

**FINAL**

**FINDING OF NO SIGNIFICANT IMPACT  
FOR  
INTEGRATED FIXED TOWERS ON THE TOHONO O'ODHAM NATION  
IN THE AJO AND CASA GRANDE STATIONS'  
AREAS OF RESPONSIBILITY  
U.S. BORDER PATROL TUCSON SECTOR, ARIZONA  
U.S. CUSTOMS AND BORDER PROTECTION  
DEPARTMENT OF HOMELAND SECURITY  
WASHINGTON, D.C.**

**NAME OF PROPOSED ACTION**

Integrated Fixed Towers (IFT) on the Tohono O'odham Nation in the U.S. Border Patrol's (USBP) Ajo and Casa Grande Stations' Areas of Responsibility (AOR), Tucson Sector, Arizona

**DESCRIPTION OF PROPOSED ACTION AND ALTERNATIVES**

U.S. Customs and Border Protection (CBP) proposes to implement an IFT system in the USBP's Ajo and Casa Grande Stations' AOR. This system provides long-range, persistent surveillance, enabling USBP personnel to detect, track, identify, and classify illegal entries through a series of integrated sensors and tower-based surveillance equipment. The IFT system would primarily be deployed on lands within the Tohono O'odham Nation in order to provide long-term/permanent surveillance in USBP's Ajo and Casa Grande Stations' AORs.

CBP analyzed the following three alternatives in the *Environmental Assessment for Integrated Fixed Towers on the Tohono O'odham Nation in the Ajo and Casa Grande Stations' Areas of Responsibility, U.S. Border Patrol Tucson Sector, Arizona* (hereinafter the EA). This Finding of No Significant Impact (FONSI) incorporates the descriptions, evaluations, and analyses in the EA.

**Alternative 1:** Alternative 1 is the No Action Alternative. Under the No Action Alternative, the new IFTs would not be constructed and current border surveillance practices and procedures would continue. USBP's ability to detect and interdict cross-border violators would not be enhanced; thus, operational effectiveness would not be improved in the project area. The No Action Alternative does not meet the purpose of and need for this project.

**Alternative 2:** Alternative 2 is the Proposed Action. The Proposed Action includes the construction, operation and maintenance of 15 new IFTs at preferred sites and the retrofit of 2 existing communication towers to provide long-term, permanent surveillance in USBP's Ajo and Casa Grande Stations' AORs. The IFT system transfers situational awareness data to the command and control facilities at San Miguel Law Enforcement Center and USBP Ajo Station, which integrate and display data from all IFTs deployed within these AORs. Each IFT consists of a tower equipped with a suite of sensors and/or communications equipment. Tower retrofits include installing or replacing sensor suites and/or communications equipment. The Proposed

Action also includes the construction of 14 new access roads (up to 0.24 miles total) and improvement of existing approach roads (up to 70.90 miles total) as well as the future maintenance and repair of these roads. Approach roads are existing private or public roads used to travel to a tower site. Access roads are short road segments from an approach road into a tower site. Roadwork may include reconstructing, widening, or straightening the existing road, and installing drainage structures. Roadwork would also include performing road maintenance and repair within 270 ephemeral washes. CBP estimates that approximately 195 of these washes would need to be improved with either a new low water crossing or culvert. Staging of equipment and materials would occur at two existing staging areas and within the temporary construction areas for the tower sites and access roads. The Proposed Action also includes obtaining Right-of-Ways from the Bureau of Indian Affairs (BIA) to perform these activities. Best Management Practices (BMPs) to avoid, reduce, or minimize potential environmental impacts as described in Section 5.0 of the EA are incorporated by reference to this Finding of No Significant Impact as part of the Proposed Action. The Proposed Action meets the purpose of and need for this project

**Alternative 3:** Alternative 3 consists of the construction, operation, and maintenance of 14 new IFTs at preferred sites and 1 IFT at an alternate site as well as the retrofit of 2 existing communication towers. The new and existing towers are proposed with the same suite of sensor and communications equipment as described in the Proposed Action. Alternative 3 also includes the construction of access roads (up to 0.23 miles total) and improvement of approach roads (up to 68.26 miles total) as well as the future maintenance and repair of these roads. Roadwork would be similar to that of the Proposed Action and would include performing maintenance and repair within 250 ephemeral washes, 187 of which would be improved with either a new low water crossing or culvert. Alternative 3 meets the purpose of and need for this project.

## **PUBLIC INVOLVEMENT**

Consultation and coordination with Federal, state, and local agencies and Federally recognized tribes began with site selection activities in July 2012. The Tohono O'odham Nation and the BIA were invited and agreed to participate as cooperating agencies in the development of the EA in May 2013.

A Draft EA was available for public review from April 15 to May 16, 2016, at <http://www.cbp.gov/about/environmental-cultural-stewardship/nepa-documents/docs-review> and at the Tohono O'odham Community College Library and the Venito Garcia Library and Archives in Sells and the Pima County Public Library in Tucson, Arizona. In addition, cooperating agencies and coordinating agencies received hard copies of the Draft EA during this period. Notices of Availability for the Draft EA were published in the Tohono O'odham Nation's *The Runner*, *Ajo Copper News*, and *Arizona Daily Star* newspapers.

The Final EA will be available on the CBP website at <https://www.cbp.gov/about/environmental-cultural-stewardship/current-ongoing-projects>. The EA will also be available at the Tohono O'odham Community College Library, the Venito Garcia Library and Archives, and the Pima County Public Library for a period of thirty days. Notices of Availability for the Final EA will

be published in the Tohono O'odham Nation's *The Runner*, *Ajo Copper News*, and *Arizona Daily Star* newspapers.

## ENVIRONMENTAL CONSEQUENCES

CBP has identified Alternative 2 (the Proposed Action) as the Preferred Alternative and incorporates the descriptions, evaluations, and analyses in the attached EA. No mitigation measures beyond the routine BMPs described in Section 5.0 in the EA are needed to prevent significant direct, indirect, or cumulative impacts from implementation of the Proposed Action.

**Physical Environment:** The Proposed Action would have a permanent, direct impact on up to 8.23 acres and a temporary impact on up to 6.06 acres of undisturbed land for new tower sites and access roads. In addition, improvements to approach roads would permanently impact up to 214.20 acres of previously undisturbed land, assuming an existing road width of 20 feet. Standard erosion control and soil stabilization BMPs would be implemented during and following construction.

The Proposed Action would have a minor impact on air quality and a negligible impact on noise levels. Temporary increases in air emissions, fugitive dust, and noise levels are anticipated during the construction of the towers and related roadwork. However, air emissions associated with the construction of the towers and associated roads and operation of the towers would not exceed Federal and state criteria. Surface water quality could be temporarily impacted during construction as a result of increased erosion and sedimentation; however, these impacts would be minor. The Proposed Action would have no impact on floodplains or wetlands and a negligible impact on waters of the United States. The withdrawal of water for construction purposes could have a temporary, minor impact on groundwater resources. CBP will obtain Clean Water Act Section 401 certification and Section 404 permits prior to implementing this action.

**Natural Environment:** Construction activities for the proposed IFTs and roads would not adversely impact wildlife nor would the loss of habitat adversely affect the population viability of any plant or animal species in the region. Temporary, negligible increases in noise levels would be expected during the construction of towers and access roads, as well as approach road maintenance and repair. Permanent noise level increases associated with tower operations would be negligible. Based on the current knowledge of microwave emissions and the type of system deployed by CBP, impacts on wildlife are anticipated to be minor. There is a possibility that the proposed IFTs could pose hazards to migratory birds and cause bird mortality; however, since the towers would not use guy-wires and are less than 200 feet tall, the potential for adverse impacts is greatly reduced.

CBP determined that the Proposed Action may affect, but is not likely to adversely affect, the following Federally listed species: Sonoran pronghorn (*Antilocapra americana sonoriensis*), jaguar (*Panthera onca*), lesser long-nosed bat (*Leptonycteris curasoae yerbabuena*), and yellow-billed cuckoo (*Coccyzus americanus*). CBP has also determined that the Proposed Action would not adversely modify designated critical habitat for the jaguar or the yellow-billed cuckoo. The U.S. Fish and Wildlife Service concurred with these determinations in accordance with Section 7 of the Endangered Species Act.

**Cultural Resources:** CBP determined that the Proposed Action would not adversely affect any National Register of Historic Places (NRHP) listed or eligible architectural or aboveground resource, NRHP listed or eligible archaeological resource, traditional cultural property, or sacred site. The Tohono O'odham Nation Tribal Historic Preservation Officer concurred with this determination in accordance with Section 106 of the National Historic Preservation Act.

In the event that unanticipated archaeological resources are discovered during construction or any other project-related activities, or should known archaeological resources be inadvertently affected in a manner that was not anticipated, CBP would implement the procedures detailed in the BMPs located at measure 14 under Section 5.5 of the EA. This procedure was developed in coordination with BIA and the Tohono O'odham Nation Tribal Historic Preservation Officer to handle sensitive archaeological resources.

**Human Environment:** The Proposed Action would have a long-term, negligible impact on utilities. During construction, the Proposed Action would have a temporary minor impact on roadways and traffic within the project area. Impacts associated with tower maintenance would be long-term and negligible. Depending on the location and elevation of an observer, most towers would be visible up to 5 miles away, and some towers may be visible up to 15 miles; therefore, some towers would have a long-term, moderate impact on the aesthetic qualities of the region. There would be no exposure of the environment or public to any hazardous materials. Further, any adverse effects on human health would be negligible due to the minimal exposure risk and the elevated locations in which the communications equipment would be positioned on the towers.

## FINDING

On the basis of the analysis in the EA, which is incorporated by reference, and which has been conducted in accordance with the National Environmental Policy Act, the Council on Environmental Quality regulations, and Department of Homeland Security Directive 023-01 (October 2014) and Instruction 023-01-001-01, Rev. 01 (November 2014) both "Implementation of the National Environmental Policy Act", and after careful review of the potential environmental impacts, we find the Preferred Alternative would not have a significant impact on the quality of the human or natural environment, either individually or cumulatively and an Environmental Impact Statement is not required. Further, in implementing the Preferred Alternative, we are committed to incorporating the BMPs and environmental design measures identified in the EA and supporting documents.



Ruynard Singleton  
Acting Executive Director, Program Management Office  
U.S. Border Patrol Headquarters  
U.S. Customs and Border Protection

3/22/17  
Date

**MAR 23 2017**




---

Benjamin C. Huffman  
Chief, Strategic Planning and Analysis Directorate  
U.S. Border Patrol Headquarters  
U.S. Customs and Border Protection

---

Date



---

Francis Dutch  
Director  
Facilities Management and Engineering  
U.S. Customs and Border Protection

MAR 28 2017

---

Date