FTHL is not possible or if a FTHL is found trapped in an excavation, the affected lizard

shall be captured by hand and relocated.

- The project proponent shall develop a project-specific habitat restoration plan under approval by the lead agency. The plan shall consider and include as appropriate the following methods: replacement of topsoil, seedbed preparation, fertilization, seeding of species native to the project area, noxious weed control, and additional erosion control (see Habitat Rehabilitation, p. 69 - Flat-tailed Horned Lizard Interagency Coordinating Committee, 2003). Generally, the restoration objective shall be to return the disturbed area to a condition that will perpetuate previous land use. The project proponent shall conduct periodic inspection of the restored area. Restoration shall include eliminating any hazards to FTHLs created by construction, such as holes and trenches in which lizards might become entrapped. Disturbance of existing perennial shrubs during restoration shall be minimized, even if such shrubs have been crushed by construction activities.
- The City of San Luis will construct the Project outside of flat-tailed horned lizard active season. Construction will occur after October 31st and before April 1st. If construction will occur between April 1st and October 31st, monitoring will be required per the *Rangewide Management Strategy mitigation requirements*.
- If vegetation clearing will occur during the migratory bird breeding season (March 1 - August 31), the contractor shall avoid any active bird nests. If the active nests cannot be avoided, the contractor shall notify the Engineer to evaluate the situation. During the non-breeding season (September 1 - February 28) vegetation removal is not subject to this restriction.

3.4 Cultural Resources

3.4.1 Affected Environment

The National Historic Preservation Act (NHPA) as codified in the Code of Federal Regulations (36 CFR 800) establishes national policy for identifying and protecting significant cultural resources that are defined as “historic properties.” 36 CFR 800.4(a-d) requires that Federal agencies determine the scope of identification efforts, identify historic properties, evaluate historic significance, and determine the effects that Federal projects may have on historic properties under their jurisdiction.

Reclamation has identified an Area of Potential Effect (APE) for this undertaking of approximately 24 acres. The APE includes the 1.9-mile long roadway (24th Street) including two 13-foot travel lanes and 8-foot shoulders. Additional scope would include installing signage, lighting, and utility improvements and would be constructed within an existing 66-foot easement along 10th Avenue (Avenue H) and 24th Street, and a proposed 33-foot easement along Avenue F ½ . The entire APE has been surveyed for cultural resources. The APE is shown in Figure 1.1 (above).

On July 30, 2009, the 24th St. and 10th Ave. (Avenue H) segments within the APE were surveyed for cultural resources in support of a proposed water main installation (Shumaker 2009). The roadway and easements were carefully examined for the presence of prehistoric and historic artifacts, features and archaeological sites. The western portion of the survey area was moderately disturbed desert habitat, while the eastern portion was heavily disturbed by road use and trash dumping. No prehistoric or historic artifacts were noted and no historic properties were identified.

On May 6, 2022, a Reclamation archaeologist conducted a pedestrian survey of the proposed 33-foot easement along a 300-foot-long segment of Avenue F ½ . . The roadway and easement were carefully examined for the presence of prehistoric or historic artifacts, features and sites but none were identified. Additionally, Reclamation conducted a Class I survey (file and record search) of the AZSITE system for the entire project area.

3.4.2 Environmental Consequences

No Action - Under the No Action Alternative, no paving of 24th Street would be conducted.

Proposed Action – On November 12, 2009, the Arizona State Historic Preservation Officer (SHPO) concurred with Reclamation’s determination of “no historic properties affected” for the 24th St. and 10th Ave. (Avenue H) portions of the project. Additional pedestrian survey of the proposed 33-foot easement along Avenue F½ did not identify any historic properties. This action would not have significant impacts on properties listed, or eligible for listing, on the National Register of Historic Places as determined by the bureau (43 CFR 46.215 (g)), and would not limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (43 CFR 46.215(k))

3.4.3 Minimization and Mitigation Measures

- In the unlikely event of an inadvertent discovery of archaeological or historical cultural resources, or human remains, all activities within the immediate area of discovery must cease immediately. Telephone notification of the discovery must be made immediately to Reclamation’s Environmental Group Manager at (928) 343-8100. In addition, all reasonable efforts to protect the discovery must be made. The activity may resume only after Reclamation has authorized a continuance.

3.5 Indian Trust Assets

3.5.1 Affected Environment

Indian Trust Assets (ITAs) are legal interests in property held in trust by the United States for Indian tribes or individuals, or property in which the US is charged by law to protect for Indian tribes or individuals. In accordance with the Indian Trusts Fund Management Reform Act of 1994, as amended, all Department of Interior agencies, including Reclamation, are responsible for protecting

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ITAs from adverse impacts resulting from their programs and activities. In cooperation with tribes, Federal agencies must inventory and evaluate assets, and mitigate or compensate for adverse impacts to the asset. While most ITAs are located on reservation lands, they may also be located off-reservation. Examples of ITAs include, but are not limited to, land, minerals, rights to hunt, fish, and gather, and water rights.

3.5.2 Environmental Consequences

Reclamation departmental policy requires the agency to address potential impacts to ITAs even if impacts are found to be non-significant. The proposed project does not involve Indian Trust Assets.

Trust Lands

The Proposed Action is not located on ITA lands. There are no tribal residences and/or facilities within the project area.

Water Rights

No tribes inhabit the immediate area where a water right might be impacted.

No Action

Under the No Action Alternative, the Proposed Action would not be constructed and the current dirt/gravel road on 24th Street would remain in its current condition. Resources would remain as is and there would be no new adverse effects to ITAs.

Proposed Action

Trust Lands

The Proposed Action will not interfere with any Trust Lands. The project is not located on Trust Lands and does not prevent the use or management of any tribal or Trust Lands.

Water Rights

The Proposed Action will not result in a change to any tribal water right, or to the diversion or delivery of tribal water entitlements.

3.5.3 Management and Mitigation Measures

No mitigation measures are proposed.

3.6 Land Use

3.6.1 Affected Environment

The proposed project is located on federal land withdrawn for project purposes by Reclamation. The land is currently managed by Reclamation.

3.6.2 Environmental Consequences

No Action

Under this alternative, use and status of the land would remain. City of San Luis will continue to maintain the existing 16-inch water line within the existing easement.

Proposed Action

There would be no change in land use or status. City of San Luis would operate and maintain new paved road within existing easement area.

3.6.3 Management and Mitigation Measures

No mitigation measures are proposed.

3.7 Hazardous Materials or Solid Waste

3.7.1 Affected Environment

No hazardous materials are currently used or stored anywhere at the proposed structure location sites.

3.7.2 Environmental Consequences

No Action

Under this alternative, no ground disturbing activities that may affect hazardous materials in the area or produce waste from construction activities. Therefore, there would be no change to existing conditions.

Proposed Action

Under this alternative, waste petroleum, oils, and lubricants would be generated that would require disposal. Any of the hazardous waste associated with construction activities will be disposed of properly as to not pose a further hazard.

3.7.3 Management and Mitigation Measures

Mitigation actions designed to limit the potential impact of hazardous materials or solid waste would be implemented according to State and Federal regulations. Other hazardous materials anticipated to be used during construction of the project are small volumes of petroleum hydrocarbons and their derivatives (for example, fuels, oils, lubricants, and solvents) required to operate the equipment used in the construction activities. These materials are those routinely associated with the operation and maintenance of heavy equipment or other support vehicles, including gasoline, diesel fuels, and hydraulic fluids.

- A site specific contingency spill plan should be developed and implemented by the City of San Luis. The plan should consist of reporting guidelines in the event of a spill, good housekeeping techniques, and employee training in the use of required equipment and proper handling of potentially hazardous materials.
- Hazardous materials used for this project would be contained within vessels engineered for safe storage.
- Areas for refueling of equipment would be chosen to prevent any accidental fuel leakage from contaminating surface water, groundwater, or soils.

3.8 Noise

3.8.1 Affected Environment

Noise that currently exists in the area generally comes from vehicles traveling along Cesar Chavez Boulevard and adjacent City roads. Residences in the general vicinity include those in within the City limits.

3.8.2 Environmental Consequences

No Action

In the No Action Alternative, current noise levels including noise from roadways would continue at the present levels.

Proposed Action

The use of equipment during the implementation of the project will slightly increase noise disturbance temporarily in the vicinity where work will occur. This could affect adjacent areas; however, the project area is located away from any public sensitive receptors (e.g., schools).

3.8.3 Management and Mitigation Measures

No mitigation measures are necessary because noise levels would continue to be consistent with current ongoing operations and adjacent recreational activities.

3.9 Air Quality

3.9.1 Affected Environment

The proposed project is located within Yuma County a PM₁₀ non-attainment area.

The Clean Air Act, as amended in 1990, requires the Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) for wide-spread pollutants from numerous and diverse sources considered harmful to public health and the environment. PM₁₀ is defined as particulate matter that is 10 micrometers in diameter or smaller. Yuma County is designated as a Moderate Nonattainment Area for the PM₁₀ NAAQS.

3.9.2 Environmental Consequences

No Action

Under the No Action Alternative, air quality in the area would not change from its present readings.

Proposed Action

Construction activities associated with the Proposed Action have the potential to release small amounts of ozone precursors such as nitrogen oxides or volatile organic compounds from vehicle and machine exhaust. Ground disturbance associated with the movement of dirt and other dry material has the potential to generate dust, resulting in an increase in PM₁₀ emissions.

3.9.3 Management and Mitigation Measures

Best Management Practices (BMPs) would be followed to limit dust and PM₁₀ emissions, including at a minimum:

- Vehicle and equipment traffic would be limited to existing roads as much as possible.
- Where equipment traffic, excavation, or demolition is required outside of paved or graveled roads, water or soil binders would be applied to exposed surfaces.
- Equipment should be properly maintained to minimize exhaust emissions, and equipment idling would be limited.

- Ground disturbing activities would cease temporarily when wind speeds at the site exceed 25 miles per hour.

3.10 Environmental Justice and Socioeconomic Considerations

3.10.1 Affected Environment

The EPA’s EJScreen tool was utilized determine that the Proposed Action is located in the 95th percentile for low income populations and the 100th percentile for minority populations (EPA, 2022).

3.10.2 Environmental Consequences

No Action

Under the No Action Alternative, the Proposed Action would not be constructed and the current dirt/gravel road on 24th Street would remain in its current condition. Environmental justice and socioeconomic groups would remain in their current condition.

Proposed Action

Implementation of the Proposed Action would disproportionately affect the minority and low income populations in the area; however, the scope of the Project (constructing a 1.9-mile long paved roadway (24th Street)) would improve connectivity and address safety concerns in the City which would be beneficial to protected populations.

3.10.3 Minimization and Mitigation Measures

No mitigation measures are required under environmental justice and socioeconomic considerations.

3.11 Reasonably Foreseeable Impacts

Reasonably foreseeable and *effects* or *impacts* are defined in the CEQ guidelines (40 CFR Parts 1500–1508 (2020)) as follows:

§ 1508.1 (aa) *Reasonably foreseeable* means sufficiently likely to occur such that a person of ordinary prudence would take it into account in reaching a decision.

(g) *Effects* or *impacts* means changes to the human environment from the proposed action or alternatives that are reasonably foreseeable and have a reasonably close causal relationship to the proposed action or alternatives, including those effects that occur at the same time and place as the

proposed action or alternatives and may include effects that are later in time or farther removed in distance from the proposed action or alternatives.

For this analysis, reasonably foreseeable impacts for the Proposed Action area are the combined direct and indirect effects of the present and reasonably foreseeable future actions, in addition to the direct and indirect impacts of the Proposed Action and No Action Alternatives, respectively. If the results of the analysis of direct or indirect impacts were considered to be none or negligible as a result of the Proposed Action and No Action Alternatives, there would be no measurable contribution to a cumulative effect; therefore, no cumulative effects analysis for the respective resource/use has been completed.

The analysis of direct and indirect impacts from the No Action Alternative and the Proposed Action are provided in Section 3.3 through Section 3.10 above; refer to the specific resource subsection for detailed information.

There are no other current and/or planned projects that would have any effects on the area of potential effects for the Proposed Action, or on common affected resources. Therefore, it is concluded that the Proposed Action has no potential to contribute to any adverse cumulative effects.

Chapter 4. Consultation, Coordination, and List of Preparers

4.1 Agencies Consulted

4.1.1 Scoping

As part of the NEPA process, Reclamation sent a Notice of Intent (NOI) to prepare this EA on August 23, 2022 with a scoping letter to the agencies listed below. No written comments on the NOI scoping letter were received.

4.1.2 Draft Environmental Assessment

An electronic copy of this EA has been posted for public viewing on Reclamation's Yuma Area Office web site at <http://www.usbr.gov/lc/yuma/>. Electronic copies of the Notice of Availability memorandum and EA were distributed to the following entities:

- Fort Yuma Quechan Indian Tribe
- Cocopah Indian Tribe
- USFWS
- Bureau of Land Management (BLM), Yuma Field Office
- AGFD
- Yuma County Department of Engineering
- City of San Luis
- Yuma Audubon Society
- U.S. Border Patrol Yuma Sector

4.1.3 Final Environmental Assessment

Reclamation will consider and incorporate relevant comments from the Draft EA and publish a Final EA and FONSI if a determination is made that an EIS is not required and a FONSI is appropriate. Reclamation will make the final documents available on the Yuma Area Office's Environmental Documents web site at <http://www.usbr.gov/lc/yuma/>.

4.2 List of Preparers

Bureau of Reclamation, Yuma Area Office, Lower Colorado Region

- Julian DeSantiago, Group Manager Environmental Planning and Compliance

- Nicholas Heatwole, Senior Environmental Protection Specialist
- Arturo Lopez, Senior Realty Specialist
- Andrea Kayser, Archaeologist

City of San Luis

- Jenny Torres, Economic Development Manager City of San Luis Economic Development

Kimley-Horn

- Jennifer Simpkins, Senior Environmental Scientist
- Emma Weiss, Environmental Scientist
- Jason Getz, GIS Specialist

Chapter 5. References

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Appendix A

Resources Considered but Eliminated
from Further Consideration

Table A-1. Resources Considered but Eliminated from Further Consideration

Resource	Rationale for Elimination from Further Analysis
Access and Transportation	The purpose of the Proposed Action is to provide a paved roadway along 24 th Street between 10 th Avenue (Avenue H) and Avenue F-1/2. The Project is needed due to the substantial population growth anticipated within eastern and western San Luis. It is critical to provide an alternative east-west route that would alleviate traffic congestion on the main corridor of Cesar Chavez Boulevard. The 24 th Street connection would improve the efficiency and reliability of east-west travel; therefore, access and transportation would improve due to the Proposed Action. No detailed analysis is warranted.
Agricultural Resources	The Proposed Action area is classified as farmland of unique importance (USDA, 2022). However, the Proposed Action area consists of paved and dirt/gravel maintained roads. Therefore, the land has been removed from potential use as farmland. As such, agricultural resources would not be adversely affected by the Proposed Action. No detailed analysis is warranted.
Conservation Lands	No lands designated as conservation lands exist within the Proposed Action area; however, lands south of County 24 th Street are designated as conservation lands. This is an area that is located in close proximity to the international boundary and is less suitable for residential development. As such, this area is designated as a conservation area and will not be developed.
Floodplains	The Proposed Action is located on Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) #04027C2135F and #04027C2155E (FEMA, 2022). There are no FEMA designated floodplains in the Proposed Action area; therefore, no detailed analysis is warranted.
Forestry	There are no forests located on or adjacent to the Proposed Action area. No detailed analysis is warranted.
Geology and Soils	The following soil occurs within the Proposed Action area: Superstition sand (USDA, 2022). The following geological formations occur within the Proposed Action area: Quaternary surficial deposits, undivided (USGS, 2022). No detailed analysis is warranted.
Hydrology and Water Quality	There are no potential Waters of the U.S. (WOTUS) in the Proposed Action area; therefore, Section 404/401 permitting is not required. No wetlands or wild or scenic rivers are located in the Proposed Action area. Construction of the Project will disturb more than one acre; therefore, a Section 402 Arizona Pollutant Discharge Elimination System (AZPDES) permit and a Stormwater Pollution Prevention Plan (SWPPP) are required from the ADEQ. No detailed analysis is warranted.

Livestock Grazing	No livestock are present on the Proposed Action area, nor is the site considered suitable for livestock grazing. No effect to livestock grazing would occur. No detailed analysis is warranted.
Magnuson-Stevens Fishery Conservation and Management Act	Essential fish habitat (EFH) does not exist within the Proposed Action area. No effect to protected fish or EFH would occur. No detailed analysis is warranted.
Noxious and Invasive Weeds	No noxious and/or invasive weeds were observed within the Proposed Action area. No detailed analysis is warranted.
Public Health and Safety	In the past, public safety personnel have been forced to close Cesar Chavez Boulevard during fatal vehicle accidents. Public safety personnel and residents are disconnected from the western portion of the City creating a public safety concern. The new medical mall was designated to have a landing path for emergency helicopters, and it is critical for public safety personnel to have an alternative access during closure of the main corridor. The Proposed Action would be beneficial for public health and safety. No detailed analysis is warranted.
Visual Resources	The visual character of the Proposed Action area will not change due to paving of 24 th Street. No detailed analysis is warranted.
Wildlife Connectivity	The Proposed Action area is not located within a wildlife connectivity area (AGFD Statewide Connectivity Team, 2013).